

INDEPENDENT ENVIRONMENTAL AUDIT

ANNUAL (No. 3) - 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:	Development Consent CSSI 9687 – Compliance to all relevant conditions of consent, commitments made in the approved Management Plans, Environment Protection Licence (EPL) conditions, and EPBC 2018-8322 Approval conditions. Scope also included: Areas identified in Audit #2 as “areas to be assessed at next / future audits”, follow-up of previous IEA non-compliances and other findings and areas identified as focus areas by agencies and authorities.
Location(s)	Snowy Hydro Office – Monaro Highway, Cooma Future Generation Office – Cooma Project Sites / Locations: Lobs Hole, Rock Forest, Tantangara; Marica; Trunk Services,
Audit Dates:	31 January, 1-4 February 2022 (on-site)

Revision no.	Author / Auditor	Purpose / Change	Date
0.1	Julie Dickson (Lead Auditor) Cecilia Caselia (Auditor)	Draft for review/comment	18/04/2022
0.2	Julie Dickson, Cecilia Caselia	Second draft for final review /comment	28/04/2022
1.0	Julie Dickson	Final for issue to Client and DPIE	13/05/2022

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Document Information	
Title:	Independent Environmental Audit Report – Snowy 2.0 Main Works – Annual – Audit No. 3.
Audit Organisation:	Dickson Environmental Consulting and Audit
Lead Auditor & Author:	Julie Dickson
Audit Team Member	Cecilia Caselia
Preliminary findings issued:	18 February 2022
First Draft Report issued:	18 April 2022
Second Draft Report issued:	28 April 2022
Final Report for issue:	13 May 2022

EXECUTIVE SUMMARY

A third (annual) Independent Environmental Audit (IEA) was conducted of the Snowy 2.0 Main Works Project in January / February 2022. 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 previous IEA reports, due to the sensitive location and scale of the Snowy 2.0 project, Snowy Hydro Limited (SHL) 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 agreed audit frequency is an initial audit within 12 weeks of commencement of construction and thence, every 26 weeks. This third audit was conducted just over 26 weeks after the second audit.

This IEA was conducted as an “Annual” audit, and as such, covered the full scope of the project in accordance with the IAP, including all relevant NSW Conditions of Consent, the project Environment Protection Licence (EPL) and all relevant Commonwealth conditions under the Environmental Protection and Biodiversity Conservation (EPBC) Act. The audit generally covered the period July 2021 to January 2022, with expanded timeframes for EPBC and EPL requirements.

The scope of the audit included site visits to all active areas of the project, a follow-up on non-compliances and other findings from Audit #2; management plans and associated systems and processes identified as priority areas; activities relevant to the current phase of the development; and areas of focus identified by the agencies / key stakeholders during the pre-audit consultation process.

Areas of strength identified during the audit included wildlife underpasses almost complete; improved retention of felled habitat trees; adequate erosion and sediment controls including stabilisation, clean and dirty water diversion and separation; installation of fish “windows” at watercourse crossings; and tunnel spoil management and tracking.

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

Twenty-six (26) findings were raised at this audit, comprising:

- Fifteen (15) NCs;
- Seven (7) OBSs; and
- Four (4) OFIs

The **previous audit findings** were followed-up and it was found that **a significant number had not been adequately addressed**, and as such remain open and still require corrective action and closure. It is noted that the responsibility for actioning the majority of open findings lies with the contractor, Future Generation Joint Venture (FGJV). In summary:

Fourteen (14) non-compliances (NC), four (4) Observations (OBS) and two (2) Opportunities for Improvement (OFI) were raised at the **previous audit**. Of those:

- Eight (8) NCs and three (3) OBSs remain open;
- Two (2) NCs were closed or partially closed, with new related non-compliance(s) raised; and
- Four (4) NCs, one (1) OBS and two (2) OFIs were addressed and closed;

As the FGJV corrective action process is ineffective to adequately respond to IEA findings, an Action Plan has been prepared by the audit team, detailing all open findings from IEA#2 and all findings from this audit (IEA#3) with agreed actions. It is expected that FGJV (and Snowy Hydro) will use this Action Plan to document all actions taken to address the findings.

Agreed FGJV actions include keeping the Action Plan up to date, providing regular updates on the progress to address the actions to SHL through monthly compliance meetings, and participation in an internal follow-up audit (by Snowy Hydro) by 30 July 2022 to monitor progress and close-out completed actions.

The Non-Compliances and Observations from this audit and the findings that are still open from the previous audit can be grouped into the following main areas;

- Failure to adequately address and close out previous IEA findings / corrective action processes;
- Incident, non-compliance, traffic incident and event reporting / notification to authorities;
- Biodiversity – Weeds control, weeds hygiene processes, feral animal control;
- Submission of various Management Plans – NSW Approval and Commonwealth EPBC Approval;
- Surrender of Exploratory Works Approval;
- Commonwealth EPBC Approval - Annual Compliance Reporting and notification of biodiversity offset;
- Environment Protection Licence (EPL) – publication of results of monitoring, submission of six-monthly Environmental Monitoring Report and use of approved monitoring publication for monitoring the concentration of pollutants;
- Provision of Natural Hazards Management Plan to agencies for annual review;
- Waste minimisation, reuse and recycling maximisation (non-spoil related);
- Chemicals Management – ongoing issue – 1 NC, 2 OBS;
- Environmental Management, monitoring, reporting and access to information;
- Transport and Traffic, public information relating to traffic, road upgrades.

The Auditees were cooperative throughout the audit process, however non-timely provision of requested evidence by the construction contractor (FGJV) impacted on the timeliness of this IEA report. The Auditor would like to thank all participants for their cooperation and assistance.

1.1. Audit definitions and Abbreviations

Abbreviation	Explanation
APZ	Asset Protection Zone
BCA	Building Code of Australia
BCD	Biodiversity Conservation Division (a division of DPE)
BDAR	Biodiversity Development Assessment Report
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)
DPE	NSW Department of Planning and Environment (formerly DPIE)
DPIE	Department of Planning, Industry and Environment (now DPE)
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 (Construction contractors)
GDE	Groundwater Dependent Ecosystem
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
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 (formerly Roads and Maritime Service – RMS)
TMP	Transport Management Plan
WAL	Water Access Licence
WMP	Water Management Plan

1.0 INTRODUCTION

1.2. Purpose and Requirement for this Audit

This third Independent Environmental Audit was conducted as an independent and objective assessment of the environmental performance and compliance status of the Snowy 2.0 Project with the Department of Planning and Environment (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, the second audit was conducted in July 2021. This audit is the third construction phase IEA and was conducted in January / February 2022.

1.3. Background of the Project

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

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

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

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

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

Main Works Infrastructure Approval would apply to any Exploratory Works activities required to be completed.

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

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
Lead Auditor & Report Author:	Julie Dickson
Lead Auditor Qualification:	Exemplar Global Lead Environmental Auditor Accreditation no. 13573 (exp June 2022)
Affiliations:	EIANZ Certified Environmental Practitioner Reg. no. 221
Audit Team Member	Cecilia Caselia

1.5. Audit Objectives, Scope Development, Scope & Criteria

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

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

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

- Site inspections at all active areas of the project;
- Follow-up on non-compliances and other findings from Audit #2;
- All relevant / triggered conditions of the NSW Conditions of Consent;
- All relevant / triggered conditions of the Commonwealth EPBC Conditions of Approval;
- All relevant, auditable Environment Protection Licence conditions;
- Management Plans and associated systems and processes identified as priority areas, based on the previous audit report and the activities relevant to the current phase of the development; 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 Min Works NSE (EPBC 2018/8322) Parts A & B and relevant appendices;
- Environment Protection Licence 21266;
- Snowy 2.0 Main Works – Environmental Management Strategy Rev I 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 – 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 – 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 – Construction Noise Management Plan – Rock Forest Rev E, 02/12/2020 (FGJV);
- Snowy 2.0 Main Works – Natural Hazards Management Plan Rev C 04/08/2020 (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 third audit was conducted just over 26 weeks after the second audit (July 2021). The timing of the commencement of the audit was delayed by two weeks to avoid school holidays and to ensure relevant personnel would be available to participate in the audit. The timing was agreed by DPIE. The period covered by the audit was generally the period from July 2021 to January 2022, however for conditions not previously audited, the full construction period since commencement was covered.

This audit was held over 5 days, commencing with an opening meeting at the Future Generation JV offices on Monday 31 January 2022. Office based audit activities were conducted over the first two days in the Snowy Hydro and Future Generation JV Offices. Site visits were conducted on the following two days (two auditors over various sites), and the final day included a follow-up of audit trails discussion of key issues. Draft findings were issued on 18 February during a remote closing meeting.

Various follow-up activities were undertaken during the following weeks including the issue of a clarifications document, and additional evidence requests.

The first Draft Independent Environmental Audit Report, together with the Draft IEA Action Plan was issued to the proponent via email on 19 April 2022.

The second Draft Independent Environmental Audit Report was issued on 28/04/2022, and following receipt and consideration of feedback, the Final Report was issued on 13 May 2022.

2.0 AUDIT PROCESS AND METHODOLOGY

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

Audit Tables were developed, based on the conditions of consent requirements (NSW and Commonwealth), EPL conditions, key commitments made in the approved Project Management Plans and scope input by key stakeholders following agency consultation. The Audit Tables were provided to Snowy Hydro and FGJV around 7 working days prior to the audit as a tool to facilitate ready availability of evidence during the audit.

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

The audit was structured to conduct the audit separately with the proponent (Snowy Hydro) and the construction contractor (Future Generation Joint Venture) on the first two office-based audit days. Separate opening meetings were held with each party. The Audit Plan and Scope is included in Appendix D.

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

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

2.1. Selection and Endorsement of Auditor

The Secretary agreed to Julie Dickson (Lead Auditor) and Cecilia Caselia of Dickson Environmental Consulting and Audit as the Audit Team for IEA #3. A copy of the letter endorsing the auditors is contained within Appendix C of this report.

2.2. Site Inspections and Interviews

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

- Lobs Hole and Lobs Hole Ravine Road;
- Marica – including Marica Camp and surge shaft;
- Trunk Services (various locations – Marica trail);
- Rock Forest; and
- Tantangara.

Interviews were held at Snowy Hydro and Future Generation JV offices in Cooma with the management and environmental teams as part of the office-based audit activities.

Interviews were held with supervisors, environmental advisors / officers, staff and contractors at the sites visited. Interviewees are listed on the Attendance Register in Appendix A.

2.3. Consultation with Agencies

Department of Planning, Industry and Environment (DPIE):

An initial email was sent by the Auditor to DPIE via compliance@planning.nsw.gov.au on 8 December 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. Detailed proposed areas of focus were provided by the auditor based on the outcomes of the previous audit and areas identified from the SHL internal audit program. They were:

- Areas identified in Audit #2 as areas of non-compliance / observation / Opportunities for improvement including:
 - Biodiversity Management Plan – with an ongoing focus on weeds management (follow-up and overall);
 - Water Management Plan – with an ongoing focus on chemicals management, storage and handling;
 - Monitoring and public reporting (water);
 - Traffic, transport and access management, monitoring and reporting;
 - Review and update of strategies, plans and programs;
 - Incident / non-compliance reporting to NPWS and DPIE;
 - Compliance tracking processes;
 - Maintenance of website with information to be made publicly available;
 - Traffic Incident reporting;
 - Spoil management
- Areas identified as a focus from the SHL internal audit program including:
- Spoil Management (Tunnel and topsoil/subsoil)
 - Weed management, chemical management and surface water management (also identified above)

A response was received from DPIE on 13 December 2021 noting that additional scope items the Department would like include (in addition to those listed by the auditor) are:

- Erosion and sediment controls/management;
- Roads upgrades/sign off, and
- Biodiversity and water monitoring as required in the respective management plans.

A request was also made by DPIE to consult with Biodiversity Conservation Division (BCD), NSW Fisheries (DPI) and Commonwealth Department of Agriculture, Water and the Environment (DAWE).

Department of Agriculture, Water and the Environment (DAWE)

An initial email was sent by the Auditor to DAWE via epbc.referrals@awe.gov.au on 13 December 2021 with the same list of proposed areas of scope that was sent to DPIE (see above) requesting input to the scope of the audit, and requested clarification on DAWE audit requirements. A response was provided that the enquiry would be forwarded to the Post Approvals teams.

A phone call was made on 14 January 2022 reminding DAWE that they had not yet responded to the request for scope input. This was followed up with an email on the same date, requesting input by 20 January 2022. A response from DAWE was provided on 14 January requesting a time to schedule a phone discussion. A phone discussion was held on 17 January 2022, followed up with an email from DAWE noting:

- The NSW Infrastructure Approval required the approval holder to consult the Department regarding the proposed content of a series of management plans required

under the approval. The Department consulted internally and provided co-ordinated comments on the draft plans. Did the approved plans (i.e. as approved by NSW Infrastructure) give effect to the comments provided by the Department? What key comments provided by the Department were not given effect in the approved plans?

National Parks and Wildlife Service:

An email was sent to NPWS on 13 December 2021 with the same list of proposed areas of scope that was sent to DPIE (see above) requesting input to the scope of the audit. NPWS responded with a phone call, noting that the Biodiversity Conservation division should be contacted regarding joint concerns on weed and pest control. The discussion was followed up by an email on 15 December 2021. Their concerns were as follows:

- The issue previously identified in relation to reporting of non- compliances and incidents appears to be unresolved. The interpretation of what an incident and or non-compliance by the project is not in accordance with expectation of NPWS as a major stakeholder and regulator;
- Reporting of overtopping of sediment basins as per the Surface Water MP continues to be inconsistent;
- There appears to be a missing link in the chain between commitments in various Management Plans and design and procedures. Issues relating to spoil management during Tantangara road works and water quality monitoring on Trunk services installation have not been incorporated and missed during execution of works;
- Public information on websites relating to traffic continues to be out of date or missing. The traffic information is currently for the beginning of October;
- Parking on the public road network has continued to be an issue and regularly raised with SHL and FGJV;
- NPWS request a review of all the agreed actions and due dates from previous audits be conducted.

In a follow-up email dated 7 January 2022, it was also requested that the Natural Hazard Management Plan be included in the review, particularly the annual review components as outlined in Section 7.3.

Environment Protection Authority:

An email was sent to EPA on 13 December 2021 with the same list of proposed areas of scope that was sent to DPIE (see above) requesting input to the scope of the audit. EPA responded on 13 December 2021 noting that “we are comfortable that the included scope covers the items that we are most interested in from an EPA perspective with the project at the moment (namely – spoil management and water management)”.

Transport for NSW (TfNSW):

An email was sent to TfNSW on 13 December 2021 with the same list of proposed areas of scope that was sent to DPIE (see above) requesting input to the scope of the audit. A follow-up phone call was made on 20 December 2021 as a reminder to respond should TfNSW wish to have an input to the scope. Written comments were provided on 14 January 2022 and a phone call was made to Lee Shoemark as requested on the same day.

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 includes 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;
- How heavy vehicle safety and general vehicle safety associated with the Main Works approval is being managed by Snowy Hydro and Future Generation and what can be done to improve how it currently operating noting that there have been several near misses on the road network. Noting that weather/road conditions will deteriorate as we approach the winter/snow season appropriate measures must be identified and complied with. It is suggested that a further discussion be had with Lee Shoemark, Senior Manager Customer Coordination South during the audit process;
- That spoil associated with the Main Works project is being disposed of as per the requirements of the approval and not being taken off-site to other locations that would result in additional heavy vehicle movements on the classified road network; and
- Timeframe for the implementation of any identified measures to address road related concerns.

Snowy Monaro Council:

An email was sent to TfNSW on 13 December 2021 with the same list of proposed areas of scope that was sent to DPIE (see above) requesting input to the scope of the audit. The following response was provided:

- The scope and focus is comprehensive. The only feedback I offer is in relation to one problem we have had come up occasionally is wet concrete being included in skip bins being sent to our Cooma land fill from the segment factory. I am not sure if this is a specific matter within the approval, but if it is and can be audited that may be worthwhile. If not, we continue working with Future Gen to monitor this matter.

Table 1 – Agency Consultation Summary Table

Agency consultation and scope input requests	Degree of scope assessed, comments
Department of Planning, Industry and Environment (DPIE)	
Erosion and sediment controls/management	Addressed as part of site inspection and established audit scope.
Roads upgrades/sign off	Addressed as part of previous IEA findings follow-up.
Biodiversity and water monitoring as required in the respective management plans	Addressed as part of audit scope.

Agency consultation and scope input requests	Degree of scope assessed, comments
Department of Agriculture, Water and the Environment	
Did the approved plans (i.e. as approved by NSW Infrastructure) give effect to the comments provided by the Department and what key comments provided by the Department were not given effect in the approved plans?	A series of emails between FGJV, consultants (Arcadis) and Vaughn Cox of DAWE regarding DAWEs final consultation comments provided evidence of giving effect to comments. A review of the Biodiversity Plan found that the final comments had been taken into consideration.
National Parks and Wildlife Service (NPWS)	
Resolution of issues relating to reporting of non-compliances (NC) and incidents and the interpretation of what is an incident or NC.	Addressed as part of previous IEA findings follow-up – issues remains open.
Inconsistency of reporting of overtopping of sediment basins as per the Surface Water MP	Addressed as part of previous IEA findings follow-up (improvement on previous audit outcome, however still not fully resolved)
Link between commitments in management plans and design and procedures (e.g. – spoil management during Tantangara road works and water quality monitoring on trunk services).	Addressed as part of audit scope.
Public information on websites relating to traffic continues to be out of date or missing (traffic information currently beginning of October 2021).	Addressed as part of previous IEA findings follow-up – issue remained open, recently partly addressed – remains non-compliant.
Parking on the public road network has continued to be an issue and regularly raised with SHL and FGJV.	Addressed as part of previous IEA findings follow-up.
NPWS request a review of all the agreed actions and due dates from previous audits be conducted.	Addressed as part of previous IEA findings follow-up.
Annual review requirements for the Natural Hazard Management Plan.	Addressed in response to NPWS request – non compliant.
Environment Protection Authority	
Spoil management and water management	Addressed as part of established audit scope.
Snowy Monaro Council	
Wet concrete in skip bins to landfill from segment factory	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 to applicable transport/road works conditions (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).	<p>Sch 3 Conditions 7 & 8 not related to traffic and transport, however were within scope of this audit.</p> <p>Sch 3 Condition 50 not triggered.</p> <p>Sch 3 Conditions 41, 43, 45, 46, 49 and Sch 4 Condition 12 addressed as part of established audit scope.</p> <p>Appendix 5 Table 5.2 addressed at previous IEA, re-confirmed at this audit.</p>
Management of worker movement 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	The revised traffic volumes in the PIR were estimates only, and were not incorporated into the Conditions of Consent. Traffic volumes were generally included in the IEA scope.
Management of the movement of raw materials along the Snowy Mountains Highway in the vicinity of Talbingo Mountain	Movement of heavy vehicles generally was assessed.
How heavy vehicle safety and general vehicle safety is being managed by Snowy Hydro and Future Generation and what can be done to improve how it currently operating noting that there have been several near misses on the road network	Assessed as part of scope and focus as requested. Previous NC regarding traffic incident reporting remains open.

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 an assessment of compliance is not relevant.

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

2.5. Explanation of Finding Classifications

Table 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 compliant conditions / items	IEA #3 STATUS			IEA #2 Status OPEN findings
			Compliant		Non-Compliant	
			OFI	OBS	NC	
Sch 2 – Administrative conditions	Terms, limits of approval, surrender of approval (Exploratory works), operation of plant & equipment.	12			2	
Sch 3 - Management Plan submission to agencies (various conditions)	Submission of various Management Plans to agencies (NCs on 3 conditions: 24, 39 & 54, amalgamated into single NC)	4			1	
Sch 3 Cond 1-3– Digital information	Open-source database, digital strategy	2				1
Sch 3 (Cond 4 – 8) Spoil Management	Spoil, topsoils, tunnel spoil handling & management	63	1			
Sch 3 (Cond 9 – 19) Rehabilitation, biodiversity management, groundwater dependent ecosystems (GDEs).	Clearing limits, flora and fauna protection and monitoring, rehabilitation, weed and pathogen management, GDEs	76	1	2	1	
Commonwealth EPBC Conditions	Biodiversity, biosecurity, water, heritage Annual Compliance reporting, Submission of Management Plans	31			4	
Environment Protection Licence / POEO Act	EPL Licence conditions, publishing of monitoring date	94			3	
Sch 3 – Biosecurity / fish	Threatened fish MP, recreational fishing MP	21				
Sch 3 – (Cond 29 – 32) Surface and Groundwater, soil, chemicals management	Erosion and sediment control, temporary stabilisation, surface water and groundwater, spoil management, fuel and chemical management, spill prevention	44	1	2		1

Focus Area	Key Criteria	No. of compliant conditions / items	IEA #3 STATUS			IEA #2 Status OPEN findings
			Compliant		Non-Compliant	
			OFI	OBS	NC	
Sch 3 (Cond 33-40) Heritage, recreation	Aboriginal and European heritage, boulder streams, recreation	30				
Sch 3 – (Cond 41-51) Transport and Traffic Management.	Road and intersection upgrades to satisfaction of roads authority, vehicle restrictions, traffic incident prevention / minimisation / reporting	36		1		2 1
Environmental Management Strategy, other misc.	Responsibilities, inspections, awareness, complaints	9				
Sch 3 (Cond 52-55) Waste, visual amenity	Waste management, visual amenity	8			1	
Sch 3 – (Cond 56-59) Noise and air quality management	Rock Forest – Noise Management Plan + CNMP, dust	21				1
Sch 3 (Cond 60 – 61) Emergency Management	Natural Hazards Management Plan	15			1	
Sch 4 – Environmental management, reporting and auditing	Updates of strategies plans and programs, incident and non-compliance reporting, IEA, monitoring & public reporting, audit actions compliance tracking	42	1	1	2	3
TOTALS		498	4	7	15	8 3

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

** Note 2: findings that remain open from the previous audit are included in the last column of the table.

3.2. Audit Findings, Actions and Recommendations

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

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
1.	Sch 4 Cond 11 EMS Section 8.5	<p>The Proponent must implement any approved audit action plan for the development.</p> <p>Where a non-conformance has been identified, a corrective action /preventative action will be developed and implemented to minimise the potential for recurrence. In the event of a non-conformance the following will occur:</p> <ul style="list-style-type: none"> – the nature of the event will be investigated; – advice may be sought from a specialist; – monitoring may be undertaken; – the effectiveness or need for new/additional controls will be reviewed; – an appropriate preventative and corrective action will be implemented; – environmental documentation will be reviewed and revised; and 	<p>The internal FGJV corrective action process is not effective to adequately address and satisfactorily close non-compliances and observations raised in the Independent Environmental Audits.</p> <p>Limited evidence could be provided to demonstrate that the processes described within the EMS were implemented to address and prevent recurrence of non-compliances and observations raised in the last two audits.</p> <p>The follow-up of previous findings found that a significant number had not been adequately addressed. Fourteen (14) non-compliances (NC), four (4) Observations (OBS) and two (2) Opportunities for Improvement (OFI) were raised at the previous audit. Of those, eight (8) NCs and three (3) OBSs remain open and require further action to complete and close out</p> <p>A review of the SHL Aconex corrective actions export document</p>	<p>Agreed Actions (FGJV):</p> <p>The Auditor has developed an Audit Action Plan spreadsheet for use by FGJV to respond to audit actions.</p> <ul style="list-style-type: none"> – Use the Audit Action Plan to document all corrective actions taken to address the IEA findings. FGJV may enhance / improve the Plan to include investigation and other preventive action elements where appropriate. – Submit the latest version of the Audit Action Plan to SHL that will be provided to DPIE; – Keep the Audit Action Plan up to date (minimum of monthly review), providing commentary on actions taken to date. To be reviewed at SHL monthly compliance meetings; – Participate in a follow-up audit by SHL, providing evidence of audit actions completed to date within 6 months of commencement of IEA#3 	NC 1	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
		<ul style="list-style-type: none"> – the activities may be stopped, if necessary, by the Future Generation Environmental Manager in consultation with the Project Director and Project HSE Manager. <p>Corrective/preventative actions will be entered into Future Generation's quality system database and include details of the issue raised, the action required, and timing and responsibilities. The close out details shall include the date closed and the name of the person verifying completion of the required action.</p>	<p>found that most issues raised at the last audit were still in open status (16) or “ready to inspect” (5 – partially addressed but not closed / verified). One finding had been formally closed.</p> <p>The majority of actions assigned to FGJV have not been closed. Refer to the Follow-up of Audit Findings Table for full details of the status of non-compliances and other findings.</p>	<p>Responsibility: FGJV</p> <p>Agreed Action (SHL)</p> <ul style="list-style-type: none"> – Use the Audit Action Plan to document SHL progress' – Monitor FGJV progress on addressing IEA findings at least monthly through monthly compliance meetings – Undertake an internal follow-up audit on FGJV progress against agreed actions within 6 months of commencement of IEA#3 (by 30 July 2022). <p>Responsibility: SHL</p>		
2.	Sch 4 Cond 6 EPL 21266 R2.2	<p>The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.</p> <p>R.2.2: The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.</p>	<p>Incident Reporting / Notification to Authorities</p> <p>Adequate evidence was not provided to demonstrate that all incidents are reported to the appropriate authority with required timeframes.</p> <p>Evidence was not provided to demonstrate that an incident notified verbally to EPA on 22/12/2021 was also notified to DPIE and NPWS (INC 1140 level spreader - ECVT Lobs Hole).</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Ensure all incidents triggered by this condition are reported to DPIE and NPWS in addition to the EPA within the required time frames – Review and update the Environmental Incident and Event Register to <ul style="list-style-type: none"> ○ include an area to record which agency was notified and when. ○ Include date each agency was notified; 	NC 2	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <small>(Agreed due dates for each action are in Audit Action Plan issued separately)</small>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
		<p><i>Note: The definition of an incident for reporting to EPA and under Condition 6 are similar (both referring to “causes or threatens to cause material harm”), and therefore, notifications of incidents are required for both agencies.</i></p>	<p>The incident notified verbally to EPA on 22/12/2021 was not followed up with a written report within the 7 day timeframe (reported 30/01/2022)</p> <p>The reporting and notification information in the FGJV Environmental Incident and Event Register is not always consistent with the information included in the Incident Reports. The Register recorded that the incident did not cause or threaten material harm, however it was notified to EPA under the Cond R2.1 – “...must notify EPA of environmental harm ...”</p>	<ul style="list-style-type: none"> ○ Provide more detail regarding nature of the incident <p>Responsibility: FGJV</p>		
3.	Sch 4 Cond 7	<p>Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department via the Major Projects portal of the non-compliance.</p> <p>This notice must set out the non-compliance, the reasons for the non-compliance (if known) and what actions have been taken, or will be taken, to address the non-compliance.</p>	<p>A review of FGJV incident reports raised since the last audit found that some of the incidents were noted as non-compliant to the approval conditions however evidence was not provided that these were notified to DPIE.</p> <p>Note: this NC has been re-raised from previous IEA non-compliance. Examples sighted included: INC 1166 relating to process water release and INC 911 relating to procedural breach to Biodiversity Plan – clearing without ecologist on site.</p> <p>The monthly reports sighted also included a section noting non-compliance to approval conditions.</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Review and update the Environmental Incident and Event Register to include notification of non-compliances – Ensure all non-compliances triggered by this condition are reported to DPIE through the Major Project Portal, records are kept and notification is recorded in the Environmental Incident and Event Register. <p>Responsibility: FGJV / SHL</p>	NC 3	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
4.	Sch 4 Cond 8 Sch 4 Cond 12 (a) and (b) Sch 3 Cond 32	<p>The Proponent must provide regular reporting on the environmental performance of the development on its website in accordance with the requirements in any approved strategies, plans or programs.</p> <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> <ul style="list-style-type: none"> a) make copies of the following information publicly available on its website: <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 – A record of all incidents and non-compliances a) make copies of the following information publicly available on its website: <p>The Proponent must implement the approved Water</p>	<p>At the time of the audit, the following reports relating to environmental performance had not been completed or uploaded to the website:</p> <ul style="list-style-type: none"> – The Quarterly Environmental Water Reports as required by the Water Management Plan (also non-compliant at previous audit); – The Quarterly Traffic Reports required by the Transport Management Plan (also non-compliant at previous audit); – A record of all incidents and non-compliances <p>It was noted that the Annual Report required by the Biodiversity Management Plan was in draft at the time of the audit (also refer to Observation regarding Annual Report)</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Finalise Quarterly Environmental Water Reports; – Finalise Quarterly Traffic Reports; – Develop a register to record incidents and non-compliances suitable for upload to the website (summary documentation). <p>Responsibility: FGJV</p> <p>Actions:</p> <ul style="list-style-type: none"> – Upload the documents to the project website once documents have been provided by FGJV <p>Responsibility: SHL</p>	NC 4	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
	EPBC Cond 7	<p>Management Plan for the development.</p> <p>To minimise impacts on water resources, the approval holder must comply with conditions 30 - 32 of the NSW approval relating to water management.</p>				
5.	Part B Annexure A EPBC Cond 33	<p>Annual compliance reporting</p> <p>The approval holder must prepare a compliance report for each 12-month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p> <p>a. publish each compliance report on the website within 60 business days following the relevant 12 month period.</p>	<p>An EPBC Annual Compliance Report had not been prepared or published on the website within the required timeframe of this condition.</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Prepare and submit the EPBC Annual Compliance Report as required by this condition; <p>Responsibility: SHL</p>	NC 5	Non-compliant
6.	EPL 21266 POEO Act Sect 66(6)	<p><u>Protection of the Environment Operations Act 1997 Section 66(6)</u></p> <p>Publication of results of monitoring. The holder of a licence subject to a condition referred to in subsection (1) (a) must, within 14 days of obtaining monitoring data as referred to in that subsection.</p>	<p>The water quality and volume monitoring data reports had not been uploaded to the project website within the required 14 day timeframe.</p> <p>At the time of the audit, the latest monitoring data on the Snowy Hydro website was for August 2021 and was significantly overdue.</p>	<p>Agreed Actions</p> <ul style="list-style-type: none"> – Upload all outstanding EPL monitoring results to the website; – Ensure required summary data is uploaded within the required timeframes for the balance of the project. 	NC 6	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
		<p><u>Subsection (1) (a)</u></p> <p>(1) Monitoring The conditions of a licence may require --</p> <p>(a) monitoring by the holder of the licence of the activity or work authorised, required or controlled by the licence, including with respect to--</p> <p>(i) the operation or maintenance of premises or plant, and</p> <p>(ii) discharges from premises, and</p> <p>(iii) relevant ambient conditions prevailing on or outside premises, and</p> <p>(iv) anything required by the conditions of the licence</p> <p>EPA publication: <u>Requirements for publishing pollution monitoring data – Section 2:</u></p> <p>The specific requirements for providing monitoring results are set out in section 66(6) of the POEO Act. In summary, this provision requires that:</p> <ul style="list-style-type: none"> – licensees who undertake monitoring as a result of a licence condition must publish or make available pollution monitoring data within 14 days of obtaining the data and/or receiving a specific request for a copy of the data 		<ul style="list-style-type: none"> – Report as a non-compliance in the next EPL Annual Return. <p>Responsibility: SHL</p>		

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
		<ul style="list-style-type: none"> – licensees who maintain a website must make the monitoring data related to pollution available in a prominent position on their website. 				
7.	Sch 3 Cond 19 EPBC Cond 8 BMP App F 5.1.2.1 Table 2-3 BMP	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>The spring 2021 (due Nov 2021) weed spraying program had not been undertaken.</p> <p>It was noted during the site inspection that weed control is required at various locations across the project.</p> <p>It was also noted that a non-compliance was issued by Snowy Hydro to FGJV January 2022 in regards to weeds control and management.</p> <p>.</p>	<p>Actions Taken:</p> <ul style="list-style-type: none"> – A Weed Management Program has been provided by Narla (following issues with the engagement of a different supplier), and this is in the process of being implemented <p>Agreed Actions:</p> <ul style="list-style-type: none"> – Implement the weed management program; – Ensure that all future spraying programs are implemented in accordance with the requirements of the BMP. <p>Responsibility: FGJV</p>	NC 7	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
8.	Sch 3 Cond 24 EPBC Cond 12 Sch 3 Cond 54 Sch 3 Cond 39	<p>Management Plans issues within required timeframes (various):</p> <p>Within 12 months of the commencement of construction, the Proponent must prepare a Threatened Fish Management Plan for the development to the satisfaction of the Director-General of NSW DPI</p> <p>EPBC – To minimise impacts to the aquatic environment, the approval holder must comply with Cond 20-25 of the NSW Approval</p> <p>Within 12 months of the commencement of construction, the Proponent must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary.</p> <p>Within 12 months of the commencement of construction, the Proponent must prepare a Recreation Management Plan for the development to the</p>	<p>The following Management Plans had not been prepared or submitted to the relevant agencies (Director General of the NSW DPI, the NSW Planning Secretary or to the Commonwealth (DAWE) within the nominated time frames:</p> <ul style="list-style-type: none"> – Threatened Fish MP (Relevant agencies: NSW DPI and Commonwealth Department of Agriculture, Water and the Environment - DAWE) – Visual Impact Management Plan (Relevant agency: NSW Planning Secretary - DPIE) – Recreation MP (Relevant agency: NSW Planning Secretary - DPIE) <p>It is noted that an extension of time was requested by SHL to DPI and DPIE for submission of these Plans. A letter from DPIE dated</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Submit the relevant plans to DPIE by April 2022 – Submit relevant plans to DPI by April 2022 – Submit relevant plans to DAWE by April 2022 	NC 8	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
		satisfaction of the Planning Secretary.	<p>6/12/2021 noted that SHL has been liaising with the relevant agencies to progress these with a schedule to have them submitted by April 2022.</p> <p>DPIE assessed these non-compliances and determined that the breaches will be recorded in their system.</p> <p>It was noted that DPI endorsed the requested extension, noting that a delay of the submission of the Threatened Fish Management Plan would not increase the risk to the aquatic environment.</p>			
9.	EPBC Part B Annexure A Cond 31a.	The approval holder must: a) submit plans required by conditions 18, 22 and 24 of the NSW approval and conditions 18 and 22 of this approval for consultation purposes, electronically to the Department;	<p>The Threatened Fish MP NSW Cond 24 had not been submitted within the 12 months from construction commencement timeframe as required. Whilst the NSW Department of Primary Industry (DPI) endorsed a request to extend the timeframe for submission, DPIE determined that the late submission of the Threatened Fish MP be recorded as a breach, and is therefore determined as non-compliant to this condition.</p>	<p>Agreed Action</p> <ul style="list-style-type: none"> – Submit the Threatened Fish Management Plan to DPIE, DPI and DAWE by April 2022 <p>Responsibility: SHL</p>	NC 9	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
10.	Sch 2 Cond 8 Sch 2 Cond 9	<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> <p>Prior to surrendering the infrastructure approval (CSSI 9208) for the Exploratory Works, the Proponent must update the approved management plans for the development to incorporate the approved management plans for the Exploratory Works to the satisfaction of the Planning Secretary.</p>	<p>At the time of the audit, the Exploratory Works Approval had not yet been surrendered.</p> <p>It was noted that a surrender request was made in August 2021, however correspondence between DPIE and NPWS indicate that the Exploratory Works approval cannot be surrendered until the Main Works Worker Recreation Management Plan has been approved. (refer to NC 5)</p> <p>At the time of the audit, the issue was still under consideration by DPIE and NPWS and had not been resolved.</p>	<p>Agreed Action</p> <p>Once the Main Works Recreation Management Plan has been approved a prerequisite for surrender), surrender the Exploratory Works Approval</p> <p>Responsibility: SHL</p>	NC 10	Non-compliant
11.	NHMP S 7.3	<p>This Natural Hazards Management Plan (NHMP) will be provided for comment annually to Local Emergency Management Committees, NSWRFS, NSWSES and NPWS. Following natural hazard emergencies, where necessary lessons learnt will be incorporated into this plan.</p>	<p>The NHMP had not yet been provided in the 12 months since construction commencement for comment to Local Emergency Management Committees, NSWRFS, NSWSES and NPWS.</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Provide the Natural Hazards Management Plan to the relevant agencies for comment; – Facilitate discussions and review to ensure appropriateness and currency of the Plan – Update the NHMP as necessary following receipt 	NC 11	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
				of comments from the agencies. Responsibility: FGJV		
12.	Sch 3, Cond 52 (a) and (b)	Excluding the spoil generated by the development, the Proponent must: a) minimise the waste generated by the development; b) maximise the reuse and recycling of any waste;	a) Bottled water is provided extensively across the project, with minimal provision of potable water for drinking (or refilling own containers). This does not meet the requirement to "minimise waste generated by the development". It is acknowledged that bottles are sent to recycling (return and earn), however this is not minimisation of waste generation. b) The FGJV Waste Tracking Register- shows all waste from Lobs Hole (including recycling stream) goes to landfill). This does not meet b) - "maximise the reuse and recycling of any waste".	Agreed Actions: <ul style="list-style-type: none"> Provide potable water for drinking and positively encourage workers to refill their own containers; FGJV could consider providing reusable vessels to workers (among other things); For other waste streams (other than plastic bottles), provide segregation facilities and send to recycle facilities rather than landfill. 	NC 12	Non-compliant
13.	EPBC Part A Cond 7	The approval holder must notify the Department in writing within 10 business days of making a biodiversity offset payment to the NSW National Parks and Wildlife Service. Each notification must state the date of payment and the amount paid.	The latest biodiversity offset payment was paid on 22/10/2021 to the NSW government and was notified to them. However, evidence could not be provided to demonstrate that Snowy Hydro had also notified the (Commonwealth) Department within 10 business days of making a biodiversity offset payment.	Agreed Actions: <ul style="list-style-type: none"> Ensure all future biodiversity payments are notified in writing to the designated contact to DAWE within the required timeframes and records retained. 	NC 13	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
14.	EPL 20266 Cond R4.2 and R4.3	<p>The licensee must submit an Environmental Monitoring Report every six (6) months to the EPA, unless otherwise agreed in writing by the EPA.</p> <p>The Environmental Monitoring Report must be prepared by a suitably qualified and experienced person and include, but not be limited to:</p> <ul style="list-style-type: none"> a) results of all water quality monitoring undertaken in the preceding six (6) month period; b) results of all-weather monitoring undertaken in the preceding six (6) month period; c) assessment of historical trends in all water sampling data for each monitoring point inclusive of the current six (6) month period; d) identification of instances where the water quality objective triggers for each relevant pollutant were exceeded at receiving water locations and/or where the predicted discharge water quality was exceeded at sediment basin discharge points; e) include details of any actions taken by the Licensee in response to exceedances 	<p>A 6-monthly Environmental Monitoring Report was not yet been prepared or submitted to the EPA.</p>	<p>Agreed Actions</p> <ul style="list-style-type: none"> – Prepare and submit the overdue 6 monthly report to the EPA in accordance with these conditions; – Ensure the 6 monthly reports are prepared on an ongoing basis; – Report this as a non-compliance in the annual return; – Publish the Environmental Monitoring Report on the website in accordance with Sect 66 (6) of the POEO Act. <p>Responsibility: FGJV</p>	NC 14	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
		identified under point (d), including but not limited to: i. additional monitoring; ii. remedial actions and; iii. activation of trigger, action, response plans (TARPs); f) recommendations for future actions in relation to monitoring and/or management.				
15.	EPL 21266 Cond M3.2, M3.1	M3.1 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted. M3.2 Condition M3.1 also applies to the monitoring of any points identified in Condition M2.2	The monitoring for the concentration of pollutants in monitoring points identified in condition M2.2 has not been conducted in accordance with the approved methods publication. Evidence of express provision to use in-house methods are not included in the current Environment Protection Licence.	Agreed Actions Either: <ul style="list-style-type: none">- Ensure that the laboratory (Eurofins) uses the EPA approved publication for monitoring the concentration of pollutants OR- Seek approval for the use of in-house methods. Responsibility: FGJV	NC 15	Non-compliant
16.	Sch 3 Cond 18 Biodiversity Management Plan S 6.5	a) An annual report will be prepared to report on the variety of biodiversity matters addressed in this plan. This report, which will be made available to NPWS, DAWE and BCD, will include the following matters:	At the time of the audit, the Annual Report (biodiversity) was being drafted by consultants EMM and had not been finalised and made available to NPWS, DAWE or BCD. A draft report was provided to the auditor for review on 15 Feb 2022. The report covered the monitoring	Agreed Actions: <ul style="list-style-type: none">- Revise the Draft Annual Report to include details on items i. ii, iii, v, vi, vii. This would involve input from FGJV;	OBS 1	Compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
		<ul style="list-style-type: none"> i. summary of weed and vertebrate pest control activities undertaken since last report (as detailed in Appendix F); ii. account of all clearing activities including tracking against clearing limits and threatened species habitat limits; iii. post-clearing ecology reports since last report (as detailed in Appendix C); iv. results of threatened species, groundwater-dependant ecosystem, weed and pest monitoring (as detailed in Appendix B); v. account of fauna strike mitigation strategy management actions (as detailed in Appendix G); vi. account of any relevant incidents and non-compliances; and vii. efficacy of the implemented biodiversity management measures against the performance measures included in section 6.5.1 of this plan. 	<p>period of October 2020 (project commencement) to October 2021 (End of year 1 monitoring)</p> <p>A review of the draft report found that only item iv. had been addressed, and the following matters were not included in the report:</p> <p>Items i. ii, iii, v, vi, vii.</p> <p>Note 1: <i>No timeframe for the issue of the Annual Report is included in the Biodiversity Management Plan (see recommendation)</i></p> <p>Note 2: <i>This finding has been issued as an OBS as the Annual Report was in draft at the time of the audit. If the Annual Report were to be issued in its current form, it would be non-compliant with this requirement.</i></p>	<ul style="list-style-type: none"> – Once finalised, make the Annual Report available to NPWS, DAWE and BCD; – Upload the Annual Report to the project website as required by Sch 4 Cond 8; <p>Responsibility: - SHL</p> <ul style="list-style-type: none"> – Review the Biodiversity Management Plan (BMP) to ensure it includes relevant information for project phases; – Update the BMP with changes from the review above including providing a more specific timeframe for issue of the Annual Report. A three (3) month timeframe from the end of the monitoring period would be appropriate; – Update the BMP with the recommendations contained within the Annual Report. <p>Responsibility: FGJV</p>		

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations (Agreed due dates for each action are in Audit Action Plan issued separately)	Finding no. & rating (NC, OBS/OFI)	Compliance Status
17.	Sch 2 Cond 13 (c)	Sch 3 Cond 13 (c): The Proponent must ensure that all plant and equipment used on site, or in connection with the development, is: (c) kept free of weeds, seeds and pathogens when entering or leaving the site.	<p>The site inspection at the Tantangara site identified that whilst the construction of the permanent wheel wash had been completed as per the agreed actions to previous non-compliance 07/21/NC2, on the day of the audit, it was not operating correctly due to the pump not working and the water reservoir was empty.</p> <p>It is unknown how long the facility had been non-operational or how many vehicles would have left site without having their wheels washed. There was no back-up system in place.</p> <p>Note: The previous NC 07/21/NC2 remains open, and this OBS should be addressed in conjunction with that on-going non-compliance.</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> Investigate the root causes of this failure including the potential consequences; Undertake a risk assessment on the operation of the wheel washes; Implement contingencies and fail-safe mechanisms to address the issue to prevent recurrence at this and other sites <p>Responsibility: FGJV</p>	OBS 2	Compliant
18.	Biodiversity Management Plan App F, 5.2.2	<p>An experienced and suitably qualified pest control contractor will be employed to manage feral predators including wild dogs, foxes and cats. This program will be prepared in conjunction with the NPWS activities occurring in the broader area.</p> <p>The frequency and timing of control activities will be determined by the pest control</p>	<p>The Draft Annual Monitoring Report noted: <i>"The sighting of feral animals within proximity to known Smoky Mouse habitat or project infrastructure is a trigger for adaptive management".</i></p> <p><i>Feral animals were recorded within proximity to project roads and infrastructure within Lobs Hole, Marica, Tantangara Dam, Tantangara Road and Rock Forest. Therefore, Snowy Hydro/FGJV are</i></p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> As per the adaptive management trigger, undertake a feral animal control program using an experienced and qualified pest control contractor <p>Responsibility: SHL</p>	OBS 3	Compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations (Agreed due dates for each action are in Audit Action Plan issued separately)	Finding no. & rating (NC, OBS/OFI)	Compliance Status
		contractor through discussion with NPWS.	<p><i>required to control feral animals in accordance with the Weed, Pest and Pathogen Management Plan (FGJV, 2020).</i></p> <p><i>All areas within proximity to project infrastructure are required to have feral animal control undertaken. Priority areas for control include Marica and upper Lobs Hole within proximity to Smoky Mouse habitat.</i></p> <p>It was advised that to date, no targeted program for feral animal control has been executed outside of the camp areas.</p>			
19.	Schedule 3, Cond 30 (p)	30 (p): store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards”	Bunds and bunded pallets were not always covered allowing ingress of water, leading to the need to pump out potentially contaminated water. Specific example sighted – IBC of Stonewall on bunded pallet on trunk services – see photo in report.	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Undertake an internal review to review the scale of the issue across the project – Communicate the requirement cover bunded pallets or store bunded pallets under cover to contractors / subcontractors; – Communicate this requirement to contractors / subcontractors. <p>Responsibility: FGJV</p>	OBS 4	Compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
20.	Schedule 3, Cond 30 (p)	30 (p): store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards"	New pump installed on access road near Marica Surge shaft was not bunded (oil contained in motor)	Agreed Actions: <ul style="list-style-type: none"> Install bunding / secondary containment beneath the pump Responsibility: FGJV	OBS 5	Compliant
21.	Sch 4 Cond 6 (a)	The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.	It is noted that the responsibility to notify incidents and non-conformances has been changed from an SHL responsibility to an FGJV responsibility (where incident or non-conformance is caused by FGJV). The project Management Plans do not currently reflect this.	Agreed Actions: <ul style="list-style-type: none"> Review and update the relevant management plans to reflect the changed reporting / notification responsibilities. 	OBS 6	Compliant
22.	Sch 3 Cond 45(m) Transport Mgmt Plan Section 7.4	m) keep the public informed of any road or infrastructure upgrades, disruptions to traffic, the closure of roads or other infrastructure, OSOM vehicle use, peak construction periods, and any emergencies.	Public information on the FGJV website (link from Snowy Hydro website) relating to traffic was considerably out of date at the time of commencement of the audit (referred to activities in September / October 2021). Whilst it is recognised that other means of communication of information to the public have been implemented, the website is an important part of the communications.	Completed Actions: <ul style="list-style-type: none"> Website updated with latest OSOM movements Agreed Actions: <ul style="list-style-type: none"> Update the FGJV Traffic website to include: <ul style="list-style-type: none"> information about other ways of receiving information regarding traffic and include a "last updated" date. Include links on the website to other sources of information (e.g. – Live traffic) Ensure the traffic website is kept up to date. Responsibility: FGJV	OBS 7	Compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
23.	Biodiversity Management Plan S 6.5 BMP App B (Biodiversity Monitoring Plan) S10	b) Where possible, threatened species, weed and pest monitoring results will informally be provided to NPWS, DAWE and BCD as they become available to assist with conservation activities being undertaken in the locality by those agencies (further detail included in Appendix B).	<p>Whilst some reports (3) have been provided to BCD (listed below), other monitoring and quarterly reports referenced in the Draft Annual Report have not been provided:</p> <ul style="list-style-type: none"> – BMP Year 1 Quarter 3 Report dated 30 Sept 2021; – October 2021 Monitoring Report dated 20 Oct 2021; and – Fauna Strike Mitigation Report - Fauna Strike Monitoring Report dated 26 August 2021 	<p>Recommendation:</p> <ul style="list-style-type: none"> – Snowy Hydro should forward any quarterly or other biodiversity monitoring reports to the relevant agencies on a regular basis, once received from the consultant and reviewed to keep agencies informed of key project issues. 	OFI 1	Compliant
24.		Compliance tracking	Whilst FGJV have developed a comprehensive spreadsheet for tracking compliance against Conditions of Approval, it does not include the key requirements from the approved management plans	<p>Recommendation:</p> <ul style="list-style-type: none"> – FGJV could consider adding the requirements of the Management Plans to the compliance tracking spreadsheet to ensure compliance to the key requirements tracked. 	OFI 2	Compliant
25.	Schedule 3, Cond 30 (p)	30 (p): store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards	Water ingress was noted during the site inspection at the Fuel Farm. Whilst the fuel farm is roofed, rain has entered the bund as the roof is not large enough to prevent ingress of heavy rain. re- extend roofing over fuel farm to prevent rain water entering the bund).	<p>Recommendation:</p> <ul style="list-style-type: none"> – FGJV should consider extending the roofing (or other solutions) to limit ingress of water 	OFI 3	Compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/OFI)	Compliance Status
26.	Sch 3 Cond 7(f) Sect 9.5 and Table 9.4 of SMP	include a program to monitor and publicly report on: <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>The spoil specific reporting will be triggered shortly after this audit was conducted. TBM operation, and therefore spoil generation commenced around August 2021. The first report is therefore due to be undertaken in February 2022.</p> <p>This is raised as an Opportunity for Improvement as a reminder that the reports are due soon.</p>	Recommendation: <ul style="list-style-type: none"> – FGJV to prepare the spoil specific report as per the requirements of the Spoil Management Plan 	OFI 4	

3.3. Previous Audit findings – Actions, Progress and Status

The previous audit findings were followed-up and it was found that a significant number had not been adequately addressed, and as such remain open and still require corrective action and closure. It is noted that the responsibility for actioning the majority of open findings lies with the contractor, Future Generation Joint Venture (FGJV).

The internal FGJV corrective action process is not effective to adequately address and satisfactorily close non-compliances and observations raised in the Independent Environmental Audits (Refer to Non-compliance #1). The Environmental Management Strategy (EMS) provides a process for managing non-conformity noting that where a non-conformance has been identified, a correction action /preventative action will be developed and implemented to minimise the potential for recurrence. Limited evidence could be provided to demonstrate that the processes described within the EMS were implemented.

In summary:

Fourteen (14) non-compliances (NC), four (4) Observations (OBS) and two (2) Opportunities for Improvement (OFI) were raised at the previous audit. Of those:

- Eight (8) NCs and three (3) OBSs remain open;
- Two (2) NCs were closed or partially closed, with new related non-compliance(s) raised; and
- Four NCs, one (1) OBS and two (2) OFIs were addressed and closed;

As the FGJV corrective action process is ineffective to adequately respond to IEA findings, an Action Plan has been prepared by the audit team, detailing all open findings from IEA#2 and all findings from this audit (IEA#3) together with the agreed actions. It is expected that FGJV (and Snowy Hydro) will use this Action Plan to document all actions taken to address the findings.

Agreed FGJV actions include keeping the Action Plan up to date, providing regular updates on the progress to address the actions to SHL through monthly compliance meetings, and participation in an internal follow-up audit (by Snowy Hydro) by July 2022 to monitor progress and close-out completed actions.

Table 6 - Previous Audit Findings Follow-up Summary

*Note: grey shaded rows denote finding closed

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
27.	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		Closed
28.	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 Re-raised under	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	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	Agreed Actions: 1. Implement a new procedure to monitor wheel washing compliance including tagging and photographic evidence. 2. Complete installation of wheel washes at all areas. 3. Develop operating and management procedures for the wheel washes. 4. Implement further toolboxes regarding	07/21/ NC 2	Wheel washes at Tantangara (exit – Ox Eye Daily), – Action 1 – a new procedure has not yet been implemented to monitor wheel washing compliance (no tagging, security cameras not yet on site) Remains open – Action 2 : Wheel washes have generally been installed at all areas (permanent or temporary) or are being set up (however, refer to new Observation). Closed – Action 3 : No written procedures have yet been developed. Remains Open	Remains open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		pathogens when entering or leaving the site.	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.	site specific weed hygiene risks. Responsibility: FGJV Due Date: 30 October 2021		<ul style="list-style-type: none"> Action 4: Toolboxes completed. – Marica and Tantangara – 27/09/21, Trunk Services – various in Oct 2021, Lobs Hole in 2021 Closed. <p>At Audit #3, it was noted that wide vehicles can't fit through wheel wash at Lobs Hole and require hygiene certificates. A review of provided hygiene certificates found that they were generally not adequately completed</p>	
29.	Sch 3 Cond 2	Within 6 months of the commencement of construction, the Proponent must prepare a Digital Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: (a) be prepared in consultation with the NPWS; (b) identify innovative ways to give effect to the requirements in condition 1 above; and (c) include a program to develop a digital application for users of the Kosciuszko	Whilst a Digital Strategy has been prepared, the Strategy had not been prepared within the required 6-month time frame. 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	Previous Agreed Actions: No action required – Digital strategy was submitted prior to audit – The NC related to a timing issue. Responsibility: Snowy Hydro Completed Date: 4 June 2021 New Agreed Actions (Audit #3): <ul style="list-style-type: none"> Review and revise the Digital Strategy taking the DPIE comments into consideration 	07/21/ NC 3	<p>Since the last audit, communications have been sent by DPIE to SHL requesting additional information.</p> <p>The communication from DPIE dated 1 November 2021 requested the following additional information before accepting the document:</p> <ul style="list-style-type: none"> Include feedback and outcomes of consultation with NPWS regarding delivery of the Digital Strategy; Provide firmer timeframes for how frequently the information will be supplemented over time as per Condition 1(b) of Schedule 3; Provide clearer timeframes on the proposed staged delivery of the Digital Strategy; 	Remains open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		National Park to bring key information to life in an interactive way and enhance the enjoyment of the park.	<p>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>	<ul style="list-style-type: none"> – Submit the revised Digital Strategy to DPIE 		<ul style="list-style-type: none"> – Digital Strategy Program should provide firmer timeframes and details on how and when this information will be provided to NPWS for integration into a digital application as per Condition 2 (c) of Schedule 3. <p>The communication requested that a meeting be arranged with the Department prior to re-submitting the Strategy for further discussions.</p> <p>The Digital Strategy had not yet been developed "to the satisfaction of the Planning Secretary" and therefore continues to be non-compliant to this condition.</p>	
30.	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</p> <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 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>Agreed Actions:</p> <ol style="list-style-type: none"> 1. Immediately remove the acid from the bunded area in which the Sodium Hypochlorite is stored; 2. Undertake a review of the compatibility of all chemicals stored in bunded storage areas, with particular attention to those that have bulk quantities of Class 8 chemicals (also recommended in EMM Hazardous 	07/21/ NC 4	<p>Whilst some improvement was noted, further actions are required to ensure appropriate chemical and hydrocarbon management.</p> <p>The non-compliance was closed out in Aconex on 21/10/21 however no evidence was included in the close-out document and did not include a photo of the completed action or name of person who closed it out.</p> <ul style="list-style-type: none"> – Action 1: the site visit conducted at Lobs Hole found that acid was still stored in the same bunded area with the Sodium Hypochlorite (Not resolved) 	Remains open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
			<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 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 	<p>Chemicals Audit in March 2021)</p> <p>3. Review storage of all Class 2 flammable gas storage across the project and ensure only compatible items are stored together;</p> <p>4. Review all SDSs held on site and ensure they were issued less than 5 years ago as per regulations.</p> <p>5. Review the internal chemical handling and storage program audit and inspection program and make any necessary changes;</p> <p>Responsibility: FGJV</p> <p>Due Date: 21 September 2021</p>		<ul style="list-style-type: none"> – Action 2: It was verbally advised that the Warehouse Manager based at Polo Flat) had undertaken a review of compatibility, however this review was not documented (Not resolved) – Action 3: The site inspection identified that there had been significant improvement in the segregation and storage of flammable gases across the project - Closed – Action 4: A review of SDSs on site (Lobs Hole store) found that the majority of SDSs were out of date, were incorrectly filed and the folders did not include a listing of substances held (Not resolved) – Action 5 – no evidence was provided of review of internal audit and inspection program (Not resolved) <p>Other actions undertaken but not listed in the previous Agreed Actions List included:</p> <ul style="list-style-type: none"> – A Hazardous Chemicals Procedure has been drafted, however has not yet been issued (not complete) – A Training package— Chemical Handling and Management developed had been developed and 2 groups at Lobs Hole and 	

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
			significantly out of date (Nov 2010 issue). – based on limited sampling.			<p>Cooma completed the training before Xmas (Commenced, not complete).</p> <ul style="list-style-type: none"> – New delivery forms have been developed (excel with tabs for receipt, transfer and issue) - implemented since Oct/Nov 21 <p>The site inspections identified several instance of substances not being stored appropriately (Lobs Hole – receiving area, Trunk services – IBC on a bunded pallet which had filled with water) – refer to photos in the report.</p>	
31.	Sch 3 Cond 31 (c) and 32 Sch 3 Cond 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...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 	<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> <ul style="list-style-type: none"> – Publish the Environmental Water Reports on the Project Website <p>Responsibility: SHL</p>	07/21/ NC 5	<p>Two of the outstanding draft Quarterly Environmental Water Reports had been completed by FGJV and issued to Snowy Hydro, however none have yet been finalised or uploaded to the project website. (not resolved)</p> <p>Two further Quarterly Environmental Reports had not yet been completed or issued to Snowy Hydro. The status of the reports at the time of the audit are provided below:</p> <ul style="list-style-type: none"> – Dec 2020 – Feb 21 – sent to Snowy 12/10/21 – March to May 2021 – sent to Snowy 12/10/21 	Remains open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
	Water Mgmt Plan Sect 6.6	<p>32. The Proponent must implement the approved Water Management Plan for the development.</p> <p>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</p>	<ul style="list-style-type: none"> – 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>	<p>Due Date: 21 September 2021</p>		<ul style="list-style-type: none"> – June to Aug 21 – not yet sent to Snowy (due to be sent 31/1/22) final draft status – – Oct 2021 – Dec 2021 – outstanding - Due from consultants Eco Logical <p>This has been raised as a new Non-compliance</p>	
32.	Sch 3 Cond 41 Table 5-1	<p>The Proponent must carry out the road and intersection upgrades in Tables 5-1 and 5-2 in Appendix 5 in accordance with any specified timeframes to the satisfaction of the relevant roads authority.</p> <p>The following upgrades had been either</p>	<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.</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 	07/21/ NC 6	<p>A Show Cause letter from DPIE dated 3 November 2021, alleging a breach of section 4.2(1)(b) of the EP&A Act was issued to SHL on as a result of this non-compliance. The letter provided SHL with an opportunity to make representations as to why the Department should not take formal enforcement action by COB 19 November 2021.</p> <p>SHL responded to the above in a letter dated 19 November 2021 with a detailed response (442-page document comprising an 11-page letter with various annexures). The letter concluded that “<i>SHL submits that the facts and circumstances of</i></p>	Remains open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
			<p>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>undertaken to the satisfaction of the relevant roads authority (NPWS)</p> <p>Responsibility: Snowy Hydro</p> <p>Due Date: TBC (dependent on outcomes of SHL/NPWS consultation duration)</p>		<p><i>the matter as set out in detail in this response, indicate that the only appropriate action would be informal action to note and support the actions that SHL is already taking to implement the Agreed Actions and the commitments it has made going forward as detailed above”</i></p> <p>At the time of the audit, no formal response from DPIE had been received, and therefore, the issue had not been fully resolved and remains open. However, evidence was provided that consultation with NPWS has been conducted and is ongoing.</p>	
33.	Sch 3 Cond 46 (e)	<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 	<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 	07/21/ NC 7	<p>Some progress was being made on the development of the Vehicle Movement Summary Reports through the use of a newly introduced system, Borealis. The data will be used to prepare the required reports.</p> <p>No Reports had been completed or uploaded to the project website.</p> <p>At the time of the audit, the following Quarterly Summary Reports were in draft however had not been issued:</p> <ul style="list-style-type: none"> – April to June 2021; – July to September 2021; and – October to December 2021 	Remains open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
	Sch 3 Cond 49 Transport Management Plan Table 6-1	<ul style="list-style-type: none"> 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 		<ul style="list-style-type: none"> – Publish Quarterly Cumulative Summary Report on the Project Website Responsibility: FGJV <p>Due Date: 21 September 2021</p>		Evidence of these draft reports was not provided.	

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		<p>(max 120 movement / day – 60 each way) and annual average maximum of 60 movements / day (Quarterly Report)</p> <ul style="list-style-type: none"> • Quarterly Cumulative Summary Report submitted to project website. 					
34.	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</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</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) 	07/21/ NC 8	<p>An Approvals Register has been developed to track the review and update of Management Plans, strategies and programs, with a tab for each Plan / strategy and includes a column – reason for review. Where no changes have been made, the “reason for review” column records “Reviewed after 6 month audit with no updates required at this time”.</p> <p>Water Management Plan has been revised and has been submitted to SHL and EPA for review, however has not yet been submitted to DPIE for approval.</p> <p>The Approvals Register indicated that the Spoil Management Plan has been reviewed and updated to address EPA comments on the “Lobs Hole Operational Material Characterisation</p>	Closed

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		report under condition 10	<p>relevant to the scope of the Independent Environmental Audit #1 (IEA) had been reviewed following submission of the IEA Report.</p> <p><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>	<ul style="list-style-type: none"> When Management Plans (or other strategies / programs) are reviewed, retain evidence of the review. <p>Responsibility: FGJV Due Date: Nov 2021</p>		<p>and Handling Procedure" and reflect the "Tantangara Operational Material Characterisation and Handling Procedure"</p> <p>Adequate evidence was provided to indicate that a review process has now been established and that some plans are being / have been updated.</p>	
35.	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</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</i></p>	<p>Proposed Action: - SHL</p> <ul style="list-style-type: none"> Notify DPIE and NPWS of any past incident that meets the definition of an incident under the approval; 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 	07/21/ NC 9	<p>FGJV are now undertaking the notification process to all agencies (EPA, DPIE, NPWS).</p> <p>Various incident reports recorded on the "External Agency Incident Notification Form" (form0013 – (DPIE) and 0014 – (EPA) were sighted (INC 898, 1058, 1140</p> <p>Whilst reporting has improved, it could not be demonstrated that all incidents involving overtopping of basins were reported to DPIE.</p> <p>This NC has been closed and a new NC (NC 2) has been raised (due to additional related findings and recommendations)</p>	Closed New NC raised

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		material harm and which may or may not be or cause a non-compliance”	<i>similar (both referring to “causes or threatens to cause material harm”), and therefore, notifications of incidents are required for both agencies.</i>	Responsibility: Snowy Hydro Due Date: 30 Sept 2021 and ongoing as required			
36.	Sch 4 Cond 7	Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department via the 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	Part 1. 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. Part 2. 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.	Agreed Actions - SHL: <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. 	07/21/ NC 10	Part 1: Post approval Form SSI-9687-PA-37 and related email from no-reply@majorprojects.planning.nsw.gov.au acknowledging receipt of the 6 monthly IEA Report, 6 monthly IEA and compliance letter and 6 monthly IEA non-compliance summary (Audit response and Action Plan) sighted. This component (Part 1) of the NC is closed Part 2: Further examples of non-compliances not being notified to DPIE were noted during Audit #3 (raised as new non-compliance):	Part 1 – Closed Part 2: Remains Open – re-raised

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status	
			<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>	<ul style="list-style-type: none"> – Non-compliances notified by FGJV to Snowy Hydro to be notified to DPIE within 7-day timeframe from occurrence. <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>				
37.	Sch 4 Cond 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;	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.	<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) 	07/21/ NC 11	The IEA Report for Audit #2 was submitted within the required timeframes.	Closed	

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		(b) its response to the recommendations in the audit report; and (c) a copy of the proposed audit action plan to address the recommendations	<p>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>Responsibility: Snowy Hydro</p> <p>Due Date: 04/10/2021</p>			
38.	Sch 4 Cond 12 (a) and (b)	From the commencement of the development of the Main Works until the completion of the ecological rehabilitation of the areas used for operations, the Proponent must:	<p>(a) make copies of the following information publicly available on its website:</p> <ul style="list-style-type: none"> From the commencement of the development of the Main Works until the completion of the ecological rehabilitation of the areas used for operations, the Proponent must: (a) make copies of the following information publicly available on its website: 	<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 <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 	07/21/ NC 12	<p>Several of the listed documents had been uploaded to the project website since the last audit including the Rock Forest Noise Management Plan, summary of complaints and the Independent Environmental Audit Report(s) #1 and #2.</p> <p>Documents that had NOT been uploaded to the website included a record of all incidents and non-compliances, Quarterly Environmental Water Reports and Quarterly Cumulative Summary Report (traffic). These omissions are raised in a new separate non-</p>	Closed

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		<ul style="list-style-type: none"> approved strategies, plans or programs; a comprehensive summary of the monitoring results of the development.... 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 (b) keep this information up to date 	<ul style="list-style-type: none"> 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) <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 	<p>website when required, in a timely manner;</p> <ul style="list-style-type: none"> Maintain a spreadsheet of all incidents and non-compliances that are required to be publicly reported, and upload to the website in a timely manner whenever updated; 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 Due Date: Sept 2021 and ongoing</p>		<p>compliance under Sch 4 Cond 8 and this condition, Sch 4 Cond 12.</p> <p>Recent EPL monitoring records were also NOT up to date on the project website. This issue is also raised under a new separate non-compliance specific to EPL and pollution monitoring requirements.</p> <p>In light of the above, this non-compliance is closed, noting that two new related non-compliances have been raised.</p>	

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
			<p>dated 20 Sept 2020 (Note: <i>results up to Apr 2021 were on the website on 13 July</i>)</p> <ul style="list-style-type: none"> • The latest Complaints summary register on the website on 16 June was dated Dec 2020 (Noted that the May 2021 Register was on the website 13 July 2021) 				
39.	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.	<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 as required by the TARP (INC 575 – 23 March 2021 – reported to EPA)</p>	<p>Agreed Actions:</p> <ol style="list-style-type: none"> All events resulting in an overtopping event to be reported to NPWS as per the TARP going forward; Notifications to be provided to Snowy Hydro prior to submission; Communicate this requirement to all relevant Management and Staff <p>SHL Proposed Actions</p> <ol style="list-style-type: none"> SHL propose to update TARP 2 to remove the requirement to notify 	07/21/ NC 13	<p>TARP has not yet been changed or submitted to EPA / NPWS and it was advised that there have been various overtoppings due to recent wet weather events and that they have been notified to EPA/NPWS and SHL.</p> <p>Evidence sighted:</p> <ul style="list-style-type: none"> – Email from FGJV to NPWS date 10/01/2022 – Basin Overtopping Event Commencing 02/01/2022 – Email from FGJV to NPWS dated 29/01/2022 – Basin overtopping event commencing 29/01/2022 (5 days between 24 & 29/01/22) – Sediment Basin Overtopping Event Form – 04/09/2021 detailing basins that overtopped 	Remains Open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
				<p>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> <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): 1 October 2021, implementation - if approved by DPIE/NPWS – after approval received.</p>		<p>between 4 & 6/09/2021 including photos and water quality results.</p> <p>It is not known whether the overtopping event 4-6 September 2021 was notified to NPWS and EPA (evidence of notification not provided).</p> <p>Examples and the Environmental Incident and Event register provided by FGJV does not provide sufficient evidence to close this NC</p>	
40.	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 	<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</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 	07/21/ NC 14	<p>A Traffic Incident Register has been developed and maintained, however the information captured is sparse and does not provide confidence that all relevant traffic incidents have been notified.</p> <p>Some email notifications to NPWS were sighted:</p> <ul style="list-style-type: none"> – 08/11/2021 - Link Road - roll of conveyor belting fell off truck 	Remains Open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		<p>Health and Safety Management Plan and the associated incident and emergency reporting procedures;</p> <ul style="list-style-type: none"> 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):</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</p>	<p>location, type, severity etc).</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>what is to be reported;</p> <ul style="list-style-type: none"> Since this meeting, at least one incident had been reported to NPWS using the hotline number; Daily transport meetings 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> <p>Agreed Actions:</p>			

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		<p>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>		<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>	Red		
41.	<p>Sch 3 Cond 8</p> <p>Spoil Management Plan</p> <p>Topsoil Strategy App B</p> <p>Pages 96, 97</p>	<p>Topsoil and subsoil maintenance:</p> <p>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 was sighted in the vicinity – Mulch.</p> <p>An interview with FGJV site environmental staff noted that due to limited storage areas at Lobs Hole, it can be very challenging to adequately store the topsoils, subsoils and mulch separately.</p>	<p>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 	07/21/ OBS 1	<p>The site inspection across all sites noted an improvement in the separation and management of topsoils, subsoils and mulch.</p> <p>Construction Method Statements were provided as evidence (Bulk Earthworks dated 2020) and Stripping procedure date 2019) however there was no evidence these have been reviewed or updated since the last audit.</p> <p>(note – Aconex corrective action shows action to review CMS and conduct toolbox talks is still open)</p>	Remains open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
				space and logistics allow). Responsibility: FGJV Due Date: 1 October 2021			
42.	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.	Agreed Actions: <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 length. - Develop and install signage at the exit of each site noting the requirement to reduce convoys Responsibility: FGJV	07/21/ OBS 2	<p>Signage was installed at Lobs Hole advising to limit convoy size (all HV's to keep at least 250m apart)</p> <p>No evidence of formal communications to heavy vehicle companies was provided.</p> <p>This Observation remains open in the SHL Aconex corrective action system.</p>	Remains Open

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
				Due Date: 1 October 2021 and ongoing.			
43.	Sch 3 Cond 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: (c) include a program to monitor and publicly report on the effectiveness of these measures.	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. <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>	Agreed Actions: <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 Responsibility: FGJV / SHL Due Date: 1 October 2021	07/21/ OBS 3	This Observation remains open in the SHL Aconex corrective action system. The Construction Noise Management Plan – Rock Forest had not been updated at the time of the audit.	Remains open
44.	S3 Cond 45 (d)	The Proponent must: (d) provide sufficient parking on site for all vehicles and ensure vehicles associated with the development	Whilst it is reported that parking is provided on site, there have been some reports from NPWS (to FGJV/Snowy) of private vehicles parked	Completed Actions: <ul style="list-style-type: none">Reiterated that project personnel are not to park on the public road network at Pre-start	07/21/ OBS 4	No inappropriate parking was identified during the site inspections. FGJV are encouraging NPWS to notify them if they notice any inappropriate parking	Closed

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
		do not park on the public road network;	on the roads and at 3-mile dam. 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.	conducted 14 July 2021. – Reinforce message through pre-starts / toolbox talks / other means, periodically as required.) Responsibility: FGJV Due date: 14 July 2021 Status: Closed and ongoing.			
45.	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.	Agreed Actions: – FGJV will continue to implement a program to investigate and minimise the frequency of minor spills. Responsibility: FGJV Due date: Outcomes to be reviewed October 2021 Auditor note: It is recognised that there is a positive culture of reporting minor spills, and this should not change.	07/21/ OFI 1	Improvement noted. new maintenance processes have been introduced including cleaning of hoses etc prior to pre-start inspections.	Closed

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Follow up comments / action taken	Finding Status
46.	Transport Management Plan Sect 5.6.1	Vehicle Movement Plans and Heavy Vehicle Haulage Routes: 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	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.	Recommendation: FGJV should ensure that the processes and named plans described within the Transport Management Plan are consistent with actual practice. Responsibility: FGJV Due Date: 17 January 2022	07/21/ OFI 2	VMPs are now appropriately named and various examples were sighted	Closed

4.0 OVERVIEW OF ENVIRONMENTAL PERFORMANCE

4.1.1. Provision of audit evidence

As noted under the Audit Process and Methodology section, the Audit Tables were provided to Snowy Hydro and FGJV around 7 working days prior to the audit, with a column for “expected evidence” as a tool to facilitate ready availability of evidence during the audit. Audit evidence requested from the proponent (Snowy Hydro) was generally provided during the audit and within requested timeframes.

The provision of audit evidence by FGJV both during and after the on-site audit was problematic. During the audit, the availability of appropriate management and staff was less than anticipated due to their other commitments, and following the audit, clarifications and further evidence requested from the contractor were not provided in a timely manner.

To illustrate, a clarifications table was provided to FGJV (and SHL) on 27 February requesting that clarification questions be answered, and that the requested additional evidence be provided in a shared folder. When no response or evidence had been received, a follow-up email was sent to FGJV on 18 March titled “*Clarifications table - please provide additional evidence - FINAL REMINDER – URGENT*”. The email noted “*I urgently require a full response to the Clarifications Request Table and the associated provision of requested evidence by CoB Monday 21 March. It has now been 3 weeks since I sent the request*”.

Following further reminders via email and phone, evidence and responses were finally provided on 24 March 2022. Where evidence provided by that date was insufficient to address the criteria, non-compliances were raised and findings from previous audits remained open. The lack of timely response had an impact on the timeframes for the submission of the draft and final IEA reports.

4.1.2. Environmental Management, Incidents, Monitoring, Reporting, Access to Information

Overall, the reporting and notification of incidents, non-compliances, overtopping events and traffic incidents was somewhat improved from the previous audit, however insufficient evidence was provided to give confidence that all required notifications and reports were provided to the appropriate regulatory authorities. Three (3) non-compliances were raised / remain open in this area.

Public reporting of environmental performance and monitoring outcomes continued to be an issue, with the Quarterly Environmental Water Reports and the Quarterly Cumulative Traffic Summary Reports required by the NSW Approval still not issued or made publicly available.

The Annual Compliance Report required by the Commonwealth EPBC Approval had not been prepared or submitted and is therefore non-compliant with the Commonwealth Conditions of Approval.

An Observation was raised regarding the submission of an Annual Report on biodiversity (refer to Biodiversity section).

The publication of the Environment Protection Licence monitoring data was significantly overdue. The POEO Act requires that monitoring data be uploaded within 14 days, and at the time of the audit, the latest data was current up to August 2021.

The Exploratory Works approval had not been surrendered within required timeframes as this is dependent on the submission of further Management Plans

A number of Management Plans were required to be developed and submitted to the relevant authorities (DPIE / DPE and DAWE), however had yet not been submitted. In summary, the Visual Impact Management Plan and the Recreation Management Plans had not been submitted within the required timeframes. The Digital Strategy had been submitted (prior to previous audit), however DPIE have indicated that further information is required to be included in the strategy before being accepted.

A non-compliance was raised at the previous audit relating to review and update of Management Plans. A process has now been implemented to track and plan the review and update of the Management Plans.

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

The site inspections at all sites found that overall, erosion and sediment controls and surface water management were generally adequate. It was noted that there had been significant heavy falls of rain over the weeks and months prior to the audit, and in most site visited, the sediment basins were almost full, and works were being undertaken to repair and maintain the controls. Some areas (as identified in the photos) required some ongoing maintenance, and some slumping and subsidence was observed, however FGJV have engaged erosion and sediment control specialists to inspect and advise on appropriate actions to address these issues.

During an EPA site inspection undertaken on 19/11/2021 at Gooandra Trail trunk services site, Marica Trail and R5 Laydown on Ravine Road, unstable conditions in some road construction areas and their immediate catchments were observed. Together with the above average rainfall expected in the region, the EPA determined that this presented a risk to the pristine waters of the Kosciuszko National Park (KNP). To address the soil and water management issues described in three separate letters dated 30/11/21, the EPA requested further work to mitigate environmental harm, including the review and update of the Water Management Plan (WMP) for those sites, and proposed a Pollution Reduction Program (PRP) in relation to the Water Management Plan (WMP) for the Marica Trail.

The Contractor replied to the three letters on 15/12/21 with a Draft Appendix to the Water Management Plan, providing commitments on actions that would prioritise the stabilisation of the Marica Trail, in lieu of the PRP. FGJV proposed a set of interim controls to stabilise and mitigate impacts to the Prospectors Creek catchment until permanent designs are approved and Ravine Road is sealed. At the time of the audit, there had been no further correspondence on this matter. Based on the observations during this EIA, progress had been made in the implementation of interim controls.

Chemicals and fuel management had generally improved across the sites, however previous audit actions had not been fully closed, and some examples of inadequate storage and handling, and out of date SDSs were again observed during the site inspections. Of particular concern was that incompatible chemicals stored at the Lobs Hole Sewage Treatment Plant (STP) was identified as an issue at the previous audit, and the same chemicals were observed in the same

bund during this audit, despite the issue being “closed” in the SHL Aconex corrective action system.

The STP at Lobs Hole was operational at the time of the audit, and it was advised that all treated effluent had been reused on site and that to date, no treated effluent had yet been discharged to Talbingo Reservoir. The process water treatment plant had been operational since the commencement of the operation of the TBM, and all treated water was being stored and reused on site for TBM operations, concrete batching and dust suppression. The Talbingo reverse osmosis (RO) water treatment plant was installed and commissioned in November 2021 with an EPL discharge point (EPL 41). There had been only one discharge into Talbingo reservoir to date in December 2021 which was process water only. This was part of the Mixing Zone Verification Program, which had not yet been finalised. All STP water has been reused on site for dust suppression and has not been discharged to the RO water treatment plant or into the reservoir. Once the Mixing Zone Verification Program is complete and approved discharge to Lake Talbingo via the RO Plant and EPL discharge point 41 can occur.

4.1.4. Topsoil and Subsoil management

An Observation was raised at the previous audit identifying that topsoils, subsoils and mulch material were mixed and were not adequately separated. The site inspection across all sites noted an improvement in the separation and management of topsoils, subsoils and mulch.

Topsoil and subsoil management was observed at various sites including Tantangara, Rock Forest, trunk services and Lobs Hole. These soils are stored and reused in the same general area from which they were derived (not transported to other sites) Topsoil had generally been stockpiled in separate areas and clearly signposted. Where topsoil has been stored for some time, it had generally been hydro-mulched and it appeared stable. At Tantangara in particular, it was noted that brumbies occasionally damage fences and ropes, and trample soil stockpiles and established boundary markers. Topsoil stockpiles were observed to have a low gradient, with clean water diversions upslope and sediment controls downslope. A Topsoil Stripping Register has been maintained.

Subsoil has been stockpiled in a different location to topsoil (subsoil stockpiles have not been signposted). Subsoil stockpiles have a number of sediment controls. Stormwater runoff is directed into sediment retention basins using diversion mounds, geotextile fabric and crushed rock. The contractor is working to minimize the number of sediment basins, particularly along Spoil Road, installing more frequent diversions. Sediment basins at Tantangara were clearly identified (e.g. signposted SBL01; SBL08 etc.).

4.1.5. Biodiversity

The previous two audits 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 audit focused on ongoing compliance in key areas identified by the relevant agencies (NPWS, BCD, DAWE). The following commentary provides an overview of performance in key areas:

- The Annual Report (biodiversity) was still in draft and had not yet been released or provided to the agencies. The draft report did not include all the requirements listed within the Biodiversity Management Plan and will require revision prior to issue. As no timeframe for

issue is included in the Conditions of Consent, this has been raised as an Observation, not a non-compliance.

- FGJV continues to track and monitor the clearing of native vegetation and habitat in detail;
- The Master Tracker Clearing Register continues to track 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 audits), and it was verbally confirmed by FGJV and SHL that this requirement is ongoing, including for subcontractors to minimise fauna strike;
- Fauna Strike Monitoring Report August 2021 by EMM dated 26 August 2021 noted that there has been no reported or observed fauna strikes on threatened species in the monitoring periods from November 2020 to July 2021;
- Six wildlife underpasses had been installed under Lobs Hole Ravine Road, however issues had been raised by NPWS and were in the process of being rectified. At the previous audit in July 2021, it was identified that improvements were required to camera positioning as an improvement opportunity gained from the trial underpass. At this audit, it was noted that cameras had been purchased, but had not yet been installed (awaiting rectification works completion);
- Pre-clearing survey reports continue to be prepared by ecologists prior to clearing providing detailed information for input to the clearing permits to ensure required protocols are followed;
- Post-clearing survey reports by ecologists continue to be reported via a KML survey file, which is uploaded to the WebGIS system;
- FGJV continue to maintain a fauna encounter register and a Pest Trapping Register and an ad hoc live trapping is undertaken on an as-needed basis;
- The weed control program had not been conducted in the spring as required by the Biodiversity Management Plan and this was raised as a non-compliance;
- Whilst improvements have been made in the washdown of vehicles, plant and equipment with the installation of permanent wheel wash facilities, actions from previous audit non-compliances had not been completed and remain open. The wheel wash facility at Tantangara was not working on the day of the audit due to malfunction of the pump and lack of water.

[4.1.6. Groundwater / Groundwater Dependent Ecosystems](#)

Water Licences are in place for the project, and water take is monitored.

At the time of the audit, tunnelling was being undertaken only at the Main Access Tunnel (MAT) at Lobs Hole (approximately 1200m of tunnelling completed) and the ECVT (approximately 100 - 200m of tunnelling completed).

The areas of higher predicted inflows and drawdown areas had not yet been encountered, and groundwater level monitoring had not indicated any project related drawdown to date. It is expected that drawdown would commence from the beginning of tunnelling at Tantangara - this could potentially commence by May 2022. It is also expected that the area under Nungar Creek may be encountered by around October 2022 (tunnelling from Tantangara). In summary, there

has been no measured groundwater drawdown to date, and would be re-assessed at future audits.

It was advised that a probe is drilled at least 24m ahead of the cutter head to determine inflow rates, which is compared with trigger levels. Pre-grouting and post-grouting would be undertaken where triggers are exceeded. To date, there have been no triggers to undertake pre-or post-grouting. A dual tunnel inflow monitoring program by SHL and FGJV program is in place, and a Snowy Hydro person on site at all times when tunnelling. A telemetry system is currently being considered by SHL and is currently at the test environment stage of the SHL Proof of Concept. SHL are aiming to have the system in place by winter 2022. Snowy Hydro was also in the process of developing a program with a dashboard which would provide real time presentation of data on actual vs predicted inflows.

4.1.7. Spoil Management – Tunnel Spoil Management

At the time of the audit, tunnel spoil had only been generated at Lobs Hole. The spoil is temporarily stockpiled at the yard outside the MAT portal, which is surrounded by concrete barriers. Spoil is transported to the Western Emplacement Area at Lobs Hole.

The methods for sampling, testing and characterisation of spoil material are defined in the “Snowy Hydro 2.0 Lobs Hole Operational Material Characterisation and Handling Plan” by: Golder Associates Pty Ltd dated 10 June 2021.

Spoil material testing has been undertaken. Two sampling methods are used: (1) Probe-drilling every 45 meters (a sample is taken every 5 rings and identified with the ring numbers e.g. R 1-5; R 6-11); (2) Samples are taken from the conveyor belt.

A preliminary material testing is done on-site using an XRF gun to detect calcium and sulphur. X-Ray Fluorescent Analysis is conducted by Internal Lab Services (currently managed by Australian Indigenous Business Services). Samples are then externally tested by an accredited laboratory (Eurofins). A new spoil tracking system has been introduced since January 2022 to improve identification, location and traceability of spoil (e.g. Spoil Placement Permits; Spoil Placement Load Sheets; Spoil Tracker (e.g. Spoil Tracking – MAT Portal TBM). Quadrants have been allocated in the Western Emplacement Area and indicated in the spoil placement permit to allow dump truck drivers know where to unload the spoil.

Non-Acid Forming (NAF) material goes into the Western Emplacement Area and for re-use on site (e.g. paths, road, pads, parking areas). Potentially Acid Forming (PAF) material is currently taken to the HOLCIM Pad and Stage 5. The intention is to treat all PAF as much as possible. A Contingency Plan (GF01) is still under review by DPIE.

No spoil has been produced yet at Tantangara; however, the preparation of the spoil emplacement area commenced. A new road is under construction (Spoil Road) to access the spoil emplacement area (Peninsula Emplacement Area). Rock Forest is being established as an area to receive spoil in the future, however no spoil has yet been transported to the site.

4.1.8. 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.

Plant inspection for compliance purposes is conducted on a quarterly basis. An “Equipment Maintenance and Hours Control Schedule” (equivalent to an Asset Register) and associated

records were sighted and reviewed, including Hourly Service Reports, Quarterly Inspections and corresponding stickers on vehicles inspected and Pre-Start Inspection Checklists. During the site inspections at Tantangara and Lobs Hole, some vehicles and plant were checked.

At the last audit, an opportunity for improvement was raised for FGJV to continue to implement a program to investigate and minimise the frequency of minor spills, particularly from hydraulic hoses. The investigation identified that during weekly inspections, plant and equipment were usually covered in mud and leaks were not always detected. Plant is now washed down before the inspection. Additionally, for new plant and equipment, FGJV is requesting the use of biodegradable oil (e.g., all drill rigs and multi service vehicles are currently using biodegradable oil).

During the site inspection at Tantangara, the Vehicle/Plant Hygiene Station (Wheel Wash Station to prevent the spread of Ox-eye daisy and other weeds) did not operate correctly. It appears that the system had run out of water due to a pump malfunction (refer to Observation 2).

4.1.9. Transport and Traffic Management, Road Upgrades, Incidents

The previous IEA identified that insufficient evidence was provided to demonstrate that all traffic incidents that required notification were notified to the appropriate authorities. At this audit, a Traffic Incident Register had been developed and maintained, however the information captured and provided to the auditors is sparse and does not provide confidence that all relevant traffic incidents have been notified.

The previous audit also identified that Quarterly Cumulative Summary Reports had not been prepared, submitted to SHL or uploaded to the project website. Whilst it appears that draft summary reports had been submitted to SHL, no summary reports had been uploaded to the project website. Traffic information on the project website was also substantially out of date at the time of the audit.

The previous audit also identified that there was insufficient evidence to demonstrate that the roads and intersection upgrades had been carried out to the satisfaction of the roads authority (NPWS). The resolution of this issue was still a work in progress following the issue of a Show Cause letter from DPIE, providing SHL with an opportunity to make representations as to why the Department should not take formal enforcement action.

A pre-winter planning discussion was held in January 2022 between FGJV and TfNSW as the 2021 winter season highlighted areas along the Snowy Mountains Highway that are of concern regarding incident management. TfNSW are focussing on improving incident management response and clearance times, and FGJV have provided attendees with the key activities / policies that FGJV. The Traffic and Transport Liaison Group (TTLG) also meets on a quarterly basis with participants from SHL, FGJV, and agencies such as TfNSW and NPWS (e.g. meeting held on 17/09/21).

Measures to minimize traffic safety risks in snow and ice conditions included the preparation of a B-Triple Inclement Weather Protocol; a Scania / B-Triple Combination Operational Risk Assessment “Driving on Snow and Ice” Training for staff; and internal reporting of road conditions to staff on Daily Transport Planning minutes and via WhatsApp group.

PBS (performance-based standard) process for Segment Transport has been introduced, using three trailer, allowing the transport of nine (9) segments in one load rather than the three (3), carried by traditional semi-trailers. At the time of the audit, only two of the three trailers could be

loaded due to performance issues with the PBS trucks. Trucks are currently run with a triple configuration as per the PBS permit requirements, however, only 2 out of 3 trailers are being loaded at this time. The resolution of this issue was a work in progress at the time of the audit.

At the time of the audit, public information on the FGJV website (link from Snowy Hydro website) relating to traffic was considerably out of date, and was updated around the time of commencement of the audit. This was raised as an Observation. It was however noted that other forms of communication were in place such as Variable Message Signs (VMS) at six locations, radio, newsletters and newspapers have been implemented.

To minimise the traffic impacts of the development on the public road network, a booking system for heavy vehicles has been introduced and a strict convoy timetable is implemented, particularly at Ravine Road to and from Lobs Hole, where light vehicles and heavy vehicles have been separated. Vehicle Movement Plans have been used to communicate internally approved heavy haulage routes and include travel directions, permitted intersection turning movements, speeds, approved parking and lay-up areas. Signage has been installed at Lobs Hole gatehouse area “All HV’s to keep at least 250m apart (avoid convoying)”.

4.1.10. Complaints

The Community and Stakeholder Engagement Management Plan (Jun-20) includes the Complaints and Dispute Resolution Procedure (Annexure A). The Complaints Process has been documented in a flowchart and is included in the Site Induction, under Community section, including contact numbers, email address and policies around dealing with the community. Complaints are prioritized and notified to SHL (“flagged”) on weekly meetings.

The Complaints Register is maintained by SHL and has been published on SHL’s website. There have been four recorded complaints since July 2021, three related to traffic management, and one to contractor’s management. There is a hotline number (1800 Snowy 2) for general enquiries, including complaints (but it is not a dedicated line for complaints); staffed 24x7

4.2. Site Inspection Photographs

4.2.1. Site Inspection Photographs – Lobs Hole Ravine Road

Site inspection Photos – Lobs Hole Ravine Road 3 February 2022	
	
LHRR1: Gate house area and entry to Lobs Hole Ravine Road from Link Road. All vehicles must use wheel-wash	LHRR2: PBS Truck with 2 loaded trailers commencing drive down Lobs Hole Ravine Road (currently only able to load 2 of the three trailers due to performance issues).
	
LHRR3: Truck passing through wheel wash at Lobs Hole gate house.	LHRR4: Signage at Lobs Hole exit: "All HV's to keep at least 250m apart (avoid convoying)"
	
LHRR5: Batter stabilised with mulch, Lobs Hole Ravine Road surface in good condition	LHRR6: Blue rope on sides of the road denoting clearing area (clearing completed and regrowth occurring)

Site inspection Photos – Lobs Hole Ravine Road 3 February 2022

		
LHRR7 : Recently completed wildlife underpass (low side) (one of 6 being constructed)		LHRR8: Recently completed wildlife underpass (high side)
		
LHRR9: Stabilised batters		LHRR710: Road widening activities in progress – Lobs Hole Ravine Road
		
LHRR11: Stabilisation of batter and ongoing road widening activities along Lobs Hole Ravine Road		LHRR12 Fossil beds – Lobs Hole Ravine Road

4.2.2. Site Inspection Photographs – Lobs Hole

Site inspection Photos – Lobs Hole 3 February 2022	
	
LH1 and LH2: Fuel Farm. Noted ingress of water – roofing is not sufficient to prevent ingress of water during heavy rain	
	
LH3: Sediment basin – Lobs Hole	LH4: Process water treatment plant
	
LH5: Tunnel water monitoring instrumentation	LH6: IBC of sulphuric acid within bund at water treatment plant
	
LH7: Tunnel spoil – excavated from Main Access Tunnel (MAT) Portal tunnel -	LH8: MAT Portal – length was approximately 1km at the time of the audit. Segments for installation in the tunnel

Site inspection Photos – Lobs Hole 3 February 2022

	
LH9: Chemical stores area. Noted that SDSs were out of date and no list of chemicals was in place (see NC)	LH10: Chemical storage container - contractors
	
LH11: Inside the chemical storage container.	LH12: Road between MAT Portal and Exploratory Camp – sediment basins full due to recent heavy rain events.
	
LH13, and LH24: Sodium Hydroxide stored in a bund with acids (incompatible) at the STP. This was identified as an issue at the previous audit (see NC)	

Site inspection Photos – Lobs Hole 3 February 2022

	
LH15: Water truck – near Main Camp - spraying road for dust suppression	LH16: Topsoil stockpile – signage - :Clean topsoil
	
LH17: View of Main Camp	LH18: Blue rope signifies clearing boundary. Beyond the trees (outside the boundary) is the heritage cemetery.
	
LH19: Flagging and no entry sign – no go area along road towards Lobs Hole Ravine Road North	LH20: Gated entry to Lobs Hole Ravine Road North (restricted access). Notice says “ Ravine Road North will be closed to all traffic from 7am to 5.30m 7 days per week”

Site inspection Photos – Lobs Hole 3 February 2022



LH21: View towards Talbingo intake and Adit works



LH22: Talbingo Reservoir / Yarrangobilly River



LH23 and LH24 Reverse Osmosis water treatment plant. It was not discharging at the time of the audit. A generator is on site, however will soon be mains powered



LH25 and LH26: EPL RO Outlet sample point 12. At the time of the audit, a report was being prepared for mixing zone validation.

Site inspection Photos – Lobs Hole 3 February 2022

	
LH27: Talbingo Adit area – laying foundations and basin	LH28: Silt curtains in place near the Talbingo intake area
	
LH29: Old / backup water intake pump area – now has permanent bunding. Audit#1 identified inadequate bunding – now fixed. Intake was operating on the day of the audit	LH30: Water intake from Talbingo (old / backup)
	
LH31 and LH32: Western Spoil Emplacement Area	
	
LH33 and LH34: Western Spoil Emplacement area.	

4.2.3. Site Inspection Photographs – Marica

Site inspection Photos – Marica Access road, Office Pad, HDD Pad, Surge Shaft and Camp 2 February 2022	
	
MC1: Access point to Marica from Snowy Mountains Highway	MC2: Culvert and roadway over Dip Creek
	
MC3: "Fish windows" installed in culvert – Dip Creek (also installed at other creek crossings.)	MC4: Road to Marica showing various stages of road construction
	
MC5: Wheel wash-down on Marica Road (towards Marica site)	MC6: Example of detention basin and erosion and sediment control measures. There had been heavy rainfall events over the weeks prior to the site visit.

Site inspection Photos – Marica Access road, Office Pad, HDD Pad, Surge Shaft and Camp
2 February 2022

	
MC7: EPL 26 – Water quality monitoring point	MC8: Basin and sediment controls near Marica Trunk services work – coir log working but requires maintenance.
	
MC9: Marica Office Pad with generator set up in a bunded area	MC10: View of Marica Office Pad area
	
MC11: Marica Office Pad – waste bins	MC12: Marica Office Pad – flammable liquids storage container

Site inspection Photos – Marica Access road, Office Pad, HDD Pad, Surge Shaft and Camp

2 February 2022



MC13: Inside the flammable storage container – bunded, chemicals / fuels compatible



MC14: Spill kits provided at the Marica Office Pad – general purpose



MC15: Access road to Horizontal Directional Drilling (HDD) site



MC16: Access road to HDD site



MC17: Area recently cleared – route to HDD pad



MC18: Habitat tree placed outside the clearing boundary near HDD pad area

Site inspection Photos – Marica Access road, Office Pad, HDD Pad, Surge Shaft and Camp
2 February 2022



MC19: HDD pad area – pointing towards Lobs Hole. Use of HDD will avoid clearing of steep terrain

MC20: HDD track – cross drain diverting water off the roadway to small sediment basins



MC21: Marica Surge Shaft pad area. Site offices to be erected at the front of the cutting



MC22: View of Marica Surge Shaft pad under construction. The area will first be filled, then the surge shaft will be excavated through to the tunnel.

Site inspection Photos – Marica Access road, Office Pad, HDD Pad, Surge Shaft and Camp
2 February 2022



MC23: Water tank and pump on access road to Surge Shaft

MC24: Pump installed at water tank. It requires bunding to contain any spills / leaks.



MC25: Small sediment basin on edge of access road

MC26: Access road construction- "Steep 1"



MC27: Marica Camp – under construction – seeding / revegetation of batters appears to be successful to date

Site inspection Photos – Marica Access road, Office Pad, HDD Pad, Surge Shaft and Camp

2 February 2022



MC28 and MC29: Refuelling of plant in progress. Portable bund / plant nappy used to contain potential spills. Spill materials were on hand nearby in refuelling truck



MC30: Bunded pad for generators and fuel storage – Marica Camp

MC31: Water bottles for collection at Marica Camp. Bottled water was the main source of drinking water at most sites.

4.2.4. Site Inspection Photographs – Tantangara

Site inspection Photos – Tantangara Road, Tantangara Dam, Portal and Construction Compound, Spoil Road, Cofferdam and Water Intake, Accommodation Camp 2 February 2022	
	
TT1: Tantangara Road turnoff from Snowy Mountains Hwy	TT2: Tantangara Road – Access road, road work signage at intersection with Snowy Mountains Highway
	
TT3: Traffic control signage, traffic conditions, maximum speed	TT4: Traffic control signage, radio channel
	
TT5: Project vehicles using lights and flags in foggy conditions	TT6: Tantangara Road showing various stages of road construction; hollow bearing habitat trees are marked with an "H"
	
TT7: Sediment controls on Tantangara Road	TT8: Minor subsidence at a creek on Tantangara Rd
	
TT9: Overview of Accommodation Camp	TT10: Overview of Construction compound on Tantangara Dam

Site inspection Photos – Tantangara Road, Tantangara Dam, Portal and Construction Compound, Spoil Road, Coffer Dam and Water Intake, Accommodation Camp 2 February 2022

	
TT11: Silt curtains - Tantangara Dam	TT12: Overview of Tantangara construction compound, dam and coffer dam
	 
TT13: Weeds requiring control – Tantangara	TT14: Brumbies on Tantangara Road and on topsoil stockpiles. Brumbies have frequently damaged boundary ropes and markers.
	
TT15: Tantangara coffer dam; silt curtains	TT16: Tantangara construction compound
	
TT17: Environmental awareness communication on site notice board (snakes, fauna strike prevention, water management, chemical management)	TT18: Overview of construction work on Portal wall

Site inspection Photos – Tantangara Road, Tantangara Dam, Portal and Construction Compound, Spoil Road, Cofferdam and Water Intake, Accommodation Camp 2 February 2022

	
TT19: Stabilisation of batter	TT20: Clean top soil stockpile, clearly marked (signposted), hydromulched
	
TT21: Traffic control in construction site	TT22: Equipment - inspected
	
TT23: Chemical storage at receiving area, not bunded	TT24: One of various sediment basins near Tantangara Reservoir (each were numbered)
	
TT25: 3 Spoil Road to Peninsula Emplacement Area, clean water diversion, sediment controls in place	TT26: Stabilisation of batter, hydromulched
	
TT27: Boundary demarcation (blue rope) – No entry: Environmental Protection Zone	TT28: Spoil Road to Peninsula Emplacement Area, sediment controls, dam side

Site inspection Photos – Tantangara Road, Tantangara Dam, Portal and Construction Compound, Spoil Road, Coffer Dam and Water Intake, Accommodation Camp 2 February 2022

	
TT29: Subsoil stockpile (not signposted)	TT30: Water diversion into sediment basin, dewatering pump, bunded
	
TT31: Coffer dam sediment basin	TT32: Coffer dam under construction
	
TT33: Tantangara Accommodation Camp	TT34: Tantangara Accommodation Camp water treatment plant
	
TT35: Stabilisation of batter; hydromulched	TT36: Fire trailer at Accommodation Camp
	
TT37: Tantangara site office and lunch room	TT38: Weed and seed control: vehicle wash down signage

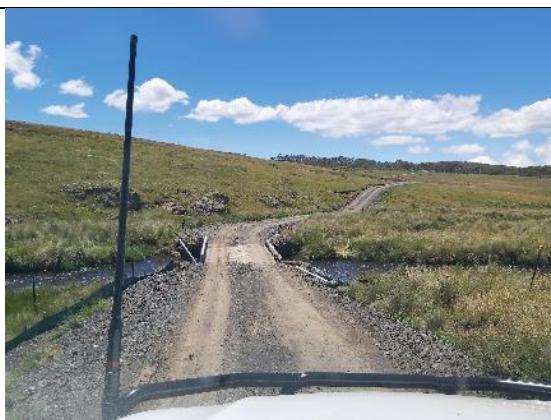
Site inspection Photos – Tantangara Road, Tantangara Dam, Portal and Construction Compound, Spoil Road, Cofferdam and Water Intake, Accommodation Camp 2 February 2022

	
TT39: Sediment basin, water used for wash down station	TT40: Tantangara wash down station; not operational at the time of the site inspection due to water pump malfunction and had they also run out of water.

4.2.5. Site Inspection Photographs – Trunk Services

Site inspection Photos – Trunk Services – Gooandra Trail - 2 February 2022			
		TS1: Site offices – Trunk Services near Gooandra Fire trail	
TS2: Wheel wash – used on exit from the trunk services / Gooandra fire trail back to Snowy Mountains Highway.			
TS3: Chemical storage at Trunk Services site offices		TS4: Chemicals stored within bunded container – SDSs were available and in date.	
		TS5: Site sheds and pump on bunded pallet – Gooandra trail	
TS6: Stonewall IBC – stored on undersized bunded pallet Gooandra fire trail in the vicinity of Eucumbene River (full of water – no capacity to contain a spill)			

Site inspection Photos – Trunk Services – Gooandra Trail - 2 February 2022

	
TS7: Eucumbene River crossing – Gooandra Trail	TS8: Sediment controls - Gooandra
	
TS9: Recent disturbance – Gooandra trail	TS10: Jute mesh stabilising batter, recent clearing works on RHS of Gooandra Trail
	
TS11: Tantangara Creek crossing – Gooandra Trail	TS12: Mulching and natural vegetation regrowth on verge following installation of services

4.2.6. Site Inspection Photographs – Rock Forest

Site inspection Photos – Rock Forest 2 February 2022	
	
RF1: Entrance to Rock Forest site – Variable message sign near front boundary on Snowy Mountains Highway	RF2: Covid-19 testing area – main activity on the site at the time of the audit.
	
RF3: View of completed hard stand / laydown area. The area will be used by truck park-up during inclement weather, particularly during winter. The site has not yet been used for tunnel spoil stockpiling.	
	
RF4: View of site drainage installation with stabilisation.	RF5: Close-up view of stabilisation along drainage line

Site inspection Photos – Rock Forest 2 February 2022	
	
RF6: View of retained topsoil stockpile at rear of hardstand / laydown area.	RF7: View towards rear of the property where the stockpile area will be established in the future (beyond the trees in the foreground)
	
RF8: View of retained stockpile. It was observed that weed control is required (overdue) at Rock Forest and other sites	RF9: Sediment basin on the Rock Forest site. It was noted that there had been heavy rain events over the days prior to the site visit.

5.0 Appendix A – Audit Attendance Register

NAME	ORGANISATION	POSITION	ENTRY	EXIT
Chris Buscall	Snowy Hydro	Environment Lead	✓	✓
Ben Croome	Snowy Hydro	Environment Coordinator	✓	✓
Ellen Porter	FGJV	Environmental Manager	✓	
Jessica Adams	FGJV	Environmental Design Review	✓	✓
Other audit participants			✓	
Emily Martin	Snowy Hydro	Environmental Engineer	✓	
Jordan Chenery	Snowy Hydro	Environmental Advisor	✓	
Lachlan Bollen	Snowy Hydro	Scientist - Project Water & Spoil Management	✓	
Kobus Meulenbroeks	FGJV	Environmental Coordinator	✓	
Maree Zannis	FGJV	Environmental Coordinator – Lobs Hole	✓	
Mahlea Ryan	FGJV	Environmental Advisor - Tantangara	✓	
Nathan Jones	FGJV	Environmental Coordinator – Polo Flat		
Colin Brooks	FGJV	Dewatering supervisor – Lobs Hole	✓	
Len Dequin	FGJV	Storeman – Lobs Hole MAT Portal	✓	
Marianne McCabe	FGJV	Community and Stakeholder Engagement Manager	✓	
Ellen Rummery	FGJV	Traffic & Transport Coordinator	✓	
Jenny Thornton	FGJV	Safety Officer	✓	
Dennis Buzzi	FGJV	Maintenance of Plant and Equipment	✓	
Isabella Mejia Echeverri	FGJV	Construction and Environment – Spoil Management – Lobs Hole	✓	

6.0 Appendix B – Independent Audit Declaration Forms

Project Name: Snowy 2.0 Main Works

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

Declaration of Independence - Auditor

Project Name: *Snowy 2.0 Main Works*

Consent Number: *SSI 9687*

Description of Project: *The development of an underground power station and associated infrastructure*

Project Address: *Various locations generally between Talbingo and Tantangara Reservoirs in the NSW Snowy Mountains*

Proponent: *Snowy Hydro Limited*

Date: *13 October 2021*

I declare that:

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

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 Proposed Auditor: *Cecilia Caselia*



Signature

Qualification: *Certified by SAI Global, Bureau Veritas and TQCSI as Lead Environmental Auditor (Exemplar Global application in progress)*

Company: *Dickson Environmental Consulting and Audit P/L (DECA) (as subcontractor)*

7.0 Appendix C – Planning Secretary Audit Team Agreement



Mr Ben Croome
Snowy Hydro Ltd
Senior Environmental Advisor Snowy 2.0
PO Box 332
Cooma New South Wales 2630

25/11/2021

Dear Mr Croome

Snowy 2.0 - Main Works - CSSI-9687
Independent Environmental Audit (IEA) #3 Audit Team Endorsement Request

I refer to your request (SSI-9687-PA-41) submitted to the Department of Planning, Industry and Environment (the Department) on 22 November 2021 for the Secretary's approval of suitably qualified persons to undertake the Independent Environmental Audit (IEA) #3 for the Snowy 2.0 - Main Works (the project) in accordance with Schedule 4 Condition 9 of CSSI-9687 (the consent).

The Department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, in accordance with Schedule 4 Condition 9 of the Consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team from Dickson Environmental Consulting and Audit Pty Ltd to undertake the IEA and prepare the Audit report;

- Ms Julie Dickson – Lead Auditor and
- Ms Celicia Ines Caselia – 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.

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 'Katrina O'Reilly'.

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

8.0 Appendix D – Audit Plan and Scope

Audit Plan and Scope - Snowy Hydro 2.0 Audit # 3

Project:	Snowy Hydro 2.0		
Audit Title:	Independent Environmental Audit – Environmental Compliance #3		
Auditors:	Julie Dickson (Lead), Cecilia Caselia (Auditor) DECA Pty Ltd		
Date (s) of Audit:	31 January to 4 February 2022		
Time:	08.30 – 16.30 (approx.) daily		
Location (s):	Cooma: Snowy Hydro Office Cooma: Future Generation Joint Venture Office Site visits to: Lobs Hole, Tantangara, Marica, surge shaft, trunk services, Rock Forest		
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 all relevant conditions of consent, commitments made in the approved Management Plans, Environment Protection Licence (EPL) conditions, and EPBC 2018-8322 Approval conditions. Scope will also include: Areas identified in Audit #2 as “ <i>areas to be assessed at next / future audits</i> ”, “ <i>follow-up on areas of non-compliance / observation / Opportunities for improvement</i> ” 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)	DPIE: Erosion and sediment controls, roads upgrades/signoff, biodiversity & water monitoring as per respective management plans; NPWS: Pest and weed control/vehicle hygiene, incident, overtopping and non-compliance reporting, links between Management Plans, design & procedures, trunk services installation (spoil and water quality monitoring), public traffic information on website, parking on public roads, Natural Hazard Mgmt Plan; BCD: Biodiversity monitoring and provision of information to the agency – concerns over lack of detail and information provided as required by DAWE / Fisheries / TFNSW: TBC		
Audit Invitees (Required)	Name:	Organisation	Role
	Chris Buscall	Snowy Hydro	Environment Manager
	Ben Croome	Snowy Hydro	Senior Environmental Advisor
	Hugh Goymour	Snowy Hydro	Environmental Advisor
	Lachlan Bollen	Snowy Hydro	Environment Scientist
	Emily Martin	Snowy Hydro	Environment Engineer
	Jordan Chenery	Snowy Hydro	Environmental Advisor
	John Weir	FGJV	Project HSSE Manager
	Ellen Porter	FGJV	Environment Manager
	Mahlea Ryan	FGJV	Environment Coordinator
	Kobus Meulenbroeks	FGJV	Environment Coordinator
	Nathan Jones	FGJV	Environment Coordinator
	Maree Zannis	FGJV	Environmental Coordinator
Invitees (Optional)	Kieran Cusack	Snowy Hydro	Project Director

AUDIT PLAN - Day 1

DAY 1 – Monday 31 January 2022				
Indicative time	Agenda item / Areas for review	Proposed attendees	Auditor	
			JD	CC
8.30 – 9.00 am	Opening meeting (at FGJV Office – SHL to dial in) <ul style="list-style-type: none"> • Introductions, confirmation of scope, criteria, arrangements, methodology, logistics • Overview of project issues / progress / background 	All SHL and FGJV	X	X
9.00 – 09.15	Overview of current FGJV activities, planned / actual updates to Management Plans, high level overview of issues / challenges / interactions with regulators, communications / reporting to SHL, subcontractor management, compliance tracking.	FGJV Ellen Porter	X	X
9.15 – 10.45	<ul style="list-style-type: none"> – Review of actions taken to address previous audit findings relevant to FGJV; – Review of FGJV corrective action processes and responses to SHL site instructions, SHL and internal audit findings / regulator requests; – Communications with Proponent (SHL) 	FGJV Ellen Porter Others as required	X	
9.15 – 10.45	Environmental Management Strategy (Sch 4) implementation: <ul style="list-style-type: none"> – Environmental inspections (incl. joint with SHL); – Environmental Training and awareness, inductions, toolbox talks – Complaints management; – Incident reporting to SHL / Regulators (Sch 4 C6) – Reporting of non-compliances to SHL / Regulators (Sch 4 C7) – Monthly Environmental Reports to SHL; – Reporting of adverse traffic interactions (to SHL & Road authorities); – Administration Conditions - Schedule 2 – Protection of Infrastructure (Cond 12); – Plant and equipment maintenance (Cond 13) 	FGJV Environment Team member		X
10.45 – 12.30	<ul style="list-style-type: none"> – Reporting on environmental performance (Sch 4 C8) – Monitoring and Reporting (various Plans) including: <ul style="list-style-type: none"> ○ Quarterly vehicle movement summary report (TMP); ○ Spoil volumes (Spoil MP); ○ biodiversity (BMP); Quarterly Environmental water report (Water MP).	FGJV Ellen Porter Others as required	X	
10.45 – 12.30	Environment Protection Licence (EPL) compliance <ul style="list-style-type: none"> – Operating and general conditions, selected discharge, limit, monitoring and special conditions relevant to FGJV; – Reporting EPL requirements to SHL, EPA, regulators, EPL monitoring – monthly results upload to website and 6 monthly Environmental Monitoring Report 	FGJV Environment Team member		X
12.30 – 13.15	Break			
13.15 – 14.00	Follow-up on previous Audit #2 findings – actions and status (SHL component):	SHL Chris Buscall	X	
13.15 – 14.15	– Demolition, structural adequacy, protection of infrastructure (NSW Sch 3 C1-13);	Ben Croome		X

DAY 1 – Monday 31 January 2022				
Indicative time	Agenda item / Areas for review	Proposed attendees	Auditor	
			JD	CC
	<ul style="list-style-type: none"> – Threatened Fish Mgmt Plan, (NSW Sch 3 C 20 – 27) – Aquatic ecology, biosecurity, (Inc EPBC C12 – 16) – Recreational Mgmt Plan (NSW Sch3 C37-40) – Heritage – archival recording, salvage (Sch 3 C34) 			
14.00 – 16.00	<ul style="list-style-type: none"> – Biodiversity - offset payment, additional offset (NSW Sch 3 C12-16), – Sch 3 C17, BMP requirements including: <ul style="list-style-type: none"> ○ Seed collection; ○ Underpass construction / fauna strike; ○ Biodiversity monitoring and reporting; ○ GDE / groundwater monitoring / drawdown triggers as relevant to SHL; ○ Annual report – Biodiversity Monitoring Plan reqts (App B - BMP) EPBC (C1 – 11), changes to NSW approval (C26, 27) 	Chris Buscall Lachlan Bollen Hugh Goymour	X	
14.15 – 16.00	<ul style="list-style-type: none"> – Water supply, water pollution (NSW Sch 3 C29-32) – Reporting of incidents (including traffic) and notification (NSW Sch 4 C6, EPBC C34, 35) – Reporting of non-compliances (Sch 4 C7) 	Ben Croome		X
16.00 – 16.30	Auditor consolidation of notes	Auditors	X	X
16.30 – 16.45	End of Day 1 debrief audit progress and outcomes to date (if required).	As required	X	X

AUDIT PLAN - Day 2

DAY 2 – Tuesday 1 February 2022

Indicative time	Agenda item / Areas for review	Proposed attendees	Auditor	
			JD	CC
8.30 – 12.00	<ul style="list-style-type: none"> – Terms of approval – DPIE requirements, lapse of approval, surrender of approval (Sch 2 C1-13) – Digital Strategy (Sch 3 C1 – 3) – Rehabilitation Plan, Objectives (NSW Sch 3 C9 – 11, EPBC C 25); – Transport – road upgrades / sign-off (Sch 3 C41, 42(a), Long-term road strategy (C 50); – Notification of dates, reporting on performance, compliance tracking, independent audit Sch 4 (C6, 8, 10, 11) 	Snowy Hydro Chris Buscall	X	
8.30 – 12.00	<ul style="list-style-type: none"> – Environment Protection Licence (EPL): Administrative and reporting conditions, selected discharge, limit, and monitoring conditions relevant to SHL, Annual returns; – Uploading monitoring information to public website; – Access to Information (Sch 4 Cond 12) 	Snowy Hydro Ben Croome		X
12.00 – 12.45	Break			
12.45 – 13.30	<p>FGJV</p> <p>Trunk Services management – plans, procedures, processes, locations, implementation, planning for site visit</p>	FGJV Ellen Porter Others as required	X	
12.45 – 13.30	<ul style="list-style-type: none"> – Water, Surface water, Process and wastewater treatment plants, discharge points, ESCPs, reporting (Sch 3 C29 – 32) – EPBC - water resources (C17-20) 	FGJV Environment Team member?		X
13.30 – 16.00	<p>Flora and fauna / biodiversity (Sch 3 C 17, 16, Biodiversity Management Plan including:</p> <ul style="list-style-type: none"> – Tracking of limits on disturbance areas and native vegetation clearing (Cond 5); – Clearing permits/registers, – Fauna strike; – Weeds, pathogens, pests (including Weed, Pest and Pathogen Management Plan requirements) – Light spill; – Bushfire risk; – Unexpected finds; – Salvage; – Fauna relocation. 	FGJV Ellen Porter Others as required	X	
13.30 – 16.00	<ul style="list-style-type: none"> – Spoil Management (Sch 3Cond 4 - 8) – tracking, classification, planning, topsoil and subsoil separation, characterisation & assessment; – Transport and Traffic management, congestion, parking, website traffic updates, implementation of TMP; – Emergency / Natural Hazards / bushfire management, annual review and consultation on NHMP; – Noise management (Rock Forest CNMP), general; – Visual Impact Management Plan. 	FGJV Environment Team member		X
16.00 – 16.30	Auditor consolidation of notes	Auditors	X	X
16.30 – 16.45	End of Day 2 debrief audit progress and outcomes to date (if required).		X	X

AUDIT PLAN – DAYS 3,4 and 5

DAY 3 – Site Visits - Wednesday 2 February (Auditor – Julie Dickson)		
Indicative time	Agenda item / Areas for review	Proposed attendees
TBC	Travel to site	
All day (incl break)	Visit to sites: Rock Forest, Marica, Marica camp, surge shaft, trunk services (various locations). To include all areas of sites, interviews with relevant personnel, review of site-based documentation.	Environmental Coordinator: Mahlea Ryan. Others including: <ul style="list-style-type: none"> – Plant / Maintenance Supervisor – Ecologist – Operator (s) – Refueller – Site Supervisor – Random subcontractor(s)
16.00 – 16.15	Site debrief (if possible or if required). Return to accommodation Cooma	

DAY 3 – Site Visits - Wednesday 2 February (Auditor – Cecilia Caselia)		
Indicative time	Agenda item / Areas for review	Proposed attendees
TBC	Travel to site	
All day (incl break)	Visit to sites: Tantangara To include all areas of sites, interviews with relevant personnel, review of site-based documentation.	Environmental Coordinator: Nathan Jones Others including: <ul style="list-style-type: none"> – Plant / Maintenance Supervisor – Ecologist – Operator (s) – Refueller – Site Supervisor – Random subcontractor(s)
16.00 – 16.15	Site debrief (if possible or if required). Return to accommodation Cooma	

DAY 4 – Site Visit - Thursday 3 February
(Auditors – Julie Dickson & Cecilia Caselia)

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

DAY 5 – Friday 4 February (Auditors – Julie Dickson & Cecilia Caselia)

Indicative time	Agenda item / Areas for review	Proposed attendees
AM	<p>Follow-up on audit trails, revisit site / visit other sites / locations</p> <p>Flexible schedule for the day – to be planned Thursday pm or Friday am</p>	TBC
PM	Preparation for closing meeting	Auditors
4.00pm	<p>Closing meeting – presentation of overview of outcomes and summary of findings to date.</p> <p>Full interim findings to be issued approximately one week following completion of audit on site</p>	All (Snowy Hydro and Future Generation)

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

APPENDIX F – AUDIT TABLES

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

TABLE A – SCHEDULE 2 – ADMINISTRATIVE CONDITIONS

TABLE B – SCHEDULE 3 – General / Digital Strategy

TABLE C- SCHEDULE 3 – Spoil Management and Rehabilitation

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

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

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

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

TABLE H – Environment Protection Licence conditions

9.0 Appendix F – Snowy 2.0 Independent Audit Tables

TABLE A – SCHEDULE 2 – ADMINISTRATIVE CONDITIONS

ID	S2 - CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 2 - ADMINISTRATIVE CONDITIONS					
1.	1	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT In meeting the conditions of this approval, the Proponent must implement all feasible and reasonable measures to prevent, and if prevention is not feasible or reasonable, minimise any material harm to the environment that may result from the construction, operation, decommissioning or rehabilitation of the development.	Overall audit outcome Site inspection	Feasible and reasonable measures were being implemented to minimise harm to the environment.	Compliant
2.	2	TERMS OF APPROVAL The Proponent must carry out the development: generally, in accordance with the Exploratory Works and Main Works; and a) in accordance with the conditions of this approval. Notes: <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>		The development was being generally carried out in accordance with the conditions or approval, however non-compliances have been raised and non-compliances remain open from the previous audit. Details of non-compliances and the associated required actions are documented within these audit tables and in the IEA report. Although a non-compliance was raised against this condition in previous audits, it was considered unnecessary to re-raise a non-compliance at this audit as no actions to address it are required.	Compliant
3.	3	TERMS OF APPROVAL If there is any inconsistency between the above documents, the most recent document will prevail to the extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency.		Noted - no compliance requirements	Not triggered
4.	4	TERMS OF APPROVAL The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence submitted in accordance with this approval; b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and c) the implementation of any actions or measures contained in these documents.	Show Cause letter from DPIE dated 3 November 2021, alleging a breach of section 4.2(1)(b) of the EP&A Act. SHL response Show Cause letter dated 19 November 2021 with a detailed response (442-page document comprising an 11-page letter with various annexures)	A Show Cause letter was issued by the Department, and a response was provided by SHL. The issue had not yet been fully resolved or determined. The Show Cause letter was in response to a non-compliance raised at IEA#2 and the non-compliance remains open.	Compliant
5.	5	LIMITS ON APPROVAL Restrictions on Disturbance Area and Native Vegetation Clearing	S2-FGJV-ENV-LST Master Tracker Clearing Register WebGIS	Clearing Limits Register, WebGIS and other evidence sighted indicate that the clearing and disturbance areas are currently being complied with.	Compliant

ID	S2 - CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status												
SCHEDULE 2 - ADMINISTRATIVE CONDITIONS																	
		<p>The Proponent must comply with the restrictions in Table 1 below:</p> <p><i>Table 1: Restrictions on Approval¹¹</i></p> <table border="1"> <thead> <tr> <th>Matter</th> <th>Exploratory Works^a</th> <th>Main Works^a</th> <th>Total^b</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><i>Note: The areas in Table 1 relate to direct disturbance and clearing and do not include the indirect impacts of this disturbance and clearing.¹¹</i></p>	Matter	Exploratory Works ^a	Main Works ^a	Total ^b	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	Clearing Limits Register (last data update 24/10/2021)		
Matter	Exploratory Works ^a	Main Works ^a	Total ^b														
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														
6.	6	STAGING The Proponent may construct, operate, and decommission the development in stages. When staging occurs, the Proponent is only required to comply with the conditions of this approval that are relevant to the specific stage/s.		Noted - no compliance requirements	Compliant												
7.	7	LAPSE OF APPROVAL This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.	Infrastructure Approval CSSI 9687 - Snowy Hydro Main Works dated 20 May 2020.	Construction works commenced in October 2020 which is well within the 5 year timeframe.	Not triggered												
8.	8	SURRENDER OF APPROVAL 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>Letter from FGJV to Snowy Hydro dated 16/05/2021: Surrender of Exploratory Works Approval (CSSI9208) outlining updated plans and those that may require discussion or clarification with DPIE.</p> <p>Letter from Snowy Hydro to DPIE dated 17/08/2021: RE: Surrender of Exploratory Works Approval CSSI 9208</p> <p>Email: Snowy 2.0 Exploratory Works - Surrender of Approval from DPIE to Snowy Hydro dated 27/09/2022 - re: the approach to surrender of Exploratory Works Approval requires consultation with NPWS and approval of Workers Recreation Management Plan.</p> <p>Email: Snowy 2.0 Exploratory Works - Surrender of Approval - Drafting of Notice for DPIE from Snowy Hydro to NPWS dated 12/01/2022 requesting a statement from NPWS consenting to the surrender.</p>	<p>It was reported at the previous audit that a 4 month extension was granted to 21 Aug 2021.</p> <p>Surrender request was submitted 17/08/2021 in the DPIE Portal</p> <p>Correspondence and reported discussions noted that Exploratory Works approval cannot be surrendered until the Workers Recreation Management Plan requirements are captured.</p> <p>It appears that the Exploratory Works approval cannot be surrendered until the Main Works Worker Recreation Management Plan has been approved.</p> <p>No formal response from NPWS regarding the statement to consent to the surrender had been received at the time of the audit.</p>	Non-compliant												
9.	9	SURRENDER OF APPROVAL Prior to surrendering the infrastructure approval (CSSI 9208) for the Exploratory Works, the Proponent must update the approved management plans for the development to incorporate the	Letter from FGJV to Snowy Hydro dated 16/05/2021: Surrender of Exploratory Works Approval (CSSI9208) outlining updated plans and those that may require discussion	At the time of the audit, the Exploratory Works Approval had not yet been surrendered. It appears that the Exploratory Works approval cannot be surrendered until	Non-compliant												

ID	S2 - CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 2 - ADMINISTRATIVE CONDITIONS					
		approved management plans for the Exploratory Works to the satisfaction of the Planning Secretary.	or clarification with DPIE. Letter from Snowy Hydro to DPIE dated 17/08/2021: RE: Surrender of Exploratory Works Approval CSSI 9208 Email: Snowy 2.0 Exploratory Works - Surrender of Approval from DPIE to Snowy Hydro dated 27/09/2022 - re: the approach to surrender of Exploratory Works Approval requires consultation with NPWS and approval of Workers Recreation Management Plan. Email: Snowy 2.0 Exploratory Works - Surrender of Approval - Drafting of Notice for DPIE from Snowy Hydro to NPWS dated 12/01/2022 requesting a statement from NPWS consenting to the surrender.	the Main Works Worker Recreation Management Plan has been approved.	
10.	10	DEMOLITION The Proponent must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Interviews; Site inspection	It was advised that no structure has been demolished in the last 6 months and there are no plans to undertaken any demolition in the upcoming 12 months.	Not triggered
11.	11	STRUCTURAL ADEQUACY The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA; and where the BCA is not applicable, the relevant Australian Standard. Notes: <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>	Construction and occupation certificates for the development e.g. Building Completion Statement – Building Completion Certificate (BCC) No. 9480.1-01-2020-BCC; Date: 25/04/2020; Property: Snowy Hydro 2.0 – Fly Camp, Lobs Hole Ravine Road, Pinbeyan Email from Chris Buscall (17/02/22).	SHL considers that this condition does not apply to infrastructure such as the underground hydropower station or a tunnel as it will not be occupied. FGJV have Occupation Certificates for project camps. Examples of Building Completion Certificate (BCC) were sighted. No further evidence was gathered and it appears to be compliant based on the information available.	Compliant
12.	12	PROTECTION OF INFRASTRUCTURE Unless the Proponent and the applicable authority agree otherwise, the Proponent must: a) repair, or pay the full cost associated with repairing, any public infrastructure that is damaged by the development; and b) relocate, or pay the full cost associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Interview - SHL & FGJV Email from FGJV Transport Dept to NPWS with attached photo dated 10/03/2022 noting that repairs had been completed today.	Evidence was provided of repair of a barrier damaged by a truck at the entrance to Ravine Road.	Compliant
					Not triggered

ID	S2 - CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 2 - ADMINISTRATIVE CONDITIONS					
		<i>Note: This condition does not apply to any damage to roads caused by the development.</i>			
13.	13	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;	Site inspection - workshops, operation of plant and equipment Interviews - Equipment Maintenance and Hours Control Schedule Hourly Service Reports Quarterly Inspections Pre-Start Inspection Checklists	At the last audit, an opportunity for improvement was raised for FGJV to continue to implement a program to investigate and minimise the frequency of minor spills, particularly from hydraulic hoses. Improvements have been made including cleaning down equipment prior to weekly inspections to better detect potential leaks	Compliant
		b) operated in a proper and efficient manner; and	Site inspection.	The site inspection did not identify any areas in which plant were not operated in a proper and efficient manner.	Compliant
		c) kept free of weeds, seeds and pathogens when entering or leaving the site.	Follow-up of previous findings Site inspections	This condition has been deemed non-compliant at the last two (2) audits. Refer to follow-up audit findings and non-compliances (07/21/NC2) (also NC under Sch 4 Cond 11)	Non-compliant

TABLE B – SCHEDULE 3 -- General / Digital Strategy

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – GENERAL / DIGITAL STRATEGY						
14.	1		<p>The Proponent must:</p> <ul style="list-style-type: none"> a) consolidate all the information presented in the documents prepared for the Exploratory Works and Main Works (see definitions) in a single, open source database; b) supplement this information over time with the information that must be gathered and made public under the conditions of this approval; c) prepare a detailed archival record of all phases of the development; and d) make this information publicly available. 	<p>“Digital Strategy and Application Project” proposal prepared by Coordinate (sighted at previous audit)</p> <p>Letter from SHL to Director - Energy Assessments, DPIE dated 21 July 2021 - RE; CSSI 9687 Snowy 2.0 Main Works Digital Strategy (submission to the Department).</p>	<p>As the Digital Strategy is not yet complete (see Cond 2 below), this condition has not been triggered)</p>	Not triggered
15.	2		<p>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:</p> <ul style="list-style-type: none"> a) be prepared in consultation with the NPWS; b) identify innovative ways to give effect to the requirements in condition 1 above; and c) include a program to develop a digital application for users of the Kosciuszko National Park to bring key information to life in an interactive way and enhance the enjoyment of the park. 	<p>Letter from SHL to Director - Energy Assessments, DPIE dated 21 July 2021 - RE; CSSI 9687 Snowy 2.0 Main Works Digital Strategy (submission to the Department).</p> <p>Communication from DPIE from major project email: Snowy 2.0 - Main Works - Post Approval Document Received (SSI-9687-PA-31) acknowledging receipt of Digital Strategy.</p> <p>Communication from DPIE via major projects email dated 1 November 2021: Snowy 2.0 - Main Works - Digital Strategy - More Information Required.</p>	<p>The previous IEA determined that this condition was non-compliant due to the Digital Strategy not being submitted within the required time-frame. (07/21/NC3)</p> <p>Since the last audit, communications have been sent by DPIE to SHL requesting additional information.</p> <p>The communication from DPIE dated 1 November 2021 requested the following additional information before accepting the document:</p> <ul style="list-style-type: none"> * include feedback and outcomes of consultation with NPWS regarding delivery of the Digital Strategy; * Provide firmer timeframes for how frequently the information will be supplemented over time as per Condition 1(b) of Schedule 3; * Provide clearer timeframes on the proposed staged delivery of the Digital Strategy; * Digital Strategy Program should provide firmer timeframes and details on how and when this information will be provided to NPWS for integration into a digital application as per Condition 2 (c) of Schedule 3. <p>The communication requested that a meeting be arranged with the Department prior to re-submitting the Strategy for further discussions.</p> <p>The Digital Strategy is not yet developed "to the satisfaction of the Planning Secretary" and therefore continues to be non-compliant to this condition.</p>	Non-compliant
16.	3		The Proponent must implement the approved Digital Strategy for the development.		Not triggered	Not triggered

TABLE C- SCHEDULE 3 – Spoil Management and Rehabilitation -

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
17.	4		SPOIL MANAGEMENT Spoil Management Requirements The Proponent must: <ul style="list-style-type: none"> a) minimise the spoil generated by the development; 	<p>Spoil Management Plan (SPM), section 6.2.1. Minimisation</p> <p>Examples of site maps verified included:</p> <ul style="list-style-type: none"> - S2-CIV-AI-LHS-0001 (Rev 2, issue for construction, date stamp: 19/10/2021) LH Spoil Disposal Area - Final Landform - General Arrangement Plan; - Snowy 2.0 WebGIS images - MetroMap - Snowy Hydro Site - Main Block (13-12-2021) (e.g. Aerial Overlay Dec 21 LH (Lobs Hole); Aerial Overlay Dec 21 MAR (Marica); Aerial Overlay Dec 21 TAN (Tantangara)). 	<p>Spoil Management Plan (SPM) indicates that the amount of spoil generated will be reduced through design optimisation. Material will only be excavated where required to construct the project. Where possible both temporary and permanent infrastructure has been designed to minimise excavation.</p> <p>At the time of the audit, spoil has been generated from excavation activities at the MAT portal (1km excavated) and at the ECVT (around 100m excavated). Observations during the site inspection indicate that non-reactive spoil has been reused on site in permanent infrastructure (e.g. cradle for TBM), reducing the volume of material to be placed in permanent emplacement areas.</p> <p>A new spoil tracking system has been introduced since January 2022 to improve identification, location and traceability of spoil (e.g. Spoil Placement Permits; Spoil Placement Load Sheets; Spoil Tracker (e.g. Spoil Tracking – MAT Portal TBM)).</p>	Compliant
18.			<ul style="list-style-type: none"> b) test and classify the relevant physical and chemical characteristics of the spoil; 	<p>S2-CIV-AI-LHS-REP-0001 LH Operational Material Characterisation and Handling Procedure Report (Rev 2, 12/08/2021) (prepared by Golder Associates);</p> <p>S2-FGJV-ENV-PLN-0019 Spoil Management Plan - Main Works (Rev H, 01/01/2021);</p> <p>S2-FGJV-QUA-ITP-0048 ITP - TBM Spoil Management (Rev A, 12/10/2021).</p>	<p>Spoil material testing has been undertaken. Two sampling methods are used: (1) Probe-drilling every 45 meters (a sample is taken every 5 rings and identified with the ring numbers e.g. R 1-5; R 6-11); (2) Samples are taken from the conveyor belt.</p> <p>A preliminary material testing is done on-site using an XRF gun to detect calcium and sulphur. X-Ray Fluorescent Analysis is conducted by Internal Lab Services (currently managed by Australian Indigenous Business Services). Samples are then externally tested by an accredited laboratory (Eurofins).</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
19.			c) manage, use or dispose of the spoil in accordance with its classification;	<ul style="list-style-type: none"> - S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021); - Section 6 - Spoil Management Strategy, and - Appendix E - Acid and Metalliferous Drainage (ADM) Management Plan; - Spoil handling, testing and placement records: <ul style="list-style-type: none"> o Spoil Placement Permit (e.g. Permit Nr.: S2-FGJV-ENV-PER-0012-0045, Batch Nr: report 494, ring 544-548, tested as NAF: TR-2687 Sample 1388); o Record of X-Ray Fluorescence Analysis (e.g. Report 494, dated 12/12/2021); o - Spoil Placement Load Sheet (e.g. for Permit Nr. S2-FGJV-ENV-PER-0012-0045, Batch Nr: report 494, ring 544-548, to be placed in Pad 50: Loads transported by Plant ID ADT030 and ADT034 on 12/12/21); o Spoil Placement Permit - Tracking, including sampling and testing information, test results and material characterisation (NAF/PAF). 	<p>Only non-reactive spoil is currently placed in the western emplacement areas (refer to photos). PAF material is treated at the final placement area and re-tested post-treatment to validate that the material has been effectively neutralised and no longer poses risk of leaching low pH seepage or cause an oxidation reactor conditions.</p> <p>PAF is thoroughly blended with Acid neutralising capacity (ANC) material to create a neutral spoil mass.</p> <p>Spoil transport from MAT Portal to Western Emplacement Area and spoil placement in WEA was observed during the site inspection. Records of sampling, testing, chain of custody, laboratory test results were verified during the audit.</p>	Compliant
20.			d) develop and implement suitable procedures for handling, storing and disposing of any: <ul style="list-style-type: none"> • potentially acid forming material; • asbestosiform mineral fibres; • contaminated material; 	<p>S2-CIV-AI-LHS-REP-0001 LH Operational Material Characterisation and Handling Procedure Report (Rev 2, 12/08/2021) (prepared by Golder Associates);</p> <p>S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021);</p> <p>S2-FGJV-QUA-ITP-0048 ITP - TBM Spoil Management (Rev A, 12/10/2021).</p>	<p>A detailed procedure has been developed by Golder Associates (e.g. S2-CIV-AI-LHS-REP-0001 LH Operational Material Characterisation and Handling Procedure Report (Rev 2, 12/08/2021). It defines methods and criteria for material classification, transport and handling, and emplacement and management of PAF and NOA material from Lobs Hole.</p>	Compliant
21.			e) only place non-reactive spoil, which has a low geochemical risk and is suitable for reuse, in the western emplacement area;	S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021);	Only non-reactive spoil is currently placed in the western emplacement areas (refer to photos). PAF material is treated at the final placement area and re-tested post-treatment to validate that the material has been effectively neutralised and no longer poses risk of leaching low pH seepage or cause an oxidation reactor conditions.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
				<ul style="list-style-type: none"> - Section 6 - Spoil Management Strategy, and - Appendix E - Acid and Metalliferous Drainage (ADM) Management Plan; <p>Spoil handling, testing and placement records:</p> <ul style="list-style-type: none"> - Spoil Placement Permit (e.g. Permit Nr.: S2-FGJV-ENV-PER-0012-0045, Batch Nr: report 494, ring 544-548, tested as NAF: TR-2687 Sample 1388); - Record of X-Ray Fluorescence Analysis (e.g. Report 494, dated 12/12/2021); - Spoil Placement Load Sheet (e.g. for Permit Nr. S2-FGJV-ENV-PER-0012-0045, Batch Nr: report 494, ring 544-548, to be placed in Pad 50: Loads transported by Plant ID ADT030 and ADT034 on 12/12/21); - Spoil Placement Permit - Tracking, including sampling and testing information, test results and material characterisation (NAF/PAF). 	<p>neutralised and no longer poses risk of leaching low pH seepage or cause an oxidation reactor conditions.</p> <p>PAF is thoroughly blended with Acid neutralising capacity (ANC) material to create a neutral spoil mass.</p> <p>Spoil transport from MAT Portal to Western Emplacement Area and spoil placement in WEA was observed during the site inspection. Records of sampling, testing, chain of custody, laboratory test results were verified during the audit.</p>	
22.			f) maximise the reuse of non-reactive spoil on site and in other parts of the Kosciuszko National Park;	<p>S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021):</p> <ul style="list-style-type: none"> - Section 6 - Spoil Management Strategy, Table 6-1: Spoil generation, reuse and placement. 	<p>Spoil from the clearing has been used within the operational pads and road construction, however spoil from tunnelling has only been used in temporary storage stockpiles or has been taken to the western emplacement area in Lobs Hole. No tunnel spoil has been generated at any sites other than Lobs Hole.</p> <p>Significant quantities of tunnel spoil have not yet been generated to a degree in which it would be used outside Lobs Hole at this stage.</p>	Not triggered
23.			g) maximise the use of the permanent spoil emplacement areas;	<p>Snowy 2.0 WebGIS images:</p> <ul style="list-style-type: none"> - Aerial Overlay Lobs Hole Main Yard Dec 2021; - Aerial Overlay Ravine Bay Spoil Emplacement Area Dec 2021; 	<p>Non-reactive spoil is currently placed in the western emplacement areas at Lobs Hole. Spoil is placed in horizontal layers of less than 300 mm thick, proof-rolled with a 12-tonne static roller. Progressive stabilisation methods are used to minimise the extent of exposed /</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
24.			<p>- Aerial Overlay Tantangara Emplacement Area Dec 2021;</p> <p>Examples of Progressive Erosion and Sediment Control Plans (PESCP):</p> <ul style="list-style-type: none"> - ESCP 21000199_P32_ESCP_REV A Main Yard ESCP - Bottom Pad Extension; - ESCP S2-FGJV-ENV-PLN-0224-Tantangara Spoil Emplacement Area ESCP; <p>Detailed plans for permanent spoil emplacement (PSE):</p> <ul style="list-style-type: none"> - SMP Appendix H - Ravine Bay Emplacement Area (Rev A, 13/01/2021); - SMP Appendix H - Tantangara Emplacement Area (Rev A, 07/10/2021); - SMP Appendix F - Lobs Hole Main Yard Permanent Emplacement Area (Rev D, 21/07/2021); 	<p>unconsolidated materials. Placement of spoil and stabilisation methods were observed during the site inspection.</p> 		
			h) minimise the spoil left at Lobs Hole and Marica for incorporation into the final landform;	S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021); - Section 6 - Spoil Management Strategy, 6.3. Placement.	As tunnelling is in the early stages, the use of spoil in the incorporation into the final landform has not yet been triggered.	Not triggered
			i) minimise the water quality impacts of the temporary and permanent emplacement areas;	Examples of Progressive Erosion and Sediment Control Plans (PESCP): - ESCP 21000199_P32_ESCP_REV A Main Yard ESCP - Bottom Pad Extension; - ESCP S2-FGJV-ENV-PLN-0224-Tantangara Spoil Emplacement Area ESCP; S2-FGJV-ENV-REG-0014 - Environmental Incident and Event Register; SMP - Appendix C - Stockpiling Procedure.	Progressive Erosion and Sediment Control Plans (PESCP) have been prepared and implemented to minimise water quality impacts from emplacement areas. During the audit site inspections, generally adequate ESC were sighted (refer to site inspection photos in this report).	Compliant
			j) not place any spoil from the tunnel boring machines in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary; and	S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021); - Section 6 - Spoil Management Strategy; Table 6-1 Spoil Generation, Re-use and	Spoil from TBM is currently placed at the Western Emplacement Area in the LH Main Yard.	Compliant



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
				Placement; Spoil Tracker (e.g. Spoil Tracking - MAT Portal TBM from 19/07/21 to 29/01/22 including permit number, ring number, final location and weight); Placement Locations - Main Yard (map including quadrants and site identification e.g. Pad 45, 50 and 51, each divided into 4 quadrants).		
27.			k) not place any spoil from dredging, channel excavation or underwater blasting in the eastern and western emplacement areas, or in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary.	S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021): - Section 6 - Spoil Management Strategy	No dredging, or underwater blasting has been undertaken to date. Minor channel excavation was undertaken early in the construction phase, however no spoil from this was placed in the reservoir or in the permanent emplacement areas.	Not triggered
28.	5		Permanent Spoil Emplacement Areas Apart from the spoil that is provided to the NPWS for use in other parts of the Kosciuszko National Park, sent off-site, used to construct temporary or permanent infrastructure for the development or used to rehabilitate the site, the Proponent must ensure that all the spoil generated by the development is disposed of in the following emplacement areas: a) Ravine Bay; b) GFO 1; c) Lobs Hole; d) Tantangara; or e) Rock Forest. <i>Note: The location of these emplacement areas is shown in the figures in Appendix 2.</i>	S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021): - Section 6 - Spoil Management Strategy; Table 6-1 Spoil Generation, Re-use and Placement.	Based on observations during the audit site inspections, generated spoil is disposed only in permanent emplacement areas. Only Lobs Hole was generating spoil at the time of the audit. Spoil is being placed in the Lobs Hole Western Emplacement Area.	Compliant
29.	6		Design Objectives for Permanent Spoil Emplacement Areas The Proponent must ensure the permanent spoil emplacement areas comply with the design objectives in Table 2. <i>Table 2: Design Objectives for Permanent Spoil Emplacement Areas</i> Aspect / Objective: Landforms	Detailed plans for each of the permanent spoil emplacement (PSE): - SMP Appendix H - Ravine Bay Permanent Spoil Emplacement (PSE) Area (Rev A, 13/01/2021); - SMP Appendix H - Tantangara Permanent Spoil Emplacement (PSE) Area (Rev A, 07/10/2021); - SMP Appendix F - Lobs Hole Main Yard	Detailed plans for permanent spoil emplacement (PSE) have been prepared. Ravine Bay and Tantangara Plans have been drafted for SHL to review. Lobs Hole plan has been revised to address NPWS and DPIE's comments. These plans have taken into consideration the Design Objectives indicated in the Approval.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
			<ul style="list-style-type: none"> As natural as possible, including minimising the use of linear or engineered structures <ul style="list-style-type: none"> Sympathetic with the landforms in the surrounding area, particularly from a visual, water management and ecological perspective <ul style="list-style-type: none"> Suitable drainage density Safe, long-term stable and non-polluting Where feasible, gradients along the water line of the reservoirs that could be exposed under normal conditions (i.e. above the minimum operating level) must be suitable for safe recreational use and consistent with the approved Recreation Management Plan <ul style="list-style-type: none"> Provide suitable access for vehicles and/or all-terrain vehicles for rehabilitation, weed control and firefighting to allow for spraying from vehicles (at around 200 metres measured on the slope, or as approved by the NPWS) <p><u>Water management</u></p> <ul style="list-style-type: none"> Integrate the drainage of the emplacement area with the surrounding drainage network, including any upstream flows and residual run-on water <ul style="list-style-type: none"> Minimise downstream water flows and velocities with any changes to be quantified and addressed through suitable design <ul style="list-style-type: none"> Minimise valley infill Create natural drainage lines that are long-term sustainable having regard to the selection of suitable underlying materials, including rock sizing and grading Minimise the use of large rocks in drainage lines Minimise the concentration of water on landforms unless this is consistent with accepted drainage density and geomorphic design practices <ul style="list-style-type: none"> Minimise the generation and dispersion of sediment in the Talbingo Reservoir, Tantangara Reservoir or other waterways <p><u>Erosional stability</u></p>	Permanent Spoil Emplacement (PSE) Area (Rev D, 21/07/2021);		

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
			<ul style="list-style-type: none"> Minimise steep slopes, particularly slopes that will be difficult to access and maintain (such as slopes over 18o or 1V:3H) <ul style="list-style-type: none"> The final surface of the landform must be long-term sustainable with sufficient topsoil (or some other suitable growth medium) to maintain a soil water profile and sustain vegetation <ul style="list-style-type: none"> Maximise the revegetation of the final surface Ensure areas subject to wave action are suitably protected or the slopes are flattened to limit wave action <p><u>Land Use</u></p> <ul style="list-style-type: none"> Native vegetation and habitat must comply with the approved Rehabilitation Management Plan Recreational facilities and use must comply with the approved Recreation Management Plan <p><u>Constructability</u></p> <ul style="list-style-type: none"> The emplacement area must be constructible having regard to the: <ul style="list-style-type: none"> availability of suitable material, including topsoil erosion and sediment control; access; initial shaping of natural ground; progressive rehabilitation; shapes and benching; and safety around water 			
30.	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>	S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021)	A Spoil Management Plan (SMP) has been prepared and approved by the Planning Secretary on 11/08/2020 (Rev G). The SMP have been reviewed (Rev H, 01/01/2021) to include GF01 (Contingency Plan) and it is still under review by DPIE.	Compliant
31.			a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, EPA, Water Group, NRAR, NSW DPI and TfNSW;	SMP Section 1.7. Consultation	The SMP was prepared by Derek Low, who has over 13 years' experience in infrastructure and remediation. Evidence of the consultation process has been included in the Plan.	Compliant
32.			b) provide an overarching framework for the management of all spoil generated on site - including	S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works	An overarching framework for the management of all spoil generated on site - including the testing, classification,	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
			the testing, classification, handling, temporary storage and disposal of spoil – that complies with the spoil management requirements in condition 4 above	(Rev H, 01/01/2021): <ul style="list-style-type: none"> - Section 6 - Spoil Management Strategy, and - Appendix E - Acid and Metalliferous Drainage (ADM) Management Plan 	handling, temporary storage and disposal of spoil, has been defined in Section 6 of the SPM. Flowcharts explain the sequence in a graphic manner: <ul style="list-style-type: none"> - Figure 6-1: D&B and earthworks generated material flow chart; - Figure 6-2: TBM generated material flow chart; - Figure 6-3: Dredge, underwater blasting and channel excavation generated material flow chart. 	
33.			c) include a detailed plan for managing the temporary spoil stockpiles of the development, which includes suitable triggers for remedial measures (if necessary) and describes the contingency measures that would be implemented to address any water quality risks	SMP: <ul style="list-style-type: none"> - Section 6.5 Stockpile management; - Section 9 - Compliance Management; - Appendix C - Stockpiling Procedure 	A detailed plan for managing temporary spoil stockpiles has been included in App C - Stockpiling Procedure of the SMP. Section 6.5 Stockpile management describes stockpile design applying erosion and sediment control principles and the use of erosion and sediment control plans (ESCP). Section 9 - Compliance Management, defines monitoring and inspection activities related to temporary stockpiles in general, as well as trigger action response plans (TARPs) for temporary stockpiles.	Compliant
34.			d) include a detailed plan for managing all the reactive or contaminated spoil generated on site, including the contingency measures that would be implemented if the volumes of this spoil are greater than expected and unsuitable for land disposal;	S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021): <ul style="list-style-type: none"> - Section 6 - Spoil Management Strategy, and - Appendix E - Acid and Metalliferous Drainage (ADM) Management Plan 	A detailed plan for managing all the reactive or contaminated spoil has been defined in the Spoil Management Plan (SPM), Appendix E - Acid and Metalliferous Drainage (ADM) Management Plan. Additional contingency measures Section 6 - Spoil Management Strategy of the SPM.	Compliant
35.			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: <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 	Detailed plans for each of the permanent spoil emplacement (PSE): <ul style="list-style-type: none"> - SMP Appendix F - Lobs Hole Main Yard (Rev D, 21/07/2020 - approved as part of the SMP approval); - SMP Appendix H - Ravine Bay Emplacement Area (Rev A, 13/01/2021 - Initial draft for Snowy Hydro review); - SMP Appendix I - Tantangara Emplacement (PSE) Area (Rev A, 07/10/2021 - Initial draft for Snowy Hydro review). 	Detailed plans for permanent spoil emplacement (PSE) areas have been prepared. Ravine Bay and Tantangara Plans have been drafted for SHL to review. Lobs Hole plan has been revised to address NPWS and DPIE's comments. Only the plan for the Lobs Hole permanent spoil emplacement (PSE) area had been approved at the time of the audit, as part of the SMP approval. App F - Lobs Hole Main Yard indicates in the introduction that whilst the Lobs Hole Main Yard is within a designated permanent spoil emplacement area, it is the primary base for construction for the western portion of the project. For that reason, this plan has been prepared to address	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
			<p>sustain the target PCTs in the long term, having regard to the approved strategy in the Rehabilitation Management Plan;</p> <ul style="list-style-type: none"> • 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); 		<p>the requirements of condition 7 where relevant to establishing the Main Yard as a construction area (refer to Table 3-1).</p> <p>Design of the Lobs Hole permanent emplacement area (final design) will be developed during construction so as to comply with Design Objectives in schedule 3 condition 6 of the Infrastructure Approval. The plan will be updated for approval prior to commencing final placement works over the Main Yard construction footprint.</p>	
36.			<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 occurring in the relevant emplacement area.</i></p>	<p>S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021):</p> <ul style="list-style-type: none"> - Section 9 - Compliance Management, 9.5. Reporting; <p>S2-CIV-AI-LHS-REP-0001 LH Operational Material Characterisation and Handling Procedure Report (Rev 2, 12/08/2021) (prepared by Golder Associates), section 5.0 Input to Public Reporting.</p>	<p>The program to monitor is included in Section 9.5 of the SMP. Refer to Spoil Management Plan implementation requirement below.</p>	Compliant
37.	8		The Proponent must implement the approved Spoil Management Plan for the development	<p>S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021):</p> <ul style="list-style-type: none"> - Section 8 - Environmental Management Measures; - Section 9 - Compliance Management, including Monitoring and Inspection, Training, Trigger Action Plans (TARPs), Auditing and Reporting; <p>S2-FGJV-ENV-REG-0026-Project Topsoil Register.</p>	<p>A Spoil Permit and the Spoil Tracking Register has been implemented (records verified and spoil transport and placement at the Western Emplacement Area was observed).</p> <p>The site inspection across all sites noted an improvement in the separation and management of topsoils, subsoils and mulch.</p> <p>Overall, the spoil management plan was appropriately implemented.</p>	Compliant
SPOIL MANAGEMENT PLAN / TOPSOIL STRATEGY						

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
38.		Sect 9.5 and Table 9.4 of SMP	<p>Spoil specific reporting is presented in Table 9-4 and will be completed and made publicly available in accordance with schedule 3 condition 7 (f). The following will be reported 6 monthly for the duration of construction</p> <p>Table 9.4: Volume of spoil excavated from tunnelling; Volume placed at each emplacement area: <ul style="list-style-type: none"> • Ravine Bay • GFO • Lobs Hole • Tantangara • Rock Forest. and a brief summary of progress towards final design objectives listed in Table 7-1 of this Plan. Volume disposed of off-site (if any). Volume reused elsewhere in KNP (if any). Volume of AMD material treated (if any). Volume of NOA excavated and placed in encapsulation (if any).</p>		<p>The spoil specific reporting will be triggered shortly after this audit was conducted. TBM operation, and therefore spoil generation commenced around August 2021. The first report is therefore due to be undertaken in February 2022.</p> <p>This is raised as an Opportunity for Improvement as a reminder that the reports are due soon.</p>	Not triggered Compliant OFI
39.		App B; Pages 98, 99	<p>Topsoil Stripping</p> <p>– The area to be stripped will be clearly identified to avoid over stripping and / or entering areas beyond the disturbance footprint;</p>	Topsoil Stripping Procedure S2-FGJV-ENV-PRO-0012[A]; Topsoil Stripping Register (S2-FGJV-ENV-REG-0026-Project Topsoil Register)	<p>The area to be stripped is clearly marked and identified in the Topsoil Stripping Register (topsoil tracker) with references to stripping name of the site/area in a map. Map images are included in the register to ensure traceability.</p> <p>A Grubbing Permit is generated from the information contained in the Topsoil Stripping Register (Excel spreadsheet).</p>	Compliant
40.			<p>– The target depths of topsoil and subsoil to be stripped for each location will be clearly communicated to machinery operators and supervisors;</p>	S2-FGJV-ENV-PRO-0012[A] Topsoil Stripping Procedure; Topsoil Stripping Register (S2-FGJV-ENV-REG-0026-Project Topsoil Register); Construction Method Statements (e.g. S2-FGJV-TEC-CMS-0106[A] Bulk Earthworks dated 2020).	<p>The target depth is clearly defined in the Topsoil Register and it is communicated to machinery operators and supervisors on the Grubbing Permit.</p> <p>It has been also communicated on the Construction Method Statements (e.g. Bulk Earthworks). In relation to the depth, it indicates that topsoil across the site is to be stripped to a depth of 200mm and stockpiled for re-use. It should be noted that, although the CMS indicates stripping depth of 200mm, most of the strips in the register have been authorised for a depth < 200 mm (e.g. 150 or 100 mm).</p>	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
41.			<ul style="list-style-type: none"> – Collect vegetative matter for future use a seed source from which indigenous plants can be propagated. 		Seeds were being collected - see Biodiversity section	Compliant
42.			<ul style="list-style-type: none"> – To minimise soil exposure duration, stripping will commence as soon as practicable prior to bulk earthworks; 	Topsoil Stripping Procedure S2-FGJV-ENV-PRO-0012[A]	The Topsoil Stripping Procedure includes this requirement.	Compliant
43.			<ul style="list-style-type: none"> – Any trees present will be cleared and grubbed before topsoil salvage; 	Topsoil Stripping Procedure S2-FGJV-ENV-PRO-0012[A]	The Topsoil Stripping Procedure includes this requirement.	Compliant
44.			<ul style="list-style-type: none"> – Topsoil and subsoil will be stripped to the required depths and then stockpiled where not immediately required in the works; 	Topsoil Stripping Procedure S2-FGJV-ENV-PRO-0012[A]; Site inspections	<p>The Topsoil Stripping Procedure includes this requirement. The Grubbing Permit indicates the required stripping depth.</p> <p>Topsoil and subsoil management was observed at Tantangara. Stockpiles of topsoil and subsoil were kept in different locations.</p>	Compliant
45.			<ul style="list-style-type: none"> – Subsoil will be stripped and stockpiled separately to topsoil where identified as suitable for re-use; 	Topsoil Stripping Procedure S2-FGJV-ENV-PRO-0012[A]; Site inspections	<p>The Topsoil Stripping Procedure includes this requirement. The Grubbing Permit indicates the required stripping depth.</p> <p>Topsoil and subsoil management was observed at Tantangara. Stockpiles of topsoil and subsoil were kept in different locations.</p>	Compliant
46.			<ul style="list-style-type: none"> – An inventory of soils to be stripped, including depths and volumes will be developed; 	Topsoil Stripping Register (S2-FGJV-ENV-REG-0026-Project Topsoil Register);	The Topsoil Stripping Register includes an inventory of soils to be stripped, including depths, areas and volumes, and information on Predominant Soil Type (GIS) and the Grubbing Permit number.	Compliant
47.			<ul style="list-style-type: none"> – Topsoil from contaminated areas, or areas of weeds will not be recovered for rehabilitation works. These materials will be appropriately managed on-site or if there is a potential to spread contamination then the material will be sent off-site to a disposal facility that is lawfully permitted to receive it. 	Topsoil Stripping Procedure S2-FGJV-ENV-PRO-0012[A]	The Topsoil Stripping Procedure includes this requirement. A flowchart indicates a decision-making process for managing topsoil from contaminated areas, or areas of weeds to ensure these are not recovered for rehabilitation works.	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
48.		App B; Pages 96 - 97	Topsoil and subsoil maintenance: <ul style="list-style-type: none"> – Topsoil will be stockpiled, signposted and separated from other materials, and tracked; 	<ul style="list-style-type: none"> – S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021); – - Section 8 - Environmental Management Measures; – - Section 9 - Compliance Management, including Monitoring and Inspection, Training, Trigger Action Plans (TARPs), Auditing and Reporting; – Project Topsoil Register S2-FGJV-ENV-REG-0026; – Construction Method Statements (e.g. S2-FGJV-TEC-CMS-0106[A] Bulk Earthworks dated 2020); – S2-FGJV-ENV-PRO-0012[A] Stripping Procedure dated 2019. 	<p>Topsoil management was observed at Tantangara. Topsoil has been stockpiled in a separate area and clearly marked (signage – "Clean Topsoil"). Topsoil has been hydromulched and it appears stable. Brumbies occasionally damage fences and ropes trampling established boundaries. Topsoil stockpiles have a low gradient, with clean water diversions upslope and sediment controls downslope.</p> <p>The site inspection across all sites noted an improvement in the separation and management of topsoils, subsoils and mulch.</p> <p>An Observation was raised at the last audit (07/21/ OBS 1). Based on the information verified, this observation remains open, however the signposting and separation component of the Observation was adequately addressed and therefore determined as compliant here.</p> <p>Construction Method Statements were provided as evidence (Bulk Earthworks dated 2020) and Stripping procedure date 2019) however there was no evidence these have been reviewed or updated since the last audit to consider the Observation raised. (note – Aconex corrective action shows action to review CMS and conduct toolbox talks is still open).</p>	Compliant
49.			<ul style="list-style-type: none"> – Subsoil should be removed and stockpiled separately from topsoil; 	Topsoil Stripping Procedure S2-FGJV-ENV-PRO-0012[A]; Site inspections	Subsoil management was observed at Tantangara. Subsoil has been stockpiled in a different location to topsoil (subsoil stockpiles have not been signposted, but the location). Subsoil stockpiles have a number of sediment controls. Stormwater runoffs are directed into sediment retention basins using diversion humps, geotextile fabric and crushed rock. The contractor is trying to minimize the number of sediment basins, particularly along Spoil Road, installing more frequent diversions. Sediment basins at Tantangara were clearly identified (e.g. signposted SBL01; SBL08).	Compliant
50.			<ul style="list-style-type: none"> – Stripped topsoil will be stockpiled separately from woody material and subsoil stockpiles; 	Topsoil Stripping Procedure S2-FGJV-ENV-PRO-0012[A]; Site inspections	The Topsoil Stripping Procedure includes this requirement. Topsoil and subsoil management was observed at Tantangara. Topsoil and subsoil were stockpiled in different locations.	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
51.			<ul style="list-style-type: none"> – Topsoil stockpile heights will not exceed 2.5 m, to minimise the risk of compaction and to maintain the viability of the soil seed bank; 	Topsoil Stripping Procedure S2-FGJV-ENV-PRO-0012[A]; Site inspections	The Topsoil Stripping Procedure includes this requirement. Topsoil stockpiles observed at Tantangara appeared not to exceed 2.5 m high.	Compliant
52.			<ul style="list-style-type: none"> – Topsoil stockpiles will be placed away from water discharge zones and flow paths; topsoil should not be stockpiled against fences or vegetation and should be retained separately from mulch (apart from a surface layer); 	Site Inspection - Tantangara	Topsoil stockpiles at Tantangara was placed away from water discharge zone (refer to site inspection photos). Topsoil stockpiles have a low gradient, with clean water diversions upslope and sediment controls downslope.	Compliant
53.			<ul style="list-style-type: none"> – Topsoils to be maintained for an extended period of time should have the surface left in a rough state and monitored for weed management; 	Environmental Inspection Checklist S2-FGJV-ENV-CHE-0002 (e.g. MAR 05/11/21); Site Inspection - Tantangara	Topsoil has been hydromulched and it appears stable. Brumbies occasionally damage fences and ropes, trampling established boundaries.	Compliant
54.			<ul style="list-style-type: none"> – Topsoil stockpiles to be covered with weed-free mulch, jute mesh, geofabric or similar to assist with reducing temperature extremes and reducing weeds and helps to maintain its integrity for future use. 	Environmental Inspection Checklist S2-FGJV-ENV-CHE-0002 (e.g. MAR 05/11/21); Site Inspection - Tantangara	Topsoil has been hydromulched and it appears stable. Brumbies occasionally damage fences and ropes, trampling established boundaries.	Compliant
55.			<ul style="list-style-type: none"> – Inspections for dispersion and erosion of subsoil stockpiles will be undertaken, particularly on moderately dispersive soils. Suitable measures will be applied to reduce erosion potential as required. 	Environmental Inspection Checklist S2-FGJV-ENV-CHE-0002 (e.g. MAR 05/11/21); Site Inspection - Tantangara	Weekly Environmental Site Inspections throughout the project were reviewed. Checklist includes questions on stockpiles management.	Compliant
56.	BMP; App F 5.1.2	(From Biodiversity Plan App F – weeds management)	<ul style="list-style-type: none"> – Topsoil, mulch and spoil stockpiles will be inspected for evidence of weeds on a regular basis as a part of routine environmental site inspections. 	Weekly Environmental Site Inspections throughout the project.	Weekly Environmental Site Inspections throughout the project were reviewed. Checklist includes questions on stockpiles showing signs of weeds.	Compliant
57.	SMP; App C; Pages 100 - 101		<p>Stockpiling Procedure</p> <p>The location of stockpiles will be planned in advance of topsoil stripping and bulk earthwork. Stockpile locations will be selected such that they are:</p> <ul style="list-style-type: none"> – away from areas of retained vegetation and outside of the tree protection zone; – not exposed to concentrated flows; – at least 50m from rivers and creeks; – located above the 20% AEP flood event where possible to avoid flood flows; – where practicable located on slopes less than 10%. If required to be placed on slopes greater than 10% additional erosion and sediment controls shall be implemented; – located outside weed infested areas; and 	SMP - Appendix C - Stockpiling Procedure	<p>Topsoil and subsoil management was observed at Tantangara. Topsoil has been stockpiled in a separate area and clearly marked (signage – Clean Topsoil). Topsoil has been hydromulched and it appears stable. Brumbies occasionally damage fences and ropes, trampling established boundaries. Topsoil stockpiles have a low gradient, with clean water diversions upslope and sediment controls downslope. A Topsoil Stripping Register has been maintained.</p> <p>Subsoil has been stockpiled in a different location to topsoil (subsoil stockpiles have not been signposted). Subsoil stockpiles have a number of sediment controls. Stormwater runoffs are directed into sediment retention basins using diversion humps, geotextile fabric and crushed rock.</p>	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
58.			<ul style="list-style-type: none"> – positioned such that erosion of the stockpile and surrounding area is minimised; – Clean water diversions will be installed upslope of stockpiles and sediment controls installed downslope; 			
SPOIL MANAGEMENT PLAN						
59.		SMP 6.1	<p>6. SPOIL MANAGEMENT STRATEGY</p> <p>6.1 Overview (page 66)</p> <p>Spoil that cannot be re-used in permanent infrastructure will be directed to the approved emplacement areas at Talbingo (Ravine Bay, GF01 and Lobs Hole), Tantangara Reservoir and outside KNP at Rock Forest as a priority:</p> <ul style="list-style-type: none"> • Reactive material would be placed in the aforementioned emplacement areas with prior treatment and / or appropriate engineering controls to manage leaching and reaction both in the short term and long term. <ul style="list-style-type: none"> • NOA material would be placed within designated encapsulation cells above the FSL of the Tantangara Reservoir emplacement area. • TBM spoil must not be placed in the active storages or below the FSL of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary. • Spoil from dredging, channel excavation or underwater blasting must not be placed in the Exploratory Works eastern and western emplacement areas, or in the active storages or below the FSL of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary. • Unsuitable material will be disposed of offsite to facilities lawfully permitted to receive it. 	<p>S2-FGJV-ENV-PLN-0019 Spoil Management Plan (SPM) - Main Works (Rev H, 01/01/2021):</p> <ul style="list-style-type: none"> - Section 6 - Spoil Management Strategy; Table 6-1 Spoil Generation, Re-use and Placement. 	<p>Based on observations during the audit site inspections, generated spoil is disposed only in permanent emplacement areas, particularly Lobs Hole (where the Western Emplacement Area is located).</p>	Compliant
60.		SMP 6.1; Fig 6-2	<p>Figure 6-2: TBM generated material flow chart (page 68)</p> <p>TBM-generated spoil is subject to geochemical testing and classification.</p> <p>If TBM-generated spoil is “reactive”:</p> <ul style="list-style-type: none"> • Review results and verify engineering and environmental controls based on characteristic. 	<p>S2-CIV-AI-LHS-REP-0001 LH Operational Material Characterisation and Handling Procedure Report (Rev 2, 12/08/2021) (prepared by Golder Associates);</p> <p>S2-FGJV-ENV-PLN-0019 Spoil Management Plan - Main Works (Rev H, 01/01/2021);</p>	<p>Spoil material testing has been undertaken. Two sampling methods are used: (1) Probe-drilling every 45 meters (a sample is taken every 5 rings and identified with the ring numbers e.g. R 1-5; R 6-11); (2) Samples are taken from the conveyor belt.</p> <p>A preliminary material testing is done on-site using an XRF gun to detect calcium and sulphur. X-Ray Fluorescent</p>	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
			<ul style="list-style-type: none"> Treat if results indicate unacceptable risk. Note 1: Neutralised PAF material can, once validated, be safely disposed of like any other spoil. Maximise re-use in permanent infrastructure. Place at Ravine Bay and Tantangara Reservoir emplacement areas, and on land emplacement at GF01, Rock Forest and minimizing permanent placement at Lobs Hole Main Yard. No placement in the EW western emplacement area or below FSL at Talbingo or Tantangara Reservoirs unless approved by the Planning Secretary. <ul style="list-style-type: none"> Conduct ongoing monitoring of water quality, sediment quality and aquatic ecology. If unacceptable result obtained, initiate TARPAs as per relevant management plan. Investigate root cause. <ul style="list-style-type: none"> If non-conformance potentially related to spoil placement, stop placement; implement corrective actions and monitor progress. If no issues, continue placement. 	S2-FGJV-QUA-ITP-0048 ITP - TBM Spoil Management (Rev A, 12/10/2021).	Analysis is conducted by Internal Lab Services (currently managed by Australian Indigenous Business Services). Samples are then externally tested by an accredited laboratory (Eurofins).	
61.		SMP 8; Table 8-1	8. ENVIRONMENTAL MANAGEMENT MEASURES Table 8-1: Spoil management measures (page 82-87) General			
62.		SM01	SM01 Training will be provided to all project personnel, including relevant sub-contractors on spoil management practices and the requirements from this plan through inductions, toolboxes and targeted training.	Site Induction Records (refer to EMS 5.1); Monthly Toolbox Talks (refer to EMS 5.3); Environmental Awareness Training, e.g. - ERSED presentation/training by SEEC in Oct-21 at TAL, MAT, Pad2; - Spoil Management - Topsoil Stripping in Feb-21 at TAN; MAR, LOBS.	Based on records reviewed, training on spoil management has been provided to staff and contractors.	Compliant
63.		SMP 8; Table 8-1	8. ENVIRONMENTAL MANAGEMENT MEASURES Table 8-1: Spoil management measures (page 82-87) Characterisation	Addressed under Condition 4(d)	Addressed under Condition 4 (c) and (d)	Compliant
		SM03	SM03 The spoil characterisation program in Appendix A will be implemented. The program will enable adequate assessment of contaminated materials, NOA, acid metalliferous drainage (AMD)/neutral metalliferous drainage (NMD)/saline drainage (SD) material, and reduce the risk of material being			

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
			misclassified as 'benign' and being managed inappropriately.			
64.		SM05	SM05 Material which has been assessed as not suitable for reuse on land or for subaqueous disposal or cannot be reused will be classified in accordance with the Waste Classification Guidelines (NSW EPA 2014).	Interview Spoil Tracker (e.g. Spoil Tracking - MAT Portal TBM from 19/07/21 to 29/01/22 including permit number, ring number, final location and weight); Laboratory testing reports	No spoil generated to date has been tested as unsuitable for reuse.	Not triggered
65.		SMP 8; Table 8-1	8. ENVIRONMENTAL MANAGEMENT MEASURES Table 8-1: Spoil management measures (page 82-87) Spoil handling and management			
		SM16	The Exploratory Works western emplacement area must only receive non-reactive spoil, which has a low geochemical risk and is suitable for reuse. Reactive spoil must not be directed to the Exploratory Works western emplacement area.	Interview Spoil Tracker (e.g. Spoil Tracking - MAT Portal TBM from 19/07/21 to 29/01/22 including permit number, ring number, final location and weight); Laboratory testing reports	Only non-reactive spoil is currently placed in the western emplacement areas (refer to photos).	Compliant
66.		SM18	SM18 An unexpected finds procedure is included in the Contaminated Land Management Plan (S2-FGJV-ENV-PLN-0049). Workers will be trained to identify potential contamination that may be encountered during construction.		The unexpected finds procedure for contaminated soils (App A of Contaminated Management Plan is in place and personnel have been trained. This was determined as compliant at the previous audit.	Compliant
67.		SM19	SM19 The Naturally Occurring Asbestos Management Plan (Appendix D of this Plan) will be implemented to ensure appropriate management of Naturally Occurring Asbestos encountered during works.	Lobs Hole Operational Material Characterisation and Handling Procedure (S2-CIV-AI-LHS-REP-0001_02; Rev 2 12/08/21); Spoil Placement Permits; Laboratory Reports attached to permits (only Records of X-Ray Fluorescent Analysis which is to detect AMD; no records of PLM testing on site);	The Lobs Hole Operational Material Characterisation and Handling Procedure has been reviewed in Aug-21. This document has been prepared to provide direction on material sampling, geochemical characterisation, classification, handling, and disposal for the Lobs Hole emplacement areas known as Main Yard, GF-01 and Ravine Bay. Section 2.3.2. Naturally Occurring Asbestos (NOA) indicates that NOA has not been identified in the Ravine Beds and Boraig Group during the various geochemical material characterisation studies undertaken to date. However, amphibole mineral has been observed at the surface level of the contact area between Boraig Group and Ravine Beds and as such pushes this area into a "possible" category of occurrence. Action: Polarising Light Microscope (PLM) implemented on site to detect NOA early, material to be kept moist and rapid placement of the material in dedicated NOA cells.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
					<p>The material to be excavated is to be sorted into different classes considering AMD potential and NOA. For NOA, the onsite laboratory will provide a screening level NOA analysis and will inform a classification of the material as NOA or non-NOA. When sampling, NOA presence is assessed using polarised light microscopy (PLM) at the site laboratory. Records of PLM analysis on site were not available at the time of the audit. However, it was stated during the interviews that no NOA has been encountered so far related to TBM activities. Therefore, this condition is considered compliant. No records were available.</p>	
68.		SM20	SM20 The Acid and Metalliferous Drainage Management Plan (Appendix E of this Plan) will be implemented to ensure appropriate management of AMD material encountered during works.	<p>Lobs Hole Operational Material Characterisation and Handling Procedure (S2-CIV-AI-LHS-REP-0001_02; Rev 2 12/08/21); Spoil Placement Permits; Laboratory Reports attached to permits (only Records of X-Ray Fluorescent Analysis which is to detect AMD; no records of PLM testing on site);</p>	Spoil management records reviewed provided sufficient evidence of implementation of the AMD management plan.	Compliant
69.		SM23	SM23 The Stockpile Procedure (Appendix C of this Plan) will be developed to ensure temporary stockpiling is appropriately managed and that any adverse impacts are controlled and rectified.		Addressed under SMP; App C; Pages 100 - 101.	Compliant
70.		SM24	SM24 The Surface Water Management Plan (S2-FGJV-ENV-PLN-0011) will be implemented to ensure impacts on surface waters as a result of spoil handling and placement are minimised.		Addressed under Surface Water.	Compliant
71.		SM25	SM25 Site-based Erosion and Sediment Control Plans (ESCPs) will be prepared by a suitably qualified erosion and sediment control specialist.		Addressed under Condition 4 (g) and (i)	Compliant
72.		SM26	SM26 A non-naturally occurring Asbestos Management Plan (S2-FGJV-HAS-PLN-0010) has been developed and will be implemented to manage Asbestos Containing Materials ACM (ACM), or areas are suspected of containing ACM (such as historical buildings). The AMP addresses unexpected finds of ACM. Specifically, protocols will be stipulated for separation, monitoring, validation and clearance of asbestos.	Interview	ACM was not expected to be encountered for some time	Not triggered

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
73.		SM27	SM27 An Occupational Hygienist (Hygienist) will be on-site for the duration of the excavation works where ACM has been identified from pre-construction or where unexpected finds of ACM are encountered.	Interview	ACM was not expected to be encountered for some time	Not triggered
74.		SM30	SM30 A hold point process will be established and implemented requiring approval by the Future Generation Environment Manager or Construction Manager prior to the placement of material generated from dredging, channel excavation or underwater blasting. This hold point process will note that this material cannot be placed in the Exploratory Works eastern and western emplacement areas without the approval of the Planning Secretary.		Dredging, channel excavation or underwater blasting has not yet occurred.	Not triggered
75.		SMP, App A; 3.1.1	APPENDIX A – CHARACTERISATION PROGRAM 3. ONGOING MATERIAL CHARACTERISATION 3.1. Sampling approach (page 88) 3.1.1. Sample frequency The sample frequency will adopt a risk-based approach and the nominal sample frequencies from the standards and guidelines listed in Section 1, namely: <ul style="list-style-type: none"> AMD sampling frequency of approximately 20 samples per geological unit (when combined with stockpile sampling). Sampling to focus on Possible, Likely and Confirmed AMD hazard areas (Boraig Group, Shaw Hill Gabbro, Tantangara, Temperance, Gooandra Volcanics and Ravine Bed) and lithological boundaries of each. NOA sampling at excavation front of each geological boundary; and every 100m within the same geological formation, focussing on Gooandra Volcanics, Boggy Plain Site and Shaw Hill Gabbro units, to focus on Gooandra Volcanics, Boggy Plain Site and Shaw Hill Gabbro units. 	Lobs Hole Operational Material Characterisation and Handling Procedure (S2-CIV-AI-LHS-REP-0001_02; Rev 2 12/08/21); Operational Material Characterisation and Handling Procedure Report (S2-CIV-AI-LHS-REP-0001 LH; Rev 2, 12/08/2021) (prepared by Golder Associates).	SMP, App A; 3.1.1 and SMP, App D NOA Management Plan: These documents have been updated and are currently under review by EPA and SHL. New CMS currently under development.	Compliant
76.		SMP, App A; 3.1.2	3.1.2. Pre-excavation assessment In-situ Geochemical sampling/testing during pre-excavation will be undertaken to provide an initial classification obtained from: <ul style="list-style-type: none"> selected shallow in situ bore holes and / or test pits at relevant portal, camp and construction pad cutting areas (i.e.: surface works) for PAF/AMD, NMD, 	Lobs Hole Operational Material Characterisation and Handling Procedure (S2-CIV-AI-LHS-REP-0001_02; Rev 2 12/08/21); Operational Material Characterisation and Handling Procedure Report (S2-CIV-AI-	As above.	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - SPOIL MANAGEMENT						
			<p><i>SD and NOA determinations as soon as possible and prior to excavation; and</i></p> <ul style="list-style-type: none"> • <i>selected blasting drilling holes and TBM excavated materials for the tunnel.</i> 	LHS-REP-0001 LH; Rev 2, 12/08/2021) (prepared by Golder Associates).		
77.	SMP, App A; 3.1.3	3.1.3. Post-excavation assessment	<p>Post-excavation sampling of D&B and TBM material will be required to enable ongoing correlation with spoil scanning and sampling and to test materials before and following treatment (if required). Post-excavation sampling must be undertaken in accordance with Australian Standard 1141 <i>Methods for sampling and testing aggregates</i> (or equivalent). The Standard will be applied based on the Inspection and Test Plan quality document and will be relevant depending on each sample's particle sizing. Composite samples shall be obtained from stockpiles at locations and at frequencies that enables confidence in the material classification. Sub-samples (those that make up the composite samples) are to be collected uniformly throughout the stockpile to account for potential variability in soil characteristics. Samples should also be collected at various depths in the stockpile (not just the surface). Where possible it is recommended that a systematic grid sampling pattern. An example of a sample pattern for stockpiles is presented in Figure 3-1.</p> <p>Survey methods such as LiDAR, drones and rovers may also be used to survey the stockpiles to inform quantity movements.</p>	<p>Lobs Hole Operational Material Characterisation and Handling Procedure (S2-CIV-AI-LHS-REP-0001_02; Rev 2 12/08/21);</p> <p>Operational Material Characterisation and Handling Procedure Report (S2-CIV-AI-LHS-REP-0001 LH; Rev 2, 12/08/2021) (prepared by Golder Associates).</p>	As above.	Compliant
78.	SMP, App A; 3.1.4	3.1.4. Underwater excavation and dredging	<p>It is anticipated that post excavation assessment for material excavated from underwater (or dredged) will generally follow the same process as that applied for excavated material from bulk earthworks (refer Section 3.1.3 above).</p>		There has been no underwater excavation or dredging.	Not triggered
Part A EPBC Condition - Annexure A - Conditions specific to the action						
Amenity and landscape						
79.	24		To minimise impacts to the environment in Kosciuszko National Park, the approval holder must comply with conditions 4-11 of the NSW approval relating to spoil management and site rehabilitation.		No non-compliances were raised against the NSW Conditions 4 - 11, and therefore is compliant to this condition	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION						
80.	9		<p>REHABILITATION</p> <p>Rehabilitation Requirements</p> <p>The Proponent must:</p> <p>a) rehabilitate all parts of the site within the Kosciuszko National Park to comply with the rehabilitation objectives in Table 3 and the ecological rehabilitation objectives in Table 4;</p> <p>Table 3 - Rehabilitation Objectives - Kosciuszko National Park</p> <p>Land use:</p> <p>Enhance the recreational use of the site in accordance with the approved Recreation Management Plan;</p> <p>Land:</p> <ul style="list-style-type: none"> i. Safe, stable, non-polluting; ii. Ensure the creation of all new landforms complies with the design criteria in Table 2; iii. Minimise surface disturbance of site during construction; iv. Progressively rehabilitate the site as soon as possible following disturbance; v. Employ interim rehabilitation strategies to areas that can't be permanently rehabilitated yet to minimise dust generation; <p>Infrastructure:</p> <ul style="list-style-type: none"> vi. Decommission and remove infrastructure, unless NPWS agrees otherwise; vii. Restore all roads on site in accordance with the Long Term Road Strategy; <p>Community:</p>	<p>Interviews with SHL. Site inspections - various sites.</p>	<p>Elements of this condition has not yet been triggered, and it was noted that the Rehabilitation Management Plan is likely to address the requirements of this condition.</p> <p>The following elements of Table 3 were assessed and the elements that were not triggered are indicated below:</p> <ul style="list-style-type: none"> i. Not triggered; ii. Not triggered; iii. Not triggered; vii. Not triggered; viii. Not triggered <p>The following elements of Table 3 were triggered and determined as compliant (with comments):</p> <ul style="list-style-type: none"> iv. Surface disturbance was generally minimised during construction v. Partially triggered - Rehabilitation had commenced on the upper sections of Lobs Hole Ravine Road Chainage 550 - 7000 at the time of the audit. This is main area undergoing rehabilitated to date. Evidence of temporary rehabilitation of disturbed areas were observed on Lobs Hole Ravine Road, vi. As noted above with (v), temporary stabilisation has generally been employed to minimise dust generation. This was observed on Trunk Services works and around the accommodation camps; ix. The site inspection did not identify areas of rehabilitation that may impact on public safety <p>It is noted that at the time of the audit, the development of the Rehabilitation Management Plan was in progress. The Plan will also link with the Long</p>	<p>Not triggered</p> <p>Compliant</p>

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION						
81.			Within 18 months of the commencement of construction, the Proponent must prepare a Rehabilitation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:		This condition is not formally triggered - the Rehabilitation Management Plan is due for submission to DPIE by 21 April 2022 (Construction commenced 21 October 2020). However, progress is described below: SHL advised that a series of workshops have been held and that updates have been provided to NPWS.	
82.			<p>a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, BCD, EPA, NSW DPI and TfNSW;</p> <p>b) be consistent with the Spoil Management Plan, Recreation Management Plan, Long-Term Road Strategy and Visual Mitigation Management Plan;</p> <p>c) include a conceptual plan for the rehabilitation of the whole site;</p> <p>d) include the detailed program for the rehabilitation of roads in the Kosciuszko National Park in accordance with the approved Long-Term Road Strategy;</p> <p>e) include a topsoil balance for the site, which includes a strategy for:</p> <ul style="list-style-type: none"> maximising the reuse of topsoil on site (provided it is suitable for reuse); using other suitable growth media; and importing additional topsoil to the site (if necessary); 		SHL have engaged the services of SLR and Alpine Flora (Liz McPhee) to prepare the draft Rehabilitation plan and the Project Execution Plan	Not triggered
83.			<p>f) include a native seed collection and propagation program in accordance with Florabank (www.florabank.org.au) and/or NPWS guidelines for the site, which includes a strategy for:</p> <ul style="list-style-type: none"> maximising the collection and use of native seed resources from the site prior to disturbance; collecting seed from the surrounding area, including other parts of the Kosciuszko National Park (with the approval of the NPWS); and prioritising the use of local sources of seed for the ecological rehabilitation of the site; 	Ecosystem and PCT composition spreadsheet - for determining seed mixes composition percentage etc 2022 PCT Species list and rehab sites	At the time of the audit, discussions were underway with native seed collection contractors and some seed had been collected Liz McPhee has been monitoring the Flora of Lobs Hole 21 September 2021	Not triggered
84.			<p>g) include detailed plans for the rehabilitation of the disturbance area at each of the following sites, describing the measures that would be implemented to comply with the rehabilitation objectives in Table 3 or 5:</p> <ul style="list-style-type: none"> Talbingo Reservoir; Lobs Hole; Marica; Plateau; Tantangara Reservoir; and Rock Forest; 		There will be subsets of these in the Rehabilitation Plan.	Not triggered
85.			h) include a detailed ecological rehabilitation management plan for the development that:		The preparation of the RMP was in progress at the time of the audit. Snowy Hydro have engaged	Not triggered

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION						
			<ul style="list-style-type: none"> provides an overarching description of the proposed ecological rehabilitation works, identifying the: plant community types to be established; and area of land to be established for each plant community type; provides maps showing the proposed location of each plant community type; describes the detailed measures that would be implemented to comply with the ecological rehabilitation objectives in Table 4; 		<p>consultants SLR and Alpine Flora to develop the RMP and indicated that there will be an overall rehabilitation strategy with individual plans for site locations which will be developed in stages.</p> <p>It was reported that PCTs will be addressed in overall plan and specific areas.</p>	
86.			i) identify the key risks to the successful completion of the rehabilitation and describe the contingency measures that would be implemented to address these risks;		Rehabilitation Risk Dashboard had been developed (is a live document) at the time of the audit (has GIS maps function - live) and was being used to assist with rehabilitation planning	Not triggered
87.			j) include detailed completion criteria and performance indicators for the rehabilitation of the development (having regard) to the criteria and indicators in Table 4, including criteria for triggering remedial action (if necessary); and			Not triggered
88.			k) include a program to monitor and publicly report on: <ul style="list-style-type: none"> the rehabilitation of the site; the implementation of the each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and progress against the detailed completion criteria and performance indicators. 			Not triggered
89.	11		The Proponent must implement the approved Rehabilitation Management Plan for the development.			Not triggered
REHABILITATION MANAGEMENT PLAN (Exploratory works)						
90.		5.2.3	<p>Seed and cutting collection and propagation</p> <p>Seed and cuttings will be sourced from areas being cleared for the project and more broadly across the KNP to meet the revegetation requirements of the project.</p>	Email from SHL to to NPWS (Rod Peel and Glenn Stroud) dated 01/02/2022 with maps showing proposed areas of seed collection. Snowy 2.0 Seed Inventory July 2021; Snowy Hydro Alpine and Sub-Alpine cutting bed July 2021 - Monaro Native Tree Nursery spreadsheet listing botanical name, common name and provenance. Photos of propagated cuttings at the Monaro tree	SHL had obtained the services of Greening Australia and Native Seeds Pty Ltd for seed collecting. Native Seeds had already undertaken some seed picking. Cuttings taken in 2020/2021 were being propagated and nurtured at the Monaro tree nursery (through Liz McPhee as contractor). Native Seeds will be collecting seeds in 2022 - it has been reported that there have been challenges to date in collecting at the correct time due to weather, rain etc. Seed production areas and processes are currently being investigated.	Compliant

ID	S3 - CoA No	Plan / section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION						
				ursery in Gunningrah Road Bombala	Seeds are being stored at the Monaro tree nursery in a cool room	
91.		5.2.5	<p>Early rehabilitation trials</p> <p>The few areas that can be rehabilitated (during/following exploratory works) will be restored as small-scale trials before further rehabilitation works which will be detailed in the Main Works RMP. The areas where these trials may be undertaken include:</p> <p>Redundant sections of Lobs Hole Ravine Road; Decommissioned drills sites and access paths; and Selected areas on the Exploratory Camp and Minetrail Road batter slopes (where no further disturbance is anticipated).</p>	<p>Lobs Hole Rehabilitation Trials by Liz McPhee dated 10 Feb 2021 (approved April 2021).</p> <p>Lobs Hole Rehabilitation Trials by Liz McPhee dated 5 September 2021</p>	<p>The Lobs Hole Rehabilitation Trials report details the scope of the trials and plan for rehabilitation of the sections of road within the Lobs Hole area that will no longer be impacted by the construction of Snowy 2.0.</p> <p>The report notes also that it is envisaged that other areas outside of the Exploratory Works Rehabilitation Plan, such as bore hole sites will also be used to investigate the success of different rehabilitation techniques in the future, but is not included as part of the current document.</p> <p>The primary goals of the ecological rehabilitation trials in Lobs Hole is to assess the efficacy of a range of rehabilitation techniques to test the use of topsoil, direct seeding, tubestock planting and grazing protection techniques to reinstate the dominant colonising species and to return ecological function and the appropriate Plant Community Types (PCT's) to the disturbance areas.</p>	Compliant
92.		5.2.5	<p>A detailed methodology for the trial rehabilitation works will be developed prior to progressing beyond phase 1 and 2 (stabilisation and decommissioning). The project will engage with the NPWS Snowy 2.0 team and BCD early in development of the rehabilitation methodology to seek their advice and lessons learnt. The detailed methodology for trial rehabilitation will include phases 3 through 6 (refer to Table 5-1) including plantform establishment, growth medium development, ecosystem and plantform establishment, and ecosystem and land use development.</p>		<p>Detailed trial methodology not yet triggered</p> <p>To be reviewed at next scheduled IEA.</p>	Not triggered
Part A EPBC Condition - Annexure A - Conditions specific to the action						
Rehabilitation						
93.	25		<p>The Rehabilitation Management Plan required by condition 10 of the NSW approval must include provisions to make monitoring data (excluding sensitive ecological data) available as part of the monitoring, evaluation and reporting program required by condition 10k of the NSW approval.</p>		<p>This condition is not formally triggered - the Rehabilitation Management Plan is due for submission to DPIE by 21 April 2022 (Construction commenced 21 October 2020). Refer to information provided under Condition 10 of the NSW approval.</p>	Not triggered

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

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
94.	12		FLORA AND FAUNA Biodiversity Offset Payments The Proponent must make the following payments to the NPWS to offset the residual biodiversity impacts of the Main Works: a) \$14.76 million prior to the commencement of construction;		Part a) was assessed as compliant at the IEA #1 and was therefore not triggered at this Audit.	Not triggered
95.			b) \$14.76 million within 1 year of the commencement of construction;	Tax Invoice from DPIE dated 29/09/2021 for \$14.76m plus GST - total \$16.236m Payment receipt from Snowy Hydro - Biodiversity offset 2nd payment Sept 2021 - payment date 22/10/2021 - approval status - paid	Invoice / receipt for the appropriate amount was sighted	Compliant
96.			c) \$14.76 million within 2 years of the commencement of construction; and			Not triggered
97.			d) \$14.76 million within 3 years of the commencement of construction. • <i>This payment represents 80% of the Proponent's liability to offset the residual biodiversity impacts of the Main Works. These funds will augment the \$8,492,909 already paid to the NPWS to offset the residual biodiversity impacts of the Exploratory Works.</i> • <i>The NPWS will use these funds and any interest generated by these funds to enhance the biodiversity values of the Kosciuszko National Park. However, in the limited circumstances where it is not possible to address all of the residual biodiversity impacts of the development within the Kosciuszko National Park, the NPWS may use some of these funds to ensure suitable conservation actions are carried out outside the park.</i> • <i>To ensure accountability, the NPWS will:</i> ~ <i>develop and implement a detailed program for the allocation of these funds to specific projects, focusing on the ecosystems and species affected by the development; and</i> ~ <i>monitor, evaluate and publicly report on the progress of the implementation of the detailed</i>			Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
98.			<p><i>program and the effectiveness of the specific projects;</i></p> <ul style="list-style-type: none"> • <i>The NPWS will develop and implement a specific program in consultation with DAWE to carry out conservation actions to address the residual biodiversity impacts of the development on the following Commonwealth-listed species and communities:</i> <ul style="list-style-type: none"> ~ <i>Alpine Sphagnum Bogs and Associated Fens;</i> ~ <i>Broad-toothed Rat;</i> ~ <i>Smoky Mouse;</i> ~ <i>Alpine Tree Frog; and</i> ~ <i>Alpine She-oak Skink.</i> 			
99.	13		<p>Additional Biodiversity Offset Payment</p> <p>Within 3 years of the commencement of construction, the Proponent must submit a report via the Major Projects Portal that:</p> <ol style="list-style-type: none"> <i>identifies the final disturbance area of the Main Works;</i> <i>calculates the difference between the maximum disturbance area and the final disturbance area of the Main Works; and</i> <i>calculates the value of the outstanding biodiversity offset payment on a proportionate basis.</i> 			Not triggered
100.						
101.						
102.	14		<p>Within 6 months of the Planning Secretary setting the value of the outstanding biodiversity offset payment, the Proponent must pay the funds to the NPWS.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • <i>These conditions relate to the remaining 20% of the Proponent's liability to offset the residual biodiversity impacts of the development.</i> • <i>They are intended to create an incentive for the Proponent to reduce the biodiversity impacts of the development by reducing the final disturbance area of the development during the final design of the project.</i> • <i>For instance, if the final disturbance area of the Main Works is only 87% of the maximum</i> 			Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			<p><i>disturbance area of the Main Works then the Proponent will only have to pay 35% of the outstanding liability of \$14.76 million.</i></p> <ul style="list-style-type: none"> <i>These funds will be added to the funds paid under condition 12 and managed in accordance with the notes under that condition.</i> 			
103.	15		<p>Potential Additional Offsets – Alpine Sphagnum Bogs and Associated Fens</p> <p>The Proponent must ensure that the development does not cause any exceedances of the following performance measures in the Alpine Sphagnum Bogs and Associated Fens above the Gooandra Volcanics and Kellys Plains Volcanics (see the figures in Appendix 2):</p> <p>a) negligible change to the shallow groundwater regime supporting the bogs and associated fens when compared to a suitable control site; and</p> <p>b) negligible change in the ecosystem functionality of the bogs and associated fens.</p>			Not triggered
104.	16		<p>If the Planning Secretary determines that the development has caused exceedances of the performance measures in condition 15 above, the Proponent must pay additional funds to the NPWS within 3 months of the determination to offset the groundwater-related impacts of the development on these Alpine Sphagnum Bogs and Associated Fens. The Planning Secretary will determine the amount of funds the Proponent must pay following consultation with the NPWS, DAWE and the Proponent; and having regard to:</p> <p>a) the significance of the impacts on the bogs and associated fens;</p> <p>b) the relevant values from the Biodiversity Offsets Payment Calculator; and</p> <p>c) the likely cost of carrying out the conservation actions required to offset these impacts on the bogs and associated fens.</p> <p><i>Note: These funds will be added to the funds paid under condition 12 and managed in accordance with the notes under that condition.</i></p>			Not triggered
105.			<p>Biodiversity Management Requirements</p> <p>17. The Proponent must:</p>	<p>Are review of aerial WebGIS overlays of the disturbance area (viewed live and</p>	<p>The review of the WebGIS images did not identify any areas of disturbance outside the boundary.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			a) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance area;	copies of images dated December 2021 provided)		
106.			b) minimise the clearing of native vegetation and habitat within the disturbance area;	Interviews with SHL and FGJV Master Tracker Clearing Register WebGIS Clearing (Land disturbance) Permit 0008-0117 - Trunkline Services Ch 8300 - Ch 16000 dated 13/10/2021 with 5 dates of revalidation to 2/02/2022; Clearing (Land disturbance) Permit 0008-0103 - Quarry Ttrail Road dated 26/01/2022, witness point signed by SHL 28/01/2022 Clearing (Land disturbance) Permit 0008-0113 - Ravine Road Additional clearing Part 3 Ch 10850- 10895 dated 7/10/2021 Clearing Permits Folder (screen shot)- showing up to permit 0146	The review of clearing permits, the Master Tracker, Clearing Register and the WebGIS indicated that clearing is within the maximum allowable clearing limits, and that overall, clearing appears to be minimised as far as possible.	Compliant
107.			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;	Interviews	Information from interviews indicate that there doesn't appear to have been any specific tree trimming for safety purposes since the last audit. The majority of trimming would have been undertaken following the bush fires.	Compliant
108.			d) minimise the impacts of the development on threatened flora and fauna species or ecological communities within the disturbance area and its surrounds, including the: <ul style="list-style-type: none">• Alpine Sphagnum Bogs and Associated Fens;• Alpine She-oak Skink; (EPBC - max 80.83 ha)• Alpine Tree Frog; (EPBC - max 22.87 ha)• Booroolong Frog;• Broad-toothed Rat; (EPBC - max 61.47 ha)• Caladenia montana;• Clover Glycine;• Eastern Pygmy-possum; (EPBC - max 197.95 ha)	Master Tracker Clearing Register Predicted Clearing Report dated 5 Jan 2.07 ha, Upstream surge shaft stockpile area (within EIS construction envelope); Predicted Clearing Report - Tantangara Spoil Road clearing (July 22, 2021). 9.42 Ha; Email from Coffey (Greg Hanton) 23 Dec 2021 - noting have updated WebGIS with supplied post clearing survey.	Master Tracker Clearing Register - updated whenever any clearing occurs. Currently clearing in the Marica upstream surge shaft area - clearing area for stockpile of material from surge shaft excavation (instead of carting to Rock Forest) Predicted Clearing Report dated 5 Jan 2.07 ha, Upstream surge shaft stockpile area (within EIS construction envelope). Added to the clearing master tracker once report is generated Summary Table for SHL Post clearing reports are sent to Jess from construction team, (a survey file - KML file, which is uploaded to the Web GIS by Coffey.	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
109.			<ul style="list-style-type: none"> • Gang-gang Cockatoo; • Hoary Sunray; • Kiandra Leek Orchid; • Leafy Anchor Plant; • Mauve Burr-daisy; • Max Mueller's Burr-daisy; • Raleigh Sedge; • Slender Greenhood; • Smoky Mouse; (EPBC - max 84.29 ha) • Spotted tailed Quoll; • Southern Myotis; • Thelymitra alpicola; • White-bellied Sea-eagle; <p>e) minimise potential fauna strike in sensitive habitat areas on the road network within the site, including reducing speed limits between sunset and sunrise and constructing suitable underpasses;</p>	<p>(sent to Snowy named as Headrace Surge Structure - 12 Jan 2022.</p> <p>Clearing Permits 0008-1117 and 0008-1113.</p> <p>Monthly Project Reports</p>	<p>Email from Coffey (Greg Hanton) 23 Dec 2021) - noting have updated WebGIS with supplied post clearing survey.</p> <p>Clearing permits managed on site - sighted Permit nos. 0008-1117 and 0008-1113.</p> <p><i>Review Clearing Register, workflow documents (clear and grub etc), Monthly project progress reports, monthly look aheads - monitoring programs</i></p>	
				<p>Snowy 2.0 Main Works Fauna Strike Mitigation Report - Fauna Strike Monitoring Report August 2021 by EMM dated 26 August 2021 .</p> <p>Email from Nathan Garvey (EMM) to Angela Jenkins (BCD) dated 28/09/2021 attaching outcomes of fauna strike monitoring to date.</p> <p>Email response to above by Michael Saxon (BCD) to Chris Buscall (SHL) dated 4/11/2021 noting concerns about reducing monitoring actions at Lobs Hole and delaying discussion regarding vehicle strike at impact mitigation measures at Marica.</p> <p>Email response to above by Chris Buscall to Michael Saxon dated 10/01/21, addressing concerns and flagging further dialogue regarding response</p> <p>Site inspection - presence of underpasses (incomplete at time of inspection)</p> <p>Underpass Inspections Ravine Road - NPWS report dated 2 February 2022 noting that the inspection of the underpass at Chainage 4850 highlighted many</p>	<p>The Fauna Strike Mitigation Report by EMM noted that there has been no reported or observed fauna strikes on threatened species in the monitoring periods from November 2020 to July 2021. The Report included results of the detection dog surveys.</p> <p>Correspondence between SHL, BCD and NPWS indicates evidence of some consultation with agencies on this matter.</p> <p>Six (6) underpasses have been installed on Ravine Road - issues raised by NPWS and are being rectified. At the time of the audit, cameras had been purchased but were not yet installed yet - awaiting rectification works completion.</p> <p>Letter from NPWS regarding the underpass inspection in Feb 2022 noted that it highlighted many improvements over the intial works, with further recommendations and comments. Consultation with NPWS is ongoing.</p> <p>IVMS continues to be installed in project vehicles. It could not be confirmed that ALL vehicles including contractor vehicles were filled with IVMS.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
				improvements and some minor changes still need to be made. Site inspection - speed limit of 30km/hr signage along Lobs Hole Ravine Road.		
110.			f) undertake pre-clearance surveys;	Narla Pre-clearance Survey - Quarry Trail Road October 2021 (widening - near Tantangara) - required prior to any clearing - one for each permit (146 permits to date including some future works) Gooandra Trunk Services Pre-clearing report Feb 2021 - provided and approx area marked on my hard copy map. (valid for whole period) 5 Clearing Permits related to the above pre-clearing report. Original Permit was no. 59, which was broken up into 5 separate permits 112, 114, 117, 121, 132.	Evidence was provided that pre-clearance surveys are undertaken across the project.	Compliant
111.			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;	Site inspection Interviews	The site inspection noted apparent improvement in the salvage of felled habitat trees, particularly at Marica / surge shaft and Tantangara.	Compliant
112.			h) collect seeds for use in the ecological rehabilitation of the site;	Snowy Hydro Kosciuszko National Park Seed collection Report February 2022 by Greening Australia (for SHL) Native Seed Collection Data Sheet - completed by Kim Lembke - collected at Tantangara Road Tantangara 23/01/2022.	Evidence was sighted that seeds are being collected for the ecological rehabilitation of the site. Greening Australia has been contracted to source, process and store seed required for the Snowy Hydro 2.0 restoration work. Tasks included in these works consist of project management, seed collection, seed cleaning, seed testing, seed databasing and storage. A list of the seed collected during the first KNP seed collection event between Feb 4 and Feb 6 2022 is provided	Compliant
113.			i) minimise the spread of weeds, pathogens and feral pests on site, and import or export of these matters to or from the site, including the Phytophthora, Chytrid Fungus, African Lovegrass and Ox-eye Daisy;	Follow-up of previous audit findings Site inspection	Findings have been raised at the past two IEAs regarding management of weeds. Issues were initially raised as an Observation at IEA#1, and was escalated to non-compliance at IEA#2. Whilst additional works have been undertaken to manage	Non-compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
					weeds including installation of permanent wheel wash facilities, issues still remain, and FGJV need to better monitor the effectiveness of the system.	
114.			j) minimise the generation and dispersion of sediment to watercourses, particularly Yarrangobilly River and Wallace Creek;	Site inspection Interviews	An observation was raised at this audit in regards to a site inspection observation that the wheel wash at Tantangara was not working due to malfunction of a pump and running out of water. Refer to previous non-compliance follow-up comments.	Compliant
115.			k) minimise the light spill from night works, including using directional and LED lighting; and	Trunk Services Lighting Plan S2-FGJV-ENV-PLN-0262 dated 07/12/2021 Lighting Plan folder - Lighting plans in place for Lobs Hole, Talbingo, Tantangara and Trunk Services. Lighting Tower Checklist	The Lighting Plans reviewed include instructions to eliminate upward spill light, examples of shielded fittings, use of energy efficient bulbs including LED, and use of asymmetric beams where floodlights are required. Maps are also provided with position of lighting source and direction of direct light	Compliant
116.			l) minimise bushfire risk.	Site inspection Interviews	At the time of the audit, the site was very wet and there was low fire danger. However, the site inspection noted that fire trailers were deployed to the sites visited.	Compliant
117.	18		Biodiversity Management Plan Prior to carrying out any construction, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: a) be prepared by a suitably qualified and experienced biodiversity expert/s in consultation with the NPWS, BCD and DAWE; b) describe the detailed measures that would be implemented to comply with the biodiversity mitigation requirements in condition 17 above; c) include a strategy to address the requirements in condition 17(e), including:	Biodiversity Management Plan Rev I 12/10/2020 (FGJV);	The Biodiversity Management Plan was reviewed for adequacy at the first IEA and had not been revised or updated since then. It was previously assessed as compliant.	Compliant
118.						
119.						

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			<ul style="list-style-type: none"> • a detailed risk assessment to identify the locations where underpasses would be built during the upgrade of the road network; and • a trigger, action and response plan for reducing speed limits on the road network on site to minimise fauna strike; 			
120.			<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"> ~ establishing a suitable control site; ~ baseline monitoring of the condition of the relevant Alpine Sphagnum Bogs and Associated Fens; ~ detailed criteria for determining the impact of the development on the performance measures; and ~ a program to monitor the impacts of the development against the detailed criteria. 			
121.	19		Proponent must implement the approved Biodiversity Management Plan for the development		See below: Criteria from Biodiversity Management Plan	
BIODIVERSITY MANAGEMENT PLAN						
122.		BMP 4.2.2.1	<p>The true extent of GDE impact is not yet known. The impact may vary from the 6.93 ha predicted for PCT 637 Alpine bogs and fens. Monitoring of deep and shallow groundwater during construction of the project will determine the extent to which deep groundwater and shallow GDE water is connected and which GDE patches, if any, are impacted by the project.</p> <p>Deep and shallow groundwater levels will be monitored in accordance with the Groundwater Monitoring Program (as detailed in the Water Management Plan). Once the extent of impact has been confirmed then follow up actions will be carried out in accordance with section 5.3.</p>	<p>Master Groundwater Monitoring Database (SHL) updated to October 2021;</p> <p>Groundwater Inflow Matrix - Snowy Hydro</p> <p>ETM Pacific LoRa Solution - proposal for remote / real time monitoring of groundwater levels</p> <p>Email from the Project Water and Spoil Management Scientist (SHL) providing information on consultation with DPIE (03/02/2022) to establish what triggers a model update.</p>	<p>Groundwater monitoring was being conducted - SHL database was sighted and reviewed.</p> <p>At the time of the audit, tunnelling was being undertaken only at the Main Access Tunnel (MAT) at Lobs Hole (approximately 1200m of tunnelling completed) and the ECVT (approximately 100 - 200m of tunnelling completed).</p> <p>The areas of higher predicted inflows and drawdown areas had not yet been encountered. It is expected that drawdown would commence from the beginning of tunnelling at Tantangara - this could potentially commence by May 2022. It is also expected that the area under Nungar Creek may be encountered by around October 2022 (tunnelling from Tantangara).</p> <p>In summary, there has been no measured groundwater drawdown to date, and would be re-assessed at future audits.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
123.		BMP 5.3	<p>Monitoring of groundwater levels will be carried out in accordance with the Groundwater Monitoring Program (Water Management Plan).</p> <p>If the shallow groundwater regime in GDE patches shows a drawdown in exceedance of the 80th percentile (<i>May to October - as per Figure 5-2</i>) and this drawdown is subsequently found to be attributable to the project, then a non-negligible impact to the shallow groundwater system will be confirmed.</p>	<p>Master Groundwater Monitoring Database (SHL) updated to October 2021;</p> <p>Groundwater Inflow Matrix - Snowy Hydro</p>	<p>Groundwater monitoring was being conducted - SHL database was sighted and reviewed.</p> <p>There had been no measured groundwater drawdown to date.</p> <p>Also refer to Groundwater Management audit table.</p>	Compliant
124.		BMP 5.3	<p>Where there is a confirmed change to the shallow groundwater regime (as determined by the Groundwater Monitoring Program), an adverse impact to ecosystem function is assumed to follow.</p> <p>At the time of registering a confirmed impact to groundwater levels in GDE patches, the Project will notify agency stakeholders and will investigate with experts if ameliorative steps are available to recover the groundwater levels in the GDE patches.</p>		No detected change to the groundwater regime to date	Not triggered
125.		6.5 BMP	<p>Biodiversity monitoring reporting</p> <p>a) An annual report will be prepared to report on the variety of biodiversity matters addressed in this plan. This report, which will be made available to NPWS, DAWE and BCD, will include the following matters:</p> <ul style="list-style-type: none"> i. summary of weed and vertebrate pest control activities undertaken since last report (as detailed in Appendix F); ii. account of all clearing activities including tracking against clearing limits and threatened species habitat limits; iii. post-clearing ecology reports since last report (as detailed in Appendix C); iv. results of threatened species, groundwater-dependant ecosystem, weed and pest monitoring (as detailed in Appendix B); 	<p>Snowy 2.0 Main Works Biodiversity Monitoring Program: Year 1 Annual Monitoring Report (2020 / 2021) February 2022 v1 Draft</p>	<p>At the time of the audit, the Annual Monitoring Report was in progress by EMM Consulting Pty Ltd on behalf of Snowy Hydro. A draft report was provided to the auditor for review on 15 Feb 2022. However, the Annual Monitoring Report does not address the majority of the biodiversity matters listed under section 6.6 of the BMP.</p> <p>No summary of weed and vertebrate pest control activities undertaken was included in the draft report.</p> <p>The draft Annual Report identified that monitoring results triggered pest control in accordance with the Weed, Pest and Pathogen Management Plan.</p> <p>Not included in the draft EMM Annual Monitoring Report</p> <p>Not included in the draft EMM Annual Monitoring Report</p> <p>Draft Annual Monitoring Report addresses threatened species, weed, pest and phytophthora monitoring results</p>	OBS

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			v. account of fauna strike mitigation strategy management actions (as detailed in Appendix G); vi. account of any relevant incidents and non-compliances; and vii. efficacy of the implemented biodiversity management measures against the performance measures included in section 6.5.1 of this plan. b) Where possible, threatened species, weed and pest monitoring results will informally be provided to NPWS, DAWE and BCD as they become available to assist with conservation activities being undertaken in the locality by those agencies (further detail included in Appendix B).		<p>Draft Annual Report does not address fauna strike Fauna strike is addressed in a separate EMM report - August 2021</p> <p>No incidents or non-compliances reported in the draft Annual Monitoring Report</p> <p>Draft Annual Report does not address the efficacy of the biodiversity management measures against the performance measures in section 6.5.1 / Table 6-2.</p>	
					<p>Whilst some reports (3) have been provided to BCD (listed below), other monitoring and quarterly reports referenced in the Draft Annual Report have not been provided to BCD or other agencies.</p> <p>It is recommended that Snowy Hydro forward any quarterly or other biodiversity monitoring reports to the relevant agencies on a regular basis, once received from the consultant and reviewed to keep agencies informed of key project issues</p>	Compliant OFI
126.		6.5 BMP	A public version of this report will be made available in accordance with schedule 3, condition 18(d) of the infrastructure approval (SSI 9687) and condition 9(b) of the commonwealth approval.		The Annual Report was still in draft at the time of the audit, and therefore this requirement has not yet been triggered.	Not triggered
127.		BMP 6.5.1 Tbl 6-2 (2)	<p>Performance Measure</p> <p>The project will ensure that if the shallow groundwater regime is impacted and results in a measurable change to the ecosystem function of the Alpine Bogs and Fens vegetation community that appropriate biodiversity offsets will be calculated and paid.</p>		Monitoring to date does not indicate any impact to groundwater regime at this stage of the development.	Not triggered
128.		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</p>	<p>Snowy 2.0 Main Works - Biodiversity Monitoring Program: Year 1 Quarter 1 Monitoring Report dated 21 January 2021;</p> <p>Snowy 2.0 Main Works - Biodiversity Monitoring Program: Year 1 Quarter 2 Monitoring Report dated 30 April 2021;</p> <p>Snowy 2.0 Main Works - Biodiversity Monitoring Program: Year 1 Quarter 3 Monitoring Report dated 29 September 2021;</p> <p>Snowy 2.0 Main Works - Biodiversity Monitoring Program: Year 1 Quarter 4</p>	Quarterly Biodiversity Monitoring Reports and Monitoring period reports have been provided to Snowy Hydro by EMM Consulting as part of a monitoring contract.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			make interim recommendations for modifications to the monitoring program, if warranted.	<p>Monitoring Report dated 15 December 2021;</p> <p>Snowy 2.0 Main Works Biodiversity Monitoring Program: Year 1 Annual Monitoring Report (2020/2021) dated 11 February 2022</p> <p>Snowy 2.0 Main Works Fauna Strike Mitigation Report - Fauna Strike Monitoring Report August 2021 - dated 26 August 2021</p> <p>February 2021 monitoring period report dated 5 March 2021;</p> <p>July 2021 monitoring period report dated 4 August 2021</p> <p>September 2021 monitoring period report dated 20 Sept 2021</p> <p>Octover 2021 monitoring period report dated 20 October 2021</p>		
129.		Table 5-1; BM04	In the event that threatened species, active breeding habitat of threatened species or endangered ecological communities are unexpectedly identified during construction, the Unexpected Threatened Species Finds Procedure included in Appendix D will be followed.	<p>The December 2021 FGJV Project Report noted that a Mountain Spider Orchid was identified and confirmed as Caladenia Montana. It also notes</p> <p><i>"While the Biodiversity Development Assessment Report (BDAR) identifies the presence of C. Montana in Lobs Hole, the Environmental Impact Statement shows no presence of threatened species along Ravine Road. Additionally, Ravine Road is not included in the Main Works Biodiversity Management Plan. As such, the Contractor notified the Employer of C. Montana as an unexpected find".</i></p>	Mountain spider Orchid - found at Lobs Hole Ravine Road turnaround bay - found during a pre-clearing survey - FGJV worked through the flow chart / procedure.	Compliant
130.		Table 5-1; BM06	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		The site visits found that overall, this requirement was being complied with. Various no-go / Environmentally sensitive areas were established (refer to photos in report).	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			designated and signed as no-go zones or environmentally sensitive area.			
131.		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>		<p>Overall, the clearing limits/disturbance areas were observed as delineated using blue rope, however in some areas (particularly on some roadsides / linear infrastructure), rope barriers are continually being damaged by large animal / wild horses.</p> <p>It was advised that in some cases, the rope has been reinstalled, however continues to be damaged on a regular basis, and for certain areas has not been reinstalled.</p>	Compliant
132.		Table 5-1; BM12	Fauna detected during pre-clearing surveys shall be relocated into areas of retained vegetation in accordance with the Preclearing and Clearing Procedure (Appendix C) and Fauna Handling and Rescue Procedure (Appendix E).	<p>Fauna Handling Record Sheets (S2-FGJV-ENV-CHE-0007). The following completed examples were sighted:</p> <p>Blue Tongue Lizard 20 Jan 2022 Brown Snake - 19 Jan 2022 Bat 22 Jan Quail - 8 Dec 21 Pygmy possum Dec 2020. Eastern Banjo Frog Oct 2020 Screen shot of folders containing Fauna Handling forms</p>	Various examples of completed Fauna Handling Records sheets were sighted and reviewed. An overview of the file folder containing the completed forms provided evidence of compliance with this requirement.	Compliant
133.		Table 5-1; BM13	Where manual relocation of frogs is required, the hygiene requirements outlined in the Fauna Handling and Rescue Procedure (Appendix E) will be implemented to prevent the spread of Chytrid fungus.		Could not be verified at this audit - fauna handling record sheets were provided as evidence, however none of the fauna encountered were frogs.	Not triggered
134.		Table 5-1; BM14	Habitat trees within areas to be cleared will be marked during the pre-clearing inspection by the Ecologist. GPS coordinates for all habitat trees identified will be recorded during the pre-clearing survey.	Site inspection Pre-clearing survey	Pre-clearing reports identified the GPS coordinates or habitat trees recorded within the survey area and notes that the habitat trees were identified and demarcated in accordance with the approved methodology	Compliant
135.		Table 5-1; BM15	Where a HBT is felled, the tree hollows will be salvaged, and the salvaged sections reused as hollow replacements for the rehabilitation of the site.	Site inspection	Various examples of HBT trees moved outside the clearing boundary and retained were sighted during the site visit at Marica (the most active area for clearing at the time of the audit)	Compliant
136.		Table 5-1; BM17	HBTs marked for removal will be checked by the Ecologist prior to felling/ disturbance and any	Pre-clearing Survey Report - Tantangara Q2 Area Road Realignment 4/10/2021	Permits and procedures require that an ecologist is present during clearing.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			<p>animals found will be relocated to adjacent habitat. Ecologists should capture and/or remove fauna that have the potential to be disturbed as a result of clearing activities.</p> <p>To prevent injury and mortality of fauna, an ecologist will be present at the time of felling HBTs. Further details are provided in the Fauna Handling and Rescue Procedure included in Appendix E.</p>	<p>(Pre-clearing survey conducted 9/4/2021)</p> <p>Pre-clearing Survey Report - Gooandra Trunk Services Feb 2021</p> <p>Pre-clearing reports folder / subfolders with retained pre-clearing survey reports</p> <p>Clearing Permit No 0008-0113 - Ravine Road Additional Clearing - 7/10/2021. Part 3. Part D - Project Ecologist section (completed 6/10/21).</p> <p>Clearing Permit no. 008-0117 - Trunkline Services dated 13/10/2021. Part D - Project Ecologist section completed 22/09/2021, signoff dated 6/10/2021. Permit revalidated to 02/02/2022.</p> <p>Incident Report - INC 0911 - Clearing without an ecologist present.</p>	<p>The incident report relating to clearing without an ecologist present provides evidence that it is standard practice to have an ecologist on site when clearing, and when this did not occur at the Marica Trail in September 2021, this triggered the incident report.</p>	
137.		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.	Master Tracker Clearing Register WebGIS	PCTs and threatened species habitats are monitored as part of the Master Tracker clearing register and are also tracked on the WebGIS.	Compliant
138.		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 – Weed Monitoring – 1/year in early summer 	<p>Snowy 2.0 Main Works Biodiversity Monitoring Program: Year 1 Annual Monitoring Report (2020/2021) (in draft at the time of the audit and not formally issued to agencies)</p>	<p>Annual report will include a recommendation to review the full program in consultation with BCS / NPWS etc.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			– Pathogen Monitoring - Annual Phytophthora soil tests.			
BIODIVERSITY MONITORING PLAN (Appendix B - BMP)						
139.		BMP App B Tble 4.2	Threatened Flora Monitoring (Clover Glycine and Kiandra Leek-Orchid) * 8 impact and 6 control monitoring sites (Tantangara area - see site inspection checklist) * To be conducted bi-annually between Dec & January (dependent on flowering)	Snowy 2.0 Main Works Biodiversity Monitoring Program: Year 1 Annual Monitoring Report (2020/2021) (Draft - Feb 2022)	The draft Annual Monitoring Report included outcomes of monitoring in Dec 2020 and Jan 2021 at 8 impact and 6 control monitoring sites.	Compliant
140.		BMP App B Tble 5.2	Small terrestrial mammal presence / absence monitoring (Smoky Mouse, Eastern Pygmy-possum, Broad toothed rat) * Remote camera monitoring sites established (21 impact sites) (Lobs Hole Ravine Road and construction areas, Marica trail, Tantangara Road and construction areas) and 18 control sites outside construction envelope. Min 30 day deployment of cameras * Faecal search (broad tooth rat only) - one per event * 4 monitoring events per year (one per season) * Data to be kept in a spreadsheet to determine presence /absence between monitoring periods *Trends to be analysed by suitably qualified person to detect changes in absence/presence.		The draft Annual Monitoring Report included presence / absence monitoring for 4 periods - Q1- Q4 - Summer, Autumn, Winter and Spring including for Smoky Mouse, Eastern Pygmy Possum and Broad Tootheed rat.	Compliant
141.		BMP App B Tble 5.3	Small Terrestrial Mammal habitat characteristic monitoring (Smoky Mouse, Eastern Pygmy-possum, Broad toothed rat): * Pair of transects to be placed at sites as per the presence / absence monitoring * Estimate of habitat characteristics at each 1 m interval, weed cover (sum over 50m transect) * One monitoring event per year (spring) * Transect data to be kept in a spreadsheet to determine any changes in % cover		The draft Annual Monitoring Report included small terrestrial mammal habitat characteristic monitoring	Compliant
142.		BMP App 2 Tble 6-1	Frog occupancy monitoring (presence/absence) (Booralong Frog and Alpine Tree Frog) * Stream transects along section of waterways providing breeding habitat. * The collected data will be tracked on a spreadsheet to determine trends in occupancy		The draft Annual Monitoring Report included Frog occupancy monitoring (presence /absence) including Alpine Tree Frog and Booralong Frog	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			Booralong Frog (Talbingo area) * 4 impact monitoring transects on Yarrangobilly River and 1 at Wallaces Creek * 2 control transects along Yarrangobilly River, upstream from disturbance footprint * Surveys to be at night during breeding season (Nov to Mid-Dec) twice per year for frog abundance Alpine Tree Frog (Tantangara, various) * 4 impact transects located on Kellys Plain Creek, Tantangara Ck, Nungar Ck, Tantangara reservoir between MOL & FSL * 4 proposed control transects on Eucumbene R, Murrumbidgee R, Nungar Ck & Tantangara Ck * Surveys to be at night during breeding season (Dec to Jan) twice per year for frog abundance.			
143.		BMP App 2 Tble 6-2	Habitat characteristic monitoring - Booralong Frog * Aerial imagery will be collected using unmanned aerial vehicles (UAVs or drones) Data to be processed using software and classified into: cobble banks, bedrock banks, riparian vegetation, water and imported into GIS database. * Monitoring annually during breeding season (Nov - Mid Dec) * Location - Survey sites will replace Booroolong Frog occupancy monitoring		The draft Annual Monitoring Report included Booralong Frog habitat characteristic monitoring	Compliant
144.		BMP App 2 Tble 7-1	Alpine She-oak Skink Presence/absence monitoring Tile grid locations at key locations: * 5 impact sites including Tantangara Rd (2 sites) and Tantangara construction area (3 sites) * 4 control sites located outside disturbance area and construction envelope * Surveys to be undertaken between October and March - each tile grid checked once a month (6 times) * Data to be tracked on a spreadsheet to determine trends in occupancy, and analysed by suitably qualified person		The draft Annual Monitoring Report included Alpine She-oak Skink occupancy monitoring - December, January, February and March 2021 and October 2021	Compliant
145.		BMP App 2 Tble 8-1	Feral Animal occupancy monitoring Remote camera monitoring * Cameras to be placed at locations adjacent to		The draft Annual Monitoring Report included the outcomes of feral animal occupancy monitoring. The review of adaptive management triggers included comments:	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			<p>project infrastructure area (camps, admin buildings) and roads, left in place for 30 days</p> <ul style="list-style-type: none"> * 18 monitoring locations - Tantangara roads and infrastructure area (JD counted from map in Fig 8.2) * 24 monitoring locations - Lobs hole Ravine Road and infrastructure areas - counted as above) * Coordinates to be recorded at each camera location to allow return to same locations Location - within Smoky mouse habitat * Frequency - 4 monitoring events per year for duration of construction (event defined as 30 days of camera deployment of all camera traps) * Data (date time location, species, individuals present) to be kept in a spreadsheet to determine presence/absence *Trends to be analysed by suitably qualified person (occupancy to be compared with number of animals caught during control) 		<ul style="list-style-type: none"> • Sighting of feral animals triggers control in accordance with the Weed, Pest and Pathogen Management Plan. Feral animal control to be undertaken within areas with feral records. • Priority areas for control include Marica and upper Lobs Hole within proximity to Smoky Mouse habitat. 	
146.		BMP App 2 Tble 8-2	<p>Feral Animal abundance monitoring</p> <p>Spotlight transects through key contriction areas</p> <ul style="list-style-type: none"> * Establish transect paths along key project roads (how many transects required? - not stated) * Sum of counts at each location to be divided by the length of transect to get simple index of abundance (animals/km) * Frequency - four monitoring events per year for the duration of construction (spotlight monitoring event defined as one night of spotlighting at each nominated transect site)* 		The draft Annual Monitoring Report included the outcomes of feral animal abundance monitoring	Compliant
147.		App C	<p>Pre-clearing and Clearing Procedure - Compliance to Appendix C</p> <ul style="list-style-type: none"> – Clearing Land Disturbance Permit approved prior to clearing? – Clearing and grubbing work pack? – Clearing limits / exclusion zones established? – Inspection by project ecologist? – GPS coordinates for all threatened flora recorded during survey? 	<p>Clearing (Land disturbance) Permit 0008-0103 - Quarry Ttrail Road dated 26/01/2022, witness point signed by SHL 28/01/2022</p> <p>Clearing (Land disturbance) Permit 0008-0113 - Ravine Road Additional clearing Part 3 Ch 10850- 10895 dated 7/10/2021</p> <p>Clearing Permits Folder (screen shot)- showing up to permit 0146</p>	The review of clearing permits, the Master Tracker Clearing Register and the WebGIS and interviews with Environmental Advisors indicated that land clearing procedures are implemented.	Compliant
148.		2.4; Table 2-	<p>Spread of weeds</p> <p>A weed and pathogen monitoring program will be implemented, with a weed control program to be</p>	<p>Method Statement Main Yard - Pad 3 Phytophthora Encapsulation Rev 2 05/09/2021</p>	<p>The Method Statement Main Yard - Pad 3 Phytophthora Encapsulation document describes the methods, extent and standards to be used in carrying out works related to</p>	Non-compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
		3; (ECO2)	implemented if weeds are identified along road verges. This may include wash-down stations to be constructed at a suitable location, with wash down for weeds as well as pathogen Phytophthora cinnamomi.	MAP-ZERO Target Zero Observation card - removal of thistles at Tantangara 05/01/2022. Weed spraying program - Rev 01 (Narla Environmental March 2022)	the encapsulation of the Phytophthora identified in the topsoil located in Main Yard Pad 3. The site inspection found that weed control is required at various locations across the project. It was also noted that a non-compliance was issued by Snowy Hydro to FGJV January 2022 in regards to weeds control and management.	
149.		App F; 5.1; Table 5-1; BM34	Weed, Pest and Pathogen Management Plan Future Generation will implement the following measures to prevent the introduction or spread of weeds/pathogens on site: <ul style="list-style-type: none">– Mobile washdown stations will be established in weed and pathogen restricted areas as they are identified.– Hygiene inspections of plant and equipment being transported to site and across zones (inc. Hygiene Declaration Form – Annexure A App F Biodiversity MP available in vehicles?;)– Washdown stations at access points to site; and– Restricted access to areas of known weed/pathogen infestation. Future Generation will establish a checkpoint to carry out visual inspections of plant and equipment. Checkpoints will be located at or prior to the main access points to site.	Site Inspection Interviews	Mobile wash-down stations were sighted at various sites including entry to Trunk Services (Gooandra trail), Marica Trail Findings regarding inadequate washdown procedures were raised at the previous 2 IEAs and the majority of recommendations had not been adequately addressed - the previous non-compliance remains open.	Non-compliant
150.		App F; 5.1.1.3	Weeds, Pest and Pathogen Management Plan Weed dominated areas will be demarcated by the project ecologist during pre-clearing surveys. Weed or pathogen infested areas or sites of weed topsoil stockpiles will be demarcated as restricted areas to limit the tracking of plant materials throughout the site.	Pre-clearing Survey Report - Tantangara Q2 Area Road Realignment 4/10/2021 (Pre-clearing survey conducted 9/4/2021) Pre-clearing Survey Report - Gooandra Trunk Services Feb 2021	Pre-clearing surveys identified weed dominated areas	Compliant
151.		App F; 5.1.1.3	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. 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	Laboratory Report 28 January 2022 - Narla noting that Soils from zones 1-4 were baited for Phytophthora - Phytophthora was not detected in the soils from zones 1-3 and Phytophthora was detected in the zone 4 soil.	At IEA#2, it was noted that a vehicle washdown station had been set up in an area known to contain Phytophthora. Laboratory results of Phytophthora testing were sighted noting that Phytophthora was detected in the Zone 4 soil. It is understood that no further work will be undertaken in the	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			infection in this area and to assist in delineating the relevant restricted area.		areas known to contain Phytophthora until appropriate mitigation measures are in place.	
152.		App F; 5.1.2.1	Chemical weed control A weed control contractor will be employed to implement chemical weed control across the project site as the primary means of eradicating or mitigating against the spread of weeds. The weed control contractor will be suitably qualified in the sustainable management of the specific weed species occurring on the project site.	Weed spraying program - Rev 01 (Narla Environmental March 2022) (draft 1.0 - 19/10/2021; draft 1.1 16/11/2021)	Non-compliance raised by SHL on 14 Jan 2022 - review weed control on site Narla has been appointed (it was advised that the previous contractor pulled out and Narla was engaged to take over) - weed spraying is overdue.	NC
153.		App F; 5.1.2.1	Chemical weed control 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. Prior to spring, the weed contractor will prepare a customised weed spraying program. Coloured dye will be used in weed spraying units to allow the sprayers and Future Generation to identify which areas have been sprayed. 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.	Weed spraying program - Rev 01 - Final (Narla Environmental March 2022) (draft 1.0 - 19/10/2021; draft 1.1 16/11/2021) Google meets online meeting transcript between NPWS, SHL and FGJV to discuss the weed management program 14/09/2021.	The spring spraying program was not delivered in November 2021. The weed spraying program notes that two of the identified Priority Weeds for Control and Weeds of Concern (St Johns Wort and Ox Eye Daisy) should be targeted during November 2021. It also noted that the November period coincides with the optimum treatment time for the opportunistic treatment of nine Priority Weeds For Control. The use of coloured dye in the weed spraying units is referenced in the Weed Spraying Program. The Weed Spraying Program refers to NPWS requirements and guidelines, however does not specifically include reference to liaison with NPWS in the development of the program. Evidence was provided of consultation with NPWS	NC
154.		App F; 5.2	Feral predator and herbivore control food waste will be stored appropriately in inaccessible bins and disposed offsite; no waste will be left outside in open areas accessible to animals; – a monitoring program will be implemented using remote cameras and spotlight surveys to monitor for pest animal presence (refer to Appendix B of BMP); – opportunistic sightings in high risk areas, such as areas of habitation (e.g. the camp and tunnel portal) for pest animal activity will be documented. Targeted follow-up control actions will be implemented.	Site Inspection Fauna encounter register (filtered for pests) Draft Annual Biodiversity Monitoring Report	Site inspection noted that food waste was adequately contained within covered bins. The Draft Annual Biodiversity Monitoring Report - includes pest animal presence / absence monitoring.	Compliant
155.			Predator control program			Observation

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
		App F; 5.2.2	<p>A routine pest predator control program will be implemented throughout construction of the project.</p> <p>An experienced and suitably qualified pest control contractor will be employed to manage feral predators including wild dogs, foxes and cats. This program will be prepared in conjunction with the NPWS activities occurring in the broader area.</p> <p>The frequency and timing of control activities will be determined by the pest control contractor through discussion with NPWS.</p>	<p>Snowy 2.0 Main Works Biodiversity Monitoring Program: Year 1 Annual Monitoring Report (2020 / 2021) February 2022 v1 Draft</p>	<p>The Draft Annual Monitoring Report noted: "The sighting of feral animals within proximity to known Smoky Mouse habitat or project infrastructure is a trigger for adaptive management.</p> <p>Feral animals were recorded within proximity to project roads and infrastructure within Lobs Hole, Marica, Tantangara Dam, Tantangara Road and Rock Forest. Therefore, Snowy Hydro/FGJV are required to control feral animals in accordance with the Weed, Pest and Pathogen Management Plan (FGJV, 2020).</p> <p>All areas within proximity to project infrastructure are required to have feral animal control undertaken. Priority areas for control include Marica and upper Lobs Hole within proximity to Smoky Mouse habitat.</p> <p>It was advised that to date, no targeted program for feral animal control has been executed outside of the camp areas.</p>	
156.		App F; 5.2.3	<p>Incidental predator trapping</p> <p>In addition to the routine pest predator control program, cage trapping will be carried out to capture feral predators which are incidentally observed frequenting areas of human habitation such as camps and construction compounds.</p>		As above - fauna encounter register	Compliant
Part A EPBC Condition - Annexure A - Conditions specific to the action						
157.	1		The approval holder must undertake the action as described in the NSW approval.		Snowy Hydro have generally undertaken the project in compliance with the NSW approval in relation to controlled actions. Non-compliances have been raised against a number of NSW conditions. Where the issue is related to an EPBC condition, this is noted in the findings.	Compliant
158.	2		The approval holder must not clear outside of the construction envelope as identified at Appendix A.		As per the NSW approval, the clearing has been conducted within the construction envelope	Compliant
159.	3		The disturbance area must not exceed 504 hectares (ha).		As per the NSW approval, the clearing has not exceeded 504 hectares	Compliant
160.	4		The approval holder must submit the report required by condition 13 of the NSW approval to the Department on the same day as submission to the NSW Government. The report submitted to the Department must include shapefiles of the 'final		Condition 13 of the NSW Approval relates to the Additional Biodiversity Offset payment, which is not yet triggered.	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status								
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY														
			disturbance area' and the final clearance areas for the entities listed in condition 5											
Terrestrial biodiversity														
161.	5		<p>5. Within the construction envelope, the approval holder must not clear more than:</p> <p>a. 425 ha of native vegetation;</p> <p>b. 84.29 ha of habitat for the Smoky Mouse;</p> <p>c. 22.87 ha of habitat for the Alpine Tree Frog;</p> <p>d. 61.47 ha of habitat for the Broad-toothed Rat;</p> <p>e. 80.83 ha of habitat for the Alpine She-oak Skink;</p> <p>f. 197.95 ha of habitat for the Eastern Pygmy-possum;</p> <p>g. 81.86 ha of habitat for the Latham's Snipe; and</p> <p>h. 1.03 ha of the Alpine Bogs and Fens.</p>	Clearing Limits Register	<p>The Clearing Limits Register provided indicated the following totals cleared to date:</p> <p>The total areas cleared for each of the following species were within the limits</p> <table border="1"> <tr><td>181.38 ha</td></tr> <tr><td>31.56 ha</td></tr> <tr><td>11.06 ha</td></tr> <tr><td>35.53 ha</td></tr> <tr><td>46.85 ha</td></tr> <tr><td>90.41 ha</td></tr> <tr><td>1.3 ha</td></tr> <tr><td>0.41 ha</td></tr> </table>	181.38 ha	31.56 ha	11.06 ha	35.53 ha	46.85 ha	90.41 ha	1.3 ha	0.41 ha	Compliant
181.38 ha														
31.56 ha														
11.06 ha														
35.53 ha														
46.85 ha														
90.41 ha														
1.3 ha														
0.41 ha														
162.	6		To compensate for direct impacts on protected matters, including the entities listed in condition 5, the approval holder must comply with conditions 12 -16 of the NSW approval relating to biodiversity offset payments.		Conditions 12 - 16 of the NSW Approval had not been triggered at this audit.	Not triggered								
163.	7		The approval holder must notify the Department in writing within 10 business days of making a biodiversity offset payment to the NSW National Parks and Wildlife Service. Each notification must state the date of payment and the amount paid.		The latest biodiversity offset payment was paid on 22/10/2021 to the NSW government and was notified to them. However, evidence could not be provided to demonstrate that Snowy Hydro had also notified the (Commonwealth) Department within 10 business days of making a biodiversity offset payment.	Non-compliant								
164.	8		To minimise impacts on protected matters, the approval holder must comply with conditions 17 - 19 of the NSW approval relating to biodiversity management.		Non-compliances were raised in relation to Condition 19 of the NSW Approval (weeds management)	Non-compliant								
165.	9		<p>9. The Biodiversity Management Plan required under condition 18 of the NSW approval must:</p> <p>a. be consistent with relevant statutory documents; and</p> <p>b. include provisions to make biodiversity monitoring data (excluding sensitive ecological data) available as part of the monitoring, evaluation and reporting program required by condition 18d of the NSW approval.</p>	<p>Biodiversity Management Plan Rev I 12/10/2020 (FGJV);</p>	<p>The BMP was consistent with statutory documents.</p> <p>The BMP includes provisions to make biodiversity monitoring data available - requires the preparation of quarterly and Annual Monitoring Reports. Refer to Observation under the NSW Conditions</p>	<p>Compliant</p> <p>Compliant Observation</p>								
166.	10		The approval holder must implement the Biodiversity Management Plan approved by the		Non-compliances were raised in relation to the implementation of the Biodiversity Management Plan.	Non-compliant								

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			NSW Planning Secretary until the end date of this approval, unless otherwise agreed by the Minister in writing.			
167.	11		Prior to the commencement of the action, the approval holder must provide the Department with shapefiles of all records of threatened species and communities recording during surveys undertaken for the assessment of the action.	Email from EMM Consulting 9/03/2022 noting that Main Works boundaries submitted to DPIE following the PIR-RTS via email to Anthony Ko on 2 March 2020	<p>The email from EMM Consulting noted that " Vegetation and threatened species data was submitted around the same time (4 March 2020) to BCS via the Biodiversity Offsets Agreement Management System (BOAMS) website. The zip file provided was titled BDAR_RtSData_EMM_20200303."</p> <p>It appears that the submission of data was through the online platform.</p>	Compliant
Aquatic ecology and biosecurity (refer to Biosecurity and Fish table)						
Water resources (Refer to Surface Water table)						
Heritage (Refer to Heritage table)						
Amenity and landscape (see spoil management (C24) and Rehabilitation (C25) table)						
Changes to the NSW approval						
168.	26		The approval holder must notify the Department in writing of any proposed change to the NSW approval conditions referred to in these conditions within 10 business days of formally proposing a change or becoming aware of any proposed change.		At the time of the audit there had been no changes to the NSW approval conditions. A modification to the approval for horizontal directional drilling of a section of trunk services was underway, however had not yet been approved.	Not triggered
169.	27		The approval holder must notify the Department in writing of any change to the NSW approval conditions referred to in these conditions, within 10 business days of a change to conditions being finalised.		See above	Not triggered
Part B EPBC Condition - Annexure A - Standard Administrative Conditions						
170.	28		Notification of date of commencement of the action The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Letter from DAWE: Commencement of Action - Snowy 2.0 Main Works, NSW (EPBC 2018/8322) Ref 20/053464.	<p>The letter from DAWE acknowledges receipt of a letter from Snowy Hydro on 27 August 2020 that works commenced on 25 August 2020.</p> <p>It was noted that construction did not commence until October 2020 – it was notified early.</p>	Compliant
171.	29		Compliance records The approval holder must maintain accurate and complete compliance records.		Compliance records have been maintained.	Compliant
172.	30		If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.		It was advised that there have been no requests from the Department to provide compliance records.	Not triggered

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			<p><i>Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.</i></p>			
173.	31		<p>Preparation and publication of plans The approval holder must:</p> <p>a. submit plans required by conditions 18, 22 and 24 of the NSW approval and conditions 18 and 22 of this approval for consultation purposes, electronically to the Department;</p>	<p>NSW Cond 18 = Biodiversity MP NSW Cond 22 = Biosecurity Risk MP NSW Cond 24 = Threatened Fish MP EPBC Cond 18 = Water MP EPBC Cond 22 = Heritage MP</p> <p>Letter from Department of Primary Industries - Office of the Director General dated 15 September 2021 in response to a letter from Snowy Hydro (31 August 2021) requesting a revision from DPIE to the timeframes for delivery of the Threatened Fish Management Plan (and a Recreational Fishing Management Plan)</p> <p>Letter from DPIE dated 6 December 2021 to Snowy Hydro in response to a letter from Snowy Hydro dated 30 November 2021, which requested an extension of time to submit various management plans including the Threatened Fish MP.</p>	<p>The Threatened Fish MP NSW Cond 24 had not been submitted within the 12 months from construction commencement timeframe as required. Whilst the NSW Department of Primary Industry (DPI) endorsed a request to extend the timeframe for submission in their letter dated 15 September 2021, DPIE determined in their letter dated 6 December 2021 that the late submission of the Threatened Fish MP be recorded as a breach, and is therefore determined as non-compliant to this condition .</p> <p>Evidence of consultation with DAWE on the BMP, Water MP and Heritage MP was verified.</p> <p>The Biodiversity Management Plan (Condition 18 of NSW approval) included a Revision table and a Consultation table indicating that DAWE comments were taken into consideration in Rev E on 26 June 2020. In addition, an email from Vaughn Cox (DAWE) indicated involvement in consultation.</p> <p>The Water Management Plan Management Plan also included evidence of consultation with DAWE in Revision and Consultation and tables (Rev D 08/07/2020 and 24/08/2020)..</p> <p>The Heritage Management Plan Management Plan also included evidence of consultation with DAWE in Revision and Consultation and tables (Rev E 25/07/20 and 12/08/2020).</p> <p>The Biosecurity Risk MP (NSW Cond 22) had not yet been triggered.</p>	Non-compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
174.			b. publish each plan approved by the NSW Planning Secretary or Director-General of NSW Department of Primary Industries on the website within 20 business days of the date the plan is approved, unless otherwise agreed to in writing by the Minister;		The Management Plans were uploaded to the Project Website - this was verified at the initial Independent Environmental Audit	Compliant
175.			c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and		Sensitive ecological data not in plans to date - no redaction required.	Compliant
176.			d. keep plans published on the website until the end date of this approval, unless otherwise agreed to in writing by the Minister.		Management Plans continue to be on the website	Compliant
177.	32		The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan.		The email from EMM Consulting noted that "Vegetation and threatened species data was submitted around on 4 March 2020 to BCS via the Biodiversity Offsets Agreement Management System (BOAMS) website. The zip file provided was titled BDAR_RtSData_EMM_20200303".	Compliant
178.			Annual compliance reporting The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:		An EPBC Annual Compliance Report had not been prepared or published on the website within the required timeframe of this condition. Action required: Prepare and submit the EPBC Annual Compliance Report as required by this condition,	Non-compliant
179.			a. publish each compliance report on the website within 60 business days following the relevant 12 month period;	A letter from DAWE dated 31 August 2020 acknowledging notification of commencement of works on 25 August 2020 noted that first report was due to be published on the website on 18 November 2021.	Based on the actual date of commencement of the Action (21 October 2021), the report was due to be published on the website by 20 December 2021 (12 months plus 60 days).	
180.			b. notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication;		No annual report, therefore report not notified or published.	
181.			c. keep all compliance reports publicly available on the website until this approval expires, unless otherwise agreed to in writing by the Minister;		No annual report, therefore report not uploaded to website	
182.			d. exclude or redact sensitive ecological data from compliance reports published on the website; and		No annual report, therefore no redaction to date.	

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
183.			<p>e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.</p> <p><i>Note: Compliance reports may be published on the Department's website.</i></p>		<p>No annual report, therefore report not submitted to the Department.</p>	
184.	34		<p>Reporting incidents and non-compliances The approval holder must notify the Department in writing of any incident as soon as practicable after becoming aware of the incident and no later than two business days. The notification must specify:</p> <p>a. a short description of the incident; and</p> <p>b. the location (including co-ordinates), date, and time of the incident. In the event the exact information cannot be provided, provide the best information available.</p>	Interviews Environmental Incident and Event Register Incident Reports	<p>No EPBC approval related incidents or non-compliances has been triggered at this audit. Non-compliances and incidents relating to the NSW approval were reviewed and assessed and non-compliances to these conditions are reported separately.</p> <p>It should be noted however, that non-compliances against the EPBC Conditions have been identified at this IEA and therefore are required to be notified to DAWE.</p>	Not triggered
185.	35		<p>The approval holder must provide to the Department in writing the details of any incident or noncompliance with the conditions or commitments made in plans within 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <p>a. any condition that is or may be in breach;</p> <p>b. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</p> <p>c. the potential impacts of the incident or non-compliance on protected matters; and</p> <p>d. the method and timing of any remedial action that will be undertaken by the approval holder.</p>	Interviews Environmental Incident and Event Register Incident Reports	<p>No non-compliances relevant to the EPBC approval / controlled actions had been raised or noted prior to conducting this IEA.</p>	Not triggered
186.	36		<p>Independent audit The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested by the Minister.</p>		<p>This Independent Environmental Audit was triggered by the NSW approval and was not requested by the Minister.</p> <p>Pre-audit consultation correspondence indicated that the Department was happy for the EPBC conditions to be audited as part of the NSW Conditions of Consent, without triggering a separate EPBC audit that needs to be compliant with EPBC Condition 37.</p>	Not triggered
187.	37		<p>For each independent audit, the approval holder must:</p> <p>a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department;</p>		<p>As noted in Condition 36, this IEA was conducted in accordance with the NSW Conditions of Consent with the inclusion of EPBC conditions.</p>	Not triggered

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - BIODIVERSITY						
			b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and			
			c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.			
188.	38		The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.		Refer to comments in EPBC Conditions 37 and 38 above	Not triggered
189.	39		Completion of the action Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.		The Action has not yet been completed and is therefore not triggered.	Not triggered

ID	S3 - CoA No EPBC CoA	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – BIOSECURITY AND FISH MANAGEMENT REQUIREMENTS						
190.	20		<p>Biosecurity and Fish Management Requirements</p> <p>The Proponent must:</p> <ul style="list-style-type: none"> a) minimise the biosecurity risks associated the development, including the movement and/or spread of weeds, fish and pathogens; b) minimise the impact of the development on threatened fish species and their habitat, particularly the Macquarie Perch, Stocky Galaxias and Murray Crayfish; and c) minimise the impact of the development on recreational fishing in Tantangara Reservoir and Lake Eucumbene. 		<p>This Condition will not be triggered until the operational phase of the Project.</p>	Not triggered
191.	21		<p>Fish Screens and Barrier</p> <p>Prior to the commencement of commissioning, the Proponent must install:</p> <ul style="list-style-type: none"> a) a fish barrier on Tantangara Creek to prevent so far as is reasonably practicable Climbing Galaxias reaching the existing population of Stocky Galaxias in the upper reaches of the creek; and b) fish screens at the southern end of the Tantangara Reservoir to prevent so far as is reasonably practicable the movement of pest fish (in all its forms: eggs, larvae, juveniles and adults) and spread of disease to the mid-Murrumbidgee River and Lake Eucumbene. 		<p>This condition is not triggered - it will be triggered prior to the commencement of commissioning.</p>	Not triggered
192.	22		<p>Biosecurity Risk Management Plan</p> <p>Within 2 years of the commencement of construction, the Proponent must prepare a Biosecurity Risk Management Plan for the development to the satisfaction of the Director-General of NSW DPI. This plan must:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person in consultation with DPIE, NPWS and DAWE; b) include a detailed biosecurity risk management framework for minimising the ongoing biosecurity risks of the development required in condition 20(a) above, including: 		<p>The preparation of the Biosecurity Risk Management Plan has not yet been triggered - construction commenced in October 2020.</p>	Not triggered

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – BIOSECURITY AND FISH MANAGEMENT REQUIREMENTS						
			<ul style="list-style-type: none"> developing systems to prevent spills from the Tantangara Reservoir so far as is reasonably practicable; and pest fish and disease surveillance and eradication/management measures to protect the Macquarie Perch and Stocky Galaxias in the Mid to Upper Murrumbidgee catchment and the salmonid fishery in Lake Eucumbene; c) include detailed plans for the installation and use of the fish screens and barriers required in condition 21 above, including: <ul style="list-style-type: none"> minimising the environmental impacts associated with installing the screens, testing the effectiveness of the screens before they are used; and maintaining and improving the effectiveness of the screens and barriers over time; d) include a program to monitor, evaluate and publicly report on these plans, including: <ul style="list-style-type: none"> carrying out monitoring using epidemiologically designed surveys; and conducting fish, disease and eDNA surveys. 			
193.	23		The Proponent must implement the approved Biosecurity Risk Management Plan for the development.		Not triggered	Not triggered
194.	24		Threatened Fish Management Plan Within 12 months of the commencement of construction, the Proponent must prepare a Threatened Fish Management Plan for the development to the satisfaction of the Director-General of NSW DPI.	Letter from Department of Primary Industries - Office of the Director General dated 15 September 2021 in response to a letter from Snowy Hydro (31 August 2021) requesting a revision from DPIE to the timeframes for delivery of the Recreational Fishing Management Plan (and a Threatened Fish Management Plan)	The letter from the DPI Director General (DG) noted that given the considerations outlined in the letter, the proposal to request an extension from the Department of Planning, Industry and Environment is endorsed.	Non-compliant
195.	24 (a)		This plan must: <ol style="list-style-type: none"> be prepared by a suitably qualified and experienced person in consultation with DPIE and DAWE; 	Letter from DPIE dated 6 December 2021 to Snowy Hydro in response to their letter dated 30 November 2021 regarding current	The DPI DG noted that delaying the submission of these plans by a matter of months as proposed, will not increase the risk to the aquatic environment because the project is still in the early phase of construction and will not be completed for some years.	
196.	24 (b)		<ol style="list-style-type: none"> include the establishment and use of an expert advisory committee to provide advice 		The letter from DPIE dated 6 December 2021 noted that	

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – BIOSECURITY AND FISH MANAGEMENT REQUIREMENTS							
			to the proponent on the implementation of the plan;	status of management plans (including the Threatened Fish Management Plan).	<p>the Department had assessed the non-compliances in accordance with the Compliance Policy and that in this instance has determined to record the breaches in their system.</p> <p>Due to DPIE determining the late submission of the Threatened Fish Management Plan as a breach, it is determined that the proponent is non-compliant with this condition.</p>		
197.	24 (c)		c) describe the detailed measures that would be implemented to comply with condition 20(b) above;				
198.	24 (d)		<p>d) include a detailed captive breeding program for the Macquarie Perch and Stocky Galaxias involving the spending of \$5 million over 5 years from the commencement of the program that provides for:</p> <ul style="list-style-type: none"> • population monitoring, surveillance and research on the Macquarie Perch and Stocky Galaxias in the Mid to Upper Murrumbidgee catchment; • habitat surveys to identify suitable receiving sites for stocking insurance populations of Stocky Galaxias and Macquarie Perch; • captive breeding, stocking and monitoring of Macquarie Perch and Stocky Galaxias with the aim of achieving self-sustaining populations of these species; • habitat enhancement for the Macquarie Perch in the mid-Murrumbidgee catchment in accordance with the National Recovery Plan to increase the existing population's resilience to the potential biosecurity risks from the development 				
199.	24 (e)		e) include a review after 5 years of the commencement of the captive breeding program in (d) above and detail the trigger, action and response plan for the extension of the program;				
200.	24 (f)		f) include a program to minimise the impacts of the development on the Murray Crayfish in Talbingo Reservoir, including:				
			<ul style="list-style-type: none"> • population monitoring and surveillance for Murray Crayfish; • relocating any Murray Crayfish from the disturbance area of the development prior to disturbing the relevant area; and 				

ID	S3 - CoA No EPBC CoA	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – BIOSECURITY AND FISH MANAGEMENT REQUIREMENTS						
			<ul style="list-style-type: none"> habitat enhancement for the Murray Crayfish habitat in the vicinity of the disturbance area at the Talbingo Reservoir, including the use of woody debris salvaged during construction; and 			
201.	24 (g)		g) include a program to monitor and publicly report on the progress of each program/plan and the effectiveness of these measures.			
202.	25		The Proponent must implement the approved Threatened Fish Management Plan for the development.		<p>The implementation of the Threatened Fish Management Plan is not triggered. As noted by the DG of DPI, delaying the submission of these plans by a matter of months as proposed, will not increase the risk to the aquatic environment because the project is still in the early phase of construction and will not be completed for some years.</p>	Not triggered
203.	26		<p>Recreational Fishing Management Plan</p> <p>Within 12 months of the commencement of construction, the Proponent must prepare a Recreational Fishing Management Plan for the development to the satisfaction of the Director-General of NSW DPI.</p>	<p>Letter from Department of Primary Industries - Office of the Director General dated 15 September 2021 in response to a letter from Snowy Hydro (31 August 2021) requesting a revision from DPIE to the timeframes for delivery of the Recreational Fishing Management Plan (and a Threatened Fish Management Plan)</p>	<p>The letter from the DPI Director General (DG) noted that given the considerations outlined in the letter, the proposal to request an extension from the Department of Planning, Industry and Environment is endorsed.</p> <p>The DPI DG noted that delaying the submission of these plans by a matter of months as proposed, will not increase the risk to the aquatic environment because the project is still in the early phase of construction and will not be completed for some years.</p> <p>Due to the endorsement of the extension of time by the DPI DG, it is considered that Snowy Hydro is compliant with this condition.</p>	Compliant
204.	26 (a)		<p>This plan must:</p> <p>a) be prepared by a suitably qualified and experienced person in consultation with DPIE, NPWS and relevant recreational fishing groups;</p>		<p>Not triggered as the RFMP has not yet been completed</p>	Not triggered
205.	26 (b)		<p>b) describe the detailed measures that would be implemented to comply with condition 20(c) above, including:</p> <ul style="list-style-type: none"> a program involving the spending of \$5 million over 5 years from the commencement of the program to develop the capability to restock, and to restock, the 		<p>Not triggered as the RFMP has not yet been completed</p>	Not triggered

ID	S3 - CoA No EPBC CoA	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – BIOSECURITY AND FISH MANAGEMENT REQUIREMENTS						
			<p>Tantangara Reservoir and Lake Eucumbene with salmonid fish;</p> <ul style="list-style-type: none"> • a program to monitor the impacts of the development on recreational fishing in Tantangara Reservoir and Lake Eucumbene; • a review after 5 years of the commencement of the restocking program and detail the trigger, action, and response plan for the continuation of the restocking of Tantangara Reservoir and/or Lake Eucumbene salmonid fish; 			
206.	26 (c)		c) include a program to monitor and publicly report on the effectiveness of these measures.		Not triggered as the RFMP has not yet been completed	Not triggered
207.	27		The Proponent must implement the approved Recreational Fishing Management Plan for the development.	Letter from Department of Primary Industries - Office of the Director General dated 15 September 2021 in response to a letter from Snowy Hydro (31 August 2021) requesting a revision from DPIE to the timeframes for delivery of the Recreational Fishing Management Plan (and a Threatened Fish Management Plan)	Due to the endorsement of the extension of time by the DPI DG, it is considered that this condition has not been triggered.	Not triggered
	Part A	EPBC Condition - Annexure A - Conditions specific to the action				
	EPBC Cond	Aquatic ecology and biosecurity				
208.	12		To minimise impacts to the aquatic environment, the approval holder must comply with conditions 20-25 of the NSW approval relating to biosecurity and fish management.		<p>A non-compliance was raised against Condition 24 of the NSW Approval (preparation of a Threatened Fish Management Plan within 12 months of commencement of construction).</p> <p>The approval holder is therefore non-compliant to this condition.</p>	Non-compliant
209.	13		<p>To minimise potential impacts of pest fish movement on protected matters, the approval holder must, in addition to conditions 22c and 24d of the NSW approval:</p> <p>a. investigate reasonable measures, including the installation of secondary fish barriers, to protect tributaries identified as priority receiving sites for the establishment of stocking insurance</p>		The Biosecurity Management Plan is not yet triggered	Not triggered

ID	S3 - CoA No EPBC CoA	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – BIOSECURITY AND FISH MANAGEMENT REQUIREMENTS						
			<p>populations of the Macquarie Perch and Stocky Galaxias;</p> <p>b. include the findings of the investigation in the Biosecurity Risk Management Plan required by condition 22 of the NSW approval, and the Threatened Fish Management Plan required by condition 24 of the NSW approval; and</p> <p>c. before undertaking any stocking of insurance populations required by condition 24d of the NSW approval, implement those measures determined under condition 13a to protect tributaries identified as priority receiving sites for the establishment of stocking insurance populations of the Macquarie Perch and Stocky Galaxias.</p>			
210.	14		<p>The Biosecurity Risk Management Plan required by condition 22 of the NSW approval, and the Threatened Fish Management Plan required by condition 24 of the NSW approval, must be peer reviewed by an independent, suitably-qualified expert/s approved by the Department.</p> <p>a. The peer review must be made publicly available on the approval holder's website within 10 business days of finalisation; and</p> <p>b. The peer review must be undertaken prior to approval of the Biosecurity Risk Management Plan and Threatened Fish Management Plan by the Director-General of the NSW Department of Primary Industries.</p>		<p>The Biosecurity Management Plan is not yet triggered</p>	Not triggered
211.	15		The Biosecurity Risk Management Plan and the Threatened Fish Management Plan must include provisions to make monitoring data (excluding sensitive ecological data) available as part of the monitoring, evaluation and reporting programs required by condition 22d and 24g of the NSW approval.		<p>The preparation of the Biosecurity Management Plan is not yet triggered.</p> <p>The Threatened Fish Management Plan has not yet been prepared and this has been raised as a non-compliance under Condition 24 of the NSW approval and Condition 12 of this approval. A new non-compliance has not been raised against this condition.</p>	Not triggered
212.	16		The approval holder must implement the Biosecurity Risk Management Plan and Threatened Fish Management Plan approved by the Director-General of the NSW Department of Primary Industries until the end date of this		<p>The preparation of the Biosecurity Management Plan is not yet triggered.</p> <p>The implementation of the Threatened Fish Management Plan is not yet triggered</p>	Not triggered

ID	S3 - CoA No EPBC CoA	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – BIOSECURITY AND FISH MANAGEMENT REQUIREMENTS						
			approval, unless otherwise agreed by the Minister in writing.			

ID	S3 - CoA No/ EPBC CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
213.	29		<p>Water Pollution</p> <p>Unless an environment protection licence authorises otherwise, the Proponent must comply with Section 120 of the POEO Act.</p> <p>Note: Section 120 of the POEO Act makes it an offence to pollute any waters.</p>	<p>Examples of Notification of Environmental Harm (R2) and Written Report (R3): S2-FGJV-FRM-0014-External Agency Notification - Main Works EPL 21266 (R3 Report EPA) for the following incidents: INC-0897 on 04/09/21: Main Camp Pad C INC-0898 on 04/09/21: MAT Portal INC-1058 on 20/11/21: Sediment laden water entering KPC INC-1140 on 19/12/21: Failure of clean water drain level spreader INC-1218 on 29/01/22: Clean water drain failure</p> <p>S2-FGJV-ENV-PLN-0011-G Main Works – Surface Water Management Plan, Annexure A – Surface Water Monitoring Program, Table 2-2: Water quality objectives for receiving waters (source: Appendix J of EMM 2020)</p>	<p>There have been some water pollution incidents (environmental harm) in the last 6 months, primarily due to heavy rain in the area. Incidents have been reported to the EPA making an initial phone call (time recorded on R3 Report).</p> <p>A written report (FRM-0014 - R3 Report - External Agency Incident Notification Form – Main Works EPL 21266) has been prepared by FGJV and submitted to SHL (until 31/12/21) or to the EPA on SHL's behalf (since 01/01/22) (although not always within 7 days of becoming aware of the incident as required by the licence). Refer to Incident Reporting.</p> <p>Considering the laboratory results reviewed, the impact on watercourses has been minimal (low risk).</p> <p>Water sampling (in situ monitoring, and laboratory samples) were taken after the incidents, at upstream, downstream and impact locations. Results were included in the R3 Report to the EPA. Laboratory test results have been assessed against the "Snowy 2.0 – Surface Water Guidelines" (Water quality objectives for receiving waters). In-situ water quality results compared results between upstream, downstream and impact locations.</p> <p>Given that the events above were notified to the EPA and other agencies, impact has been low and the events resulted from extraordinary rain events, the Lead Auditor considers that the water pollution incidents reviewed do not constitute a breach to Section 120 of the POEO Act. Should the EPA determine that there has been a breach of Section 120, this would be raised and issued by the EPA.</p>	Compliant
214.	30 (a)		<p>Water Management Requirements</p> <p>The Proponent must:</p> <p>a) maximise the recycling and reuse of water on site;</p>	<p>S2-FGJV-PCO-MPR-0033 - Monthly Progress Report - Dec 2021; Treated effluent re-use permit (e.g. Permit Nr. S2-FGJV-ENV-PER-0011-0036, source: Ex Camp STP, period: 15-21/11/21, water cart ID: 46302, Water Take Records 15-16/11/21).</p>	<p>The following extract from the FGJV Monthly Report for Dec-21 provided evidence of activities to maximise the recycling and reuse of water on site:</p> <ul style="list-style-type: none"> - Approximately 900,000 L of STP and sediment basin water was recycled in Lobs Hole for the month of November, even with approximately 110 mm of rain. - Sediment basin water at Lobs Hole, Tantangara and Marica has continued to be used as irrigation. <p>Water recycling activities observed during the site</p>	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
					inspection included: - Dust suppression on unsealed roads; - Wheel washing stations; - Water storage on sediment basins prior to re-use (e.g. for wheel wash stations; for water carts refilling).	
215.	30 (b)		b) maximise the diversion of clean water runoff around the disturbance areas;	Pre Rainfall Inspection Checklist (e.g. 29/12/21; 13/10/21); Soil Conservationist Inspection: Tantangara Spoil Road; 12 January 2022 (by SEEC); Soil conservationist inspection: Gooandra Trunkline; 12 January 2022 (by SEEC).	A soil conservationist (Erosion and Sediment Controls specialist), SEEC, has been engaged on the project to provide fortnightly to monthly inspections and advice. Comprehensive inspections and reports have been provided for audits conducted at different sites (e.g. Tantangara Spoil Road; 12/01/22). The report reviewed noted significant issues with erosion and sediment control along the Tantangara Spoil Road. This road could not be fully inspected at the time of this audit due to wet and muddy conditions on the road. Pre-rainfall inspections have been conducted based on the Snowy Weather Forecast. Pre Rainfall Inspection Checklist includes checking sediment basins and sumps capacities, conditions of clean water diversions, soil stabilisation conditions and the installation of clean water diversions upslope of stockpiles and sediment controls downslope of stockpiles. Proposed actions are included. During the site inspection, clean water diversions and sediment controls were observed around project sites and seemed to be generally adequate, considering the extraordinary amount of rainfall in the weeks prior the audit. However, due to the number of pollution incidents that have occurred in the last 6 months, it is advisable that the effectiveness of ERSED controls is closely monitored.	Compliant
216.	30 (c)		c) minimise the flow rates and velocities of any clean water runoff diversions to adjoining watercourses;	SWMP – Section 5.1; Table 5-3 SW08; Examples of Erosion and Sediment Control Plans (e.g. Marica: 21000199_P08_ESCP_REV C (MAR)); Pre Rainfall Inspection Checklist (e.g. 29/12/21; 13/10/21); Soil Conservationist Inspection (by SEEC); e.g. Tantangara Spoil Road on 12/01/22; Gooandra Trunkline on 12/01/22;	Clean water diversions have been installed and progressively planned for (e.g. ESCP for Marica Road issued on 03/12/21). See also comments under 30 (b).	Compliant
217.	30 (d)		d) minimise the flooding impacts of the development;	SWMP – Section 5.2 Flooding; SWMP Table 5-3 SW18, SW19, SW20	Measures to minimise flooding impacts have been included in the SWMP. Additionally, the Natural Hazard	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
				and SW21; Natural Hazard Management Plan (S2-FGJV-ENV-PLN- 0090); S2-CIV-RO-GEN-MEM-S001[B] Nungar Creek Flood Study, issued 11/12/20.	Management Plan (S2-FGJV-ENV-PLN- 0090); includes information on risks of floods and emergency preparedness and response measures in case of floods. A flood study was conducted for the Nungar Creek to determine whether a bridge or culvert crossing is required at that location.	
218.	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;		Covered under groundwater table / section	
219.	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;	SWMP – Section 5.1, Table 5-3 SW03; Site inspections - Tantangara Reservoir; Talbingo Reservoir.	See response under 30 (b) - Inspections of Erosion and Sediment Controls by SEEC. Silt curtains and sediment controls were in place and appeared effective at Tantangara and Talbingo (refer to site photos).	Compliant
220.	30 (g)		g) design all instream works, particularly the inlet and outlet works, to minimise scour and erosion;	SWMP - Section 5.7, Table 5-3 SW58, SW60; Construction methodology - Eucumbene River and Dip Creek - Marica Trail - Temporary Waterway Crossing; Toolbox Talk to communicate construction methodology related to Dip Creek Temporary Crossing - 20210707 Instream Works Toolbox Marica Site); 20220128 Instream Works Permissions TS; WebGIS images of instream crossings (e.g. Spoil Rd culvert TAN; Eucumbene R culvert MAR; Concrete culverts LOBS.	Some instream works have occurred involving water crossings (e.g. at Marica: Eucumbene River and Dip Creek). A Construction methodology for Eucumbene River and Dip Creek Temporary Waterway Crossing has been prepared and communicated to workforce at a toolbox talk. Images of designed instream works were reviewed.	Compliant
221.	30 (h)		h) unless permitted by this approval, avoid carrying out of any development within 40 metres of any watercourse;	Surface Water Management Plan - Table 5-2: Works on waterfront land - notes that disturbance may occur on any land within the project disturbance area that is within 40 m of a watercourse or reservoir; WebGIS image of distance between work and waterbody (e.g. 40m buffer Lobs Hole - Yarrangabilly River = 41.8 meters).	Evidence reviewed indicated that works at Lobs Hole are not undertaken within 40 meters of the watercourse. Additional evidence was not gathered on this condition.	Compliant
222.	30 (i)		i) carry out all instream works or development within 40 metres of any watercourse generally in accordance with the requirements in the	SWMP - Section 5.7, Table 5-3 SW51, SW52; Construction methodology - Eucumbene	Some instream works have occurred involving water crossings (e.g. at Marica: Eucumbene River and Dip Creek). A Construction methodology for Eucumbene River	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
			<i>Guidelines for Controlled Activities on Waterfront Land;</i>	River and Dip Creek - Marica Trail - Temporary Waterway Crossing; Toolbox Talk to communicate construction methodology related to Dip Creek Temporary Crossing - 20210707 Instream Works Toolbox Marica Site); 20220128 Instream Works Permissions TS.	and Dip Creek Temporary Waterway Crossing has been prepared and communicated to workforce at a toolbox talk. Full design was not assessed at this audit and the crossing was not inspected.	
223.	30 (j)		j) treat all wastewater and surplus process water prior to discharging it at the approved discharge points at the Talbingo Reservoir or Tantangara Reservoir;		No discharges from the approved discharge points (EPL 42) have occurred during the audit period, except for one discharge as part of the Mixing Zone Program trial.	Not triggered
224.	30 (k)		k) reduce the number of diffuser points for low velocity discharges to the Talbingo Reservoir or Tantangara Reservoir;		Discharge diffusers for low velocity discharges to the reservoirs have not yet been installed.	Not triggered
225.	30 (l)		l) not discharge any surplus process water to the stormwater basins on site;	INC-0898 on 04/09/21: Process water pumped into the dirty water drain at MAT Portal; Environmental Training and Awareness Attendance Sheet (13/09/21; 16/09/21; ; topic: 04/09 CWTP Incident overview, Process water, Working as a team); INC-1166 on 10/10/21: Process water entered basin F3 at ECVT; INC-1079 on 25/11/21: Pad 2 Turkey Nest overtopping and entered sediment basin F8.5. Water from Pad 2 Turkey Nest is a combination of processed water from MAT Portal CWTP and treated effluent processed water. Toolbox talks communicating incident and prevention of further incidents.	It was noted that some incidents related to the accidental discharge of process water into stormwater basins have occurred. However, it appears that there has been no deliberate discharge of excess / surplus process water from the process water treatment plant to the basins. On this basis, it has been determined that the proponent / Contractor is compliant to this condition.	Compliant
226.	30 (m)		m) minimise the surface water quality impacts of the development, including: <ul style="list-style-type: none"> • the development carried out in the vicinity of waterways, particularly the Talbingo Reservoir, Tantangara Reservoir and Yarrangobilly River; 	Site inspections - Talbingo Reservoir; Tantangara Reservoir; WebGIS images (drone photos) (e.g. Surface Water Quality Silt Curtain TAN; Surface Water Quality Silt Curtain Kelly	See response under 30 (b) - Inspections of Erosion and Sediment Controls by SEEC. Silt curtains and sediment controls were in place and appeared effective at Tantangara and Talbingo (refer to site photos).	Compliant

ID	S3 - CoA No/ EPBC CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
			<ul style="list-style-type: none"> 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; 	Plains Creek TAN; Surface Water Quality Silt Curtain LOBS - Main Block 13/12/21).		
227.	30 n)		n) minimise the risk of spills or leaks on site, and clean up any spills or leaks as quickly as possible;	Toolbox talks including Environmental Training and Awareness sessions, e.g. 22/10/21 - Checking hydraulic lines prior to pre-start (at Marica); 06/10/21 - Refuelling Requirements (at Lobs Hole); 04/08/21 - Spill Prevention: Rem(inder to complete pre-start on plant and equipment (at Lobs Hole); Site Inspection Checklists (e.g. S2-FGJV-ENV-CHE-0002- Env Insp Checklist Chems: 20210827 MAR; 20211203 MAR; 20210827 LOBS).	Environmental Training and Awareness sessions have been included during toolbox talks to reinforce spill prevention measures. Spill response equipment was observed during the site inspections at Lobs Hole and Tantangara (e.g. spill kits at Fuel Farm, LH workshops, chemical storage area at LH and TAN, and PWTP at MAT Portal; trailer spill tarp at Trunkline Services). Site Inspection Checklist includes questions on availability, stock and suitability of spill kits on site. A recommendation was made at the last audit to investigate spills from hydraulic hoses. It was identified that leaks were sometimes hidden/covered by mud. The corrective action involved the new instruction to wash down plant and equipment before being inspected by the maintenance team. Incident and Event register showed a decrease in the number of minor spills.	Compliant
228.	30 (o)		o) minimise the groundwater quality impacts of the development, particularly through the design of the temporary and permanent spoil emplacement areas and all water storages on site;	S2-FGJV-ENV-PLN_Appendix I - Tantangara Emplacement Area Excerpt A, B. S2-FGJV-ENV-PLN-0019_Appendix I Tantangara Emplacement Area - Rev A dated 07.10.2021: Initial draft for Snowy Hydro review. Still under review.	Appendix I addresses design noting that the Design Report is to document sediment control measures and flag construction issues, and that overall geochemistry is to be assessed through sampling of seepage where present on the toe. Excerpts B & C provide information on how geotechnical stability will be achieved. Tantangara spoil placement had not yet commenced, however noted that planning is underway. This condition will be reassessed at future audits.	Compliant

ID	S3 - CoA No/ EPBC CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
229.	30 (p)		p) store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards.	SWMP - Section 5.4, Table 5-3 SW41, Annexure C (Spill Response Procedure)	<p>During the site inspections, some observations were noted.</p> <p>Bunds and bunded pallets were not always covered allowing ingress of water, leading to the need to pump out potentially contaminated water. Specific example sighted – IBC of Stonewall on bunded pallet on trunk services – see photo in report (OBS 4).</p> <p>New pump installed on access road near Marica Surge shaft was not bunded (oil contained in motor) (OBS 5).</p> <p>A non-compliance (NC 4) was raised at the last audit. Whilst some improvement was noted, further actions are required to ensure appropriate chemical and hydrocarbon management. NC remains open until all actions are effectively implemented.</p>	Compliant
230.	31		<p>Water Management Plan</p> <p>Prior to the commencement of construction, the Proponent must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p>	Water Management Plan (Rev G approved 15/10/20);	<p>It was noted that the Water Management Plan and the Water Monitoring Program have been updated and are currently under review by EPA and SHL. However, these documents were not available at the time of the audit. The current WMP is Rev G, reviewed as compliant at Audit #1.</p>	Compliant
231.	31 (a)		a) be prepared by a suitably qualified and experienced person in consultation with the EPA, NPWS, the Water Group, NRAR and NSW DPI;	WMP, Section 1.9	<p>A Water Management Plan was prepared for both Stage 1 and Stage 2 of Exploratory Works in consultation with the EPA, NPWS, Dol Water and DPI – Fisheries.</p> <p>Consultation undertaken is identified in Section 1.9 of the WMP.</p>	Compliant
232.	31 (b)		b) include a Site Water Balance for the development with a program to review and update this water balance each calendar year;	WMP, Section 5	<p>A conceptual Site Water Balance for month 48 of construction has been included in the WMP, Section 5. As indicated in the WMP, the Balance is currently a conceptual model. FGJV will continue to develop the Balance during construction and the completion of final tunnel design.</p> <p>The Balance will be reviewed each calendar year and the WMP updated accordingly.</p> <p>This review will involve using monitored quantities to verify predicted quantities, adjust the Balance where required, and provide explanation of any differences between predicted and actual quantities.</p>	Compliant
233.	31 (c)		c) include a Surface Water Management Plan, containing detailed plans for the Talbingo Reservoir, Lobs Hole, Marica, Plateau, Tantangara Reservoir, and Rock Forest sites, with:	Surface Water Management Plan (SWMP) S2-FGJV-ENV-PLN-0011-G (Rev G approved 15/10/20); Annexure A – Surface Water Monitoring	<p>A Surface Water Management Plan has been prepared; and it includes a Surface Water Monitoring Program in Annexure A.</p> <p>However, Surface Water Monitoring Programs are still</p>	Compliant

ID	S3 - CoA No/ EPBC CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
			<ul style="list-style-type: none"> • detailed baseline data on surface water flows and quality in the watercourses that could be affected by the development, and a program to augment this baseline data over time; • detailed criteria for determining the surface water impacts of the development (flows, quality and flooding), including criteria for triggering remedial action (if necessary); • a description of the measures that would be implemented to minimise the surface water impacts of the development and comply with the relevant water management requirements in conditions 4, 6 and 30 above, including specific plans covering: <ul style="list-style-type: none"> • the temporary or permanent emplacement of spoil; • dredging, channel extraction and underwater blasting in the Talbingo Reservoir and Tantangara Reservoir; • operation of the discharge points; • the design of the inlets and outlets; and • dewatering of the tailrace tunnel during operations; • identify the key risks to the successful implementation of these measures, and describe the contingency measures that would be implemented to address these risks; • a program to monitor and publicly report on the surface water impacts of the development; 	Program (Rev F dated 19/09/20); Plateau - Surface Water Monitoring Program DRAFT (Rev B dated 21/01/22); Marica - Surface Water Monitoring Program DRAFT (dated 19/02/22); SWMP, section 6.7. Reporting includes Table 6-3: Reporting requirements relevant to surface water.	under development. SWMP, section 6.7. Reporting includes Table 6-3: Reporting requirements relevant to surface water (e.g. Environmental Water Report every 3 months, publicly available on project website).	
234.	32		The Proponent must implement the approved Water Management Plan for the development.	S2-FGJV-ENV-REP-0041 Quarterly Environmental Water Report Mar to May 2021 (Rev A 13/08/21 issued for information) (latest report available).	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: - 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. A non-compliance (NC 5) was raised at the last audit. Two	Non-compliant

ID	S3 - CoA No/ EPBC CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
					of the outstanding draft Quarterly Environmental Water Reports had been completed by FGJV and issued to Snowy Hydro, however none have yet been finalised or uploaded to the project website. (remains open). Two further Quarterly Environmental Reports had not yet been completed or issued to Snowy Hydro (Quarter 3 and 4 2021).	
Part A						
			EPBC Cond			
235.	17		To minimise impacts on water resources, the approval holder must comply with conditions 30 - 32 of the NSW approval relating to water management.		As CoA 30 (l) and 32 are non-compliant and 30 (p) remains open, this condition is deemed non-compliant.	Non-compliant
236.	18		The approval holder must prepare the Water Management Plan required by condition 31 of the NSW approval in consultation with the Department, before it is approved by the NSW Planning Secretary.	Main Works - Water Management Plan (WMP) (S2-FGJV-ENV-PLN-0010[G]) Rev G approved 15/10/20).	A Main Works - Water Management Plan has been prepared and approved.	Compliant
237.	19		The Water Management Plan must include provisions to make monitoring data (excluding sensitive ecological data) available as part of the monitoring, evaluation and reporting programs required by condition 31c and 31d of the NSW approval.	Main Works - Water Management Plan (WMP) (S2-FGJV-ENV-PLN-0010[G]) Rev G approved 15/10/20), Section 6.3 Monitoring; Table 6-1: Water Management Plan Monitoring Overview (for SWMP and GWMP); 6.6. Reporting; Table 6-2: Reporting requirements relevant to water.	The Water Management Plan includes provisions to make monitoring data available as part of the monitoring, evaluation and reporting programs required by condition 31c and 31d. Section 6.3 Monitoring; Table 6-1: Water Management Plan Monitoring Overview (for SWMP and GWMP); 6.6. Reporting; Table 6-2: Reporting requirements relevant to water.	Compliant
238.	20		The approval holder must implement the Water Management Plan approved by the NSW Planning Secretary until the end date of this approval, unless otherwise agreed by the Minister in writing.		As CoA 30 (l) and 32 are non-compliant and 30 (p) remains open, this condition is deemed non-compliant.	Non-compliant
WATER MANAGEMENT PLAN						
239.		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 - Weekly inspection (internal) - Incidents relating to water - EPL monitoring reports (Lic 21266) (frequency?) - Water Access Licence report (annual)	Weekly inspection (internal) Incidents relating to water EPL monitoring reports (Lic 21266) - see EPL table Draft Environmental Water Reports - refer to previous non-compliance	Evidence of weekly inspection (internal), incident reports relating to water were verified during this audit (refer to corresponding sections in this reports). However, quarterly Environmental Water Report have not always been prepared (e.g. last two quarters of 2021) or made publicly available.	Non-compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
			<ul style="list-style-type: none"> – Environmental Water Report (every 3 months) – publicly available 			
SURFACE WATER MANAGEMENT PLAN						
240.		5.1	The Project will implement stormwater control and treatment options in accordance with the Blue Book.	<p>Site inspection; Interviews; Examples of Progressive Erosion and Sediment Control Plans (PESCP): - ESCP 21000199_P32_ESCP_REV A Main Yard ESCP - Bottom Pad Extension; - ESCP S2-FGJV-ENV-PLN-0224-Tantangara Spoil Emplacement Area ESCP.</p>	<p>During the site inspection, it was observed that stormwater has been generally adequately managed, utilising different controls and measures, as per the Blue Book (e.g. sediment basins; in-stream works control measures, temporary erosion control measures).</p>	Compliant
241.		5.3.1	<p>Process water treatment plant 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>	<p>Site inspection - Lobs Hole MAT Portal and Process Water Treatment Plant; Interviews</p>	<p>The generation of process water started with the commencement of operation of the TBMs (currently at MAT Portal and ECVT). During the site inspection, it was observed that 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.</p>	Compliant
242.		5.3.2; Table 5-3; SW35	<p>Wastewater treatment plants Multiple wastewater treatment plants are proposed. These will be located at the Main camp, Marica camp, Tantangara camp and Exploratory works camp. 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>	<p>Site inspections; Interviews</p>	<p>Waste water treatment plants are still under construction and not yet operating. No discharges to reservoirs from STPs has occurred to date.</p>	Not triggered
243.		5.3.4	<p>Operation of the discharge points A combined water stream of surplus treated process water and treated wastewater will discharge to the Talbingo Reservoir and</p>	<p>Site inspections; Interviews</p>	<p>No discharges to reservoirs from PWTP or STPs have occurred to date, except for a trial to test the Mixing Zone Program (MSP), which was a controlled event.</p>	Not triggered

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
			<p>Tantangara Reservoir at licenced discharge points.</p> <p>Surplus process water will be reused onsite, either in the tunnel or on the surface in the first instance, and where it cannot be reused, discharged to the reservoirs.</p> <p>No surplus process water will be discharged to stormwater basins.</p> <p>A specific plan for the operation of the discharge points is included in Annexure F. All measures are included in Table 5-3 of the SWMP.</p>			
244.	5.13; Table 5-3 SW04	Stormwater management	<p>An Erosion and Sediment Control Plan (ESCP) will be prepared for each construction area. Each ESCP will apply the methods and principles provided in Managing Urban Stormwater: Soils and Construction:</p> <ul style="list-style-type: none"> – Volume 1 – Soils and construction (Landcom 2004); and/or – Volume 2A – Installation of services (DECC 2008); and/or – Volume 2C – Unsealed roads (DECC 2008); 	<p>Site inspections;</p> <p>Interviews;</p> <p>Examples of Progressive Erosion and Sediment Control Plans (PESCP):</p> <ul style="list-style-type: none"> - ESCP 21000199_P32_ESCP_REV A Main Yard ESCP - Bottom Pad Extension; - ESCP S2-FGJV-ENV-PLN-0224-Tantangara Spoil Emplacement Area ESCP. 	<p>During the site inspection, it was observed that stormwater has been generally adequately managed, utilising different controls and measures, as per the Blue Book (e.g. sediment basins; in-stream works control measures, temporary erosion control measures).</p>	Compliant
245.	5.13; Table 5-3 SW36	Chemical control and spill management	<p>Emergency response to spills of oils and fuel etc will be managed in accordance with the Spill Response Procedure included in Annexure C of this plan.</p> <ul style="list-style-type: none"> – training in use of spill containment materials, their locations and spill response will be undertaken proactively as required particularly for personnel who are working within or near to aquatic environments such as dredging works – minimising vehicle and plant accessibility to waterways by maintaining the 50-metre exclusion zone around Yarrangobilly River (excluding some areas such as required water crossings) – where possible, refuelling, washing and maintenance of vehicles and mechanical plant will occur at least 50 metres from waterbodies – chemicals including fuels and oils will be stored when not in use in bunded areas. 	<p>Site inspections;</p> <p>Interviews;</p> <p>Training Records;</p> <p>Environmental Training and Awareness Sessions/Toolbox Talks (e.g. Spill Prevention & Response, including topics such as:</p> <ul style="list-style-type: none"> - Refuelling Operations - Checking hydraulic lines prior to pre-start - Compulsory reporting of spills - Housekeeping and Bunding; - Oily Waste Bins 	<p>Evidence reviewed included training records on spill prevention and response, covering a range of topics included in the Spill Response Procedure. e.g.</p> <ul style="list-style-type: none"> - Refuelling Operations - Checking hydraulic lines prior to pre-start - Compulsory reporting of spills - Housekeeping and Bunding; - Oily Waste Bins <p>During the site inspection, temporary and permanent bunded areas were observed, some of them exposed to rainwater, therefore, in some cases the bunds were full and needed dewatering.</p> <p>Incident Register showed a decrease in the number of minor oil spills reported.</p>	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER						
246.		6.4.2 Table 6-2 Annex B	<p>At all times during construction, Future Generation will lead the initiation of Trigger Action Response Plans (TARPs) and implementation of corrective measures.</p> <ul style="list-style-type: none"> • TARP-1: monthly routine monitoring identifies receiving water quality exceedance against the relevant WQOs; and • TARP-2: if stormwater controls (i.e. sediment basins) overtop. Stormwater controls be will be bench-marked against predicted stormwater discharge characteristics and the relevant WQOs. 		TARP 1 has not been triggered.	Not triggered
				S2-FGJV-ENV-FRM-0005-0014 Sediment Basin Overtopping Event Form (e.g. report date: 04/09/21); Overtopping event notification (e.g. - Snowy 2_0 - Basin Overtopping Event Commencing 02_01_2022; - Snowy 2_0 - Basin Overtopping Event Commencing 29_01_2022.	TARP 2 has been triggered. There is evidence that Sediment Basin Overtopping Event have been notified to relevant authorities.	Compliant
247.		6.7	<p>Reporting</p> <p>Future Generation will report to Snowy Hydro and other agencies as detailed in Table 6-3 on water management aspects related to the Project.</p> <p>During construction, surface water monitoring data will be collected, tabulated and assessed against thresholds.</p> <p>Table 6-3: Reporting requirements relevant to surface water</p> <ul style="list-style-type: none"> – Weekly Inspection (internal) – FGJV internal record – Incident Report (relating to water) – DPIE; NPWS; EPA – EPL Monitoring Reports and Annual Returns (Lic 21266) – EPA – Environmental Water Report (every 3 months) – publicly available on project website 	Environmental Water Report March to May 2021 S2-FGJV-ENV-REP-0041.	<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>A non-compliance (NC 5) was raised at the last audit. Two of the outstanding draft Quarterly Environmental Water Reports had been completed by FGJV and issued to Snowy Hydro, however none have yet been finalised or uploaded to the project website (remains open). Two further Quarterly Environmental Reports had not yet been completed or issued to Snowy Hydro (Quarter 3 and 4 2021).</p>	Non-compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUNDWATER						
248.	28		<p>WATER</p> <p>Water Supply</p> <p>The Proponent must ensure it has sufficient water for each stage of the development; and if necessary, adjust the scale of development on site to match its available water supply.</p> <p><i>Note: Under the Water Management Act 2000, the Proponent must obtain the necessary water licences for the development.</i></p>	Water Meter readings - July to October 2021	Water Licences were sighted and reviewed at the previous audit.	Compliant
249.	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;	<p>Site inspection / interview with dewatering supervisor - Lobs Hole (FGJV)</p> <p>Interview with SHL Scientist - Project Water and Spoil Management</p>	<p>At the time of the audit, tunnelling was being undertaken only at the Main Access Tunnel (MAT) at Lobs Hole (approximately 1200m of tunnelling completed) and the ECVT (approximately 100 - 200m of tunnelling completed).</p> <p>It was advised that a probe is drilled at least 24m ahead of the cutter head to determine inflow rates, which is compared with trigger levels. Pre-grouting and post-grouting would be undertaken where triggers are exceeded. To date, there have been no triggers to undertake pre-or post-grouting.</p> <p>A dual tunnel inflow monitoring program by SHL and FGJV program is in place, and a Snowy Hydro person on site at all times when tunnelling.</p> <p>The areas of higher predicted inflows and drawdown areas had not yet been encountered. It is expected that drawdown would commence from the beginning of tunnelling at Tantangara - this could potentially commence by May 2022. It is also expected that the area under Nungar Creek may be encountered by around October 2022 (tunnelling from Tantangara).</p>	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUNDWATER						
250.	31 (d)		<p>d) include a Groundwater Management Plan with:</p> <ul style="list-style-type: none"> • detailed baseline data of groundwater levels, yield and quality on the aquifers that could be affected by the development, and a program to augment this baseline data over time; • a program to validate and calibrate the groundwater model for the development as new information is collected; • detailed criteria for determining the groundwater impacts of the development, including criteria for triggering remedial action (if necessary); • a description of the measures that would be implemented to comply with the water management requirements in condition 30 above • monitor and publicly report on: <ul style="list-style-type: none"> ◦ groundwater inflows to the tunnel; ◦ water take from the groundwater bores and connected water sources; ◦ the impacts of the development on: <ul style="list-style-type: none"> ◦ regional and local (including alluvial) aquifers; ◦ base flow to surface water sources <p><i>Note: The Proponent may stage the preparation of the Water Management Plan, including the preparation of each of the detailed plans required under the Surface Water Management Plan. However, the detailed plans must be approved prior to any construction occurring on the relevant site.</i></p>	<p>Yearly consultation with DPIE Water required in GMP - Table 5.1 GW12</p>	<p>The Groundwater Management Plan includes the required information</p> <p>* Baseline data is included in Attachment A of the GMP</p> <p>* An annual review with DPIE and NRAR to review the groundwater model and commitment to update the model as required based on the results of monitoring is included in the GMP;</p> <p>* Groundwater Level Trigger Action Response Plan (TARP) is included in the GMP;</p> <p>* Section 6.4 of the GMP provides trigger levels and methodology;</p> <p>* The program to monitor and publicly report on groundwater matters is through the quarterly Environmental Water Report. These have not yet been issued or uploaded to the public website (refer to non-compliance - NC 4)</p>	Compliant
GROUNDWATER MANAGEMENT PLAN						
251.		5	Groundwater Management Measures			
		5.1	Tunnel boring machine method:			
		5.1.1	<p>Excavation sequencing: The construction program has been planned such that the Gooandra Volcanics region will be excavated late in the construction program so that the excavation would remain open for the shortest period of time. Gooandra volcanics had a higher hydraulic conductivity than other geological units in the project area.</p>	Interviews	Construction has been sequenced to commence in Lobs Hole, with the Gooandra Volcanics region to be excavated later in the construction program	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUNDWATER						
252. □		5.1.2	<p>Forward Investigations</p> <p>Surveys will be conducted ahead of each TBM to identify potentially critical areas with poor rock conditions or high fracturing intensity. Each TBM will be equipped with devices to perform the following surveys:</p> <ul style="list-style-type: none"> • geophysical seismic reflection surveys; • geoelectrical surveys; and • systematic probe core retrieval ahead of the advancing tunnel face. 	Interviews Site visit	Probes were being used in Lobs Hole in advance of the TBM cutter head to determine inflow rate prior to main tunnel activity.	Compliant
		5.1.3	<p>Segmental Lining</p> <p>Each TBM will be equipped to install the segmental lining for the tunnel using the universal ring method. The ring will be 2m wide, composed of nine pre-cast concrete segments which form each ring (eight segments, one 'large size' key-segment) and which have no bolts along the longitudinal joints. One drainage relief hole will be provided in each segment to guarantee a 'drainage effect' and water pressure re-equilibrium.</p>	Interviews Site visit	Tunnel segments are being fabricated at the Cooma segment factory, and the TBMs are equipped to install these in the tunnel (see photos in report)	Compliant
		5.1.4	<p>Pre-grouting</p> <p>Pre-grouting will be conducted to reduce the hydraulic conductivity of the rock mass (minimise groundwater inflow) and improve the stability of the excavation face. This is undertaken ahead of the excavation face and will generally be carried out by:</p> <ul style="list-style-type: none"> • drilling and testing a probe hole; • drilling and installing a crown of groutable pipes; • injecting grout through the pipes; and • drilling a verification probe hole. <p>Probe holes are drilled up to 40 m in front of the working face. Water flow through the initial holes is measured and a decision is made on the need to grout.</p> <p>Verification of the grout effectiveness is made by comparing inflow rates in the original probe hole to those in verification holes.</p>	Interview - SHL and FGJV Site inspection / site interviews	<p>As noted previously, the pre-grouting requirement has not yet been triggered by predicted or actual inflow rates.</p> <p>To determine whether pre-grouting is required, a probe is required 24 m ahead of the cutter head - pre-grouting would be undertaken where triggers are exceeded.</p> <p>A dual monitoring program is conducted by SHL and FGJV. A Snowy Hydro and an FGJV person is on site at all times when tunnelling. Daily data is reviewed at a daily meeting to discuss data interpretation.</p>	Compliant
		5.1.5	<p>Post-grouting</p> <p>Post-grouting may also be used to further consolidate the surrounding rock and/or prevent water ingress if required. Tunnel water inflow will be measured using</p>	Interviews	<p>As noted previously, the post-grouting requirement has not yet been triggered by predicted or actual inflow rates.</p> <p>Post grouting to be done according to performance</p>	Not triggered

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUNDWATER						
			in-line monitoring of flow along the constructed tunnel and will inform the decision on the need to grout.		criteria 6 l/s per km if not GDE area, 2l/s in GDE (see plan)	
255. 1		5.1.6	<p>Inflow monitoring</p> <p>Groundwater inflow into the tunnels will be monitored during construction and compared to model predictions. Tunnel water inflow will be measured in the tunnel via in-line flow meters. Tunnel inflow monitoring, water treatment plant (WTP) discharges and Project water inputs re-cycled back into the tunnel will all be monitored and used to determine a simple water balance to estimate local groundwater extracted during construction. Monitoring will be undertaken at the indicated locations shown in Figure 5-1.</p>	<p>Groundwater Inflow Matrix - Snowy_16022022</p> <p>Master Groundwater Monitoring Database - last data uploaded - October 2021.</p> <p>Interview with FGJV Dewatering Manager at Lobs Hole.</p> <p>Interview with SHL Scientist - Project Water and Spoil Management</p> <p>Site inspection - Lobs Hole Water treatment plant / flow meters</p>	<p>Groundwater inflow into the tunnels was being undertaken by both FGJV and Snowy Hydro.</p> <p>Snowy Hydro also maintain a Groundwater Inflow Matrix which provides predicted inflows (using various methods), and will be populated with actual inflow rates to compare with predictions).</p> <p>It was expected that drawdown my commence from the beginning of tunnelling at Tantangara which is due to potentially commence by May 2022. It is also expected that Nungar may be encountered by October 2022 (from Tantangara end of tunnelling)</p>	Compliant
GROUNDWATER MONITORING PROGRAM						
256. 1		Annex A GMP 1.6 Table 1-1	<p>Groundwater monitoring</p> <ul style="list-style-type: none"> * Groundwater level monitoring (direct read data loggers) - 6 hourly * Groundwater quality - water quality lab samples from the suite - Quarterly or as required by EPL or TARP's * Groundwater extraction licence compliance (volume) - as required by the extraction licence 	Master Groundwater Monitoring Database - last data uploaded - October 2021.	<p>Groundwater monitoring is being undertaken quarterly with data being collected from the field in a joint program between SHL and FGJV. The data loggers record data on a 6 hourly basis. The data is forwarded to EcoLogical once collected, and SHL reviews any trends. Currently, monitoring is undertaken at 140 locations (75 are listed in the Groundwater Management Plan) - SHL monitor the additional bore results.</p> <p>Snowy Hydro were in the process of developing a program for realtime groundwater monitoring with a dashboard which would provide real time presentation of data on actual vs predicted inflows. The telemetry system was currently at the test environment stage of the SHL proof of concept.</p> <p>Realtime monitoring would significantly improve the ability to identify drawdown more quickly and therefore implement actions to address in a timelier manner than is currently in place.</p>	Compliant
257. 1		Annex A GMP 2.5	<p>Groundwater levels</p> <p>Monitoring frequency will be continuously reviewed and data compared to model predictions, and frequency of data collection will be adapted to ensure</p>	<p>Master Groundwater Monitoring Database - last data uploaded - October 2021.</p> <p>Proposal for Telemetry system (to allow for</p>	<p>As noted in the Groundwater monitoring program, no drawdown is expected for the first few years. At the time of the audit, the data from the existing dataloggers are downloaded manually quarterly. Data is uploaded to the</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUNDWATER						
			<p>potential significant trigger events are detected early (i.e. particularly when Tunnelling commences in high risk areas).</p> <p>No drawdown is predicted for the first few years of the project (see Section 4.2.4 of GMP) hence existing data loggers will be downloaded manually quarterly until telemetry is in place. Monitoring data collection frequency will also be reviewed during the annual review of the groundwater model, in consultation with NRAR and DPIE Water.</p>	real time monitoring data to be captured and analysed).	<p>Master Groundwater Monitoring Data base (sighted and reviewed).</p> <p>It was also noted that a telemetry system is currently being considered by SHL and is currently at the test environment stage of the SHL Proof of Concept. SHL are aiming to have the system in place by winter 2022. The telemetry system would allow real-time review of data, which would mean that monitoring frequency would not require continuous review.</p> <p>An Annual review was scheduled with DPIE Water and NRAR for Thurs 3 Feb 2022. It was advised that during that meeting, initial consultation was undertaken to establish what triggers a model update, and it was noted that a model update would be required where a drawdown trigger is exceeded. Other model updates would occur based on recommendations from DPIE during data review.</p> <p>SHL were currently scoping up data review process and reporting. A report expected to be available for review with DPIE by April 2022.</p>	
258. 1		Annex A GMP 2.5	Groundwater level changes will be compared to predicted level changes from the numerical modelling as presented in Appendix B.	Master Groundwater Monitoring Database	Snowy Hydro / Ecological review the groundwater level data, however as noted previously, at this stage, groundwater drawdown is not expected until tunnelling at Tantangara is underway.	Compliant
259. 1		Annex A GMP 2.5.1	Shallow groundwater levels in standpipes located at known GDEs will be compared to the 80th percentile between the months of May and October. If drawdown is identified beyond trigger levels in areas of these GDEs during this period, actions outlined in the Groundwater level Trigger Action Response Plan (TARP) will be initiated.		It was advised that there have been no groundwater drawdown triggers except some Level 1 triggers recorded in May 2021, prior to commencement of tunnelling. FGJV assessed the trigger levels as 'natural variation' and Snowy Hydro are seeking clarification from FGJV on the potential cause of the Level 1 trigger.	Not triggered
260. 1		Annex A GMP 2.6	<p>Groundwater Quality (quarterly) monitoring</p> <p>If a Level 1 water level trigger occurs, a round of water quality sampling is initiated at the triggered bore (unless the trigger occurs at a VWP site where water quality cannot be sampled) and immediate surrounding bores.</p> <p>Water quality analysis will indicate whether any change from baseline conditions has occurred. Sampling will be</p>	Initial triggers in May 2021 (prior to tunnelling) - .).	<p>As noted above, there have been no Level 1 triggers since commencement of tunnelling.</p> <p>Since May 2021 there does not appear to have been any other Level 1 triggers (reports not yet provided to SHL</p>	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUNDWATER						
			undertaken quarterly and if no change is detected after one year the bore reverts to a Level 1 condition (i.e. no further sampling).			
261. ①		Annex A GMP 2.6	A review after the first 12 months of construction of the monitoring program will be completed to determine the efficiency of the monitoring program and any required changes.	Email from SHL Scientist - Project Water and Spoil Management dated 16 Feb 2022 providing general summary of outcomes of the meeting with DPIE Water and NRAR on 3 Feb 2022.	An Annual review was scheduled with DPIE Water and NRAR for Thurs 3 Feb 2022. It was advised that during that meeting, initial consultation was undertaken to establish what triggers a model update, and it was noted that a model update would be required where a drawdown trigger is exceeded. Other model updates would occur based on recommendations from DPIE during data review. Correspondence from SHL scientist confirmed that the meeting took place, and provided the general outcomes.	Compliant
262. ①		Annex A GMP 2.8	Tunnel Inflow Groundwater inflow into the tunnels will be monitored during construction and compared to model groundwater ingress predictions and water access licencing. The groundwater model will be updated as required based on the results of monitoring, and proposed management measures to minimise potential groundwater impacts adjusted accordingly.	Site inspection and Interview with FGJV tunnel dewatering team - Colin Groundwater Inflow Matrix (SHL) 16/02/2022	It was confirmed during the site inspection that inflow into the tunnels was being monitoring and that FGJV were primarily responsible for site water balance and monitoring of inflow. (GBR (Geotechnical Baseline Reporting) team / dewatering team) SHL maintain a Tunnel Inflow matrix which is used to validate FGJV data and are responsible for groundwater modelling update and consultation with DPIE Water and NRAR.	Compliant
263. ①		Annex A GMP 2.8.1	Groundwater extraction Groundwater extraction will be monitored throughout the year throughout the year to ensure groundwater extraction is within permitted volumes of take from respective water sources and reported on an annual basis in accordance with licence requirements	Groundwater Take spreadsheet Water accounting data entry in IWAS (WaterNSW portal) (process sighted)	Groundwater take is measured weekly by FGJV and the data is provided to SHL on a monthly basis through an RFI process. A monthly water reading is provided for each of the six (6) extraction points The process for water accounting data entry in IWAS (WaterNSW portal) was sighted. Reporting is undertaken once every 2 months to quarterly via the portal.	Compliant
264. ①		Annex B GMP	Groundwater TARP 1 - Groundwater Level * Trigger level 2 reached (early warning - trending towards exceedance) - conduct preliminary review of activities * Trigger level 3a reached (exceedance of threshold trigger level) - report results of trigger investigation to SHL, report results in Annual Review * Trigger level 3b reached (exceedance identified as related to construction activities) - notify DPIE and NPWS within 7 days of trigger investigation report, provide trigger exceedance report within 30 days of		As noted above, there have been no Level 1 or higher triggers since commencement of tunnelling. The Groundwater Level TARP has therefore not been triggered.	Not triggered

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUNDWATER						
			<p>notification, identify mitigations, etc. in consultation with DPIE</p> <p>* Trigger level 4 reached - water level drawdown impacts on a receptor (GDE) - initiate investigation into reasons for impact, take actions recommended by investigation.</p>			

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - HERITAGE						
265.	33		<p>HERITAGE Protection of Heritage Items</p> <p>The Proponent must ensure that the development does not affect:</p> <ul style="list-style-type: none"> a) any Aboriginal heritage items outside the construction envelope (see Appendix 3); b) the rock shelter (AHIMS 57-4-276) to the west of the Tantangara site (see Appendix 3); c) any of the historic heritage items outside the construction envelope (see Appendix 3); d) the heritage items listed in Table 4-2 and Table 4-4 in Appendix 4; and e) the tufa deposits outside the construction envelope (see the figures in Appendix 3). 	<ul style="list-style-type: none"> - Heritage Management Plan (HMP) (S2-FGJV-ENV-PLN-0014-G approved on 13/08/20 by DPIE); - HMP Section 5.1.1 Heritage outside construction envelope; - Section 5.3.2 Exclusion zones - Section 5.4.2 Ravine tufa deposits; - Example of Heritage Signage TSU14 H1 20220103 (photo); - Heritage Clearance Certificates on Aconex (extract from 10/11/20 to 11/04/21); - Map showing Heritage Locations at Lobs Hole (LOBS), inside and outside the project boundary; - Map showing Heritage Locations at Tantangara (TAN), inside and outside the project boundary; - S2-FGJV-ENV-REG-0019 - Environmental Training & Awareness Register, e.g.: <ul style="list-style-type: none"> - Unexpected Finds Protocol - Awareness Training (e.g. Nov-20; Sep-21); - EIS Boundaries - No-go zone areas breach and permit process (e.g. Jul-21); - Site Inductions including handling of heritage items, incident reporting and Unexpected Finds Protocol (e.g. Trunkline Services site induction presentation 29/01/22). 	<p>Heritage Management Plan (HMP) section 5.1.1 indicates that all known heritage located outside the construction envelope will be protected from direct impact by project boundary delineation and site induction training in relation to heritage.</p> <p>Known heritage items have been marked on sensitive area plans. Maps showing Heritage Locations inside and outside the project boundary were reviewed (e.g. Lobs Hole; Tantangara).</p> <p>Signage of Heritage Locations was briefly reviewed (one photo). This was not verified during the site inspection. Unexpected Finds Protocol - Awareness Training was conducted at Lobs Hole in Nov-20. Site Inductions include information and instructions on handling of heritage items, incident reporting and Unexpected Finds Protocol (e.g. Trunkline Services site induction presentation 29/01/22).</p>	Compliant
266.	34 (a)		<p>Heritage Management Requirements</p> <p>The Proponent must:</p> <ul style="list-style-type: none"> 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>Heritage site clearance form (e.g. - Marica MSU4/L1 (19/01/21) salvage excavation;</p> <ul style="list-style-type: none"> - Lobs Hole RSU5/L1 Moderate local (13/09/20); - Lobs Hole R200 (27/09/21) archival recording; <p>Aboriginal Cultural Heritage (ACH) - Interim Report for the Snowy 2.0 - Main Works was sent to DPIE (via Major Projects Portal) on 12/01/22.</p>	<p>At Audit #2 it was advised that salvage work for the exploratory works had been completed.</p> <p>The Aboriginal Cultural Heritage (ACH) - Interim Report for the Snowy 2.0 - Main Works, which includes information on the salvage heritage findings, has been prepared by a Heritage specialist (Julie Dibden) and it has been sent to DPIE (via Major Projects Portal) on 12/01/22.</p>	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - HERITAGE						
267.	34 (b)		b) undertake archival recording, test excavation and/or salvage of the historic items listed in Table 4-1 in Appendix 4 if these items are to be affected by the development;	Heritage site clearance form (Tantangara Dam TSU14/H1 13/02/21 -).		
268.	34 (c)		c) prepare a detailed archival record of the history of settlement and mining in the Lobs Hole Ravine area; and		It was indicated during the audit that detailed archival record of the history of settlement and mining in the Lobs Hole Ravine area will be captured in the final issue of the Aboriginal Cultural Heritage (ACH) - Interim Report, which will be shared with the public.	Not triggered
269.	34 (d)		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).	S2 Boulder Streams Maps (12598_INF-200520-Boulderstream Maps); Boulder stream Map Overlay with Dec 2021 imagery (e.g. Boulder Stream BS1 to BS5); Stabilisation requirements to widen Lobs Hole Ravine Road within Boulder Streams 1 to 5 (S2-6120-TCN-000006 Rev C dated 15/05/20); S2-SHL-ENV-REP-0029 Fossil Report Requirements (e.g. Table 4.2 key recommendations for management of Palaeozoic geodiversity features potentially encountered during construction).	Construction documentation related to the management of boulder streams was reviewed. During the site inspections, boulder streams on Ravine Road were sighted. There has been no change to the fossiliferous beds since the previous 2 IEAs.	Compliant
270.	35		Heritage Management Plan Prior to carrying out any development for the Main Works that could affect the heritage items listed in Appendix 3 and 4, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	Heritage Management Plan (HMP) (S2-FGJV-ENV-PLN-0014-G approved on 13/08/20 by DPIE)	Assessed previously at Audit #1 - deemed compliant. There have been no changes to the HMP since Audit #1.	Compliant
	35 (a)		a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, BCD, Heritage Council, RAPs, Yala Ngurumbang Yindamarra Executive Advisory Committee and Southern Snowy Mountains Aboriginal Community MOU Group;			
	35 (b)		b) describe the measures that would be implemented to: <ul style="list-style-type: none"> • protect the heritage items identified in condition 33 above; • comply with the heritage management requirements in condition 34 above, 			

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - HERITAGE						
			<p>including the display of removable heritage items in consultation with the NPWS and BCD;</p> <ul style="list-style-type: none"> • relocate moveable historic heritage items within the disturbance area; • manage the discovery of human remains or previously unidentified heritage items; • provide for ongoing consultation with key stakeholders during the implementation of the plan; • involve key stakeholders in the management of heritage items on site; • allow Aboriginal stakeholders to visit significant cultural heritage sites on site, provided this can be carried out safely without compromising the construction of the development; and • ensure workers receive suitable training and inductions on the heritage management requirements on site; 			
	35 (c)		(c) include a program to monitor and report on the effectiveness of these measures; and			
	35 (d)		(d) include a program to publish: <ul style="list-style-type: none"> • any detailed archival records required under the conditions of this approval; and • the findings of any excavations and salvage works. 			
271.	36		The Proponent must implement the approved Heritage Management Plan for the development.	Evidence reviewed under CoA 33, 34 and 35	Considering evidence reviewed under condition 33, 34 and 35, the implementation of the HMP is deemed compliant.	Compliant
Part A EPBC Condition - Annexure A - Conditions specific to the action						
-	EPBC Cond	-	Heritage	-	-	-
272.	21		To minimise impacts on heritage items and values, the approval holder must comply with conditions 33-36 of the NSW approval relating to the protection and management of heritage items.	Evidence reviewed under CoA 33, 34 and 35	Considering evidence reviewed under condition 33, 34 and 35, the implementation of the HMP is deemed compliant. Therefore, this condition under the EPBC is also deemed compliant.	Compliant
273.	22		The approval holder must prepare the Heritage Management Plan required by condition 35 of the NSW approval in consultation with the Department, before it is approved by the NSW Planning Secretary. The Heritage Management Plan must:	Heritage Management Plan (HMP) (S2-FGJV-ENV-PLN-0014-G approved on 13/08/20 by DPIE); HMP Section 1.9.1 Aboriginal Consultation	As indicated in section 1.9.1 of the HMP, a formal process of Aboriginal community consultation has been conducted in accordance with the guidelines as set out in the NSW DPIE's Aboriginal cultural heritage consultation requirements for proponents 2010 (NSW DECCW 2010b).	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - HERITAGE						
			<p>a. be prepared in accordance with the National Heritage Management Principles; and</p> <p>b. include a consultation plan that outlines key indigenous stakeholders and when they are to be consulted; and update the consultation plan to record consultation and how feedback has been implemented during the action.</p>		<p>The consultation process was initiated at the beginning of the Snowy 2.0 project during geotechnical works. It has continued throughout the Exploratory Works and Main Works projects and is described in the Appendix P.1 of the Main Works EIS.</p> <p>Updated information about Snowy 2.0 and the cultural heritage assessment inclusive of additional areas in the project footprint was provided to Registered Aboriginal Parties (RAPS) on 13 May 2019. The draft ACHA for Main Works was provided to RAPS for review on 10 September 2019;</p> <p>no responses were received.</p> <p>No further information was gathered under this condition.</p>	
274.	23		The approval holder must implement the Heritage Management Plan approved by the NSW Planning Secretary until the end date of this approval, unless otherwise agreed by the Minister in writing.		<p>Evidence of continuous implementation of the HMP was sighted. Therefore, at the time of this audit, this condition is deemed compliant.</p>	Compliant
HERITAGE MANAGEMENT PLAN						
275.		5.2.1 Table 5-1 HER03	The Unexpected Finds Procedure included within Appendix E will be followed in the event that any items of potential Aboriginal, historic, archaeological or natural (geodiversity) significance including human remains are discovered during construction.	<ul style="list-style-type: none"> – HMP, App E - Unexpected Finds Procedure; – S2-FGJV-ENV-REG-0019 - Environmental Training & Awareness Register, e.g.: <ul style="list-style-type: none"> ○ Unexpected Finds Protocol <ul style="list-style-type: none"> - Awareness Training (e.g. Nov-20; Sep-21); - EIS Boundaries - No-go zone areas breach and permit process (e.g. Jul-21); - Site Inductions including handling of heritage items, incident reporting and Unexpected Finds Protocol (e.g. Trunkline Services site induction presentation 29/01/22). ○ Heritage site clearance form for unexpected finds (e.g. - Marica MSU4/L1 (19/01/21) salvage excavation; 	<p>Unexpected Finds Procedure has been included in the HMP App E.</p> <p>Evidence of training and communication of the UFP was reviewed.</p> <p>Unexpected Finds Protocol - Awareness Training has been conducted by the Environmental team and/or Site Supervisor. Also, no-go zone establishment training has been conducted.</p> <p>Site Inductions including information and instructions on handling of heritage items, incident reporting and Unexpected Finds Protocol were also reviewed (e.g. Trunkline Services site induction presentation 29/01/22).</p>	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - HERITAGE						
				<ul style="list-style-type: none"> <input type="radio"/> Lobs Hole R200 (27/09/21) archival recording. 		
276.		5.2.1 Table 5-1 HER11	<p>Exclusion zones will be installed:</p> <ul style="list-style-type: none"> • around the Washington Hotel ruin (R20) with a minimum 20m avoidance buffer; • around the cadastral boundary of the Ravine town cemetery (R118); and • for heritage items inside the disturbance area that require salvage or archival recording. Flagging will remain in place until such time as the relevant mitigation measures have been implemented and heritage clearance certificate issued. 		Assessed previously at Audit #1 - deemed compliant. The Washington Hotel site continues to be fenced.	Compliant
277.		5.4.4 5.2.1 Table 5-1 HER26	<p>The disused Traces Knob quarry could potentially be directly impacted by construction works on Quarry Trail and near the Tantangara accommodation camp.</p> <p>The following measures will be implemented to prevent infilling on the former Traces Quarry site:</p> <ul style="list-style-type: none"> • the area will be marked on sensitive area maps and included in work packs; • no go fencing, flagging or markers will be installed; • site induction with elements related to historic heritage management; and • targeted training in the form of toolbox talks or pre-start briefs will be conducted. 	Environmental Inspection checklist 8/11/202 - Tantangara	Environmental inspection checklists for the Tantangara area have included checks that Heritage items area protected from works activities and works activities. This provides some evidence that checks are made, however checks on the Traces Knob quarry were not specifically sighted. Based on the limited evidence, this has been deemed compliant, however will be reviewed at future audits.	Compliant
278.		6.1	<p>Monitoring and Inspection</p> <p>Once heritage salvage works are completed, weekly environmental inspections would focus on the protection of items retained and protected in situ. A suitably qualified heritage expert would then be required only in the instance of an unexpected find on site.</p>	Environmental Inspection checklists	Environmental inspections include heritage items.	Compliant
279.		6.1 Table 6-1	<p>Geologist inspections to be undertaken on the following</p> <p>* Fossils in new exposures of cuttings made during construction of Marica Road. Frequency: following construction and commissioning of Marica Road.</p>		Marica Road was under construction at the time of the audit and is therefore not triggered.	Not triggered
280.			<p>* Graptolite fossils in exposures of black shale made during construction of Tantangara Road. Frequency: Following construction and commissioning of Tantangara Road.</p>		Tantangara road was under construction at the time of the audit and is therefore not triggered.	Not triggered

ID	S3 - CoA No	Plan / Sect	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - HERITAGE						
281.		6.5.2	<p>Aboriginal Heritage Salvage</p> <p>A combined Aboriginal heritage salvage report for Exploratory Works and Main Works will be produced to accompany the curated material obtained during Aboriginal heritage salvage works. The salvage report will be provided to DPIE, Heritage NSW and RAPs <i>within twelve (12) months of the Main Works salvage and artefact analysis being completed.</i></p> <p>To provide progressive information to agencies an Interim Report will be provided outlining the status of salvage works undertaken to date and immediate findings from Exploratory Works. The Interim Report will be provided within 12 months of completion of Exploratory Works salvage.</p>	<p>Aboriginal Cultural Heritage (ACH) - Interim Report for the Snowy 2.0 - Main Works was sent to DPIE (via Major Projects Portal) on 12/01/22.</p>	<p>Aboriginal Heritage Impact Mitigation - Interim Report (dated 30 June 2020) was provided as evidence at Audit #2.</p> <p>The Aboriginal Cultural Heritage (ACH) - Interim Report for the Snowy 2.0 - Main Works, which includes information on the salvage heritage findings, has been prepared by a Heritage specialist (Julie Dibden) and it has been sent to DPIE (via Major Projects Portal) on 12/01/22.</p>	Compliant
282.		6.5.3	<p>Lobs Hole Ravine Area Archival Record</p> <p>A detailed archival record of the history of settlement and mining in the lobs hole ravine area will be provided to Snowy Hydro, Department of Planning, Industry and Environment (DPIE), NPWS and Heritage NSW within two years of completion of the salvage.</p>		<p>It was indicated during the audit that detailed archival record of the history of settlement and mining in the Lobs Hole Ravine area will be captured in the final issue of the Aboriginal Cultural Heritage (ACH) - Interim Report, which will be shared with the public.</p>	Not triggered

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

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - RECREATION						
283.	37		<p>RECREATION Offset</p> <p>Prior to the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must pay the NPWS \$1,995,000 to offset the recreational impacts of the Main Works on the Kosciuszko National Park.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • These funds will augment the \$4,962,777 already paid to the NPWS to offset the conservation and recreational impacts of the Exploratory Works on the Kosciuszko National Park. • The NPWS will use these funds and any interest generated by these funds to enhance the recreational facilities in the Kosciuszko National Park, particularly in the areas surrounding the Talbingo Reservoir, Lobs Hole and Tantangara Reservoir sites. • To ensure accountability, the NPWS will: <ul style="list-style-type: none"> ~ develop a detailed program for the allocation of these funds to specific projects; and ~ monitor, evaluate and publicly report on the implementation of the detailed program and the effectiveness of the specific projects. 		<p>This condition was deemed compliant at Audit #1 - invoice sighted - 8/10/2020 - one off requirement.</p> <p>No further information was gathered for this condition.</p>	Compliant
284.	38 (a)		<p>Recreation Management Requirements</p> <p>The Proponent must:</p> <p>a) keep Tantangara Road open to the public once it has been upgraded for the development, and have suitable procedures in place to ensure it is safe for unrestricted use and to respond promptly to any temporary public safety risks;</p>	<p>TMP Section 5.11.3 Tantangara Road Access;</p> <p>Tantangara Foreshore Access Map;</p> <p>Road signage on Tantangara Rd (at intersection with Snowy Mountains Highway and before access to the Tantangara Reservoir boat ramp);</p> <p>Snowy 2.0 website - https://www.snowyhydro.com.au/snowy-20/roads-and-access/</p>	<p>Tantangara Road is still under construction. However, public access has been retained and information regarding public access to the Tantangara Road, Tantangara Reservoir and Boat Ramp has been communicated on SHL's website and via road signage (refer to site inspection photos).</p> <p>The following recreational areas were open to the public at the time of the audit:</p> <p>Talbingo Reservoir (with some intermittent delays at boat ramp);</p> <p>Tantangara Reservoir (except areas usually accessed via Quarry Trail Road);</p> <p>Tantangara Road;</p> <p>Tantangara Reservoir boat ramp except some temporary access disruptions.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - RECREATION						
285.	38 (b)		b) minimise the impacts of the development on users of the Kosciuszko National Park both within and in the vicinity of the construction envelope;	TMP Section 5.11.2 National Park Public Access; Pre-Winter Planning Discussion (FGJV and TfNSW meeting held on 10/02/22); Traffic and Transport Liaison Group (TTLG) quarterly meeting including participants from SHL, FGJV, and agencies such as TfNSW and NPWS (e.g. meeting held on 17/09/21).	<p>During the site inspection, the Tantangara Reservoir boat ramp was open for public access.</p> <p>Evidence verified included road signage of restricted areas, and alternative routes, providing a phone number to give park users the opportunity to provide feedback. Also, information on heavy vehicles movement in the park has been communicated on FGJV's website.</p> <p>Information discussed at meetings with agencies such as TfNSW and the TTLG meeting, provide evidence of the intent to minimize the impact of the development in the public in general, and park users in particular.</p> <p>Although no direct information was gathered, for example in relation to communication with SHL and NPWS providing advance notification of changes to park facilities, the SHL's website did provide up-to-date information on public access to recreational areas in the KNP (open and closed) and the NPWS's website on KNP on also included up-to-date information on public access and road conditions. Therefore, it is deemed that the proponent is compliant to this condition.</p>	Compliant
286.	38 (c)		c) minimise any disruption to the use of the Talbingo Boat Ramp;	Tantangara Foreshore Access Map; Road signage on Tantangara Rd (at intersection with Snowy Mountains Highway); Snowy 2.0 website - https://www.snowyhydro.com.au/snowy-20/roads-and-access/	<p>Information regarding public access to recreational areas has been communicated on SHL's website and via road signage (refer to inspection photos).</p> <p>The following recreational areas were open to the public at the time of the audit:</p> <ul style="list-style-type: none"> – Talbingo Reservoir (with some intermittent delays at boat ramp); – Tantangara Reservoir (except areas usually accessed via Quarry Trail Road); – Tantangara Road; – Tantangara Reservoir boat ramp except some temporary access disruptions. 	Compliant
287.	38 (d)		d) minimise the dust and noise impacts of the development on the Wares Yards campground;	This would be addressed in the Recreational Management Plan, however was not complete at the time of the audit.	No evidence gathered for this condition.	
288.	38 (e)		e) control the recreational activities of the workers staying in the accommodation camp to minimise the impacts of the development outside the approved disturbance area;		No evidence gathered for this condition.	
289.	38 (f)		f) progressively reopen those areas of the Kosciuszko National Park that are closed to the		No evidence gathered for this condition.	

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - RECREATION						
			public during construction as soon as possible following the completion of construction;			
290.	38 (g)		g) keep the community informed about the temporary closure of areas or any recreational facilities within the Kosciuszko National Park.	TMP, App E - Transport Communication Strategy;	<p>Information regarding public access to recreational areas has been communicated on SHL's website and via road signage (refer to inspection photos).</p> <p>TMP, App E - Transport Communication Strategy, Table 2-3: Indicative communication activities, includes a range of communication methods to keep the public informed about transport impacts of the development, including road closures and reduced access to recreational activities. However no further evidence was gathered, for example in relation to communication with tourism providers or recreational sporting bodies.</p> <p>Some evidence sighted included road signage of restricted areas, and alternative routes. Although no direct information was gathered, for example in relation to communication with SHL and NPWS providing advance notification of changes to park facilities, the SHL's website did provide up-to-date information on public access to recreational areas in the KNP (open and closed) and the NPWS's website on KNP on also included up-to-date information on public access and road conditions.</p> <p>Therefore, it is considered that as a whole, the community has been kept informed of road closure status. Therefore, this condition is deemed compliant.</p>	Compliant
291.	39		<p>Recreation Management Plan</p> <p>Within 12 months of the commencement of construction, the Proponent must prepare a Recreation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p>		<p>The Recreation MP had not been prepared or submitted to the relevant agencies (Relevant agency: NSW Planning Secretary - DPIE) within the nominated time frames.</p> <p>It is noted that an extension of time was requested by SHL to DPI and DPIE for submission of these Plans. A letter from DPIE dated 6/12/2021 noted that SHL has been liaising with the relevant agencies to progress these with a schedule to have them submitted by April 2022.</p> <p>DPIE assessed these non-compliances and determined that the breaches will be recorded in their system.</p>	Non-compliant
292.	39 (a)		a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, NSW DPI and TfNSW;			
293.	39 (b)		b) include a conceptual recreation strategy for the site, identifying the recreational facilities that would be provided during the rehabilitation of the site;			
294.	39 (c)		c) describe how the implementation of this strategy would be co-ordinated with the			

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - RECREATION						
			implementation of the Rehabilitation Management Plan;			
295.	39 (d)		d) include detailed plans for the provision of recreational facilities at, and future recreational use of, the following sites: <ul style="list-style-type: none"> • Talbingo Reservoir; • Lobs Hole; • Tantangara Reservoir; 			
296.	39 (e)		e) describe the measures that would be implemented to comply with the recreation mitigation requirements in condition 38 above; and			
297.	39 (f)		f) monitor and publicly report on the implementation of these plans and measures.			
298.	40		The Proponent must implement the approved Recreation Management Plan for the development.		As indicated under CoA 39, the Recreation Management Plan has not been approved yet, therefore, this condition has not been triggered yet.	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
299.	41		<p>TRANSPORT 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>	<p>A Show Cause letter from DPIE dated 3 November 2021, alleging a breach of section 4.2(1)(b) of the EP&A Act</p>	<p>The previous audit identified that the proponent was non-compliant to this condition as 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.</p> <p>As a result of the non-compliance, a Show Cause letter dated 3 Nov 2021 was issued to Snowy Hydro from DPIE.</p> <p>Snowy Hydro responded to the Show Cause letter in a 442 page document dated 19 Nov 2021 (442 pages) - included a design package.</p> <p>At the time of the audit, there had been no further response from DPIE. The previous non-compliance remains open.</p>	Non-compliant
300.	42 (a)		<p>Maintenance – Link Road and Tantangara Road</p> <p>The Proponent must:</p> <ul style="list-style-type: none"> a) prepare a dilapidation survey of Link Road between the Snowy Mountains Highway and Goat Ridge Road and Tantangara Road in accordance with the relevant Austroads standards and guidelines: <ul style="list-style-type: none"> • prior to the commencement of construction and/or the decommissioning of the development; and • within 2 months of the completion of construction and/or the decommissioning of the development; 	<p>Evidence assessed at the last audit:</p> <p>Snowy 2.0 Road Condition Survey – Issue A S2-6160-REP-000004-A dated 29 April 2019 (This Survey includes Link road between the Snowy Mountains Highway and Goat Ridge Road,</p> <p>Transport of Various Loads along Link Road, Kosciuszko National Park Assessments of Culverts for FGJV dated 14 July 2020 by Tasman Associates.</p> <p>Email dated 01/03/2021 from SHL Principal Engineer Roads Infrastructure – reasons for the Dilapidation survey not being undertaken for Tantangara Road.</p>	<p>At the previous audit a dilapidation survey was conducted for Link Road.</p> <p>There was also an email providing justification for a Dilapidation Survey not to be undertaken for Tantangara Rd.</p> <p>No further updates have been provided during this audit.</p>	Compliant
301.	42 (b)		<p>b) rehabilitate and/or make good any development-related damage to Link Road between the Snowy Mountains Highway and Goat Ridge Road and Tantangara Road:</p> <ul style="list-style-type: none"> • identified during the construction and/or decommissioning works if it could endanger road safety, as soon as possible after it is identified but within 7 days at the latest, unless the NPWS agrees otherwise; and 		<p>It was verbally expressed that there was only one minor incident involving damage on a guard rail on Link Rd. This has been rectified. SHL has completed a review and investigation. FGJV is waiting for final documentation for Planning.</p> <p>No further updates have been provided during this audit.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
			<ul style="list-style-type: none"> identified in any dilapidation survey completed after the construction and/or decommissioning works within 2 months of the completion of the survey, to the satisfaction of the NPWS. <p>If there is a dispute about the scope of any remedial works or the implementation of these works, then either party may refer the matter to the Planning Secretary for resolution.</p>			
302.	43		<p>Vehicle Restrictions</p> <p>All heavy vehicles associated with the development must travel to and from the site via the:</p> <ul style="list-style-type: none"> a) Snowy Mountains Highway, Miles Franklin Drive and Spillway Road; b) Snowy Mountains Highway, Link Road and Lobs Hole Ravine Road; c) Snowy Mountains Highway, Coppermine Trail and Wallaces Creek Trail; d) Snowy Mountains Highway, Marica Trail; e) Snowy Mountains Highway, Tantangara Road and Quarry Trail; or f) Elliott Way and Link Road (but only following the written approval of the Planning Secretary). <p><i>Note: The Proponent must obtain permits under the Heavy Vehicle National Law (NSW) for the use of any OSOM vehicles on the public road network.</i></p>	<ul style="list-style-type: none"> Interviews - FGJV; OSOM HV Bookings Record; OSOM Permits: Oversize and/or Overmass (OSOM) Mass or Dimension Exemption Permit (e.g. Permit number 524502V2; 524513V2); PBS (performance-based standard) process for Segment Transport: New Permit Application - Case 293903 PBS permit Polo Flat-Tantangara for 352FGJV002 B-Triple (approved with conditions 22/01/20), permit period: 28/11/19 to 27/11/22; New Permit Application - Case 293919 PBS permit Polo Flat-Lobs Hole for 352FGJV002 B-Triple (approved with conditions 22/01/20), permit period: 28/11/19 to 27/11/22. 	<p>During the interviews, it was explained that all heavy vehicles (HV) travel via Snowy Mountains Highway. For "Over Size Over Mass" (OSOM) vehicles, Traffic & Transport (T&T) has developed its own OSOM permits and a new booking system: OSOM HV Bookings Record. A PBS (performance based standard) process for Segment Transport has been introduced: using 3 trailers instead of 2, increasing the volume while reducing the truck movements.</p>	Compliant
303.	44 (a)		<p>The Proponent must:</p> <ul style="list-style-type: none"> a) restrict vehicle speeds on the road network within the site to 30 km/h between sunset and sunrise, unless the Planning Secretary agrees otherwise; 	Trunkline Services Site Induction (20220129).	<p>Speed limit during the night is 30k/h. It is communicated via site inductions (e.g. 30 km/hr speed limit on site roads - 10 km/hr entering active zones).</p>	Compliant
304.	44 (b)		<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: <ul style="list-style-type: none"> ~ a maximum of 120 vehicle movements allowed a day (60 each way); and ~ an annual average maximum of 60 vehicle movements allowed a day (30 each way); and 	Site inspection	<p>The site visit found that there is a gate in place across the Lobs Hole Ravine Road North road to restrict the movement of vehicles through a work site and on Lobs Hole Ravine Road.</p> <p>Interviews and site inspection provided evidence to suggest that the limit of 120 vehicles per day would not be close to occurring</p>	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
	44 (c)		c) restrict vessel speeds on Tantangara Reservoir and Talbingo Reservoir to current TfNSW speed limits.	Transport Management Plan (TMP) S2-FGJV-LOG-PLN-0008-G (Rev G issued and approved Aug-20) Maritime Traffic Control Plan (MTCP) S2-FGJV-LOG-PLN-0013 is to provide guidance to enhance marine safety on Talbingo Reservoir, Rev A issued Sep-21; Marine Safety Regulation 2016 (NSW).	The approved Marine Transport Management Plan (MTMP) (S2-FGJV-LOG-PLN-0012) (not verified during this audit) requires a Maritime Traffic Control Plan (MTCP) for any construction-related activities that occur on-water for both Talbingo and Tantangara reservoirs. Given geographical and other differences between these two reservoirs, separate MTCPs have been prepared. During the interview, it was indicated that the Talbingo MTCP had been already approved by Maritime TfNSW and NPWS (approval not sighted) and Tantangara is still under review and not yet approved). Transport Management Plan (TMP) REMM NAV01 for Marine Transport indicates that all work vessels will be limited to 4 knots; Marine Safety Regulation 2016 (NSW) indicates vessel speed limit of 60 knots.	Compliant
305.	45 (a)		Transport Management Requirements The Proponent must: a) minimise the impacts of the road and intersection upgrades of the development;	IEA Report #2	Intersection upgrades were completed prior to the Audit #1. It was confirmed with TfNSW at Audit #2 that the intersection works were undertaken by TfNSW with minimal impacts on the road and intersections	Compliant
306.	45 (b)		b) maintain all roads and water-related infrastructure on site in a safe and serviceable condition;	Interviews - FGJV; Observations	During the site inspection it was observed that roads and water-related infrastructure on site have been maintained in a safe and serviceable condition; road signage has been used to inform road conditions or road work. FGJV T&T team maintains public roads. FGJV Site Construction teams maintain project site roads.	Compliant
307.	45 (c)		c) allow NPWS officers to access the site at all times, including during the upgrade of Tantangara Road;	Email from NPWS dated 20 October 2021 advising that NPWS staff will be using Gooandra Trail later that week.	Information from email was conveyed to FGJV to facilitate access.	Compliant
308.	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;	Interviews - FGJV; Observations	An observation was raised at the previous audit (OBS 4) - reports of private vehicles parked on the roads at Three Mile Dam. During the site inspection, various sites were reviewed, including Three Mile Dam and it was observed that not project vehicles have parked for long periods of time. Some vehicles had stop briefly for a few minutes. This is monitored by FGJV T&T team during road inspections. Parking is now provided on all project sites; buses transport workers to/from site, minimizing the need for parking of light vehicles.	Compliant

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
309.	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;	Transport Management Plan, Appendix A - Drivers Code of Conduct; Interviews; Complaints Register Jul-21 to Jan-22 (no related complaints).	These requirements are included in the Site Rules and the Drivers Code of Conduct.	Compliant
310.	45 (f)		f) minimise dust and/or sediment being tracked onto Link Road and the public road network;	Transport Management Plan, Table 5-1: TRA04 Dust and Mud tracking; Site Inductions (e.g. Trunkline Services) includes requirements on Driving and Operating Plant on Site, Environmental Rules (Weed Hygiene Protocol) and refers to ERSED controls.	Dust and mud tracking from the project area onto public sealed roads has been managed via ESCPs for project sites, installation of wheel wash stations (sighted at Tantangara and Lobs Hole Ravine Rd) and covering of heavy vehicles loads (observed during site inspection).	Compliant
311.	45 (g)		g) minimise the traffic impacts of the development on the public road network, including: <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; 	Convoy Timetable; New signage on Lobs Hole Ravine Rd; Transport Management Plan, Appendix A - Drivers Code of Conduct; Light Vehicles Management Plan, including requirements on In vehicle monitoring system (IVMS) (mandatory); IVMS on project vehicles used for site inspections - FGJV and SHL vehicles.	An observation was raised at the previous audit (OBS 2) on issues relating to convoy length identified by DPIE. Convoy Timetable: strict timetable managed from Lobs Hole Ravine Rd Laydown Area office. HV and LV travel at different times to keep them separated. HVs not allowed to convoy (signage indicating HV to keep 250m apart). Information is also included in the Drivers Code of Conduct - Additional requirements for heavy vehicles or over-dimension vehicles. The Light Vehicles Management Plan includes requirements on In-Vehicle Monitoring System (IVMS) (mandatory). Project vehicles used for the site inspections had an working IVMS - FGJV and SHL vehicles.	Compliant
312.	45 (h)		h) minimise the traffic safety risks of the development in snow and ice conditions;	<ul style="list-style-type: none"> - Transport Management Plan; - App D: Snow and Ice Traffic Management Plan (Jul-20); - App A: Drivers Code of Conduct; B-Triple Inclement Weather Protocol; - Scania/B-Triple Combination Operational Risk Assessment (Reviewed Q1 - 14/01/2022), including risks and mitigation controls; - “Driving on Snow and Ice” Training for staff; - Daily Transport Planning Minutes (including internal reporting of road conditions and weather forecasts to staff and drivers); 	Reviewed measures to minimize traffic safety risks in snow and ice conditions, included the B-Triple Inclement Weather Protocol; the Scania / B-Triple Combination Operational Risk Assessment (Reviewed Q1 - 14/01/2022); “Driving on Snow and Ice” Training for staff; internal reporting of road conditions to staff on Daily Transport Planning minutes and via WhatsApp group. Additionally, the Traffic and Transport Liaison Group (TTLG) meets on a quarterly basis with participants from SHL, FGJV, and agencies such as TfNSW and NPWS (e.g. meeting held on 17/09/21).	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
				<ul style="list-style-type: none"> – Pre-Winter Planning Discussion (FGJV and TfNSW meeting held on 10/02/22); – Traffic and Transport Liaison Group (TTLG) quarterly meeting including participants from SHL, FGJV, and agencies such as TfNSW and NPWS (e.g. meeting held on 17/09/21). 		
313.	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;	<ul style="list-style-type: none"> – Interviews - FGJV; – INX Incident Register; – (Traffic) Incident Log; – Incident Reports; – SHL Complaints Summary January 2022; – Transport Management Plan, Appendix A - Drivers Code of Conduct. 	<p>There have been no complaints related to traffic noise in the audit period.</p>	Compliant
314.	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; 	<p>Site inspection Provisions are in the code of conduct Complaints Register</p>	<p>It was not possible to confirm that trucks limit engine braking directly, however there have been no noise complaints received regarding noise in Cooma or Adaminaby.</p> <p>The notification of local community about development related traffic impacts are addressed in a separate condition (Observation raised under Cond 45(m))</p>	Compliant
315.	45 (k)		k) minimise the development-related traffic safety impacts of the development for the public: <ul style="list-style-type: none"> • using the Talbingo Reservoir and Tantangara Reservoir and any water-related infrastructure, such as the Talbingo Boat Ramp; • using Tantangara Road, particularly during the construction of the development; 	<ul style="list-style-type: none"> – Interviews - FGJV; – Transport Management Plan, Table 5-1: NAV01 - Exclusion Zones; – Maritime Traffic Control Plan (MTCP) S2-FGJV-LOG-PLN-0013 for Talbingo Reservoir, Rev A issued Sep-21, includes established Exclusion Zones. 	<p>It was advised that no vessels are being operated except for water quality monitoring testing.</p> <p>NAV01 'Exclusion Zones' have been established around marine construction works as declared by NSW Maritime to ensure the safety of vessel traffic and to establish safe working zone/s.</p> <p>Maritime Traffic Control Plan (MTCP) for Talbingo Reservoir includes the established Maritime Exclusion Zones (MEZ).</p> <p>TfNSW licence for the exclusion zones were not available nor verified during this audit.</p>	Compliant
316.	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> ;	<p>Vessel used for water quality monitoring testing (Registration 415806): sighted but not assessed.</p>	<p>It was advised that no water-related structures and no vessels are being operated, except for water quality monitoring testing vessel.</p> <p>Water-related structures or vessels not assessed at Audit #1, Audit #2 or #3.</p>	Not triggered

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SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
					As no vessel or structure is currently occupying waters, this condition is considered not triggered.	
	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	<p>Public information on the FGJV website (link from Snowy Hydro website) relating to traffic was considerably out of date at the time of commencement of the audit.</p> <p>As at February 2022, the latest information on the Future Generation website relating to traffic and transport was referring to activities in September / October 2021.</p> <p>It was however noted that other forms of communication were in place such as Variable Message Signs (VMS) at six locations, radio, newsletters and newspapers have been implemented.</p>	Compliant OBS
317.	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. This plan must:	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
318.	46 (a)		a) be prepared in consultation with the TfNSW, NPWS, Snowy Monaro Regional Council, Snowy Valleys Council and NSW Police;	<ul style="list-style-type: none"> – Transport Management Plan (TMP), Section 1.6 Consultation Summary and 7.3 Traffic Working Group (in the form of the Traffic and Transport Liaison Group (TTLG)); – Pre-Winter Planning Discussion (FGJV and TfNSW meeting held on 10/02/22); – Traffic and Transport Liaison Group (TTLG) quarterly meeting including participants from SHL, FGJV, and agencies such as TfNSW and NPWS (e.g. meeting held on 17/09/21). 	<p>A Consultation Summary including agencies consulted and comments provided by key stakeholders have been included in the TMP, section 1.6.</p> <p>Consultation process continues through the project via the Traffic and Transport Liaison Group (TTLG) with quarterly meetings, including participants from SHL, FGJV, TfNSW and NPWS.</p>	Compliant
319.	46 (b)		b) include the establishment of a working group – which includes representatives from TfNSW, NPWS, NSW Police, Destination NSW, Snowy Monaro Regional Council and Snowy Valleys Council – to ensure effective communication and co-ordination between stakeholders on transport-related matters during the construction of the project;	<ul style="list-style-type: none"> – Transport Management Plan (TMP), Section 7.3 Traffic Working Group (in the form of the Traffic and Transport Liaison Group (TTLG)); – Traffic and Transport Liaison Group (TTLG) quarterly meeting including participants from SHL, FGJV, and agencies such as TfNSW and NPWS (e.g. meeting held on 17/09/21); 	Evidence of TTLG meetings as well as targeted meetings with one agency in particular have been reviewed (e.g. TfNSW meeting on 10/02/22 pre-snow season planning).	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
				– Pre-Winter Planning Discussion (FGJV and TfNSW meeting held on 10/02/22).		
320.	46 (c)		c) describe the measures that would be implemented to comply with the transport management requirements in condition 45 above;	Transport Management Plan (TMP), Section 5 - Transport management measures	12 Transport Management Measures (TRA01 to TRA12) have been described in section 5 of the TMP	Compliant
321.	46 (d)		d) include a detailed: <ul style="list-style-type: none"> • Heavy Vehicle Salvage Plan; • Driver's Code of Conduct; • Marine Transport Management Plan; • Snow & Ice Traffic Management Plan; • Communication Strategy to keep the public informed about the transport impacts of the development; and 	App B - Heavy Vehicle Salvage Plan; App A - Driver's Code of Conduct; App C - Marine Transport Management Plan; App D - Snow & Ice Traffic Management Plan; App E - Transport Communication Strategy	The requested plans have been included in appendices of the TMP.	Compliant
322.	46 (e)		e) include a program to: <ul style="list-style-type: none"> • record and track vehicle movements; and • monitor and publicly report on the effectiveness of these measures. 	Transport Management Plan (TMP), Section 6.1 Monitoring and Reporting and Section 7.7 Reporting; TMP Reporting - HV deliveries to site (from Feb-21 to Jan-22).	<p>The parameters and frequency of monitoring traffic, transport and access outcomes have been established in the Table 6-1: Construction monitoring locations parameters and frequency of the TMP.</p> <p>However, the T&T Monitoring Program has not always been implemented. As an example, the Quarterly Cumulative Summary Reports for the last two quarters (Jul-Sep 2021 and Oct-Dec 2021) had not been sent to SHL for review nor were they published on FGJV's website for public access to this information.</p> <p>It was verbally noted that the two reports were ready to be sent to SHL the second week of February 2022.</p> <p>A non-compliance was previously raised (NC 7) (Quarterly cumulative summary report not prepared, made available). The NC remains open.</p>	Non-compliant
323.	49		The Proponent must implement the approved Transport Management Plan for the development.		A non-compliance was previously raised (NC 7) in relation to condition 46 (e) - Transport Management Plan, Table 6-1 T&T Monitoring Program has not implemented. Therefore, the NC remains open.	Non-compliant
324.	50		Long-Term Road Strategy – Kosciuszko National Park Within 2 years of the commencement of construction, unless the Planning Secretary agrees		Not triggered. SHL is underway with the early planning stages on this plan.	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
			<p>otherwise, the Proponent must prepare a Long-Term Road Strategy for the development to the satisfaction of the Planning Secretary. This strategy must be:</p> <ul style="list-style-type: none"> a) be prepared in consultation with the NPWS and TfNSW; b) identify the road network within the Kosciuszko National Park required for the development during operations, including the detailed specifications for this road network; c) identify which roads within the Kosciuszko National Park can be narrowed or closed following construction and then rehabilitated; d) include a detailed program for the rehabilitation of these roads, which can be incorporated into the Rehabilitation Management Plan for the development; and e) identify future road maintenance and funding responsibilities for the long-term road network following construction. 			
325.	51		The Proponent must implement the approved Long-Term Road Strategy for the development.		Not triggered	Not triggered
TRANSPORT MANAGEMENT PLAN						
326.		5; Table 5-1; TRA02	<p>Affected communities, visitors and emergency services will be notified in advance of any disruptions to traffic and restriction of access to areas of KNP impacted by project activities. Updates will be provided across a number of platforms so as to inform all demographics and provide ample warning of upcoming or changes in access restrictions.</p>	<p>TMP, Section 7.4 Community Communication App E: Transport Communications Strategy</p>	<p>During the interview, it was verbally noted that other forms of communication currently being used, such as VMS boards at six different locations (as at Sep-21), and the use of the local radio station.</p> <p>T&T information on FGJV's website has not been kept up to date.</p>	Compliant OBS
327.		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>	<ul style="list-style-type: none"> - VMPs available on G drive - Traffic Vehicle Movement Plans (VMPs) will be developed for both external and internal roads - FGJV VMP - Tantangara Rev K; - Adit VMP 20211031 Rev. 2; - Cofferdam VMP 20211031 Rev. 2; - Lobs Hole Holcim Pad VMP - REV B. 	<p>Vehicle Movement Plans (VMPs) have been developed for both external and internal roads. VMPs include approved heavy haulage routes (e.g. Cofferdam VMP 20211031 Rev. 2).</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
			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.			
328.		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. 	<ul style="list-style-type: none"> – Interviews - FGJV; – Site inspection observations; – OSOM/HV Bookings Record; – OSOM Permits: Oversize and/or Overmass (OSOM) Mass or Dimension Exemption Permit (e.g. Permit number 524502V2; 524513V2); 	<p>A new booking system has been implemented in the last 6 months: OSOM/HV Bookings Record.</p> <p>During the site inspection, heavy vehicle parking, idling and queuing on public roads was not observed.</p>	Compliant
329.		Sect 5.6.1	<p>Heavy vehicles will aim to travel staggered from one another when in transit in order to minimise delays to non-construction vehicle movements. This will be managed by:</p> <ul style="list-style-type: none"> – scheduling of vehicle movements using: <ul style="list-style-type: none"> ○ 6 month and 2 week look aheads at TTLG meetings; ○ next day and next week look aheads for deliveries; 	<p>DLAH for tomorrow, 2-day DLAH and 7-day DLAH are communicated on a daily basis via the Daily Transport Planning meeting (e.g. 30/09/21; 19/08/21; 05/11/21);</p> <p>TMP Reporting - HV deliveries to site (from Feb-21 to Jan-22).</p>	<p>Delivery Look Aheads (DLAH) have been used to plan HV movements and deliveries on site.</p> <p>DLAH for tomorrow, 2-day DLAH and 7-day DLAH are communicated on a daily basis via the Daily Transport Planning meeting.</p> <p>TMP Reporting - HV deliveries to site (from Feb-21 to Jan-22) was reviewed. Daily HV deliveries on site have not exceeded 175 heavy vehicle movements.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
			<ul style="list-style-type: none"> ○ staggering of the departure of segment trucks from Polo Flat by site personnel; <ul style="list-style-type: none"> – adherence to heavy vehicle traffic movements leaving the Polo Flat Segment Factory (as specified in Infrastructure Approval (SSI-10034), see below): <ul style="list-style-type: none"> ○ ensure that the development does not generate more than: <ul style="list-style-type: none"> ▪ 175 heavy vehicle movements during the day and evening; ▪ 45 heavy vehicle movements transporting finished segments from the site during the night on the public road network; ○ monitor and record these heavy vehicle traffic movements at the Polo Flat Segment Factory gate. – drivers will communicate via radio and aim to maintain distance between each heavy vehicle; and – any OSOM escort vehicles will be used to coordinate staggered movements. 			
330.		Sect 5.6.3	<p>Heavy Haulage routes:</p> <p>Heavy vehicle haulage routes will be communicated to haulage contractors during the procurement stage and requirements of the DCC, route use and compliance included in their contracts.</p>	<ul style="list-style-type: none"> – VMPs available on G drive - Traffic Vehicle Movement Plans (VMPs) will be developed for both external and internal roads – FGJV VMP - Tantangara Rev K; – Adit VMP 20211031 Rev. 2; – Cofferdam VMP 20211031 Rev. 2; – Lobs Hole Holcim Pad VMP - REV B 	<p>Vehicle Movement Plans (VMPs) have been developed for both external and internal roads. VMPs include approved heavy haulage routes</p>	Compliant
331.		Sect 5.6.4	<p>Over-size and Over-mass (OSOM) vehicles</p> <p>In advance of OSOM deliveries, Future Generation (or sub-contractor) will apply for an OSOM permit through the National Heavy Vehicle Regulator (NHVR) Portal. (specific permit to be obtained in advance of travel for vehicles exceeding 2.5m in width and/or 19m in length).</p> <p>A TMP is required for any of the following OSOM movements:</p> <ul style="list-style-type: none"> – all OSOM movements that are classified as 'High Risk' due to their dimensions and/or weights; 	<ul style="list-style-type: none"> – Interviews - FGJV; – OSOM/HV Bookings Record; – OSOM Permits: Oversize and/or Overmass (OSOM) Mass or Dimension Exemption Permit (e.g. Permit number 524502V2; 524513V2). 	<p>For "Over Size Over Mass" (OSOM) vehicles, Traffic & Transport (T&T) has developed its own OSOM permits and a new booking system: OSOM HV Bookings Record.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
			<ul style="list-style-type: none"> – all OSOM movements that travel on a 'High Risk' route; and – all OSOM movements that involve the transport of a 'Critical/Sensitive' load. 			
332.		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>	Light Vehicles Management Plan, communicated on Site Notice No 17 27/03/21 to all Subcontractors, Suppliers and Consultants (Contractor's Personnel).	<p>There is a new strategy to reduce the volume of light vehicles (LV) on the road to reduce traffic in general and to minimize the chances of interaction with HV.</p> <p>From 29/03/21 FGJV limited number of LVs admitted to Project Sites. Contractor's Personnel from 05/04/21. The plan includes:</p> <ul style="list-style-type: none"> - Ensuring LV's have a minimum of 3 personnel travelling in them to be able to enter/exit site. - Leaving operational Contractor's LVs onsite and using bus transport to/from external accommodation. 	Compliant
333.		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>	<ul style="list-style-type: none"> – INX Incident Register (including vehicle incidents); – (Traffic) Incidents Log (dump of all traffic incidents notified to T&T); – HSE - Incident Report (e.g. event 109389 on 12/10/21: Contractors Agi rolled; event 109391 on 07/11/21: Roll of conveyor belt , uncontrolled fall from delivery Semi - FGJV Management, SHL 2.0, TNSW and NPWS advised); – Daily Transport Planning Meetings (e.g. 30/09/21; 19/08/21; 05/11/21); – Snowy 2.0 Traffic and Transport Liaison Group (TTLG) (e.g. meeting No. 8 held on 17/09/21). 	<p>A non-compliance was raised at the previous audit (NC 14) as insufficient evidence was provided to demonstrate that all traffic incidents that required notification were notified to the appropriate authorities. At this audit, a Traffic Incident Register had been developed and maintained, however the information captured and provided to the auditors is sparse and does not provide confidence that all relevant traffic incidents have been notified.</p> <p>The previous NC remains open.</p>	Non-compliant
334.		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>	<ul style="list-style-type: none"> – INX Incident Register (including vehicle incidents); – (Traffic) Incidents Log (dump of all traffic incidents notified to T&T); – HSE - Incident Report (e.g. event 109389 on 12/10/21: Contractors Agi rolled; event 109391 on 07/11/21: Roll of conveyor belt , uncontrolled fall from delivery Semi - FGJV Management, SHL 2.0, TNSW and NPWS advised); 	<p>The Traffic and Transport Manager (FGJV) informed that traffic incidents external to the project site are only notified to authorities if it is on public roads and involving HV. He added, that there have been several discussions with TfNSW about:</p> <ul style="list-style-type: none"> - What to notify - When - How - Who to notify <p>SHL noted that incidents will be notified when it is external</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
				<ul style="list-style-type: none"> – Communication to NPWS regarding incident on Link Rd on 07/11/21 - Load from truck landing to rest on road; – Daily Transport Planning Meeting minutes (e.g. 30/09/21; 19/08/21; 05/11/21); – Snowy 2.0 Traffic and Transport Liaison Group (TTLG) (e.g. meeting No. 8 held on 17/09/21). 	<p>to the project site and it involves a member of the public. At the TTLG meeting reviewed, TfNSW hosted a desktop Activity involving a traffic incident scenario: "Segment truck loses load on journey between Cooma & Link Rd, Friday approx. 2:30pm. Load has fallen off the back trailer at Conors Hill, westbound. Segments on the road, blocking traffic". The response was discussed with inputs from FGJV, TfNSW and NPWS.</p> <p>Based on the evidence sighted, traffic incidents external to the project have been notified to authorities. Therefore, this condition is deemed compliant.</p>	
335.	Sect 6.1; Table 6-1	Monitoring and Reporting: Monitoring will be undertaken to confirm the satisfactory traffic, transport and access outcomes are achieved during construction. Key parameters / frequency: <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). 	TMP Reporting - HV deliveries to site (from Feb-21 to Jan-22).		<p>The parameters and frequency of monitoring traffic, transport and access outcomes have been established in the Table 6-1: Construction monitoring locations parameters and frequency of the TMP.</p> <p>However, the T&T Monitoring Program has not always been implemented. As an example, the Quarterly Cumulative Summary Reports for the last two quarters (Jul-Sep 2021 and Oct-Dec 2021) had not been sent to SHL for review nor were they published on FGJV's website for public access to this information.</p> <p>It was verbally noted that the two reports were ready to be sent to SHL the second week of February 2022.</p> <p>A non-compliance was previously raised (NC 7) (Quarterly cumulative summary report not prepared, or made publicly available). The previous NC remains open.</p>	Non-compliant
336.	App D; Sect. 4	Snow and Ice Traffic Management Plan (Appendix D) Traffic Control Plans (TCPs) and Transport Management Plans (required under Oversize overmass (OSOM) permits) will contain, where necessary details of adverse climatic conditions and measures for safe transit in adverse conditions. Management measures will include: <ul style="list-style-type: none"> – speed reductions; – best practice vehicle maintenance (tyres, lighting etc.); – adherence to legal requirements for snow chains; 	<ul style="list-style-type: none"> – B-Triple Inclement Weather Protocol; Scania/B-Triple Combination Operational Risk Assessment (Reviewed Q1 - 14/01/2022), including risks and mitigation controls; – "Driving on Snow and Ice" Training for staff (training records sighted); Daily Transport Planning Meeting minutes (e.g. 30/09/21; 19/08/21; 05/11/21); 		<p>Reviewed measures to minimize traffic safety risks in snow and ice conditions, included the B-Triple Inclement Weather Protocol; the Scania / B-Triple Combination Operational Risk Assessment (Reviewed Q1 - 14/01/2022); "Driving on Snow and Ice" Training for staff; internal reporting of road conditions to staff on Daily Transport Planning minutes and via WhatsApp group.</p> <p>Additionally, the Traffic and Transport Liaison Group (TTLG) meets on a quarterly basis with participants from SHL, FGJV, and agencies such as TfNSW and NPWS (e.g. meeting held on 17/09/21).</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – TRANSPORT / TRAFFIC						
			<ul style="list-style-type: none"> – use of fog lights during periods of low visibility; – cessation of works; and – grading and de-icing (by others) for snow removal; and – advising suppliers of potential adverse weather and likely site shutdowns <p>Relevant management measures will be included in the Drivers' Code of Conduct. Future Generation will ensure there is appropriate training for such conditions and that the potential for adverse weather is communicated in driver inductions and relevant procurement processes.</p>	<ul style="list-style-type: none"> – Pre-Winter Planning Discussion (FGJV and TfNSW meeting held on 10/02/22); – Traffic and Transport Liaison Group (TTLG) quarterly meeting including participants from SHL, FGJV, and agencies such as TfNSW and NPWS (e.g. meeting held on 17/09/21). 		

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – WASTE MANAGEMENT, VISUAL AMENITY						
337.	52		<p>WASTE</p> <p>Excluding the spoil generated by the development, the Proponent must:</p> <ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> – Waste tracking register (FGJV Waste Register (Symal); – Email to Symal requesting waste date be included in a Register similar to FGJV; – Site inspection all sites (clinical waste (Covid 19 testing); – Toolbox talk 19/10/21 - Waste Management. 	<p>a) Bottled water is provided extensively across the project, with minimal provision of potable water for drinking (or refilling own containers). This does not meet the requirement to "minimise waste generated by the development". It is acknowledged that bottles are sent to recycling (return and earn), however this is not minimisation of waste generation.</p> <p>b) Waste tracking Register- shows all waste from Lobs Hole (including recycling stream) goes to landfill). This does not meet b) - "maximise the reuse and recycling of any waste".</p> <p>c) Waste is classified within the Waste Tracking Register (complies)</p> <p>e) EPL and locations of waste facilities are recorded in the Water Tracking Register.</p>	Non-compliant
338.	53 (a)		<p>VISUAL</p> <p>Visual Impact Management Requirements</p> <p>The Proponent must:</p> <ul style="list-style-type: none"> a) minimise the visual impacts of the long-term temporary and permanent infrastructure of the development on the Kosciuszko National Park, including: <ul style="list-style-type: none"> • having regard to the NPWS Park Facilities Manual; • complying with the requirements in approved management plan under the conditions of this approval; • using suitable planting and screening; • ensuring the visual appearance of the infrastructure blends into the surrounding landscape as much as possible, including: <ul style="list-style-type: none"> ~ using appropriate colours and non-reflective paints on permanent buildings to reduce glare; ~ incorporating textures on large surfaces and using dark aggregates and oxides for exposed concrete surfaces; 	Site Inspection	<p>Long term temporary and permanent infrastructure had not generally been triggered at this audit</p> <p>however it was noted that the concrete used for stabilisation of the batters on Lobs Hole Ravine Road, particularly near the boulder streams were coloured with a dark oxide. (see photos - Lobs Hole Ravine Road)</p>	Not triggered Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status	
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – WASTE MANAGEMENT, VISUAL AMENITY							
			<ul style="list-style-type: none"> ~ using locally sourced stone to clad buildings or portals, such the Lobs Hole substation building façade; • incorporating textured surfaces along the shoreline of the Ravine Bay and Talbingo spoil emplacement areas; • installing landscaping and/or suitable screening as soon as practicable along the Snowy Mountains Highway boundary of the Rock Forest site to screen the development on site from road users and nearby residences; 				
339.	53 (b)		b) minimising the visual impacts of the development on the Rock Forest site on nearby residences during construction;	Site Inspection	Rock Forest had not yet received any spoil and there were no visually intrusive structures at the time of the audit.	Not triggered	
340.	53 (c)		c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes;	Site Inspection	Advertising signs and logos were not observed during the site inspections	Compliant	
341.	53 (d)		d) minimise the lighting impacts of the development, including ensuring that all external lighting associated with the development: <ul style="list-style-type: none"> • is consistent with the good lighting design principles in the Dark Sky Planning Guideline, (DPE 2016), or its latest version; and • complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version. 	<ul style="list-style-type: none"> – Lighting Plan – ECVT – S2-FGJV-ENV-PLN-0213 dated 28/06/2021. – Trunk Services Lighting Plan S2-FGJV-ENV-PLN-0262 dated 07/12/2021 – Lighting Plan folder - Lighting plans in place for Lobs Hole, Talbingo, Tantangara and Trunk Services. – Lighting Tower Checklist 	Lighting Plans reviewed include instructions to eliminate upward spill light, examples of shielded fittings, use of energy efficient bulbs including LED, and use of asymmetric beams where floodlights are required. Maps are also provided with position of lighting source and direction of direct light	Compliant	
342.	54		Visual Impact Management Plan Within 12 months of the commencement of construction, the Proponent must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	Excerpt of Main Works - Visual Impact Management Plan S2-FGJV-ENV-PLN-0249 Rev B Jan 2022.	At the time of the audit, the Visual Impact Management Plan (VIMP) was in "for review" status and had been updated based on SHL and NPWS comments. The VIMP had not yet been issued to the Planning Secretary.	Non-compliant	
343.	54 (a)		a) be prepared in consultation with the NPWS;				Construction commenced in October 2020, therefore the timeframe for the preparation and submission of the VIMP was not met.
344.	54 (b)		b) describe the measures that would be implemented to comply with condition 53 above; and				
345.	54 (c)		c) include detailed plans for minimising the visual impacts of the following permanent infrastructure: <ul style="list-style-type: none"> • Lobs Hole substation; • cable yard; 				

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – WASTE MANAGEMENT, VISUAL AMENITY						
			<ul style="list-style-type: none"> water intakes and associated infrastructure at the Talbingo Reservoir and Tantangara Reservoir; <ul style="list-style-type: none"> Middle Bay barge ramp; headrace surge shaft and ventilation shaft; and fish screens and barrier. 			
346.	55		The Proponent must implement the approved Visual Impact Management Plan for the development.			Not triggered

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

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – NOISE / AIR QUALITY						
347.	56		NOISE Minimise Noise The Proponent must minimise the noise generated by the construction, operation, and decommissioning of the development.	Site visit	At the time of the audit, minimal activities were being conducted at the Rock Forest site. The main activity undertaken at the site during the audit was the operation of a Covid-19 Rapid Antigen Test (RAT) area for persons travelling to site. The site was also being used for materials laydown, and was set up to allow trucks to park up due to inclement weather in preparation for winter conditions. Minimal noise was noted as being generated at the site at the time of the audit.	Compliant
348.	57		Construction Noise Management Plan – Rock Forest Prior to the commencement of construction on the Rock Forest site, the Proponent must prepare a Construction Noise Management Plan for the development on site to the satisfaction of the Planning Secretary. This plan must:	* Construction Noise Management Plan – Rock Forest S2-FGJV-ENV-PLM-0089 Rev E dated 02/12/2020;	The Construction Noise Management Plan - Rock Forest (CNMP-RF) was assessed as compliant against parts a) and b) of this condition. There have been no changes to the CNMP-RF since the last audit, and therefore parts a) and b) have not been reassessed at this audit.	Compliant
349.	57 (a)		a) be prepared by a suitably qualified and experienced person in consultation with the landowners of the nearby properties;		The Construction Noise Management Plan - Rock Forest (CNMP-RF) was assessed as compliant against parts a) and b) of this condition at the previous audit. There have been no changes to the CNMP-RF since the last audit, and therefore parts a) and b) have not been reassessed at this audit.	Compliant
350.	57 (b)		b) describe the measures that would be implemented to minimise the construction noise impacts of the development on the Rock Forest site, including: <ul style="list-style-type: none"> • minimising the use of the site during the evening and night-time periods • implementing the best practice noise mitigation measures outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version; and, • potentially, the use of voluntary noise mitigation agreements with landowners to allow higher construction noise levels or longer construction hours; 			
351.	57 (c)		c) include a program to monitor and publicly report on the effectiveness of these measures.		An Observation was raised at previous audit (OBS 3) noting that the Rock Forest CNMP did not include a requirement to publicly report on the effectiveness of measures.	OBS

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – NOISE / AIR QUALITY						
					Recommendation: The Construction Noise Management Plan - Rock Forest is to be updated during the next review to include a requirement to monitor and publicly report on the effectiveness of the noise mitigation measures.	
352.	58		The Proponent must implement the approved Construction Noise Management Plan for the Rock Forest site.		See below: Noise Management Plan - Rock Forest section	Compliant
353.	59		AIR The Proponent must: a) minimise the dust, odour, fume, and blast emissions of the development; and b) minimise the surface disturbance of the site.		The site inspections (at all sites) did not identify any specific issues relating to dust, odour, fumes or blast emissions.	Compliant
354.	59 (b)				Overall, the disturbance of the surface was satisfactory at the time of the audit. Dust from the disturbance of the surface was not an issue.	Compliant
NOISE MANAGEMENT PLAN – ROCK FOREST						
355.		NMP 6.1	Management measures will be implemented to avoid, minimise or manage noise impacts to sensitive receivers: <ul style="list-style-type: none">– the provision of contact details on a site board at the front of the site and the maintenance of a complaints register;<ul style="list-style-type: none">– community and neighbour notifications;– turning off plant that is not in use;– avoid dropping materials from a height, dropping or dragging road plates;– avoiding the use of radios or stereos outdoors where neighbours can be affected;– keeping drivers informed of designated vehicle routes, parking locations, acceptable delivery hours or other relevant practices (for example, minimising the use of engine brakes, and no extended periods of engine idling); and– periodic checks on nearby residences and other sensitive land users for noise issues so that mitigation measures can be quickly applied.	Site Inspection Complaints register	Active measures to avoid, minimise and manage noise impacts to sensitive receivers were not generally required at the Rock Forest site due to lack of activity. There were no recorded complaints relating to noise on the Complaints Register. At the time of the audit, the status of the Rock Forest activities were as follows: <ul style="list-style-type: none">* Main use - Covid-19 RAT testing* Laydown Pad, main access road to pad and sediment basins in vicinity of laydown pad complete;* drains / culverts constructed and stabilised* Minor storage / laydown of containers and pipes;* Topsoil stockpiles stored / stabilised;* Clearing of future stockpile area not yet commenced	Compliant
356.		Table 6-1; NV02	Noise management measures from this plan will be included in site environmental documents including for example Work Packs and/or Site Environmental Plans (SEPs).	Site Inspection	No works were being undertaken at Rock Forest at the time of the audit except Covid-19 testing, therefore work packs and Site Environmental Plans were not required.	Not triggered
357.		Table 6-1; NV04	Where feasible and reasonable noisy equipment and/or construction processes will be substituted	Site Inspection	No noisy equipment was on site	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – NOISE / AIR QUALITY						
			by alternative low noise emitting equipment and/or construction process.			
358.		Table 6-1; NV05	Plant and machinery based at Rock Forest will be fitted with non-tonal reversing alarms (this does not include site light vehicles). Where possible this will include site heavy vehicles.	Site inspection	No plant or machinery were working on the site at the time of the audit	Not triggered
359.		Table 6-1; NV07	The Rock Forest site will be designed and configured so that the internal road network limits reversing of plant and heavy vehicles.	Site inspection	The site was designed such that vehicles do not need to reverse.	Compliant
360.		Table 6-1; NV08	Site setup (Phase 1) of the Rock Forest site will be undertaken during standard daytime construction hours: <ul style="list-style-type: none"> – 7:00am to 6:00pm Monday to Saturday; and – 8:00am to 6:00pm Sundays and NSW Public Holidays. 		Phase 1 was completed prior to this audit (addressed at previous IEA)	Not triggered
361.		Table 6-1; NV10	Where possible, Phase 2 works will be undertaken in standard day-time hours. During evening and night time, high noise works will be minimised including but not limited to: <ul style="list-style-type: none"> – land forming and shaping of spoil placed; – loading and unloading of deliveries; and – dropping materials from a height. 		Phase 2 was not in operation - no spoil had yet been received at the Rock Forest site	Not triggered
362.		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 		Phase 1 was addressed at previous audit Phase 2 - no current construction activities	Not triggered
363.		Table 6-1; NV14; Sect 7.1;	Attended noise monitoring At the Rock Forest site attended noise monitoring will be carried out during the initial stages of construction to inform site management. Attended monitoring will also be undertaken in response to complaints.	IAE#2	Attended noise monitoring had been conducted during phase 1 and was reported on in IEA#2 as compliant. As Phase 1 is complete, and no construction activities were underway during IEA#3, this was not re-assessed	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – NOISE / AIR QUALITY						
		Table 7-1	<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>			
364.		7.2	<p>Noise complaints</p> <p>If noise complaints are received during construction, a review of noise management measures will be undertaken to determine if additional noise management controls are required.</p> <p>When a noise complaint is received, the complaint will be managed in accordance with the complaints process in the EMS.</p> <p>All reasonable efforts will be made by Future Generation to resolve an issue with the complainant. In the event a complaint is unable to be resolved, Future Generation will raise the issue with Snowy Hydro or delegate to review and facilitate an outcome</p>	Complaints Register	<p>A review of the Complaints Register did not identify any noise complaints related to Rock Forest</p>	Compliant
365.		App B	<p>Out of Hours Works Procedure (Phase 1 and Phase 3 works)</p> <ul style="list-style-type: none"> – Phase 1 and Phase 3 construction works associated with the project will only be undertaken during the approved hours, except if works have been approved otherwise through this OOHW procedure or agreed in writing by the Planning Secretary. – The Future Generation Environment Team will assess whether the OOHW are likely to be audible to sensitive receivers. If inaudible, works may proceed without regulator approval. – Where OOHW will be audible to sensitive receivers, a construction noise assessment will be undertaken where the proposed works will be assessed against predicted construction noise levels assessed in the EIS (if consistent activities and machinery). <p>– Where the proposed works are not currently covered by an existing EIS noise assessment, the noise impacts will require further assessment;</p>		<p>There was no work being undertaken at Rock Forest, and therefore, no out of hours works procedure was required to be implemented.</p>	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – NOISE / AIR QUALITY						
			<ul style="list-style-type: none"> – Where assessment finds that excessive noise from OOHW is predicted to occur, further consultation will be undertaken and negotiated agreements may be used with affected landholders. 			
366.		App B; Table B-3	<p>Additional mitigation measures for OOHW</p> <ul style="list-style-type: none"> – Notifications will be provided via email, mail and door knock at least 5 working days prior to start of the works – Clearly outline the reason the work is to be undertaken outside standard construction hours; – include a diagram that clearly identifies the location of the proposed works in relation to nearby cross streets and local landmarks – include details of relevant time restrictions that apply to the proposed works; – clearly outline, in plain English, the location, nature, scope and duration of the proposed works; – detail the expected noise impact of the works on noise sensitive receivers; – clearly state how complaints may be made and additional information obtained; and – include the number of the telephone complaints line, an afterhours contact phone number specific to the works, and the project website address. 	As above	Not triggered	
367.		App C	<p>Updated Noise assessment</p> <p>Future Generation JV has proposed to move the location of the access road to Snowy Mountains Highway approximately 800m to the south-east in order to reduce noise impacts to R6 residential receivers</p>	Rock Forest Sensitive Receptors map dated 15/09/2021 Site visit	The Sensitive Receptors map and site visit verified that the access road has been located as per this commitment.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – EMERGENCY MANAGEMENT / NATURAL HAZARDS						
368.	60		EMERGENCY MANAGEMENT Bushfire Requirements			

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – EMERGENCY MANAGEMENT / NATURAL HAZARDS						
			The Proponent must:			
	60 (a)		<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>	<p>NHMP Section 5.1 Maintenance of Asset Protection Zones and Vegetation Management; NHMP, Appendix A - Bushfire Management Plan (approved 04/08/20)</p>	<p>Final design of the development will not be completed for a number of years.</p>	Not triggered
369.	60 (b)		<p>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</p>		<p>No further information was gathered for this condition on other buildings currently under construction.</p> <p>SHIL 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 #2).</p>	Not triggered
370.	60 (c)		<p>c) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area.</p>	<p>Snowy 2.0 WebGIS Map - Tantangara APZ (image).</p>	<p>During the audit, it was stated that the Project has not created new fire trails.</p> <p>At Audit #2, the Basis of Design Report was reviewed. It identified the requirement to ensure the APZs are wholly contained within the approved disturbance area. It noted that where the site is near an EIS boundary, the APZ is to the EIS boundary.</p> <p>GIS maps sighted electronically during the audit.</p> <p>A WebGIS image of Tantangara Dam Firetrail was provided, showing Tantangara Dam Firetrail within final design/approved disturbance areas.</p>	Compliant
371.	61		<p>Emergency Management Plan (renamed Natural Hazard Management Plan)</p> <p>Prior to the commencement of construction, the Proponent must prepare an Emergency Management Plan for the development to the satisfaction of the NPWS. This plan must:</p>	<p>Natural Hazard Management Plan (NHMP) (S2-FGJV-ENV-PLN-0090-C, issue approved 04/08/20); Section 1.4</p>	<p>The Natural Hazard Management Plan (NHMP), which corresponds to the Emergency Management Plan in this condition, was submitted to NPWS on 04/08/20 and approved on 21/08/20.</p> <p>This final version (issue C 21/08/20) incorporated the Bushfire Management Plan, which was also approved on the same communication.</p>	Compliant
372.	61 (a)		<p>a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the NPWS;</p>	<p>Nathan Kearnes of Eco Logical Australia is proposed as the suitably qualified and experienced person in relation to bushfire management (page 14)</p>	<p>The NHMP was prepared by a suitably qualified and experienced person in relation to bushfire management (Nathan Kearnes of Eco Logical Australia) and endorsed by NPWS .</p> <p>Information on NHMP's authors' endorsement has been included in the App A - Bushfire Management Plan, Section 1.7 Author Endorsement.</p>	

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – EMERGENCY MANAGEMENT / NATURAL HAZARDS						
	61 (b)		b) be consistent with the Kosciuszko National Park Fire Management Strategy 2008-2013 (NPWS 2008), or its latest version;	App A – Bushfire Management Plan (BFMP), Section 2.5 Guidelines	Section 2.5 Guidelines of the BFMP makes reference to the KNP Fire Management Strategy 2008-2013.	
373.	61 (c)		c) include evacuation protocols for the site;	NHMP Section 5.2. - Flood Preparedness and Response App A – BFMP Section 8.6 - Where to Go – Managed Evacuation	The NHMP defines two types of evacuation depending on the emergency situation. For a flood event, in section 5.2 of the NHMP; for bushfire event, section 8.6 of the BFMP.	
374.	61 (d)		d) describe the measures that would be implemented to: <ul style="list-style-type: none"> • minimise the risk of bushfires on site; • protect the assets on site from bushfires; • respond to any bushfires on or in the vicinity of the site; • minimise flood risks on site, including flooding response procedures; • minimise the risk of landslips on site, including landslip response procedures; and • evacuate the site in an emergency; and 	Bushfires: Appendix A – Bushfire Management Plan Floods: NHMP Section 4.3, Section 5.2 and Section 6; Landslips: NHMP Section 4.4 and Section 5.3 Emergency evacuation: NHMP Section 5.2.2, Section 5.2.3 and Appendix A – Bushfire Management Plan	Measures to respond to different emergency situations have been defined in the following sections of the NHMP: <ul style="list-style-type: none"> - Bushfires: Appendix A – Bushfire Management Plan; - Floods: NHMP Section 4.3, Section 5.2 and Section 6; - Landslips: NHMP Section 4.4 and Section 5.3 - Emergency evacuation: NHMP Section 5.2.2, Section 5.2.3 and Appendix A – Bushfire Management Plan Section 8.6.	
375.	61 (e)		e) monitor and review the effectiveness of these measures.	NHMP Section 7 - Compliance Management; BFMP Section 9 - Compliance Management.	NHMP Section 7 - Compliance Management defines methods for monitoring and inspecting preparedness as defined in Section 5 of the NHMP. Bushfire monitoring and inspection requirements are defined in Section 9.1 of the BFMP.	
NATURAL HAZARDS MANAGEMENT PLAN						
376.		5.2.1	Extreme Weather Monitoring Future Generation will monitor and interpret local conditions onsite, via the BOM Warning Centre website (http://www.bom.gov.au/australia/flood/) and via more accurate, local forecasting provided by Snowy Hydro Monitoring information will be used to allow appropriate planning for work tasks to be undertaken for the day.	Access to BOM Warning Centre; information obtained used for work planning purposes; Local forecasting provided by Snowy Hydro Monitoring information	The BOM Warning Centre website is used for work planning and for transport communication purposes. There are two weather stations located in Lobs Hole and Tantangara. Local forecasting provided by Snowy Hydro Monitoring information was not verified.	Compliant
377.		5.2.2	If a flood event is forecast work activities will be reviewed and the event management guide within Appendix C will be implemented.		No flood event had been forecast in the last 6 months.	Not triggered
378.		5.2.2.1	Where it is considered safe to do so, any plant, equipment and potentially contaminating materials		No flood event had been forecast in the last 6 months.	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – EMERGENCY MANAGEMENT / NATURAL HAZARDS						
			located within potential flood zones would be moved to flood free locations on site as instructed by the Site Supervisor.			
379.		5.3	Site inspections will occur following adverse conditions (e.g. including bushfire, heavy rain, flood) to check for natural hazards.	During/Post Rainfall Inspection Checklist (e.g. 12/12/21 Talbingo; 14/12/21 Lobs Hole; 03/12/21 Rock Forest).	During / Post Rainfall Inspections have been conducted after heavy rain.	Compliant
380.		7.1	The PIC or delegate is responsible for the induction of new staff members, contractors, visitors and site users. The induction is to include information relating to natural hazards. Further details regarding the staff induction and training are outlined in Section 5 of the EMS. All personnel with responsibilities within the emergency control organisational structure or for the operation of emergency equipment must have the appropriate level of competency-based training in accordance with the Future Generation ERMP.	FGJV Bushfire Awareness 2020.02.13 Induction records: Refer to Section 5 of EMS.	The Bushfire Awareness Training presentation and evidence of provision of this training was sighted.	Compliant
381.		7.2	Monitoring and Inspection The PIC should undertake the following monitoring activities on a monthly basis: <ul style="list-style-type: none">– confirm that the preparedness processes (as per Section 5) are being followed, including site inspections following adverse conditions (e.g. including bushfire, heavy rain, flood) to check for natural hazards;– ensure the relevant personnel have received appropriate training (as per section 6.1); and– implement corrective actions where necessary to maintain compliance with this plan. Weekly environmental inspections of the project will occur in accordance with Section 8 of the EMS.	During/Post Rainfall Inspection Checklist (e.g. 12/12/21 Talbingo; 14/12/21 Lobs Hole; 03/12/21 Rock Forest); Weekly Environmental Site Inspections (e.g. 28/10/21 & 24/10/21 MAT Portal, ECVT, Main Yard, Batch Plant, Ravine Rd; 03/12/2021 Rock Forest; 11/11/21 Tantangara).	Monthly Monitoring Activities include During/Post Rainfall Inspection as required. Weekly Environmental Site Inspections have been conducted.	Compliant
382.		7.3	This NHMP will be provided for comment annually to Local Emergency Management Committees, NSWRFs, NSWSES and NPWS. Following natural hazard emergencies, where necessary lessons learnt will be incorporated into this plan.	Natural Hazard and Bushfire MP - NPWS Comments Register (last reviewed in Jul-20); S2-FGJV-ENV-PLN-0090-C-Main Works-Natural Hazard Management Plan (Rev C 04/08/20).	There was no evidence that the NHMP had been provided for comment to Local Emergency Management Committees, NSWRFs, NSWSES and NPWS in the last 12 months. The NHMP was last reviewed in Aug-20.	Non-compliant
383.		App A; 5.1	Maintenance of Asset Protection Zones and Vegetation Management From the commencement of the works and for every bushfire season throughout the project	Site inspection	At the time of the audit, there had been a considerable period of constant, and heavy rain, and the bushfire risk was low.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – EMERGENCY MANAGEMENT / NATURAL HAZARDS						
			<p>duration, the PIC or delegate must maintain the following asset protection zones (APZ):</p> <ul style="list-style-type: none"> – A 20m radius APZ from the external wall and/or part of the Refuge Assembly Area buildings (once constructed) and occupied accommodation buildings; – A 10m APZ around: <ul style="list-style-type: none"> ○ The external side of each Refuge Assembly Area perimeter Colorbond fence; ○ All diesel generators; ○ Non-accommodation buildings; ○ All other site infrastructure; – A 25m radius APZ around any buildings in the vicinity of high voltage transmission lines. Buildings at these areas are to be located > 25m from the nearest transmission line due to potential electrical hazards (see section 6). <p>The siting of liquid fuel and explosive storage areas will maximise the distance from bushfire prone vegetation and will not be located within a 20m radius of retained vegetation or within the nominated asset protection zones for other infrastructure as detailed above.</p>		<p>The site inspection found that generally APZs were maintained around the accommodation camps, generators and site buildings, however a detailed analysis of this requirement was not undertaken at this audit. On balance, it appears that the sites were compliant to this condition.</p>	

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

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
384.	1		Environmental Management Strategy Prior to the commencement of the development of the Main Works, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	Environmental Management Strategy (Rev I, 11/08/2020)	An Environmental Management Strategy for the development has been prepared and approved by the Planning Secretary (Rev I, 11/08/2020).	Compliant
	1 (a)		a) provide the strategic framework for the environmental management of the development;	Environmental Management Strategy (Rev I, 11/08/2020)		Compliant
385.	1 (b)		b) identify the statutory approvals that apply to the development;	Environmental Management Strategy (Rev I, 11/08/2020)	EMS Section 3 - Planning identifies applicable legal and other requirements as well as the conditions of approval. Table 3-1: Conditions relevant to the EMS – Main Works indicates references to where in the EMS it is addressed.	Compliant
386.	1 (c)		c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; and	Environmental Management Strategy (Rev I, 11/08/2020); Table 4-6: Environmental roles and responsibilities; FGJV Job Description e.g. Environmental Advisor; FGJV Environment Manager Appointment communication.	Roles and responsibilities have been defined in the EMS Table 4-6: Environmental roles and responsibilities. Job descriptions for environmental and operational roles have been defined (e.g. Environmental Advisor).	Compliant
387.	1 (d)		d) describe the procedures that would be implemented to: – keep the local community and relevant agencies informed about the progress of the development; – receive, handle, respond to, and record complaints; – resolve any disputes that may arise during the development; – respond to incidents and/or non-compliances; and – respond to any emergency.	Environmental Management Strategy (Rev I, 11/08/2020)	EMS Section 6 - Communication and Complaints Management describes the process to manage environmental complaints. It refers to the Community and Stakeholder Engagement Management Plan (Jun-20) which includes the Complaints and Dispute Resolution Procedure (Annexure A). Complaints are prioritized and notified to SHL ("flagged") on weekly meetings. The Complaints Register is maintained by SHL and has been published on SHL's website. there have been four recorded complaints since July 2021, three related to traffic management, and one to contractors management. There is a hotline number (1800 Snowy 2) for general enquiries, including complaints (but it is not a dedicated line for complaints); staffed 24x7.	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
388.	2		The Proponent must implement the approved Environmental Management Strategy.		Elements of the EMS were sampled during this audit to verify compliance with this condition. These elements are discussed below:	Compliant
ENVIRONMENTAL MANAGEMENT STRATEGY						
389.		8.5	<p>Non-conformance, Corrective and Preventative Action</p> <p>Where a non-conformance has been identified, a correction action /preventative action will be developed and implemented to minimise the potential for recurrence. In the event of a non-conformance the following will occur:</p> <ul style="list-style-type: none"> • the nature of the event will be investigated; • advice may be sought from a specialist; • monitoring may be undertaken; • the effectiveness or need for new/additional controls will be reviewed; • an appropriate preventative and corrective action will be implemented; • environmental documentation will be reviewed and revised; and • the activities may be stopped, if necessary, by the Future Generation Environmental Manager in consultation with the Project Director and Project HSE Manager. <p>Corrective actions may be generated from a number of sources, including but not limited to incidents, audits, inspections and management reviews. Corrective actions will be systematically managed to ensure issues raised are recorded and closed out in a timely manner.</p> <p>Corrective/preventative actions will be entered into Future Generation's quality system database and include details of the issue raised, the action required, and timing and responsibilities. The close out details shall include the date closed and the name of the person verifying completion of the required action.</p>	<p>FGJV Event and Incident Register</p>	<p>The internal FGJV corrective action process is not effective to adequately address and satisfactorily close non-compliances and observations raised in the Independent Environmental Audits.</p> <p>Limited evidence could be provided to demonstrate that the processes described within the EMS were implemented to address and prevent recurrence of non-compliances and observations raised in the last two audits.</p> <p>The follow-up of previous findings found that a significant number had not been adequately addressed. Fourteen (14) non-compliances (NC), four (4) Observations (OBS) and two (2) Opportunities for Improvement (OFI) were raised at the previous audit. Of those, eight (8) NCs and three (3) OBSs remain open and require further action to complete and close out</p> <p>A review of the SHL Aconex corrective actions export document found that most issues raised at the last audit were still in open status (16) or "ready to inspect" (5 – partially addressed but not closed / verified). One finding had been formally closed.</p> <p>The majority of actions assigned to FGJV have not been closed. Refer to the Follow-up of Audit Findings Table for full details of the status of non-compliances and other findings.</p>	Non-compliant
		2.8	Works within the Construction Envelope			Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status												
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING																		
390.			<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> <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><th>Total</th></tr> </thead> <tbody> <tr> <td>Maximum Disturbance Area</td><td>126 ha</td><td>504 ha</td><td>630 ha</td></tr> <tr> <td>Maximum Native Vegetation Clearing</td><td>107 ha</td><td>425 ha</td><td>532 ha</td></tr> </tbody> </table>	Matter	Exploratory Works	Main Works	Total	Maximum Disturbance Area	126 ha	504 ha	630 ha	Maximum Native Vegetation Clearing	107 ha	425 ha	532 ha	<ul style="list-style-type: none"> - Master Tracker Clearing Register WebGIS - Clearing Register 04 REG 0016 Construction Environment Management Plan (CEMP); - Clearing Limits Register; - S2-FGJV-ENV-LST-Master Tracker (from LST 0001 on 21/05/21 up to 0058 on 25/01/22 for Clearing Permit S2-FGJV-ENV-PER-008-0145 Main Yard Toe Batter; - S2-FGJV-ENV-REG-0016 Clearing Register_04; - S2-FGJV-PCO-MPR-0033 - Monthly Progress Report - Dec 2021. 	<p>The clearing conducted to date is within the limits prescribed - also refer to Biodiversity section.</p>	
Matter	Exploratory Works	Main Works	Total															
Maximum Disturbance Area	126 ha	504 ha	630 ha															
Maximum Native Vegetation Clearing	107 ha	425 ha	532 ha															
391.		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	<p>App A Unexpected Finds Procedure (page 31 of Contaminated Land Management Plan).</p> <p>Unexpected Finds Protocol Training Records (e.g. Lobs Hole Site Supervisors trained on 01/09/21).</p>	<p>An unexpected finds procedure has been included in the Contaminated Land Management Plan, not in the Construction Environment Management Plan (CEMP).</p> <p>Site Supervisors have been trained to identify potential contamination that may be encountered during construction (e.g. Unexpected Finds Protocol Training Records (e.g. Lobs Hole Site Supervisors trained on 01/09/21)).</p>	Compliant												
392.		4.1.8	<p>Progressive Erosion and Sediment Control Plans</p> <p>Progressive erosion and sediment control plans (ESCPs) are to be developed and will show the site layout and approximate location of erosion and sediment control structures on site. They will be developed for all work areas prior to commencing activities and will be updated as changes occur on site.</p> <p>ESCPs will be regularly reviewed as site conditions change and flow paths are altered.</p>	<p>Examples of Progressive Erosion and Sediment Control Plans (PESCP):</p> <ul style="list-style-type: none"> - ESCP 21000199_P32_ESCP_REV A Main Yard ESCP - Bottom Pad Extension; - ESCP S2-FGJV-ENV-PLN-0224-Tantangara Spoil Emplacement Area ESCP; - 21000199 P08 ESCP REV C (MAR) - 21000199 P14 ESCP REV B (TS) - 21000206 P01 ESCP REV 03 (RR) - 21000199 P12 ESCP REV A (Quarry Trail Road) (TAN) 	<p>Progressive erosion and sediment control plans (ESCPs) have been developed for work areas prior to commencing activities and updated as changes occur on site.</p> <p>During the site inspections conducted at Marica, Tantangara and Lobs Hole, erosion and sediment control structures were sighted. A significant rainfall event (of more than 100mm of rain in a week) occurred just 4-5 days before the site inspections and the effectiveness of the controls implemented could be verified. Sediment basins retained sediments, some overflows occurred and were reported (refer to incidents section).</p>	Compliant												
		5.1	Site Induction			Compliant												

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
393.			All personnel (including sub-contractors) will be required to attend a compulsory site induction that includes an environmental component prior to commencement on site.	<ul style="list-style-type: none"> - FGJV Snowy 2.0 - HSE Site Induction presentation (Rev 11, Jul-21); - FGJV Snowy 2.0 - Trunkline Services Site Induction (Jan-22); - FGJV Induction Acceptance and Understanding record and sign off (e.g. Neville S 12/12/21; Robert Bell 12/12/21); - Extract of Site Inductions at Tantangara in Jan-22; - HSE Site Induction Records: <ul style="list-style-type: none"> - Staff: - Sub-contractors: - Training Attendance Sheet, including SHL, FGJV and sub-contractors e.g. Nov-21; Sept-21; Jul-21. 	<p>The HSE Site Induction includes an "Environment" section with environmental aspects and controls. Site Induction Records for staff and sub-contractors were sighted. Contractors and staff are inducted before going on site. Signed Training Attendance Sheets provide evidence of attendees' acknowledgment.</p>	
394.		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>	<ul style="list-style-type: none"> - Monthly Toolbox Talks: - Presentation e.g. Weed management Tantangara; - Toolbox Talk - Weed Management TTG (27/09/21), including signed attendance records; - Toolbox Talks at LH (03/02/22) with emphasis on how to operate wheel wash correctly for weed control; - Weed Hygiene Poster; - environmental Awareness Communications on site noticeboards (e.g. protected species; snakes; weeds); - Daily pre-start meetings are held at project sites (e.g. records sighted at Tantangara site office and Talbingo Adit site office); - Environmental Training and Awareness Attendance Sheet (e.g. Erosion and Sediment Control 21/10/21; 27/08/21; - S2-FGJV-ENV-REG-0019 - Environmental Training & Awareness Register - filtered for ERSED training, since 2019; 	<p>Monthly Toolbox Talks include HSE concerns and issues coming up for the month e.g. rain; snow season.</p> <p>Daily pre-start meetings are held at project sites (e.g. examples sighted at Tantangara site office and Talbingo Adit site office).</p> <p>Examples of targeted environmental awareness training included Weed and Seed Hygiene Training Package (particularly for Lobs Hole).</p>	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
				<ul style="list-style-type: none"> – Trunk Services Environmental Awareness Training, specific to their environmental aspects. 		
395.		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 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>Future Generation will immediately notify Snowy Hydro of an incident which arises through the Infrastructure Approval. The notification will set out the location and nature of the incident. Snowy Hydro will then notify DPIE and NPWS, via the NSW Major Projects portal, immediately after becoming aware of an incident on site. Incidents are defined in the Infrastructure Approval as being '<i>An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.</i>'</p>	<p>Interview with Community Manager; FGJV Snowy 2.0 HSE Site Induction presentation (Rev 11, Jul-21) includes a section on "Community" with contact numbers, email address and policies around dealing with the community; Complaints Register, maintained by SHL (extract from Jan-19 to Jan-22); Community and Stakeholder Engagement Plan (Jun-20), including Complaints and Dispute Resolution Procedure (Annexure A); Individual Communication Report (e.g. Interaction ID 706, dated 03/02/22).</p>	<p>The Community and Stakeholder Engagement Management Plan (Jun-20) includes the Complaints and Dispute Resolution Procedure (Annexure A). The Complaints Process has been documented in a flowchart and is included in the Site Induction, under Community section, including contact numbers, email address and policies around dealing with the community. Complaints are prioritized and notified to SHL ("flagged") on weekly meetings. The Complaints Register is maintained by SHL and has been published on SHL's website. There have been four recorded complaints since July 2021, three related to traffic management, and one to contractors management. There is a hotline number (1800 Snowy 2) for general enquiries, including complaints (but it is not a dedicated line for complaints); staffed 24x7.</p>	Compliant
		8.1	Environmental Inspections			Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
396.			<p>The effectiveness of environmental protection measures described in this EMS and management plans will be inspected and assessed on a <u>weekly</u> 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.</p> <p>Stakeholders such as DPIE, NPWS and EPA will be invited to attend relevant inspections.</p>	<p>S2-FGJV-ENV-CHE-0002-20211105</p> <p>Environmental Inspection Checklist (e.g. TTG; MRC and LH: for Oct-21, Jan-22);</p> <p>Environmental Weekly Inspections on BOREALIS (e.g. TTG 08/01/22; LH 03/12/21; TTG Creek 19/11/21);</p> <p>Joint site inspection (SHL-FGJV) e.g. Clearing and Grubbing pre permit walk; SHL Environmental Inspection (25/09/21- Lobs Hole; 10/01/22 Lobs Hole - Main Yard).</p>	<p>Weekly Environmental Inspections conducted by Site Coordinators (e.g. TTG; MRC; LH: for Jan-22). Requested Dec-21 and Sep-21.</p> <p>BOREALIS (information system) used to manage monitoring programs was briefly sighted during the audit. Examples of Vehicle Movement Surveys and Environmental Weekly Inspections were reviewed.</p> <p>Joint site inspections (SHL-FGJV) are coordinated as required. Example sighted: Clearing and Grubbing Pre-Permit Walk;</p>	
397.	3		<p>Staging and Updating of Strategies, Plans or Programs</p> <p>With the agreement of the Planning Secretary, the Proponent may submit any strategy, plan or program required under this approval on a staged basis. The Proponent may also submit updates to approved strategies, plans or programs at any time.</p> <p>With the agreement of the Planning Secretary, the Proponent may prepare the staged or updated strategy, plan or program without undertaking all the consultation required under the applicable condition in this approval.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> – <i>While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times.</i> – <i>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</i> 	<p>Spoil Management Plan dated 11/08/2020</p>	<p>The Spoil Management Plan has been staged. At the time of the audit, only the Lobs Hole Main Yard Emplacement Area had been approved. Further spoil emplacement areas were in the process of being developed or approved (GF01, Ravine Bay, Tantangara, Rock Forest).</p> <p>Refer to Spoil Management tables for further information.</p>	Compliant
398.	4		<p>Update of Strategies, Plans or Programs</p> <p>Within 3 months of the following, unless the Planning Secretary agrees otherwise, the Proponent must review</p>	<p>FGJV Approvals Register</p>	<p>This condition was assessed as non-compliant (NC 8) at the previous IEA.</p>	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
			<p>and (if necessary) update the approved strategies, plans and programs for the development to the satisfaction of the Planning Secretary:</p> <p>4 (a) a) the submission of an incident report under condition 6 below;</p> <p>4 (b) b) the submission of an independent environmental audit report under condition 10 below; and</p> <p>4 (c) c) any modification to the conditions of this approval; or</p> <p>4 (d) d) a direction of the Planning Secretary under condition 4 of schedule 2.</p> <p><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></p>		Since the last audit, an Approvals Register has been developed to track document reviews, and includes the name of the Plan / document reviewed and the reason for the review.	
399.	5		<p>Monitoring</p> <p>The Proponent may undertake monitoring outside the construction envelope of the development provided this monitoring is required under the conditions of this approval and authorised under an approved management plan.</p>		Noted, not assessed	
400.	6		<p>REPORTING</p> <p>Notification of Dates</p> <p>At least 1 week prior to the relevant notification date, the Proponent must notify the Department, NPWS and NSW DPI via the Major Projects Portal of the date of the:</p>	<p>Letter from FGJV to Team Leader, Energy Assessments, DPIE: Infrastructure Approval (CSSI 9687) - Snowy 2.0 Main Works - commencement of development dated 10 August 2020</p>	<p>Assessed as compliant at Audit #1 for commencement.</p> <p>No roads have been completed since last audit (completion not triggered).</p>	<p>Not triggered</p>
	6 (a)		<p>a) commencement of the development of the Main Works;</p>			
401.	6 (b)		<p>b) commencement of development on the following sites under this approval:</p> <ul style="list-style-type: none"> - Marica site; - Plateau site; - Tantangara site; and - Rock Forest site; 			
402.	6 (c)		<p>c) commencement and completion of the required road upgrades;</p>			
403.	6 (d)		<p>d) commencement and completion of construction;</p>		The commencement of construction was notified and reported on at Audit#1. Construction is ongoing; therefore, this condition is not triggered.	Not triggered

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
404.	6 (e – k)		<p>e) commencement of commissioning and testing the power station;</p> <p>f) completion of the initial rehabilitation of the site following construction;</p> <p>g) completion of the ecological rehabilitation of the site, apart from the areas used for operations;</p> <p>h) commencement and completion of operations;</p> <p>i) commencement of decommissioning the development;</p> <p>j) completion of the final rehabilitation of the site; and</p> <p>k) completion of the ecological rehabilitation of the areas used for operations.</p>		<p>The power station has not yet been constructed, therefore this condition is not triggered.</p>	Not triggered
405.	6 (a)		<p>Incident Reporting</p> <p>The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.</p>	<ul style="list-style-type: none"> – INC 1140 level spreader - ECVT Lobs Hole – FGJV Environmental Incident and Event Register – S2-FGJV-ENV-PLN-0007-I Environmental Management Strategy, Section 7.2. Incident Reporting. – S2-FGJV-ENV-REG-0014 Environmental Incident and Event Register (extract from 01/07/21 to 31/12/21); – INX Incident Register (extract from 01/01/21 to 29/01/22); S2-FGJV-HSA-REG-0044 Incident Report Register (briefly sighted during interview); – Examples of incident notification on Aconex (e.g. ENV-INC-1166 ECVT ENV dated 24/01/22; ENV-INC-1199 Tantangara ENV dated 27/01/22); however the screenshots do not clearly show who has been notified as the information is cut out/hidden. – Examples of incident notification to authorities e.g. <ul style="list-style-type: none"> ○ S2-FGJV-ENV-INC-1218 for incident on 29/01/22 ECVT - ENV - Clean Water Drain Failure; 	<p>Adequate evidence was not provided to demonstrate that all incidents are reported to the appropriate authority within required timeframes.</p> <p>Evidence was not provided to demonstrate that an incident notified verbally to EPA on 22/12/2021 was also notified to DPIE and NPWS ().</p> <p>The incident notified verbally to EPA on 22/12/2021 was not followed up with a written report within the 7 day timeframe (reported 30/01/2022)</p> <p>The reporting and notification information in the FGJV Environmental Incident and Event Register is not always consistent with the information included in the Incident Reports. The Register recorded that the incident did not cause or threaten material harm, however it was notified to EPA under the Cond R2.1 – “ ...must notify EPA of environmental harm</p>	Non-compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
				<ul style="list-style-type: none"> ○ Full Investigation Report Form sent to SHL; ○ FRM-0013 External Agency Incident Notification - Main Works CSS 19687, sent to DPIE; ○ FRM-0014 R3 Report, sent to EPA; ○ Basin Overtopping Notification: sent to NPWS and EPA (e.g. incident on 02/01/22). 		
406.	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>	<p>- INC 0911 - 9/09/2021 - clearing / disturbance outside the "issued for Construction / Clearing and Grubbing boundary" and consequently outside the approved clearing permit area without the Project Ecologist present.</p> <p>The question "Does this incident involve a non-compliance with the planning approval conditions or commitments made by FGJV in approved Management Plan?" was answered: YES the incident is a procedural breach of Appendix C of the Biodiversity Management Plan.</p> <p>INC 1166 - 10/01/2022 - process water from the drain had entered sediment basin F3. Sediment basin water did not reach river or waterways.</p> <p>The question "Does this incident involve a non-compliance with the planning approval conditions or commitments made by FGJV in approved Management Plan?" was answered: YES</p>	<p>The Independent Environmental Audit Report # 2 was issued on 24 September 2021, and the associated non-compliances were notified to DPIE on 30 September. Notification was therefore within the 7 day requirement (actual - 6 days).</p> <p>This condition was non-compliant at previous audit - not all non-compliances had been notified to DPIE or NPWS - Part 2 of the non-compliance remains open - see details below:.</p> <p>A review of FGJV incident reports found that some of the incidents were noted as non-compliant to the approval conditions (e.g. INC 1166 relating to process water release and 911 relating to procedural breach to Biodiversity Plan – clearing without ecologist on site). The monthly reports sighted also included a section noting non-compliance to approval conditions. Evidence was not provided to demonstrate that these non-compliances were reported to DPIE.</p>	Non-compliant
407.	8		<p>Reporting on Environmental Performance</p> <p>The Proponent must provide regular reporting on the environmental performance of the development on its</p>		<p>Environmental performance is partially reported within the IEA Reports. The first IEA Report was uploaded to the website as a response to a non-compliance raised at the previous audit. The second</p>	Non-compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
			website in accordance with the requirements in any approved strategies, plans or programs.		<p>IEA report (Sept 2021) was uploaded to the website in January 2022.</p> <p>At the time of the audit, the following reports relating to environmental performance had not been uploaded to the website:</p> <ul style="list-style-type: none"> * The Quarterly Environmental Water Reports as required by the Water Management Plan; * The Quarterly Traffic Reports required by the Transport Management Plan. This is also non-compliant under Sch 4, Cond 12 * The Annual Report required by the Biodiversity Management Plan (not yet completed - due Oct 2021). It should be noted that there is no specific timeframe on the issue of the Annual Report. Refer to Observation raised under Sch 3 Cond 18 and Biodiversity Management Plan Section 6.5. 	
408.	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>	<p>Independent Environmental Audit Report (Initial) – Snowy 2.0 January 2021 (issued 9 April 2021);</p> <p>Independent Environmental Audit Report #2 (Interim) - Snowy 2.0 July 2021 (issued Sept 2021)</p> <p>Independent Environmental Audit Report #3 (Annual - Snowy 2.0 February 2022 (issued May 2022)</p>	<p>Audit #1 was conducted approximately 12 weeks from commencement of construction, and Audit #2 was conducted within 26 weeks of the first audit. This audit (Audit #3 - Annual) was conducted one year after the initial audit.</p> <p>This is generally within the timeframes required by the IEA Program approved by DPIE on 28 September 2020.</p> <p>The IEA program noted that the annual audit (this audit) would be conducted within one year of commencement of construction which meant that technically, it should have been conducted in October 2021. This apparent anomaly was raised with DPIE in the pre-audit consultation process. A response was received in writing that the Department is in agreement that the commencement of the "Annual" audit on 31 January 2022 was appropriate.</p> <p>The IEA Program is conducted at a higher frequency than required by this condition, and is therefore compliant.</p>	Compliant
409.	9 (a)		a) be conducted by a suitably qualified, experienced and independent team of experts, including a lead	Letter from Team Leader - Compliance as nominee of the Planning secretary dated	The audit was conducted by Julie Dickson (an Exemplar Global qualified Lead Auditor) and Cecilia	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
			auditor, whose appointment has been endorsed by the Planning Secretary;	25/11/2021 titled "Snowy 2.0 - Main Works - CSSI-9687 Independent Environmental Audit (IEA) #3 Audit Team Endorsement Request"	Caselia (Auditor) of Dickson Environmental Consulting and Audit. Both auditors were endorsed by the Secretary in the letter dated 25/11/2021. A copy of the endorsement letter is included in the Appendices of the IEA Report.	
410.	9 (b)		b) include consultation with the relevant agencies;	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 2.3 and Table 1 of this report.	Compliant
411.	9 (c)		c) assess the environmental performance of the development and whether it is complying with the requirements in this approval (including the requirements of any approved strategy, plan or program);	This report – including findings table with actions and recommendations	Environmental performance is reflected in the audit findings, recommendations and various sections of this report.	Compliant
412.	9 (d)		d) review the adequacy of the approved strategies, plans or programs for the development; and		The adequacy of the majority of approved strategies, plans and programs was assessed at Audit #1, and the Noise Management Plan – Rock Forest was assessed for adequacy at Audit #2. At the time of the audit, no further Management Plans had been approved. It was noted that the submission of three Management Plans to DPIE were triggered at this audit, however had not yet been completed or submitted, and therefore could not be reviewed for adequacy. A separate non-compliance has been raised in regards to late submission of these management plans.	Compliant
413.	9 (e)		e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any approved strategies, plans or programs.	This report – including findings table with actions and recommendations	This report provides recommended / agreed actions to improve the environmental performance of the development.	Compliant
414.	10 (a)		Within 12 weeks of commissioning this audit, unless the Planning Secretary agrees otherwise, the Proponent must submit the following via the Major Projects Portal: a) a copy of the audit report;	Letter from Snowy Hydro to DPIE: Infrastructure Approval No. SSI 9687 – 6 monthly PARs Audit & Notification of associated non-compliances dated 30 September 2021. Post Approval Form Snowy 2.0 - Main Works - SSI-9687-PA-37: Same of Document - IEA Report Snowy 2.0 July 2021 Final - Applicable to Conditions Sch 4 Cond 10 and Sch 4 Cond 7.	The submission of the audit report was within the 12 week requirement	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
415.	10 (b)		b) its response to the recommendations in the audit report; and	6 Monthly IEA Non-compliance summary (Audit response and action plan)	The letter was submitted to DPIE together with the Audit Report and the associated non-compliance summary table.	Compliant
416.	10 (c)		c) a copy of the proposed audit action plan to address the recommendations	6 Monthly IEA Non-compliance summary (Audit response and action plan)	The non-compliance summary report was the same document as the audit action plan. It should be noted that at this audit, a separate Action Plan has been prepared by the Audit Team to facilitate a more effective response, particularly from the construction contractor FGJV.	Compliant
417.	11		The Proponent must implement any approved audit action plan for the development.	Follow-up Audit Table within IEA#3	<p>The internal FGJV corrective action process is not effective to adequately address and satisfactorily close non-compliances and observations raised in the Independent Environmental Audits.</p> <p>Limited evidence could be provided to demonstrate that the processes described within the EMS were implemented to address and prevent recurrence of non-compliances and observations raised in the last two audits.</p> <p>The follow-up of previous findings found that a significant number had not been adequately addressed. Fourteen (14) non-compliances (NC), four (4) Observations (OBS) and two (2) Opportunities for Improvement (OFI) were raised at the previous audit. Of those, eight (8) NCs and three (3) OBSs remain open and require further action to complete and close out</p> <p>A review of the SHL Aconex corrective actions export document found that most issues raised at the last audit were still in open status (16) or "ready to inspect" (5 – partially addressed but not closed / verified). One finding had been formally closed.</p> <p>The majority of actions assigned to FGJV have not been closed. Refer to the Follow-up of Audit Findings Table for full details of the status of non-compliances and other findings.</p>	Non-compliant
12 (a)			ACCESS TO INFORMATION			

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
418.			From the commencement of the development of the Main Works until the completion of the ecological rehabilitation of the areas used for operations, the Proponent must: a) make copies of the following information publicly available on its website:	Snowy 2.0 Spreadsheet - Environmental documents to upload - last updated 31/12/2021.	A Non-compliance was raised at the previous audit previous audit (NC 12) - various plans and reports not made available on website. There has been significant improvement in this area, however some required documents had not been completed and were not uploaded to the project website.	Non-compliant
419.			* the documents referred to in the definition of the Exploratory Works and Main Works;	https://www.snowyhydro.com.au/snowy-20/documents/	The documents referred to in the definition of the Exploratory and Main Works were included on the website	Compliant
420.			* current statutory approvals for the development;		Current statutory approvals were include on the website (Main Works approval)	Compliant
421.			* approved strategies, plans or programs;		Approved strategies, plans and programs were included on the website	Compliant
422.			* 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;		At the time of the audit, the following reports relating to environmental performance had not been completed or uploaded to the website: * The Quarterly Environmental Water Reports as required by the Water Management Plan (also non-complaint at previous audit); *The Quarterly Traffic Reports required by the Transport Management Plan (also non-complaint at previous audit); The outcomes of the biodiversity monitoring report were also not uploaded to the website, however it is recognised that there is no specific timeframe on the issue of this report and is raised an observation.	Non-compliant
423.			* a monthly summary of complaints;		Summary of Complaints was on the website.	Compliant
424.			* a record of all incidents and non-compliances;		Incidents and non-compliances were not uploaded to the website.	Non-compliant
425.			* any independent environmental audit, and the Proponent's response to the recommendations in any audit;		The previous 2 IEA Reports were uploaded to the website. The IEA reports included the proponents' response to the recommendations.	Compliant
426.			* any approved audit action plan;		The approved action plan was included as part of the IEA report. However, at this audit, a separate audit action plan has been prepared and will be required to be uploaded to the website following this audit.	Compliant
427.			* any other matter required by the Planning Secretary;		No other matters required by the Planning Secretary were flagged by the proponent	Not triggered
428.	12 (b)		b) keep this information up to date.	Spreadsheet - tracking the documents that are required to be uploaded to the website.	Whilst a process has been commenced to track the documents that need to be uploaded to the website, as noted above, some of the required documents have not been completed or uploaded to the website.	Non-compliant

TABLE H – Environment Protection Licence No 21266 Conditions

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENT PROTECTION LICENCE No 21266					
3 Limit Conditions					
429.	L1	L1 Pollution of waters L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Examples of Notification of Environmental Harm (R2) and Written Report (R3): S2-FGJV-FRM-0014-External Agency Notification - Main Works EPL 21266 (R3 Report EPA) for the following incidents: <ul style="list-style-type: none"> - *INC-0897 on 04/09/21: Main Camp Pad C - *INC-0898 on 04/09/21: MAT Portal - *INC-1058 on 20/11/21: Sediment laden water entering KPC - *INC-1140 on 19/12/21: Failure of clean water drain level spreader - *INC-1218 on 29/01/22: Clean water drain failure - Main Works – Surface Water Management Plan (S2-FGJV-ENV-PLN-0011-G), Annexure A – Surface Water Monitoring Program, Table 2-2: Water quality objectives for receiving waters (source: Appendix J of EMM 2020) 	<p>There have been some water pollution incidents (environmental harm) in the last 6 months, primarily due to heavy rain in the area. Incidents have been reported to the EPA making an initial phone call (time recorded on R3 Report).</p> <p>A written report (FRM-0014 - R3 Report - External Agency Incident Notification Form – Main Works EPL 21266) has been prepared by FGJV and submitted to SHL (until 31/12/21) or to the EPA on SHL's behalf (since 01/01/22) (although not always within 7 days of becoming aware of the incident as required by the licence). Refer to Incident Reporting.</p> <p>These incidents are considered a breach to section 120 of the POEO Act. Considering the laboratory results reviewed, the impact on watercourses has been minimal (low risk).</p> <p>Water sampling (in situ monitoring, and laboratory samples) were taken after the incident, at upstream, downstream and impact locations. Results were included in the R3 Report to the EPA. Laboratory test results have been assessed against the "Snowy 2.0 – Surface Water Guidelines" (Water quality objectives for receiving waters). In-situ water quality results compared results between upstream, downstream and impact locations.</p>	Non-compliant
430.	L2	L2 Concentration limits			Not triggered
	L2.1	L2.1 For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Interviews; site inspection	<p>There has been only one discharge into Talbingo Reservoir (Dec-21) which was process water only and as part of a trial to monitor the mixing zone verification program. STP water has been fully re-used on site, primarily on roads as dust suppression.</p> <p>STP and PTP water from Tantangara has not been discharged yet (treatment plants were not yet completed/operational at the time of the audit). SHL is negotiating with EPA a discharge volume increase from 34 m3/m to 100 m3/m.</p>	

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431.	L2.2	L2.2 Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.																																																														
432.	L2.3	L2.3 To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table(s).																																																														
433.	L2.4	<p>L2.4 Water and/or Land Concentration Limits:</p> <p>POINT 41</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>50 Percentile concentration limit</th> <th>90 Percentile concentration limit</th> <th>3DGM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>milligrams per litre</td> <td>1</td> <td></td> <td>5</td> <td></td> </tr> <tr> <td>Electrical conductivity</td> <td>microsiemens per centimetre</td> <td></td> <td></td> <td>700</td> <td></td> </tr> <tr> <td>Faecal Coliforms</td> <td>colony forming units per 100 millilitres</td> <td>10</td> <td></td> <td>100</td> <td></td> </tr> <tr> <td>Nitrogen (ammonia)</td> <td>milligrams per litre</td> <td>0.2</td> <td></td> <td>2</td> <td></td> </tr> <tr> <td>Nitrogen (total)</td> <td>milligrams per litre</td> <td>0.35</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td>2</td> <td></td> <td>5</td> <td></td> </tr> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td>6.5-8.5</td> <td></td> </tr> <tr> <td>Phosphorus (total)</td> <td>milligrams per litre</td> <td>0.1</td> <td></td> <td>0.3</td> <td></td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td>5</td> <td></td> <td>10</td> <td></td> </tr> </tbody> </table>	Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	BOD	milligrams per litre	1		5		Electrical conductivity	microsiemens per centimetre			700		Faecal Coliforms	colony forming units per 100 millilitres	10		100		Nitrogen (ammonia)	milligrams per litre	0.2		2		Nitrogen (total)	milligrams per litre	0.35				Oil and Grease	milligrams per litre	2		5		pH	pH			6.5-8.5		Phosphorus (total)	milligrams per litre	0.1		0.3		Total suspended solids	milligrams per litre	5		10			
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434.	L3.1	L3.1 For each discharge point or utilisation area specified below (by a point number), the volume/mass of: a) liquids discharged to water; or; b) solids or liquids applied to the area; must not exceed the volume/mass limit specified for that discharge point or area.		<p>There has been only one discharge into Talbingo Reservoir (Dec-21) which was process water only and as part of a trial to monitor the mixing zone verification program. STP water has been fully re-used on site, primarily on roads as dust suppression.</p> <p>STP and PWTP water from Tantangara has not been discharged yet (treatment plants were not yet completed/operational at the time of the audit). SHL is negotiating with EPA a discharge volume increase from 34 m3/m to 100 m3/m.</p>	Not triggered																																																											
435.	L3.2	L3.2 For each discharge point or utilisation area specified below (by a point number), the flow rate of: a) liquids discharged to water; or b) solids or liquids applied to the area; must not exceed the flow rate specified by that discharge point or area.																																																														

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4 Operating Conditions											
436.	O1	<p>O1 Activities must be carried out in a competent manner</p> <p>O1.1 Licensed activities must be carried out in a competent manner.</p> <p>This includes:</p> <ul style="list-style-type: none"> a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 	<p>Environmental Management Strategy; Spoil Management Plan; Water Management Plan; Transport Management Plan.</p>	<p>An Environmental Management Strategy for the development has been prepared to define the methods to operate in a competent manner throughout the duration of the project (Rev I, 11/08/2020). A set of management plans specific to address different environmental aspects have been progressively established to minimize environmental impacts of the project.</p>	Compliant						
437.	O2	<p>O2 Maintenance of plant and equipment</p> <p>O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <ul style="list-style-type: none"> a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner. 	<p>a) Proper Maintenance:</p> <ul style="list-style-type: none"> - Equipment Maintenance and Hours Control Schedule (equivalent to an Asset Register); - Hourly Service Reports; - Quarterly Inspection Reports; Quarterly Inspection Stickers on plant and vehicles inspected; - Pre-Start Inspection Checklists. <p>b) Proper Operation:</p> <ul style="list-style-type: none"> - Competency and Training Database (E7) (e.g. Ellen Porter); - INX Record (Personnel Files - Starter File) including competence and training information (e.g. Underground Induction for tunnel pass; FGJV Chemical Handling); - Verification of Competency (VOC) on E7; - Site Supervisors have access to E7 via mobile phones (e.g. <ul style="list-style-type: none"> - Stephen B (supervisor); - Mitchel A (excavator certificate competency card; drivers licence); - Ahmad e (Boilermaker Level 4, VOC - EWP Haulotte, VOC - Permit Holder, VOC - Lock Holder).) 	<p>a) Maintenance: Plant inspection for compliance purposes is conducted on a quarterly basis. An "Equipment Maintenance and Hours Control Schedule" (equivalent to an Asset Register) and associated records were sighted and reviewed, including Hourly Service Reports, Quarterly Inspections and corresponding stickers on vehicles inspected and Pre-Start Inspection Checklists. During the site inspections at Tantangara and Lobs Hole, some vehicles and plant were checked.</p> <p>At the last audit, an opportunity for improvement was raised for FGJV to continue to implement a program to investigate and minimise the frequency of minor spills, particularly from hydraulic hoses. The investigation identified that during weekly inspections, plant and equipment were usually covered in mud and spills were not detected. Plant is now washed down before the inspection. Additionally, for new plant and equipment, FGJV is requesting the use of biodegradable oil (e.g. all drill rigs and multi service vehicles are currently using biodegradable oil).</p> <p>During the site inspection at Tantangara, the Vehicle/Plant Hygiene Station (Wheel Wash Station) (to prevent the spread of Ox-eye daisy) did not operate correctly. Apparently, the system had run out of water due to a pump malfunction (refer to Observation).</p> <p>b) Operation: Records are kept in the Competency and Training</p>	Compliant						

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				<p>Database (E7) (e.g. Ellen Porter); Information on compliances are kept in INX Record (Personnel Files - Starter File) including competence and training information (e.g. Underground Induction for tunnel pass; FGJV Chemical Handling); Evidence of Verification of Competency (VOC) is available on E7; Site Supervisors have access to E7 via mobile phones to check competencies of plant operators (e.g. Crane, Forklift, Excavator): "Scan Pass". VOCs are conducted by GSD (Global Skills Development).</p>	
438.	O3	<p>O3 Dust O3.1 All operations and activities occurring at the premises must be carried out in a manner that minimises or prevents the emission of dust from the premises.</p>	<ul style="list-style-type: none"> - Environmental Management Strategy; - Spoil Management Plan; - Water Management Plan; - Transport Management Plan; - Observations during site inspection. 	<p>Controls to minimize or prevent the emission of dust have been included in different management plans e.g., Spoil Management Plan; Transport Management Plan.</p> <p>Dust suppression is managed via the use of water carts recycling STP water from site.</p> <p>Speed limits enforced throughout the project and the maintenance of roads minimizes the dust generated by traffic, particularly from heavy vehicles.</p>	Compliant
439.	O4	<p>O4 Waste management O4.1 The licensee must assess, classify and manage any waste generated at the premises in accordance with the Waste Classification Guidelines 2014 and the Act. Waste need to be transported to a place that can lawfully accept that waste.</p>	<p>Evidence of collection and disposal of sump pump out from fuel farm (LH) (e.g. Dockets from JJ Richards and Cleanaway);</p> <p>Observation of segregation of plastic containers (e.g. water bottles).</p> <p>Observation of waste segregation at Tantangara.</p>	<p>Dockets from JJ Richards and Cleanaway.</p> <p>Liquid waste is transported offsite by JJ Richards and disposed of to Cleanaway.</p> <p>Based on the brief observation of waste management on site and the records sighted, controls appear to be adequate from a legal perspective.</p>	Compliant
5 Monitoring and Recording Conditions					
440.	M1	M1 Monitoring records			
	M1.1	M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	<ul style="list-style-type: none"> - Chain of Custody Record (e.g. report nr. 854730 dated 12/01/22, Surface Water Sampling); 	<p>Monitoring records were reviewed and are deemed appropriate and compliant with the requirements of this licence.</p>	Compliant
441.	M1.2	<p>M1.2 All records required to be kept by this licence must be:</p> <p>a) in a legible form, or in a form that can readily be reduced to a legible form;</p> <p>b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.</p>	<ul style="list-style-type: none"> - Sample Receipt Advice (by Eurofins) (e.g. report nr. 854730 dated 12/01/22); - Certificate of Analysis (by Eurofins) (e.g. report nr. 854730-W dated 12/01/22); 		
442.	M1.3	<p>M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <p>a) the date(s) on which the sample was taken;</p>			

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443.	M2	M2 Requirement to monitor concentration of pollutants discharged																																																																		
444.	M2.1	M2.1 For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Monthly EPL Sampling: 04-05 July; Monthly EPL Sampling: 01-02 August; Monthly EPL Sampling: 01-02 August 2021 Groundwater (published on SHL website)	Concentration of pollutants have been monitored for all the required EPL points identified.	Compliant																																																															
445.	M2.2	M2.2 Water and/ or Land Monitoring Requirements – Point 1, 2, 4, 25: POINT 1,2,4,25	Monthly EPL Sampling: 01-02 August 2021 Groundwater (although GW is monitored quarterly) (published on SHL website)		Compliant																																																															
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447.		M2.2 Water and/ or Land Monitoring Requirements – Point 5, 6, 8, 9, 12, 14, 15, 16, 24, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40:	Monthly EPL Sampling: 04-05 July and Monthly EPL Sampling: 01-02 August (published on SHL website); Monthly EPL Sampling: 4 October 2021;	Based on the information provided, it appears surface and groundwater monitoring has been undertaken as required by the EPL. A method for sampling has been defined in the FGJV																																																																

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ENVIRONMENT PROTECTION LICENCE No 21266 POINT 5,6,8,9,12,14,15,16,24,26,27,28,29,30,31,32,33,34,35,36,37,38,39,40																																																																																																	
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Sampling and monitoring records have been maintained. Probes, sampling and monitoring equipment was sighted during the site inspection at Tantangara Reservoir.</p> <p>The S2 Water Monitoring Program has been setup on WebGIS. It uses Survey123 program to upload in-situ water monitoring data. Laboratory results are submitted via email and esdat (database). Exceedances are communicated immediately via email.</p> <p>There are two weather stations: at Lobs Hole and at Tantangara (not sighted during the site inspection).</p>	
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448.		M2.2 Water and/ or Land Monitoring Requirements – Point 10, 11, 41:	Monthly EPL Sampling: 04-05 July; Monthly EPL Sampling: 01-02 August;																																																																																														

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	M3	M3 Testing methods - concentration limits																																																																																																						
449.	M3.1	M3.1 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.		No discharge has occurred from EPL 41 (except for a trial in relation to the Mixing Zone Verification Program in Dec-21).	Not triggered																																																																																																			
450.	M3.2	M3.2 Condition M3.1 also applies to the monitoring of any points identified in Condition M2.2	<ul style="list-style-type: none"> Water Monitoring Report (e.g. 854730-W issued 20/01/22 for water samples received on 12/01/22); Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (2014); Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (2022); National Association of Testing Authorities (NATA), Australia, Scope of 	<p>Laboratory reports of water sampling were reviewed. Eurofins Environment Testing (NATA Accreditation No. 1261), the laboratory conducting water pollutants analysis, has not always used EPA approved methods.</p> <p>As an example, Eurofins Environment Testing is using the following in-house methods:</p> <ul style="list-style-type: none"> LTM-INO-4200 Ammonia by Discrete Analyser for testing Ammonia (as N) (EPA approved methods include: APHA section 4120, APHA section 4130, APHA section 4500-NH3, USEPA method 350.1); 	Non-compliant																																																																																																			

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			Accreditation - Eurofins Environment Testing Australia Pty Ltd, Eurofins Site Melbourne Chemistry Testing Laboratory, Site No. 1254, NATA Accreditation No. 1261.	<ul style="list-style-type: none"> - LTM-INO-4040 Phosphate and Nitrogen in waters for testing Total Nitrogen (as N) (EPA approved methods include: APHA (1998) section 4500-N C). <p>Evidence of express provision to use in-house methods have not been included in this licence. Therefore, this condition is deemed non-compliant.</p>	
	M4	M4 Recording of pollution complaints			
451.	M4.1	M4.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.		<ul style="list-style-type: none"> - Interview with Community Manager; - FGJV Snowy 2.0 HSE Site Induction presentation (Rev 11, Jul-21) includes a section on "Community" with contact numbers, email address and policies around dealing with the community; - Complaints Register, maintained by SHL (extract from Jan-19 to Jan-22); Community and Stakeholder Engagement Plan (Jun-20), including Complaints and Dispute Resolution Procedure (Annexure A); - Individual Communication Report (e.g. Interaction ID 706, dated 03/02/22). 	<p>The Community and Stakeholder Engagement Management Plan (Jun-20) includes the Complaints and Dispute Resolution Procedure (Annexure A).</p> <p>The Complaints Process has been documented in a flowchart and is included in the Site Induction, under Community section, including contact numbers, email address and policies around dealing with the community. Complaints are prioritized and notified to SHL ("flagged") on weekly meetings.</p> <p>The Complaints Register is maintained by SHL and has been published on SHL's website. there have been four recorded complaints since July 2021, three related to traffic management, and one to contractor management.</p> <p>There is a hotline number (1800 Snowy 2) for general enquiries, including complaints (but it is not a dedicated line for complaints); staffed 24x7.</p>
452.	M4.2	M4.2 The record must include details of the following:			
453.		a) the date and time of the complaint;			
454.		b) the method by which the complaint was made;			
455.		c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;			
456.		d) the nature of the complaint;			
457.		e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and			
458.	M4.3	M4.3 The record of a complaint must be kept for at least 4 years after the complaint was made.			
459.	M4.4	M4.4 The record must be produced to any authorised officer of the EPA who asks to see them.			
	M5	M5 Telephone complaints line			
460.	M5.1	M5.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	FGJV and Snowy 2.0 websites publish the hotline number. https://www.futuregenerationjv.com.au/contact https://www.snowyhydro.com.au/contact/	<p>There is a hotline number (1800 Snowy 2) for general enquiries, including complaints (but it is not a dedicated line for complaints); staffed 24x7.</p> <p>FGJV: For enquiries or complaints contact the Snowy 2.0 Community Information Line 1800 766 992 (1800 Snowy 2)</p> <p>SHL: For environmental pollution incidents and complaints (noise, visual amenity, sewage overflow) related to site activities. Freecall: 1800 766 333.</p> <p>Snowy 2.0 enquiries: 1800 Snowy2 (766 992).</p>	<p>Compliant</p>
461.	M5.2	M5.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.			
462.	M5.3	M5.3 The preceding two conditions do not apply until immediately from the date of the issue of this licence.			
	M6	M6 Requirement to monitor volume or mass			

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463.	M6.1 M6.1 For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below. <u>POINT 43</u> <table border="1"> <tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr> <tr><td>Continuous</td><td>megalitres per day</td><td>Ultrasonic flow meter</td></tr> </table> <u>POINT 44,45</u> <table border="1"> <tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr> <tr><td>Continuous</td><td>megalitres per day</td><td>Ultrasonic flow meter</td></tr> </table>	Frequency	Unit of Measure	Sampling Method	Continuous	megalitres per day	Ultrasonic flow meter	Frequency	Unit of Measure	Sampling Method	Continuous	megalitres per day	Ultrasonic flow meter	No discharge has occurred from EPL 43, 44 or 45.	Not triggered
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464.															
465.															
466.															
467.															
6 Reporting Conditions															
468.	R1	R1 Annual return documents													
469.	R1.1	R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1) a Statement of Compliance, 2) a Monitoring and Complaints Summary, 3) a Statement of Compliance - Licence Conditions, 4) a Statement of Compliance - Load based Fee, 5) a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6) a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7) a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	<ul style="list-style-type: none"> - Annual Returns submitted to the EPA: - Period 09-May-2019 to 08-May-2020: submitted on 09-Jul-2020; - Period from 09-May-2020 to 08-May-2021: submitted on 02-Jul-2021. 	Annual returns have been submitted to the EPA in a timely manner.	Compliant										
470.	R1.2	R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below. <i>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</i>													
471.	R1.3	R1.3 Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting													

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		<p>period and ending on the date the application for the transfer of the licence to the new licensee is granted; and</p> <p>b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</p> <p><i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i></p>			
472.	R1.4	<p>R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <p>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.</p>			
473.	R1.5	R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').			
474.	R1.6	R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.			
475.	R1.7	R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:			
	R2	R2 Notification of environmental harm		FGJV are notifying EPA on SHL's behalf to ensure timely notification timeframes.	Compliant
476.	R2.1	<p>R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p><i>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</i></p>	<p>Examples of incident notification to EPA:.</p> <ul style="list-style-type: none"> - S2-FGJV-ENV-INC-1218 - ECVT - ENV - Clean Water Drain Failure on 29/01/22 (Initial Incident Notification Form S2-FGJV-HSA-FRM-0012); 	<p>Environmental incidents are recorded in the Environmental Incident and Event Register and on INX database. Extracts of those registers were verified during the audit.</p> <p>When an environmental incident occurs, FGJV prepares an Initial Incident Notification Form (S2-FGJV-HSA-FRM-</p>	Compliant

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477.	R2.2	R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	<ul style="list-style-type: none"> - S2-FGJV-FRM-0014 - R3 Report - Main Works EPL 21266 - Clean water drain failure: R3 Report (External Agency Incident Notification Form), sent to EPA (e.g. 29/01/22). 	<p>0012) to notify SHL. Four questions have been added to clarify reporting requirements:</p> <ul style="list-style-type: none"> - Q1) Did the incident cause or threaten material harm? - triggers incident notification to DPIE and NPWS, via the NSW Major Projects portal, immediately after becoming aware of an incident on site. - Q2) Did the incident involve actual or potential harm to health or safety of human beings or the environment that is not trivial? - triggers notification to the EPA (pollution incidents) (phone call immediately and R3 Report within 7 days) and DPIE. - Q3) Did the incident result in actual or potential loss of property of an amount, or amounts of aggregate exceeding \$10,000? - triggers notification to the EPA (pollution incidents) (phone call immediately and R3 Report within 7 days) and DPIE. - Q4) Does this incident involve a non-compliance with the planning approval conditions or commitments made by FGJV in approved Management Plan? – triggers non-compliance notification to DPIE. <p>Pollution incidents are notified immediately after becoming aware of the incident via telephoning the Environment Line service on 131 555. A written report (R3 Report - External Agency Incident Notification Form – Main Works EPL 21266, FRM-0014) is prepared by FGJV and submitted to EPA within 7 days of becoming aware of the incident behalf (e.g. ENV-INC-0794 incident on 04/07/21; ENV-INC-1218 incident on 29/01/22).</p>	
478.	R3	R3 Written report	<p>Examples of incident notification to EPA:</p> <ul style="list-style-type: none"> - S2-FGJV-ENV-INC-1218 - ECVT - ENV - Clean Water Drain Failure on 29/01/22 (Initial Incident Notification Form S2-FGJV-HSA-FRM-0012); - Full Investigation Report Form sent to SHL; - S2-FGJV-FRM-0014 - R3 Report - Main Works EPL 21266 - Clean water drain failure: R3 Report (External 	<p>Pollution incidents are notified immediately after becoming aware of the incident via telephoning the Environment Line service on 131 555. A written report (R3 Report - External Agency Incident Notification Form – Main Works EPL 21266, FRM-0014) is prepared by FGJV and submitted to EPA within 7 days of becoming aware of the incident behalf (e.g. ENV-INC-0794 incident on 04/07/21; ENV-INC-1218 incident on 29/01/22).</p>	Compliant
479.	R3.1	R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that: <ul style="list-style-type: none"> a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, 		<p>Examples verified indicate that environmental incidents have been reported to the EPA.</p>	

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		and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.			
480.	R3.2	R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.			
481.	R3.3	R3.3 The request may require a report which includes any or all of the following information: <ul style="list-style-type: none"> a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters. 	<ul style="list-style-type: none"> - Agency Incident Notification Form), sent to EPA (e.g. 29/01/22); - Basin Overtopping Notification: sent to NPWS and EPA (e.g. Mail titled RE_Snowy 2.0 - Basin Overtopping Event Commencing 02_01_2022); - S2-FGJV-ENV-PRO-0048 - FGJV Water Monitoring Procedure, Appendix B - Trigger Action Response Plan 2 – Stormwater Overtopping Event: to notify EPA and NPWS. - Additional evidence was provided on 23/03/22 in relation to incident reporting to authorities: - INC-897 on 04/09/21: S2-FGJV-FRM-0014-External Agency Notification - Main Works EPL 21266 - Main Yard (R3 Report EPA); - INC-898 on 04/09/21: S2-FGJV-FRM-0013 - External Agency Incident Notification - Main Works CSSI 9687 - MAT Portal B (R3 Report DPIE); S2-FGJV-FRM-0014 - External Agency Incident Notification - Main Works EPL 21266 - MAT Portal (R3 Report EPA); - S2-FGJV-FRM-0014 - External Agency Incident Notification - Main Works EPL 21266 - Lobs Hole (R3 Report EPA); - INC-1058 on 20/11/21: S2-FGJV-FRM-0013-Sediment laden water entering KPC (R3 Report DPIE); S2-FGJV-FRM-0014-Sediment laden water entering KPC Full Investigation (R3 Report EPA); - INC-1140 on 19/12/21: S2-FGJV-FRM-0014 - R3 Report - Main Works EPL 21266 - Failure of clean water drain level spreader (R3 Report EPA); 		
	R4	R4 Other reporting conditions			
483.	R4.1	R4.1 The licensee must notify the EPA within 24 hours by phone or in writing of any results from monitoring required by condition M2 that exceed the Australian and New Zealand Environment Conservation Council Guidelines and NSW	The Oct-21 Water Monitoring Report indicated that: <ul style="list-style-type: none"> - Exceedances in samples are representative of background conditions in October 2021 due to: 	Exceedances are only notified to the EPA if it is above background data/baseline trend (discussed with EPA).	Compliant

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
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		Water Quality Objectives and caused by activities carried out by or on behalf of the Licensee.	<ul style="list-style-type: none"> - Significant rainfall event experienced across sites with 70 mm recorded at Lobs Hole from 29/09/2021 to 05/10/2021, 163.25 mm recorded at Tantangara from 29/09/2021 to 19/10/2021 and 134 mm recorded at Marica from 29/09/2021 to 16/10/2021. - The trigger action response plans included in the water management plan have been followed for all analytes with concentrations exceeding the respective water quality values. At this time, no further action is required. - Therefore, based on water quality results from upstream of the site, site activity, and supporting evidence the monitoring are a result of the recent bushfire activity in the area and not site works. 		
484.	R4.2	R4.2 The licensee must submit an Environmental Monitoring Report every six (6) months to the EPA, unless otherwise agreed in writing by the EPA.		A 6-monthly Environmental Monitoring Report was not been provided as evidence, and no evidence was provided that it had been submitted to the EPA.	Non-compliant
485.	R4.3	<p>R4.3 The Environmental Monitoring Report must be prepared by a suitably qualified and experienced person and include, but not be limited to:</p> <ul style="list-style-type: none"> a) results of all water quality monitoring undertaken in the preceding six (6) month period; b) results of all weather monitoring undertaken in the preceding six (6) month period; c) assessment of historical trends in all water sampling data for each monitoring point inclusive of the current six (6) month period; d) identification of instances where the water quality objective triggers for each relevant pollutant were exceeded at receiving water locations and/or where the predicted discharge water quality was exceeded at sediment basin discharge points; e) include details of any actions taken by the Licensee in response to exceedances identified under point (d), including but not limited to: <ul style="list-style-type: none"> i. additional monitoring ii. remedial actions; and 	A 6-monthly Environmental Monitoring Report has not been prepared yet. No further information was available.	Non-compliant	

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENT PROTECTION LICENCE No 21266					
		iii. activation of trigger, action, response plans (TARPs); f) recommendations for future actions in relation to monitoring and/or management.			
7 General Conditions					
486.	G1	G1 Copy of licence kept at the premises or plant			Compliant
487.	G1.1	G1.1 A copy of this licence must be kept at the premises to which the licence applies.	https://www.snowyhydro.com.au/snowy-20/documents/	The EPL is available in a digital form on Snowy 2.0 website. Hard copies on site were not verified due to time constraints.	
488.	G1.2	G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.			
489.	G1.3	G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.			
	G2	G2 Signage			
490.	G2.1	G2.1 Each monitoring point in condition P1.2 must be clearly marked by a sign that indicates the EPA point identification number.	EPL Premise and monitoring point maps issued 15/12/2020 (e.g. Talbingo Reservoir; Lobs Hole; Marica; Tantangara Reservoir; Rock Forest); Signage sighted during site inspection (e.g. EPL Point 41 - Discharge point);	The monitoring points in condition P1.2 have been identified in the EPL Premise and monitoring point maps issued 15/12/2020 (e.g. Talbingo Reservoir; Lobs Hole; Marica; Tantangara Reservoir; Rock Forest). Additionally, all monitoring points have been digitally identified and located in WebGIS which communicates with Survey123 for uploading water monitoring data collected in situ. Lastly, monitoring points have been sign-posted. The only example that could be verified was EPL Point 41 - Discharge point (Lobs Hole STP/PWTP Final Effluent Quality Monitoring Point). At Tantangara, the auditor tried to verify the two monitoring points on the Kellys Plain Creek, downstream and upstream of the accommodation camp and laydown areas; however due to the amount of recent rain, the long grass and the time of the site inspection (midday, risk of snakes), it became too dangerous and the inspection had to be cancelled.	Compliant
8 Special Conditions					
	E1	E1 Verification of mixing zone modelling			
491.	E1.1	E1.1 The licensee must engage a suitably qualified and experienced person(s) to prepare a Mixing Zone Verification Program.	S2-FGJV-EPA-LET-0008- Verification Mixing Zone Program: engagement of qualified person to prepare MZV Program; PA2551 EPL Verification - MAT Portal progress report - Rev A_KM	FGJV engaged Royal Haskoning DHV to prepare a Mixing Zone Verification Program.	Compliant
492.	E1.2	E1.2 At least 4 weeks prior to the first discharge of each of the sewage treatment plants and process water treatment plants, the licensee must submit a written plan for the Mixing Zone	Reference; PA2551	Mixing zone for PW and STPs for discharge via RO plant at Talbingo WTP: A draft PA2551 EPL Verification - MAT Portal progress	Not triggered

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
ENVIRONMENT PROTECTION LICENCE No 21266					
		<p>Verification Program to the EPA's Manager Regulatory Operations. The plan for the Mixing Zone Verification Program must include, but need not be limited to:</p> <ul style="list-style-type: none"> a) Sampling locations: Sampling locations must be comparable to the key locations identified in <i>Attachment F Waste and Process Water Mixing Zone Assessment</i> (7 February 2020) of the "Snowy 2.0 - Main Works - Response to Submissions Main Report - Appendix J Revised Water Management Report" and capture ambient water quality; b) Sampling frequency and duration: The frequency and duration of sampling must be adequate to capture the full range of receiving waterway conditions, including but not limited to, winds, current, temperature and rainfall, to allow modelling predictions under a range of scenarios to be verified; c) Sampling depth: Sampling must allow for variations at depth under a range of scenarios (i.e. thermal stratification); and d) Sampling parameters: The parameters must include, but need not be limited to: <ul style="list-style-type: none"> i. Total nitrogen; ii. Total phosphorus; iii. pH; iv. Biological Oxygen Demand; v. Nitrogen (ammonia); vi. Turbidity; and vii. Electrical Conductivity. 	<ul style="list-style-type: none"> - Sampling and Analysis Plan for the Talbingo HR Surge Shaft Process Water Treatment Plant, Final/P01.01, Date: 10 September 2021; - Sampling and Analysis Plan for the Talbingo Main Camp Water Treatment Plant, Final/P01.01, Date: 10 September 2021; - Sampling and Analysis Plan for the Talbingo Main Yard Process Water Treatment Plant, Final/P01.01, Date: 10 September 2021; - Sampling and Analysis Plan for the Talbingo Marica Camp Water Treatment Plant, Final/P01.01, Date: 10 September 2021; - Sampling and Analysis Plan for the Talbingo Portal Process Water Treatment Plant, Final/P01.01, Date: 10 September 2021; - Sampling and Analysis Plan for the Talbingo Exploratory - Camp Sewage Treatment Plant, Final/P01.01, Date: 10 September 2021; - Sampling and Analysis Plan for the Talbingo MAT Portal Process Water Treatment Plant, Final/P01.01, Date: 10 September 2021; - PA2551 EPL Verification - MAT Portal progress report - Rev A_KM (Draft). 	<p>report (Rev A_KM) is currently under development.</p> <p>There has been only one discharge of process water treatment plant, as a trial to verify the extent of the mixing zone of the combined discharged treated water. STP waters have not been discharged, only reused for dust suppression on project sites.</p>	
493.	E1.3	E1.3 Within 6 weeks of the first discharge from each sewage treatment plant and the process water treatment plants, the licensee must submit a written progress report for the Mixing Zone Verification Program to the EPA's Manager Regulatory Operations.		No discharge from STP yet, therefore this condition is not triggered.	Not triggered
494.	E1.4	E1.4 Upon completion of the Mixing Zone Verification Program (as per Condition E1.2 (b)), the licensee must submit a written final report detailing the results of the Mixing Zone Verification Program for each of the sewage treatment plants and process		No discharge from STP yet, therefore this condition is not triggered.	Not triggered

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		water treatment plants to the EPA's Manager Regulatory Operations – Regional South.			
495.	E1.5	<p>E1.5 The written progress report and final reports referred to in Condition E1.3 and E1.4 above must include, but need not be limited to:</p> <ul style="list-style-type: none"> a) a statement of the ambient NSW Water Quality Objectives (WQOs) of the receiving waters (Talbingo/Tantangara Reservoir) relevant to the discharge, including the associated indicators and guideline values or criteria for the identified environmental values; b) a description of the ambient water quality of Talbingo/Tantangara Reservoir in relation to the relevant WQOs, to determine whether the WQOs are being achieved; c) ambient conditions (e.g. currents, temperature, density, storage level and thermal stratification processes); d) discharge and release conditions including but not limited to: <ul style="list-style-type: none"> i. rate of discharge; ii. timing; iii. total volume; iv. water quality of discharge; e) a description of the mixing zone, including the extent and shape of the mixing zone; f) a comparison of point e. above with the modelled predictions from <i>Attachment F Waste and Process Water Mixing Zone Assessment</i> (7 February 2020) of the "Snowy 2.0 - Main Works - Response to Submissions Main Report - Appendix J Revised Water Management Report" including discussion of the mixing zone modelling and whether the relevant guideline values are being met at the edge of the near-field mixing zone; and <p>g) a continuous improvement plan for managing wastewater discharge over time, so as to reduce the extent and impact of the mixing zone.</p> <p><i>Note: This program has been developed to verify the modelled water quality impacts on the Talbingo and Tantangara reservoir of the proposed discharge of treated effluent from the sewage treatment and process water treatment plants. The EPA intends to use this information to refine discharge criteria in this licence.</i></p>		No discharge from STP yet, therefore this condition is not triggered.	Not triggered
496.	E2	E2 Correlation Assessment - Faecal Coliforms			
497.	E2.1	E2.1 The Licensee is permitted to undertake an assessment to trial the use of a membrane filtration method (in-field) for	Notice of Variation to Licence 21266 dated 14-Jan-2022 by EPA.	In the Notice of Variation to the EPL 21266 dated 14-Jan-2022, EPA noted that:	Not triggered

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
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		<p>monitoring of faecal coliforms in the field. The assessment must:</p> <ol style="list-style-type: none"> 1) Ensure that the in-field and laboratory samples are taken concurrently over a period of time that is sufficient to derive a statistically robust correlation between methods. Samples may be taken more frequently than the licence requires in order to achieve this if desired 2) Derive a statistical correlation between the membrane filtration method and the method currently used in compliance with the Approved Methods Publication 3) Ensure that appropriate quality control procedures are followed 4) Demonstrate the accuracy and reliability of the membrane filtration method; and <p>Provide recommendations on an appropriate frequency of monitoring for the membrane filtration method</p>		<p>E. On 14 October 2021 the EPA received a request from the Licensee to use an alternative method for testing faecal coliforms in the treated effluent from the sewage treatment plant, the process water treatment plant and the immediate receiving environment of Talbingo Reservoir.</p> <p>F. The EPA reviewed the supporting documentation and acknowledges the logistical constraints with monitoring faecal coliforms in compliance with the Approved Methods publication. The EPA considers it appropriate to include a correlation assessment as a special condition on the licence to compare the accuracy of the proposed alternative method with the method listed under the Approved Methods publication prior to approving the proposed method.</p> <p>As no discharge has occurred from any STP yet, this condition is considered "not triggered".</p>	
498.	E2.2	E2.2 The Licensee must provide a written report detailing compliance with the above requirements to the Manager Regulatory Operations Regional South following completion of the assessment.			Not triggered