

**Independent Environmental
Audit Report
Snowy Hydro 2.0 Segment
Factory CSSI 10034**

September 2021

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Independent Environmental Audit Report Snowy Hydro 2.0 Segment Factory CSSI 10034

September 2021

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1 Introduction

1.1 Background

Snowy Hydro Limited (SHL) commissioned Mott MacDonald Australia to undertake an Independent Environmental Audit (IEA) of the Snowy 2.0 Segment Factory in accordance with Schedule 4 Conditions of Consent (CoC) 7 of the Project Approval CSSI 10034 (the Approval).

The Approval for the project was granted on 31 March 2020 and operation commenced on the 18 June 2021. This was the first IEA for this development.

1.2 Snowy 2.0 Segment Factory

Snowy 2.0 involves linking Talbingo and Tantangara reservoirs within the existing Snowy Mountains Hydro-electric Scheme (Snowy Scheme) and building an underground power station between the two reservoirs. This will increase the current Snowy Scheme generation capacity by almost 50%. The increased quick-start generation and large-scale storage capacity provided by Snowy 2.0 will increase the security and reliability of the National Electricity Market.

The segment factory (The Project) is located on industrial-zoned land in the south-eastern corner of Polo Flat, which is an industrial area located to the east of Cooma. It contains a concrete batching plant (CBP), a building for the manufacture of precast concrete segments (the precast building), uncovered storage areas for segments, covered storage areas for concrete batching materials, vehicle parking areas and associated offices and workshops. Primary inputs for the segment factory include aggregate, sand, cement and rebar steel. Primary outputs include the segments which would be transported to the construction sites of Snowy 2.0 within Kosciusko National park (KNP).

WeBuild (formerly Salini Impregilo), Clough and Lane have formed the Future Generation Joint Venture (FGJV) and have been engaged to deliver both Stage 2 of Exploratory Works and Snowy 2.0 Main Works. This JV is also responsible for the establishment and operation of the segment factory.

Mott MacDonald Australia Pty Ltd have been engaged to undertake an Independent Environmental Audit (IEA) of the Snowy 2.0 Segment Factory to fulfil the requirements of CSSI 10034 Schedule 4 Condition of Consent (COC) 7.

The approval for the project was granted on the 31 March 2020 with full operation commencing in June 2021. This will be the first IEA for the for the Project and is within three months of the commencement of operation.

1.3 Audit Team

Table 1-1 **Error! Reference source not found.** provides the details of the Snowy Hydro and FGJV representatives. Table 1-2 provides details of the team. Additional people may be required for the opening meeting, closing meeting and interviews subject to audit requirements.

Table 1-1 Auditee Details

Name	Organisation
Proponent	Snowy Hydro Limited
Principal Contractor	Future Generation Joint Venture

Name	Organisation																
Project Name	Snowy 2.0 Segment Factory																
DPIE Approval Number	CSSI 10034																
Location	Polo Flat Road, Polo Flat																
Key Contacts (Name and position)	<table border="0"> <tr> <td>Chris Buscall</td> <td>Environmental Compliance Lead</td> </tr> <tr> <td>Ben Croome</td> <td>Senior Environmental Advisor</td> </tr> <tr> <td>Ellen Porter</td> <td>FGJV Environmental Approvals Coordinator</td> </tr> <tr> <td>Nathan Jones</td> <td>FGJV Environmental Coordinator</td> </tr> <tr> <td>Andrew Jones</td> <td>FGJV</td> </tr> <tr> <td>Bilal Khalid</td> <td>FGJV</td> </tr> <tr> <td>Marianne McCabe</td> <td>FGJV Community and Stakeholder Engagement Manager</td> </tr> <tr> <td>Mick Courtney</td> <td>FGJV Traffic and Transport Compliance Manager</td> </tr> </table>	Chris Buscall	Environmental Compliance Lead	Ben Croome	Senior Environmental Advisor	Ellen Porter	FGJV Environmental Approvals Coordinator	Nathan Jones	FGJV Environmental Coordinator	Andrew Jones	FGJV	Bilal Khalid	FGJV	Marianne McCabe	FGJV Community and Stakeholder Engagement Manager	Mick Courtney	FGJV Traffic and Transport Compliance Manager
Chris Buscall	Environmental Compliance Lead																
Ben Croome	Senior Environmental Advisor																
Ellen Porter	FGJV Environmental Approvals Coordinator																
Nathan Jones	FGJV Environmental Coordinator																
Andrew Jones	FGJV																
Bilal Khalid	FGJV																
Marianne McCabe	FGJV Community and Stakeholder Engagement Manager																
Mick Courtney	FGJV Traffic and Transport Compliance Manager																

Table 1-2: Audit Team

Name & Position	Audit Role
Greg Byrnes, Technical Director, Environment (Mott MacDonald)	Lead Auditor
Michael Allen, Technical Director, Acoustics (Mott MacDonald)	Technical Specialist Noise
Matthew Stephens, Technical Director, Transport (Mott MacDonald)	Technical Specialist Traffic
Sean Reilly, Principal Civil Engineer, Water (Mott MacDonald)	Technical Specialist Flooding

1.4 Audit Objectives

The objective of the IEA is to fulfil the requirements of CSSI 10034 Schedule 4 Conditions of Consent (CoC) 7. The overall focus of the IEA is to assess compliance with CSSI 10034 Conditions of Consent and the associated management plans. CSSI 10034 Schedule 4 CoC 7 is provided in Table 1-3.

Table 1-3: CSSI 10034 Schedule 4 CoC 7

Condition No	Requirement	IEA Reference
Schedule 4 COC 7	Within 3 months of commencing operation, and two years after commencing operation, unless the Planning Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must:	This Audit
(a)	be prepared in accordance with the relevant <i>Independent Audit Post Approval</i> requirements (DPE 2018);	2.1
(b)	be led and conducted by a suitably qualified, experienced and independent team of experts, including a traffic management expert, whose appointment has been endorsed by the Planning Secretary;	2.2
(c)	be carried out in consultation with the relevant agencies;	2.5.1
(d)	assess whether the development complies with the relevant requirements in this approval, and any strategy, plan or program required under this approval; and	2.4 Appendix A
(e)	recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this approval.	Chapter 4
	<p>Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Planning Secretary, a copy of the audit report must be submitted to the Planning Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Planning Secretary.</p>	

1.5 Audit Scope

The IEA scope is consistent with the requirements of section 3.3 of the NSW Department of Planning, Industry and Environment Independent Audit guidelines.

Schedule 3 and 4 of CSSI 10034 require the following management plans to be prepared, approved and implemented on the project. The implementation and adequacy of these plans will also form part of the IEA scope.

- S2-FGJV-ENV-PLN-0065–G–Segment Factory–Environmental Management Strategy.
- S2-FGJV-ENV-PLN-0068–G–Segment Factory–Flood Emergency Response Plan.
- S2-FGJV-ENV-PLN-0071–H–Segment Factory–Noise Monitoring and Management Plan
- S2-FGJV-LOG-PLN-0009-G-Segment Factory–Traffic Management Plan
- S2-FGJV-ENV-PLN-0079 –D– Segment Factory – Accommodation and Employment Strategy.

FGJV also hold an Environmental Protection Licence (EPL) 21419. The IEA scope will include compliance with the relevant conditions of this EPL.

1.5.1 Key documents with the audit scope

Snowy 2.0 Segment Factory environmental performance will be assessed against the key requirements of the following documents:

- S2-FGJV-ENV-PLN-0065–G–Segment Factory–Environmental Management Strategy.
- S2-FGJV-ENV-PLN-0068–G–Segment Factory–Flood Emergency Response Plan.
- S2-FGJV-ENV-PLN-0071–H–Segment Factory–Noise Monitoring and Management Plan
- S2-FGJV-LOG-PLN-0009-G-Segment Factory–Traffic Management Plan
- S2-FGJV-ENV-PLN-0079 –D– Segment Factory – Accommodation and Employment Strategy
- CSSI 10034 Conditions of Consent (31 March 2020)
- Environmental Protection Licence (EPL) 21419.

1.6 Audit Period

The Approval for the project was granted on 31 March 2020 and operation commenced on the 18 June 2021. This was the first IEA for this development. The IEA was conducted on the 26 and 27 August 2021 and was within three months of commencing operation.

2 Audit methodology

2.1 Audit approach

This IEA was undertaken in accordance with AS/NZS ISO 19011:2014 – *Guidelines for auditing management systems* and the *Independent Audit Post Approval requirements* (DPIE May 2020). SHL and the FGJV were cooperative and supportive throughout the IEA process.

This IEA was undertaken during August 2021 under the relevant COVID restrictions which impacted the conduct of the IEA. To minimise person to person contact:

- Most information requests and interviews were undertaken remotely, via teleconferencing.
- The final interviews and site inspection will be held in accordance with the *Snowy Hydro Protocols & Controls for Workers Travelling From COVID-19 Affected Areas (5 August 2021.)*

2.1.1 Audit Program

Table 2-1 **Error! Reference source not found.** provides the dates that each stage of the IEA.

Table 2-1 - IEA program

Stage	Details	Date
Consultation with Agencies	Contact agency stakeholders to inform IEA scope. Feedback incorporated into Audit Compliance Checklist	5 Aug 2021
Audit Plan submission	This Independent Environmental Audit Plan describes the objectives, criteria and scope of activities to be undertaken by the Auditor as part of the environmental audit process.	9 Aug 2021
Opening Meeting	Introduces the IEA team and provides details of IEA process and requirements	16 Aug 2021
Audit Compliance Checklist submission	Provides the IEA scope and compliance requirements. Identifies evidence requirements	20 Aug 2021
Desktop audit	Documentation provided as evidence of compliance is reviewed and the Audit Compliance Checklist updated.	17 – 26 Aug 2021
Audit interviews	Following the desk-top audit, interviews were conducted with SHL and FGJV personnel to determine compliance with audit scope. Where possible findings will be closed out or further evidence will be requested.	26 Aug 2021
Site inspection	The site inspection will be undertaken to identify compliance site related requirements of the audit scope	27 Aug 2021
Closing meeting	The closing meeting will provide a brief summary of the audit findings and if any further evidence is required. It will also identify any issues that require urgent attention.	2 Sept 2021
Draft Audit Report issue	The Draft Audit Report will provide a summary of the audit methodology, findings and compliance.	24 Sept 2021
Draft Audit Report review (Snowy Hydro and FGJV)	SHL and FGJV Draft Audit Report review	24- 30 Sept 2021
Final Audit Report issue	Final Audit report submitted to DPIE in accordance with <i>Independent Audit, Post Approval Requirements</i>	

2.2 Audit team

The Independent Environmental Auditor, Greg Byrnes is supported by a number of technical specialists. These technical specialists were utilised to prepare the IEA scope, identify best practise improvement opportunities and assist with determining compliance. The technical specialists are listed in Table 2-2 below:

Table 2-2 – Audit team

Audit Team	Qualifications and experience
Greg Byrnes – Lead Auditor	<ul style="list-style-type: none"> ● BE (Environmental) ● MEnvLaw ● Exemplar Global Environmental Auditor. <p>Greg has over 20 years' experience in environmental management in major infrastructure assessment, construction and operation. He specialises in corporate environmental management, team leadership, environmental auditing, environmental impact assessments and sustainability.</p> <p>Greg has managed all environmental aspects of the planning, construction and operation of linear infrastructure projects. The scale and sensitivity of some of these projects required significant engagement with government stakeholders as well as community groups. He is registered with Exemplar Global as an Environmental Auditor and has been conducting audits on infrastructure projects in NSW, South Australia, Queensland and Victoria.</p>
Michael Allen – noise and vibration	<ul style="list-style-type: none"> ● BE Mech <p>Acoustic engineer with over 15 years' experience in the airborne noise, ground-borne noise, and vibration. Diverse experience in the assessment of impacts and specification of mitigation solutions for a wide range of transport infrastructure systems</p>
Matthew Stephens – traffic and access management	<ul style="list-style-type: none"> ● Masters of Transport Management, University of Sydney, 1994 ● Civil Engineering Certificate, Sydney College of TAFE, 1987 <p>Traffic and transport planner with over 30 years' industry experience spanning both the public and private sectors. Involved in the planning, design and delivery of some of NSW largest transport infrastructure projects, including Northconnex, Westconnex, North-West Metro, Sydney CBD Metro, Westlink M7 and numerous Pacific Highway and Hume Highway upgrade projects.</p>
Sean Reilly – flood management	<ul style="list-style-type: none"> ● <i>Bachelor of Engineering, University of Technology Sydney</i> <p>Sean is an experienced manager and designer with 13 years of experience. Sean specialises in stormwater management and has experience across the development of designs from concept through to construction phases including preliminary studies, tender submissions, concept design, detailed design, peer reviews and technical advisory roles.</p>

2.3 Independent Audit scope development

Following the completion of the IEA, a Draft Audit Report was sent to the Principal's Authorised Person and the D&C Contractor for review. An Audit Report will then be completed and provided to the Principal's Authorised Person following acceptance of the Audit Summary findings. Any adverse or non-conforming activities requiring corrective action will be submitted as a Corrective Action Request in a clear and concise manner with supporting audit evidence.

2.4 Compliance Evaluation

The compliance status of each requirement detailed in the Audit Compliance checklist will be determined using the relevant descriptors below, in accordance with Department of Planning

Industry and Environment (DPIE) *Independent Audit, Post Approval Requirements (IAPAR), June 2018*. In accordance with the IAPAR, Table 2-3 provides the descriptors used to define the compliance status of each compliance requirement in the Audit Compliance Checklist (Appendix A) and their meanings.

As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the project. Any observations or notes are in addition to the compliance status descriptor assigned to each compliance requirement, limited to the descriptors listed in Table 2-3 .

Table 2-3: Compliance Status descriptors

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.

For transparency, where SHL and the FGJV were not able to provide sufficient verifiable evidence to demonstrate compliance or non-compliance, a determination was made by the auditor based on available information and a “limitation of compliance status” was recorded.

The compliance status was attained by assessing a representative sample of documents, records and data for each requirement. Observations on site targeted areas of higher risk and were assumed to be representative of Snowy Hydro Limited performance across the project. The compliance status is detailed in the Audit checklist provided in Appendix A.

2.4.1 Site Interviews

During the desk-top review, audit interviews were conducted with SHL and FGJV personnel to further assess compliance with the audit scope outlined in section 1.5. Where possible findings were closed out or further evidence was sought. Documentary evidence was sought to verify responses provided by the SHL and FGJV. Interviews were held with the project representatives listed in Table 2-4.

Table 2-4 – Audit Interviews

Project Representative	Position
Chris Buscall	SHL Environmental Compliance Lead
Ben Croome	SHL Senior Environmental Advisor
Ellen Porter	FGJV Environmental Approvals Coordinator
Nathan Jones	FGJV Environmental Coordinator
Marianne McCabe	FGJV Community and Stakeholder Engagement Manager
Mick Courtney	FGJV Traffic and Transport Compliance Manager

2.4.2 Site Inspection

A site inspection was held on the 27 August 2021 to further assess compliance with the audit scope outlined in section 1.5. During the site inspection the auditor was accompanied by

Nathan Jones, FGJV Environmental Coordinator and Chis Buscall SHL Environmental Compliance Lead. Photos collected during the site inspection are provided in Appendix E.

The site inspection aimed to determine compliance with the site related commitments in the audit scope detailed in section 1.5 and the following:

- controls nominated in the management plans were implemented on site
- effectiveness of environmental controls
- impact of the facility on the environment
- verify responses provided by SHL and contractor personnel.

2.5 Consultation

2.5.1 Agency Consultation

The audit scope has been developed in consultation with the relevant agencies, including National Parks and Wildlife, Snowy Monaro Regional Council, Environmental Protection Agency, Office of Environment and Heritage and Department of Environment, Industry and Environment. Agency consultation is summarised in Section 3.7 and Appendix C

Table 2-5 below details the stakeholders that were contacted via email on the 5 August 2021 for input into the audit scope. Note: Katrina O'Reilly was not listed as a project stakeholder by SHL until the 18 August 2021.

Table 2-5: Agency Contacts

Agency	Name	Position	Contact date
Snowy Monaro Regional Council	Gary Shakespeare	Manager infrastructure	5 Aug 2021
Snowy Monaro Regional Council	Jeff Morgan	Chief Operating Officer	5 Aug 2021
Snowy Monaro Regional Council	John Gargett	Planning Manager	5 Aug 2021
Transport for NSW	Andrew Lissenden	Development Case Officer	5 Aug 2021
EPA	Carlie Armstrong	Compliance Officer	5 Aug 2021
DPIE	Katrina O'Reilly		19 Aug 2021

2.5.2 Opening and closing meeting

The opening meeting was held on the 19 August 2021. The attendees and items covered during the meeting are provided in Table 2-6. The closing meeting was held on the 2 September 2021. The attendees and items covered during the meeting are provided in Table 2-7.

Table 2-6: Opening meeting

Attendee	Items covered
Greg Byrnes – Independent Environmental Auditor	Introductions
Ben Croome - SHL Senior Environmental Advisor	Project Update
Chris Buscall - SHL Environmental Compliance Lead	Audit objectives
Nathan Jones FGJV Environmental Coordinator	Audit scope
Ellen Porter - FGJV Environmental Approvals Coordinator	Covid restrictions and approvals
Andrew Jones - FGJV	Audit program

Table 2-7: Closing meeting

Attendee	Items covered
Greg Byrnes – Independent Environmental Auditor	Audit Findings
Ben Croome - SHL Senior Environmental Advisor	Non-Compliances
Nathan Jones FGJV Environmental Coordinator	Audit Program update
Ellen Porter - FGJV Environmental Approvals Coordinator	

3 Audit Findings

3.1 Approval and document list

All documents reviewed as part of the audit are referenced in the “Evidence Provided” column of the Audit Compliance Checklist provided in Appendix A. Snowy 2.0 Segment Factory environmental performance was assessed against the key requirements of the following documents:

- S2-FGJV-ENV-PLN-0065–G–Segment Factory–Environmental Management Strategy.
- S2-FGJV-ENV-PLN-0068–G–Segment Factory–Flood Emergency Response Plan.
- S2-FGJV-ENV-PLN-0071–H–Segment Factory–Noise Monitoring and Management Plan
- S2-FGJV-LOG-PLN-0009-G-Segment Factory–Traffic Management Plan
- S2-FGJV-ENV-PLN-0079 –D– Segment Factory – Accommodation and Employment Strategy
- CSSI 10034 Conditions of Consent (31 March 2020)
- Environmental Protection Licence (EPL) 21419.

3.2 Compliance performance

An assessment of compliance was undertaken for each of the audit scope detailed in section 1.5 and a summary of the compliance status is presented in Table 3-1. Compliance was assessed using the compliance status descriptors in Section 2.4 of this report. Where a CoC, EPL condition or management plan commitment has multiple requirements they have been separated.

Table 3-1 – Compliance summary

Audit Scope	Compliant	Non-Compliant	Not Triggered
CSSI 10034 Conditions of Consent (31 March 2020)	50	4	11
Environmental Protection Licence (EPL) 21419	35	0	18
Environment Management Plans	53	1	4

Overall, SHL the FGJV demonstrated a high level of compliance with the project approval, associated management plans and the EPL. The implementation of these requirements on site was also observed as high.

The Audit checklist included in Appendix A provides further details on audit compliance performance. The detailed assessment against each of these documents is provided in Appendix A.

3.3 Summary of agency notices, orders, penalty notices or prosecutions

No agency notices, orders, penalty notices or prosecutions were recorded in the audit period.

3.4 Non-compliances

Table 3-2 provides details of the four non-compliances recorded against the CSSI 10034 Conditions of Consent. A further non-compliance was recorded against the commitments in the

Segment Factory-Environmental Management Strategy (Revision G). However, this non-compliance is linked to the Schedule 4 Condition 2 (b) non-compliance and has not been recorded as an additional NC. Further details are provided in Table 3-3.

. No non compliances were recorded against the EPL 21419.

Table 3-2 - CSSI 10034 Conditions of Consent compliance

Non-Conformance ID	Condition	Requirement	Audit Finding
NC 1	Schedule 2 Condition 9	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 Building Code of Australia.	SHL are negotiating with DPIE to get this condition clarified. On the date of the audit the requirements of the condition have not been achieved.
NC 2	Schedule 4 Condition 2 (b)	The Proponent must: (b) review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 1 month of the: * submission of an incident report under condition 5 of Schedule 4; * submission of an audit report under condition 7 of Schedule 4; or * any modification to the conditions of this approval.	All plans have been updated for operation in June 2021 and submitted to DPIE. Letter received from DPIE sighted and provided as evidence. However, all four plans were not reviewed following the incident triggered under condition 5 of Schedule 4; on the 7 August 2020.
NC 3	Schedule 4 Condition 6	Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department in writing via the Major Projects Portal. The notice must identify the development (including the development application number), the relevant condition of approval, the way in which the development does not comply, the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	The External Agency Notification Report (S2-FGJV-ENV-FRM-0015 meets the requirements of the condition. However, the Incident occurred on the 5 August 2021 and Notification on the Major Project Portal occurred on the 17 August 2021.
NC 4	Schedule 4 Condition 8	The Proponent must: (a) make the following information publicly available on its website as relevant to the stage of the development: * the EIS; * the final layout plans for the development; * current statutory approvals for the development. * approved strategies, plans or programs required under the conditions of this approval. * the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged. □*how complaints about the development can be made; * a complaints register; *compliance reports; * any independent environmental audit, and the Proponent's response to the recommendations in any audit; and * any other matter required by the Planning Secretary; and (b) keep this information up to date.	The proponent is Snowy Hydro. Therefore, the SHL website must contain each of the items listed in Schedule 4 condition 8: The complaint register is not on the website therefore a non-conformance has been recorded

Table 3-3 - Segment Factory-Environmental Management Strategy compliance

Non-Conformance ID	Condition	Requirement	Audit Finding
NC 1	S2-FGJV-ENV-PLN-0065 - G - Segment Factory-Environmental Management Strategy Section 1.7.1	If an incident report under condition 5 of schedule 4 has occurred the EMS and associated sub plans must be reviewed	All plans have been updated for operation in June 2021 and submitted to DPIE. Letter received from DPIE sighted and provided as evidence. However, the plans were not reviewed following the incident triggered under condition 5 of Schedule 4; on the 7 August 2020.

3.5 Previous audit recommendations

No previous independent environmental audits have been undertaken on the Project.

3.6 EMS and Sub-plans

A high-level review of the following management plans was undertaken as part of the IEA.

- S2-FGJV-ENV-PLN-0065–G–Segment Factory-Environmental Management Strategy.
- S2-FGJV-ENV-PLN-0068–G–Segment Factory–Flood Emergency Response Plan.
- S2-FGJV-ENV-PLN-0071–H–Segment Factory–Noise Monitoring and Management Plan
- S2-FGJV-LOG-PLN-0009-G-Segment Factory–Traffic Management Plan
- S2-FGJV-ENV-PLN-0079 –D– Segment Factory – Accommodation and Employment Strategy

The plans addressed the project environmental risk and were found to meet the requirements of the relevant CoC. Three minor amendments were recommended for the Segment Factory–Noise Monitoring and Management Plan (revision H). Section 1.7.1 of the Segment Factory-Environmental Management Strategy requires the management plans to be reviewed following an incident triggered under condition 5 of Schedule 4. This was not completed, and a non-compliance was recorded and is detailed in Appendix A and section 3.4.

3.7 Consultation outcomes

The stakeholders listed in section 2.5 were notified about the upcoming audit and asked to contribute to the audit scope. The outcomes of the consultation are summarised in Table 3-4 and Appendix C.

Table 3-4 Agency Consultation summary

Agency	Name	Response summary	Auditor Response
Snowy Monaro Regional Council	Gary Shakespeare	No response	
Snowy Monaro Regional Council	Jeff Morgan	Replied via email. Requested the Segment Factory – Accommodation and Employment Strategy to be part of the IEA scope.	The Accommodation and Employment Strategy was added to the audit scope
Snowy Monaro Regional Council	John Gargett	No response	

Transport for NSW	Andrew Lissenden	Replied via email on the 26/8/2021 requesting a number of traffic and transport related CoC to be included in the audit.	All relevant traffic and transport CoC were included in the audit, including the ones referenced in the email from TfNSW. Compliance is summarised in Appendix A.
EPA	Carlie Armstrong	Responded via email on the 5/8/2021 acknowledging that the audit scope satisfies the EPA	Noted
DPIE	Katrina O'Reilly	Responded via a phone call to the auditor requesting the following to be included in the IEA scope: <ul style="list-style-type: none"> • traffic records • truck movements not impacting local roads • noise monitoring • complaints management • vegetation exclusion fencing. 	All relevant CoC were included in the audit, including the ones requested by DPIE. The audit focused on areas highlighted by DPIE. Compliance is summarised in Appendix A.

3.8 Complaints

SHL and FGJV have an adequate complaints management system in place that meets the requirements of the project approval and EPL. The complaints number is on Project Website, it is answered by the FGJV reception during business hours complaints go to Sydney Reception and during after-hours calls go to the Community and Stakeholder Engagement Manager. All community notification letters contain all the project contact information.

No complaints have been received during the operation of the Segment Factory. However, one complaint, received in April 2021 was provided as evidence that the compliant management system was compliant with the project approval and EPL.

3.9 Incidents

An incident occurred on the 5 August 2021 that was not complaint with the construction hours listed in EPL condition L2.1 and L2.2 (superseded EPL) and schedule 2 Condition 5 of the CoC. The incident involved a concrete pour outside of the approved construction hours. The incident management process is robust, and the actions identified to avoid a reoccurrence were adequate.

The incident was reported to the EPA via the Environmental Line service on 131 555 in accordance with EPL condition R2.1 and R2.2. The Environmental Investigation Report into the Out of Hours non-conformance at the Polo Flat Segment Factory was issued to the EPA via email on the 11 August 2021. The incident management and reporting process is robust and meets the requirements of the EPL.

Schedule 4 condition 6 requires the Proponent to notify the Department in writing via the Major Projects Portal within seven days of non-compliances with the CoC. This incident occurred on the 5 August 2021 and Notification on the Major Project Portal occurred on the 17 August 2021. This has been recorded as NC 3.

3.10 Site inspection

A site inspection was undertaken on the 27 August 2021. The inspection covered the following areas:

- Segment storage area

- Refuelling area
- Water Treatment plant
- Materials storage area
- Segment factory production
- Stormwater detention basin
- Drainage channels
- Site access roads
- Flora exclusion zones
- Batch plant
- Power generators and fuel storage
- Chemical storage
- Wheel wash

The Segment factory and surrounding site is well set up. Plant and equipment were observed to be in a new and well-maintained condition. Significant investment has occurred to make the safe and minimise environmental impact. No non compliances were recorded during the site inspection.

A photographic record of the site inspection is presented I Appendix F.

3.11 Key strengths

Overall, the project is performing well and operating in accordance with the project approval, EPL and EMS. The four non-compliances identified during the audit were administrative. SHL and the FGJV have invested extensively in the environment and safety performance of the Project, this will allow a high level of environment performance to be achieved when the Segment Factory is fully operational.

The project is implementing a commendable local employment strategy, with work experience students observed during the site inspection. The Segment Factory is only operating at 50% capacity.

The transport of segments is a risk to the Project from both a scheduling and community perspective. The FGJV has developed a comprehensive heavy vehicle training program and management strategy that should reduce the risk of schedule and community impacts when the Segment production reaches full capacity.

4 Recommendations

Recommendations to address non-compliances and opportunities for improvement identified during this audit are presented in Table 4-1 and Table 4-2, respectively. In accordance with Schedule 4 Condition 7 of the Approval, SHL is required to submit a response to any recommendations contained in the audit report.

4.1 Non-compliances

Table 4-1: CoC Non Compliance Recommendations

Non-Conformance ID	Condition	Requirement	Audit Finding	Recommendation
NC 1	Schedule 2 Condition 9	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 Building Code of Australia.	SHL are negotiating with DPIE to get this condition clarified. On the date of the audit the requirements of the condition have not been achieved.	Continue to negotiate with DPIE to get the condition clarified.
NC 2	Schedule 4 Condition 2 (b)	The Proponent must: (b) review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 1 month of the: * submission of an incident report under condition 5 of Schedule 4; * submission of an audit report under condition 7 of Schedule 4; or * any modification to the conditions of this approval.	All plans have been updated for operation in June 2021 and submitted to DPIE. Letter received from DPIE sighted and provided as evidence. However, all four plans were not reviewed following the incident triggered under condition 5 of Schedule 4; on the 7 August 2020.	Review and, if necessary, revise the plans required under this approval based on the 7 August incident actions. Moving forward, develop a management plan review process that includes the triggers for revision of strategies, plans and programs. Document this process in the EMS. Ensure all environment and quality team members from SHL and the FGJV are aware of this process.
NC 3	Schedule 4 Condition 6	Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department in writing via the Major Projects Portal. The notice must identify the development (including the development application number), the relevant condition of approval, the way in which the development does not comply, the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	The External Agency Notification Report (S2-FGJV-ENV-FRM-0015) meets the requirements of the condition. However, the Incident occurred on the 5 August 2021 and Notification on the Major Project Portal occurred on the 17 August 2021.	A system needs to be in place to ensure this administrative oversight is not repeated. Develop a Regulator notification process for incidents and non-compliances. This process needs to be socialised and include with actions, timelines and responsibilities.
NC 4	Schedule 4 Condition 8	The Proponent must: (a) make the following information publicly available on its website as relevant to the stage of the development: * the EIS; * the final layout plans for the development; * current statutory approvals for the development;	The proponent is Snowy Hydro. Therefore, the SHL website must contain each of the items listed in Schedule 4 condition 8: The complaint register is not on the website therefore a non-conformance has been recorded	Update the Proponent website with all the information listed in Schedule 4 Condition 8. Undertake regular internal reviews of the Project website to ensure the required information is up to date and accurate.

<p>* approved strategies, plans or programs required under the conditions of this approval;</p> <p>* the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</p> <p><input type="checkbox"/> *how complaints about the development can be made;</p> <p>* a complaints register;</p> <p>* compliance reports;</p> <p>* any independent environmental audit, and the Proponent's response to the recommendations in any audit; and</p> <p>* any other matter required by the Planning Secretary; and</p> <p>(b) keep this information up to date.</p>
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Table 4-2: EMS Non-Compliance Recommendations

Non-Conformance ID	Condition	Requirement	Audit Finding	
NC 1	S2-FGJV-ENV-PLN-0065 – G – Segment Factory-Environmental Management Strategy Section 1.7.1	If an incident report under condition 5 of schedule 4 has occurred, the EMS and associated sub plans must be reviewed	All plans have been updated for operation in June 2021 and submitted to DPIE. Letter received from DPIE sighted and provided as evidence. However, the plans were not reviewed following the incident triggered under condition 5 of Schedule 4; on the 7 August 2020.	Review and, if necessary, revise the plans required under this approval based on the 7 August incident actions. Moving forward, develop a management plan review process that includes the triggers for revision of strategies, plans and programs. Document this process in the EMS. Ensure all environment and quality team members from SHL and the FGJV are aware of this process.

4.2 Opportunities for improvement

During the audit opportunities for improvement have been identified where SHL and FGJV has substantively met the relevant requirement however an improvement opportunity has been identified.

The improvement opportunities are presented in

Improvement Opportunity ID	Condition	Improvement opportunity
IO 1	S2-FGJV-ENV-PLN-0065 - G - Segment Factory-Environmental Management Strategy Section 4.1.7	The FGJV presented an erosion and sediment control plan (ESCP) for the Project, However, it was not a representation of the current site layout and should be updated.
IO 2	S2-FGJV-ENV-PLN-0065 - G - Segment Factory-Environmental Management Strategy Section 4.1.7	Environmental risk evolves as the project changes and the risk register should be reviewed to address these changes. A schedule of regular reviews should be put in place and documented in the EMS.
IO 3	S2-FGJV-ENV-PLN-0065 - G - Segment Factory-Environmental Management Strategy Section 4.1.7	Remove redundant erosion and sediment control on site, especially sed fences.
IO 4	EPL L3.1 CoC Schedule 3 Condition 12	<p>The noise monitoring that was undertaken in June 2021 meets the requirements. However, 15 minute measurements can be considered representative if evidence is provided that identifies during the time of measurement, typical site activities were taking place. The site reports do not appear to provide this information. In future it is recommended to undertake noise monitoring for longer periods and note what site activities were being undertaken at the time.</p> <p>When the measured noise level is higher the criteria, compliance is difficult to confirm. The FGJV should measure the noise coming from the site and determine what the contribution is at the source. The alternative way is to measure the noise in close proximity to the source and calculate back to the measurement location. This should then be validated with measurements at the receiver location.</p>
IO 5	EPL E1.1	<p>Wilkinson Murray have been engaged by the FGJV to verify the air quality impacts identified in the modelling undertaken in the Air Quality Impact Assessment.</p> <p>As of the 26/8/2021 the Verification Study has not been completed. It is recommended that a letter be issued to the EPA requesting an extension due to the Segment Factory not operating at full capacity and therefore a Verification Study would not be representative.</p>

Appendix A - Audit Compliance checklist

CSSI 10034 Conditions of Consent (31 March 2020)

Item	
Project Name:	Snowy Hydro 2.0 Segment Factory
Auditee:	Snowy Hydro Limited & FGJV
Auditor:	Mott MacDonald
Audit Details:	Environmental Audit
TeamBinder Reference:	

Result	Comment
NC	Non complaint (NC)
C	Complaint
NT	Not Triggered
Closed	Closed (C) - No action required.

Reference (Clause or Paragraph)	Requirement	Evidence Provided / Comments	Result	Audit Findings
CSSI 10034 Conditions of Consent Schedule 2 - ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT	1	In meeting the specific environmental performance criteria established under this approval, the Proponent must prevent and/or minimise any material harm to the environment that may result from the construction, operation or decommissioning and rehabilitation of the development	C	Snowy Hydro Limited (SHL) and the FGJV has effectively implemented the project's Environmental Management Strategy (EMS) and associated management plans, which outline reasonable and feasible environmental management measures. Areas of improvement or non-compliance identified in this audit have not resulted in material harm.
TERMS OF APPROVAL	2	The Proponent must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this approval.	C	The proponent is carrying out the operation of the Development in general accordance with the EIS and Conditions of consent. This audit assessed the implementation of the EMS and associated management plans, to the extent outlined in this table, and confirmed that the development has been carried out generally in accordance the EIS. However, three Non-Compliances were recorded against: Schedule 4 CoC 4 - Revision of Strategies, Plans and Programs Schedule 4 CoC 6 - Non-Compliance Notification Schedule 4 CoC 8 - Access to Information
	3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency.	NT	
	4	The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: (a) any strategies, plans or correspondence that are 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.	C	DPIE has reviewed and endorsed all plans and programs required by this approval.

LIMITS OF APPROVAL	5	Apart from the exemptions in Condition 6 below, the Proponent may only carry out construction during the hours listed in Table 1 Monday to Saturday: 7 am to 6 pm	External Agency Incident Notification Form – Polo Flat CSSI 10034	C	During the audit no construction works were observed to be occurring outside the hours stated in this condition. An incident occurred on the 5 August 2021 that was not compliant with the construction hours listed in schedule 2 Condition 5. This incident was reported to DPIE. It was also investigated, and actions implemented to ensure a repeat incident does not occur.
	6	The Proponent may carry out the following construction works outside the hours listed in Condition 5: (a) works that are inaudible at the nearest sensitive receivers; (b) works agreed to in writing by the Planning Secretary; (c) the delivery of materials required by the NSW Police Force or other authorities for safety reasons; or (d) works required in an emergency to avoid environmental harm, the loss of life, or property damage.		NT	
LAPSE OF APPROVAL	7	This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.		NT	
WORK AS EXECUTED PLANS	8	Prior to commencing operation, the Proponent must submit work as executed plans of the development to the Department.	Letter with plans attached issued to DPIE on the 29 March 2021	C	
STRUCTURAL ADEQUACY	9	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 Building Code of Australia.	Construction and occupation certificates have not been received by SHL	NC	SHL are negotiating with DPIE to get this condition clarified. On the date of the audit their requirements of the condition have not been achieved.
DEMOLITION	10	The Proponent must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.		NT	
PROTECTION OF PUBLIC INFRASTRUCTURE	11	Unless the Proponent and the applicable authority agree otherwise, the Proponent must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.		NT	
OPERATION OF PLANT AND EQUIPMENT	12	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; and (b) operated in a proper and efficient manner.	Verified during site inspection	C	All Plant and equipment observed during the site inspection was found to be in good working order. Most plant and equipment was new.
CSSI 10034 Conditions of Consent Schedule 3 - SPECIFIC ENVIRONMENTAL CONDITIONS					
TRAFFIC	Road Upgrades 1	The Proponent must complete the following road works (see figure in Appendix 2) to the satisfaction of Council: (a) construct the site access road and its intersection with Polo Flat Road as a basic right (BAR) turn treatment and basic left (BAL) turn treatment prior to commencing operation; (b) pavement strengthening works on Polo Flat Road from the Monaro Highway intersection to the site access road prior to transporting concrete segments from the site; These works must comply with the relevant requirements in the Austroads Guide to Road Design (as amended by TfNSW supplements). If there is a dispute in the scope of the pavement strengthening works, then either party may refer the matter to the Planning Secretary for resolution.		C	All roads have been upgraded in accordance with the condition and acceptance from Snowy Monaro Council has been received

TRAFFIC	Road Upgrades 2	Prior to transporting concrete segments from the site, the Proponent must install temporary traffic signals at the Snowy Mountains Highway/Bombala Street intersection to the satisfaction of TfNSW.	Confirmed during site inspection. See photo	C	Confirmed during site inspection. See photo
TRAFFIC	Road Maintenance 3	The Proponent must do the following to the satisfaction of Council: (a) prepare a dilapidation survey of Polo Flat Road, in accordance with guidelines and standards established by Austroads: * prior to the commencement of any construction works; * within 2 months of the cessation of operation; (b) rehabilitate and/or make good any development-related damage to Polo Flat Road: * identified during the carrying out of construction and/or operation if it could endanger road safety, as soon as possible after the damage is identified, but within 7 days at the latest; and * identified in the dilapidation survey carried out following the cessation of operations within 2 months of the completion of the survey, unless Council agrees otherwise. If there is a dispute in 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.	Polo Flat Road Dilapidation Survey dated 21/4/2020 sighted during audit.	C	The dilapidation survey has been completed. Rehabilitation of Polo Flat Road will be completed as required and at the completion of the project.
TRAFFIC	Heavy Vehicle Restrictions 4	Unless the Planning Secretary agrees otherwise, the Proponent must only use Performance Based Standards (PBS) vehicles to transport concrete segments from the site.	S2-FGJV-LOG-PLN-0009-G-Segment Factory–Traffic Management Plan	C	Current vehicles are not PBS vehicles. Section 3.4 of the TMP, approved by DPIE, includes the use flatbed semi-trailer
TRAFFIC	Heavy Vehicle Restrictions 5	All heavy vehicles associated with the development must use the designated heavy vehicle routes in Cooma, including the Monaro Highway, Polo Flat Road and the Snowy Mountains Highway (see the figure in Appendix 3).	Based on observations all heavy vehicles use the designated heavy vehicle routes in Cooma, including the Monaro Highway, Polo Flat Road and the Snowy Mountains Highway	C	All heavy vehicle drivers have been through the Project Induction and site induction. The Site Induction has the haulage routes. Site induction records to be provided. All management plans are referenced in the Sub Contractor Agreements, including the haulage companies.
TRAFFIC	Heavy Vehicle Restrictions 6	Heavy vehicles associated with the development must not use the southern end of Polo Flat Road containing the timber rail bridge, between Sale Yards Road and the Monaro Highway.	Based on observations all heavy vehicles are use the designated heavy vehicle routes in Cooma, including the Monaro Highway, Polo Flat Road and the Snowy Mountains Highway	C	All heavy vehicle drivers have been through the Project Induction and site induction. The Site Induction has the haulage routes. Site induction records to be provided. All management plans are referenced in the Sub Contractor Agreements, including the haulage companies.
TRAFFIC	Heavy Vehicle Restrictions 7	The Proponent must: (a) not receive raw material deliveries by heavy vehicles to the site between the hours of 10pm and 5am; (b) ensure that the development does not generate more than: * 175 heavy vehicle movements during the day and evening; and * 45 heavy vehicle movements transporting finished segments from the site during the night on the public road network; (c) ensure that the length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 27 metres; unless the Planning Secretary agrees otherwise.	Front gate logs were inspected during the audit	C	(a) This requirement is enforced by the sub-contractor agreements, the Segment factory gate is locked, Borals EPL only allows daytime operation. (b) Front gate logbooks record all heavy vehicle movements. Daily Log from front gate provided and records register provided and sighted. (c) The longest vehicle used is the PBS is 26.5m as described in Fig of the TMP
TRAFFIC	Heavy Vehicle Restrictions 8	The Proponent must keep accurate records of the number of heavy vehicles entering or leaving the site for the duration of the development.	Front gate logs were inspected during the audit	C	Front gate logbooks record all heavy vehicle movements. Daily Log from front gate provided and records register provided and sighted.

TRAFFIC	Operating Conditions 9	The Proponent must: (a) minimise the road traffic noise of the development; (b) construct all internal roads on site as all-weather roads; (c) provide sufficient parking on site for all vehicles, and ensure vehicles associated with the development do not park on the surrounding public road network; (d) ensure all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) ensure all heavy vehicles leaving the site are in a clean condition, and do not track dirt onto the public road network or spread weeds into the Kosciuszko National Park.	Verified during site inspection	C	The project is operating in accordance with CoA 9 (a) to (d). The site is set up well with consideration of traffic and noise impacts. To ensure compliance with CoA 9 (e) the site gate is managed by full time security guards and all vehicles are directed through a wheel wash prior to leaving the site
TRAFFIC	Traffic Management Plan 10	Prior to the commencement of construction, the Proponent must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include: (a) a schedule for avoiding peak traffic periods and conflicts with other road users, including: * minimising potential for conflict with peak winter traffic, school buses and other motorists as far as practicable; * scheduling haulage vehicle movements to minimise convoy length or platoons; * a traffic management system for managing over-dimensional vehicles;	All addressed in the S2-FGJV-LOG-PLN-0009-G-Segment Factory–Traffic Management Plan	C	The TMP meets the requirements of the condition and has been endorsed by DPIE
TRAFFIC	Traffic Management Plan 10	(b) measures to maintain road safety and network efficiency, including: * temporary traffic controls, including detours and signage; * measures to minimise the cumulative traffic impacts of the development and the Snowy 2.0 Main Works project; * measures to maintain safety for other road users and pedestrians in the Cooma town centre; * heavy vehicle salvage plans or protocols, including measures to inform road users of any incidents, delays and/or alternative routes; * details of any employee shuttle bus service and measures to encourage employee use of this service; * responding to any emergency repair or maintenance requirements; and * responding to local climate conditions that may affect road safety;	S2-FGJV-LOG-PLN-0009-G-Segment Factory–Traffic Management Plan. All drivers undergo project induction and sign on to the Driver Code of Conduct. Gate security manage trucks leaving the site. Induction records have been provided as evidence	C	All drivers undergo project induction and sign on to the Driver Code of Conduct. Gate security manage trucks leaving the site.
TRAFFIC	Traffic Management Plan 10	(c) measures to minimise noise from development-related traffic, including but not limited to: * limits on truck engine braking on Polo Flat Road and through Cooma; * notifying the local community about development-related traffic impacts; * procedures for receiving and addressing complaints from the community about development-related traffic and noise;	Driver Code of Conduct covers 10 (c) and is included in the Site Induction. Induction records from the 16 to the 31 July 2021 provided and sighted as evidence. A community complaint from the 21 May 2021 was reviewed during the audit and provided as evidence	C	Extensive training is provided to drivers to ensure compliance with this condition. A complaints management system is in place. The community is notified on a quarterly basis of project activities
TRAFFIC	Traffic Management Plan 10	(d) a driver's code of conduct that addresses: * travelling speeds; * driver fatigue; * procedures to ensure that drivers adhere to the designated heavy vehicle routes; * procedures to ensure that drivers implement safe driving practices; and	. Induction records provided and sighted as evidence.	C	Driver Code of Conduct covers 10 (d) and is included in the Site Induction
TRAFFIC	Traffic Management Plan 10	(e) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan;	Induction records provided and sighted as evidence.	C	Driver Code of Conduct covers 10 (e) and is included in the Site Induction.
TRAFFIC	Traffic Management Plan 10	(f) measures to minimise dirt and weeds being tracked onto the public road network.	Verified during site inspection. See photos	C	A wheel wash was observed to be in operation during the site inspection. The site was also cleared of vegetation and sealed with asphalt or compacted road base
NOISE	Construction 11	The Proponent must minimise the construction noise of the development in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version.		NT	

NOISE	Operational Noise Limits 12	<p>The Proponent must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2:</p> <p><i>Table 2 Noise Limits dB(A)</i></p> <table border="1" data-bbox="661 289 1389 432"> <thead> <tr> <th>Location</th> <th>Day L_{day} (15 minute)</th> <th>Evening L_{even} (15 minute)</th> <th>Night L_{night} (15 minute)</th> <th>Night L_{ntm}</th> </tr> </thead> <tbody> <tr> <td>R15</td> <td>40</td> <td>35</td> <td>35</td> <td>52</td> </tr> <tr> <td>R16</td> <td>40</td> <td>37</td> <td>37</td> <td>52</td> </tr> <tr> <td>R17</td> <td>40</td> <td>35</td> <td>35</td> <td>52</td> </tr> </tbody> </table>	Location	Day L _{day} (15 minute)	Evening L _{even} (15 minute)	Night L _{night} (15 minute)	Night L _{ntm}	R15	40	35	35	52	R16	40	37	37	52	R17	40	35	35	52	Quarterly noise monitoring results from the 29/6/2021 have been provided and meet the requirements of the condition.	C	The noise monitoring results from the monitoring event undertaken on the 29/6/2021 meets the condition
Location	Day L _{day} (15 minute)	Evening L _{even} (15 minute)	Night L _{night} (15 minute)	Night L _{ntm}																					
R15	40	35	35	52																					
R16	40	37	37	52																					
R17	40	35	35	52																					
NOISE	Noise Monitoring Plan13	Prior to commencing operation, the Proponent must prepare a Noise Monitoring Plan for the development to the satisfaction of the Planning Secretary. This plan must include: (a) a noise monitoring program for the development with quarterly attended noise monitoring at the nearest residential sensitive receivers to demonstrate compliance with the noise limits in condition 12 in Schedule 3; and (b) procedures for receiving and addressing complaints from the community about development- related noise, including road traffic noise. Following the Planning Secretary's approval, the Proponent must implement the Noise Monitoring Plan.	The S2-FGJV-ENV-PLN-0071–H-Segment Factory–Noise Monitoring and Management Plan	C	The S2-FGJV-ENV-PLN-0071–H-Segment Factory–Noise Monitoring and Management Plan meets the requirements of the condition and has been endorsed by DPIE																				
LAND	Weed Management 14	The Proponent must do the following to the satisfaction of the Planning Secretary: (a) undertake weed control measures on site prior to the commencement of construction to prevent, as far as reasonably practicable, the transfer of African Lovegrass from the site; (b) construct and operate a wheel wash down facility on site, and ensure that all heavy vehicles leaving the site and any other vehicles travelling to the Kosciuszko National Park use the facility before they leave the site; and (c) regularly inspect the site for weeds and implement further weed control measures if any weeds are detected during this monitoring.	To be verified during site inspection.	C	(b) wheel wash facility was sighted during site inspection and was operational © Part of weekly environment inspection. Weed Mapping Report conducted by Project Ecologist provided as evidence. Weed spraying scheduled for 1 September 2021																				
LAND	Contamination 15	Prior to the commencement of demolition, the Proponent must remove hazardous materials from the buildings to be demolished and obtain clearance certificates, in accordance with relevant guidelines.	Clearance certificates have been provided as evidence for asbestos removal at the following properties: 33 Carlaminda Road, Cooma NSW 2630 Polo Flat Airfield, Cooma NSW 2630 84 - 85 Polo Flat Road Cooma NSW 2630	C	The clearance certificated demonstrate compliance																				
LAND	Contamination 16	The Proponent must implement an unexpected finds protocol to manage any contaminated material encountered on site. The protocol must include procedures for identifying contaminated material, testing, classification and appropriate disposal of the material.	Unexpected finds protocol is part of the EMS Appendix A6.	C	The protocol was implemented on 11/6/2020 when an asbestos pipe was uncovered. Permit Number: s2-SGJC-ENV-PER-0019-005																				
LAND	Contamination 17	The Proponent must ensure only virgin excavated natural material or excavated natural material is imported for use as fill material on the site.	No Fill material was imported on to the site during construction or operation	NT																					
LAND	Asbestos 18	Prior to the commencement of any construction or demolition, the Proponent must remove and dispose of asbestos from the site, using appropriately qualified and licensed contractors in accordance with the requirements of SafeWork NSW, the Work Health and Safety Regulation 2017 and relevant guidelines.	Clearance certificates have been provided as evidence for asbestos removal at the following properties: 33 Carlaminda Road, Cooma NSW 2630 Polo Flat Airfield, Cooma NSW 2630 84 - 85 Polo Flat Road Cooma NSW 2630	C	The clearance certificated demonstrate compliance																				

WATER	Water Supply 19	The Proponent must ensure it has sufficient water for all stages of the development; and if necessary, adjust the intensity of development on site to match its available water supply.	Water supply is from the local supply. Water Connection application (7/2/2020) to Monaro Council sighted and provided as evidence.	C	The segment factory recycles and reuses most of its water. It has ample water supply to meet its needs.
WATER	WATER Water Supply 20	The Proponent must maximise the reuse of water from the on-site stormwater management system.	Water reuse was verified during site inspection	C	All stormwater that falls onto the bund around the batch plant flows through the batch plant treatment system. All site stormwater flows to sed basin and is used for dust suppression.
WATER	Water Discharge Limits 21	Except as expressly provided for in an EPL, the Proponent must ensure the development complies with Section 120 of the POEO Act.	No pollution incidents have occurred to date	NT	
WATER	Erosion and Sediment Control 22	Prior to commencing construction, the Proponent must install suitable erosion and sediment control measures on site, including the proposed stormwater management basin, in accordance with the relevant requirements of Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004). The Proponent must then ensure these measures operate effectively during the development.	PESCP for construction sighted and provided as evidence. PESCP Polo Flat (S2-FGJV-ENV-PLM-0084-A (1/5/2020). This PESCP was adequate and meets the requirements of the Blue Book. Its implementation was not verified due to construction being completed.	C	This PESCP was adequate and meets the requirements of the Blue Book. Its implementation was not verified due to construction being completed.
WATER	Stormwater Management 23	The Proponent must carry out the creek realignment works generally in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018), or its latest version, and implement additional measures if necessary, to minimise the water quality and erosion impacts of the diversion.	Verified during site inspection	C	This was undertaken during construction and verified during the site inspection.
WATER	Stormwater Management 24	The Proponent must provide an inter-allotment stormwater easement in favour of Council along the western boundary of the site. The easement shall be established in accordance with the requirements of Council and allow for stormwater from the industrial properties to the west of the site to be discharged via the easement to Council's existing stormwater infrastructure.	Verified during site inspection	C	This was undertaken during construction and verified during the site inspection.
WATER	Flooding 25	The Proponent must ensure: (a) all new habitable buildings, electrical wiring and equipment are constructed above the 1% AEP flood level with a minimum 500 mm of freeboard; (b) all new non-habitable buildings are constructed above the 1% AEP flood level with a minimum 300 mm of freeboard; (c) waste and hazardous materials are stored outside the 1% AEP flood extent; to the satisfaction of Council.	Evidence provided with letter from Monaro Council that confirms compliance Letter dated 14/9/2021)	C	The letter from Monaro Council demonstrates compliance
WATER	Flooding 26	Prior to commencing operation, the Proponent must prepare a Flood Emergency Response Plan for the development in consultation with Council, and to the satisfaction of the Planning Secretary. This plan must include: (a) procedures for managing flood risks on site, including flood recovery measures and procedures for protecting human safety and infrastructure; (b) identify assembly points, emergency evacuation routes and evacuation procedures; (c) describe the controls to be implemented to ensure plant, equipment and stockpiles do not become floating debris during flood events. Following the Planning Secretary's approval, the Proponent must implement the Flood Emergency Response Plan.	The S2-FGJV-ENV-PLN-0068-G-Segment Factory -Flood Emergency Response Plan	C	The S2-FGJV-ENV-PLN-0068-G-Segment Factory -Flood Emergency Response Plan meets the requirements of the condition and has been endorsed by DPIE
AMENITY	Dust 27	The Proponent must minimise the dust generated by the development.	Verified during site inspection	C	Site is sealed. Roads are sealed bitumen and other are compacted road base. Water cart is on site

AMENITY	Visual28	The Proponent must: (a) minimise the off-site visual impacts of the development, including maintaining the material storage areas in a neat and tidy condition; (b) minimise the potential for any glare or light reflection from building roofs and facades; (c) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (d) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Verified during site inspection	C	During the site inspection it was observed that all material storage was done in a neat and tidy manner. No advertising was observed, and the visual appearance of the site was in accordance with the condition.
AMENITY	Visual 29	The Proponent must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: * is installed as low intensity lighting (except where required for safety or emergency purposes); * does not shine above the horizontal; and * complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.	Verified during site inspection	C	All lighting was set up to minimise light spill. Though the site was not inspected at night
ACCOMMODATION AND EMPLOYMENT STRATEGY	30	Prior to commencing operation, the Proponent must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Planning Secretary. This strategy must: (a) ensure there is sufficient accommodation for the workforce associated with the development, including contingency measures if the planned accommodation proposal does not proceed; (b) consider the cumulative impacts with the Snowy 2.0 Main Works project and any other State significant development projects in the area; (c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible, including a program for providing training and apprenticeships for local people; and (d) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during operation. Following the Planning Secretary's approval, the Proponent must implement the Accommodation and Employment Strategy.	S2-FGJV-ENV-PLN-0079 –D– Segment Factory – Accommodation and Employment Strategy	C	The project team are implementing positive initiatives to boost local employment and training. Including seven process two mechanical and two Electrical apprenticeships. Also, four students from the local high school were observed doing work experience on the site. The Joule Ridge Accommodation camp is under construction and will be completed before the end of 2021.
BIODIVERSITY	Vegetation Clearance 31	The Proponent must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS and must install fencing to protect these areas prior to the commencement of construction.	Verified during site inspection	C	During the site inspection it was confirmed that all sensitive areas were fenced off.
BIODIVERSITY	Biodiversity Offsets 32	Prior to construction, the Proponent must retire biodiversity credits of a number and class specified in Table 3 and Table 4 below, to the satisfaction of the BCD, unless the Planning Secretary agrees otherwise. The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by: (a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; (b) making payments into an offset fund that has been developed by the NSW Government; or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.	No records available at the time of the audit	C	SHL stated that the required biodiversity credits have been acquired in accordance with the NSW Biodiversity Offsets Scheme.
HERITAGE	Unexpected Finds Protocol 33	If any new heritage items or archaeological relics are identified on site during the development, the Proponent must: (a) cease all work in the immediate vicinity of the suspected item or relic immediately; (b) cordon off a 10 m wide buffer area around the item or relic; (c) contact BCD and/or Heritage NSW immediately; and (d) only recommence in the buffer area with the approval of BCD and/or Heritage NSW.	Appendix A5 of the EMS	C	No unexpected finds have been encountered

WASTE	34	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Lab results and letter from the EPA has been sighted and provided as evidence for reuse of Polo Flat topsoil as Landfill cover. Further evidence provided for waste disposal is below: Liquid waste receipts from Dec 2020 Waste register from Sept 2020 Waste register from July 2021 Landfill receipt from Nov 2020 Liquid waste receipt 7000L 16/4/2021	C	Waste register is being maintained for all sites including Polo Flat. The waste register meets the requirements. Topsoil was sent to Cooma landfill with waste classification and receipts as Uncontaminated Fill. Lab results and letter from the EPA has been sighted and provided as evidence
WASTE	35	The Proponent must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	Lab results and letter from the EPA has been sighted and provided as evidence for reuse of Polo Flat topsoil as Landfill cover. Further evidence provided for waste disposal is below: Liquid waste receipts from Dec 2020 Waste register from Sept 2020 Waste register from July 2021 Landfill receipts from Nov 2020 Liquid waste receipt 7000L 16/4/2021	C	Waste register is being maintained for all sites including Polo Flat. The waste register meets the requirements. Septic waste and Cementitious water is disposed off site as liquid waste. Icon Water take septic waste. Receipt sighted Remondis take Cementitious water. Receipt sighted
WASTE	36	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal.	Verified during site inspection	C	No evidence of this occurring was observed during the site inspection
HAZARDS	Dangerous Goods 37	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Verified during site inspection	C	All Dangerous Goods storage was observed to be undertaken in a safe and complaint manner. Everything was bunded.
HAZARDS	Bunding 38	The Proponent must store all chemicals, fuels and oils used on site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change, 2007).	Verified during site inspection	C	All Dangerous Goods storage was observed to be undertaken in a safe and complaint manner. Everything was bunded.
DECOMMISSIONING AND REHABILITATION	39	Within 6 months of the cessation of operation, unless the Planning Secretary agrees otherwise, the Proponent must decommission the infrastructure on site and rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 5.		NT	
CSSI 10034 Conditions of Consent Schedule 4 - ENVIRONMENTAL MANAGEMENT AND REPORTING					
ENVIRONMENTAL MANAGEMENT	Environmental Management Strategy 1	Prior to carrying out any development, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) describe the procedures that would be implemented to: * keep the local community and relevant agencies informed about the operation and environmental performance of the development; * receive, handle, respond to, and record complaints; * resolve any disputes that may arise; * respond to any non-compliance; * respond to emergencies; and (e) include: * references to any plans approved under the conditions of this approval; and * a clear plan depicting all the monitoring to be carried out in relation to the development. Following the Planning Secretary's approval, the Proponent must implement the Environmental Management Strategy.	S2-FGJV-ENV-PLN-0065– G–Segment Factory - Environmental Management Strategy	C	S2-FGJV-ENV-PLN-0065– G–Segment Factory - Environmental Management Strategy has been reviewed and meets the requirements of Schedule 4 CoA 1

ENVIRONMENTAL MANAGEMENT	Revision of Strategies, Plans and Programs 2	<p>The Proponent must:</p> <p>(a) update the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary prior to carrying out any construction, operation or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 1 month of the:</p> <ul style="list-style-type: none"> * submission of an incident report under condition 5 of Schedule 4; * submission of an audit report under condition 7 of Schedule 4; or * any modification to the conditions of this approval. 	<p>S2-FGJV-ENV-PLN-0065-G-Segment Factory-Environmental Management Strategy.</p> <p>S2-FGJV-ENV-PLN-0068-G-Segment Factory-Flood Emergency Response Plan.</p> <p>S2-FGJV-ENV-PLN-0071-H-Segment Factory-Noise Monitoring and Management Plan</p> <p>S2-FGJV-LOG-PLN-0009-G-Segment Factory-Traffic Management Plan</p>	NC	<p>All plans have been updated for operation in June 2021 and submitted to DPIE. Letter received from DPIE sighted and provided as evidence.</p> <p>However, all four plans were not reviewed following the incident triggered under condition 5 of Schedule 4; on the 7 August 2020.</p>
ENVIRONMENTAL MANAGEMENT	Updating and Staging of Strategies, Plans or Programs 3	<p>With the approval of the Planning Secretary, the Proponent may submit any strategy, plan or program required by this approval on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this approval are updated on a regular basis, the Proponent may at any time submit revised strategies, plans or programs to the Planning Secretary for approval.</p> <p>With the agreement of the Planning Secretary, the Proponent may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this approval.</p>		NT	
COMPLIANCE	Notification 4	<p>The Proponent must notify the Department in writing of the date of commencement of the following phases, prior to commencing the relevant phase: (a) pre-construction; (b) construction; (c) operation; (d) cessation of operation; (e) decommissioning. If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	<p>Letter to DPIE for Pre construction 21 April 2020</p> <p>Letter to DPIE for commencement of construction 24 April 2020</p> <p>Letter to DPIE to notify operation was commencing in June was issued March 2020</p> <p>Letter to DPIE for commencement of operation 15 June 2020</p>	C	<p>DPIE has been notified of stages a, b and c. This is complaint with the condition</p>
COMPLIANCE	Incident Notification 5	<p>If the Proponent becomes aware of an incident, it must notify the Department immediately in writing via the Major Projects Portal. The notice must identify the development (including the development application number) and set out the location and nature of the incident.</p>	<p>Notification on Major projects Portal (17 Aug 2020) sighted and provided as evidence</p>	C	<p>August 2020. Hours of operation breached during construction.</p> <p>Notification on Major projects Portal (17 Aug 2020) sighted and provided as evidence</p>
COMPLIANCE	Non-Compliance Notification 6	<p>Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department in writing via the Major Projects Portal. The notice must identify the development (including the development application number), the relevant condition of approval, the way in which the development does not comply, the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</p>	<p>The External Agency Notification Report (S2-FGJV-ENV-FRM-0015</p>	NC	<p>The External Agency Notification Report (S2-FGJV-ENV-FRM-0015 meets the requirements of the condition.</p> <p>An incident occurred on the 5 August 2021 that was not complaint with the construction hours listed in schedule 2 Condition 5. This incident was investigated, and actions implemented to ensure a repeat incident does not occur.</p> <p>However, the Incident occurred on the 5 August 2021 and Notification on the Major Project Portal occurred on the 17 August 2021.</p>

<p>COMPLIANCE INDEPENDENT ENVIRONMENTAL AUDIT</p>	<p>7</p>	<p>Within 3 months of commencing operation, and two years after commencing operation, unless the Planning Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must: (a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018); (b) be led and conducted by a suitably qualified, experienced and independent team of experts, including a traffic management expert, whose appointment has been endorsed by the Planning Secretary; (c) be carried out in consultation with the relevant agencies; (d) assess whether the development complies with the relevant requirements in this approval, and any strategy, plan or program required under this approval; and (e) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this approval. Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Planning Secretary, a copy of the audit report must be submitted to the Planning Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Planning Secretary.</p>		<p>C</p>	<p>This audit is being undertaken to meet this condition. The audit is within the three months of commencing operation on the 9 June 2021.</p>
<p>ACCESS TO INFORMATION</p>	<p>8</p>	<p>The Proponent must: (a) make the following information publicly available on its website as relevant to the stage of the development: * the EIS; * the final layout plans for the development; * current statutory approvals for the development; * approved strategies, plans or programs required under the conditions of this approval; * the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; * how complaints about the development can be made; * a complaints register; * compliance reports; * any independent environmental audit, and the Proponent's response to the recommendations in any audit; and * any other matter required by the Planning Secretary; and (b) keep this information up to date.</p>	<p>https://www.snowyhydro.com.au/snowy-20/documents/</p>	<p>NC</p>	<p>The proponent is Snowy Hydro. Therefore, the SH website must contain each of the items listed in Schedule 4 condition 8: EIS - yes Final Layout - Yes Current approval - Yes strategies, Plans and approvals - yes Staging Plan - Not required at this stage of the development Complaints register - NO Compliance Reports - None required Audit Reports - The complaint register is not on the website therefore a non-conformance has been recorded</p>

Environmental Protection Licence (EPL) 21419

Reference (Clause or Paragraph)	Requirement	Evidence Provided / Comments	Result	Audit Findings	
EPL 21419 - 1 ADMINISTRATIVE CONDITIONS					
A1 What the licence authorises and regulates	A1.1	This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2. There are four (4) stages to the scheduled development works of which the following stages are authorised by this licence: Description of activities to be undertaken during the 'Construction' stage as per Condition A1.2 below.		C	Noted
	A1.2	1. Bulk earthworks, including: - Cut and fill to establish a level area for the pads; and - Trenching to install service (power, water and communications); 2. Laying concrete, asphalt and cement soil for: - The precast building; - All internal roads; and - All other areas including the storage areas; 3. Construction of the primary access road in the unmade road corridor and connection to Polo Flat Road; and 4. Construction of all buildings (precast buildings, officers, workshops and guardhouse), concrete batching plant, carparks and associated facilities	Correspondence between FGJV and EPA 19 May 2020	C	Correspondence between FGJV and EPA 19 May 2020 notified the EPA of the commencement of the four stages of work listed in the condition
	A1.3	For the purposes of this licence, written notification from the EPA is required prior to the commencement of each stage referenced in condition A1.1.	Letter to EPA (19/5/2020) from Licence holder notifying EPA of the commencement of each stage listed in A1.2. Acknowledgement from the EPA via email received on the 25 May 2021	C	Letter to EPA (19/5/2020) from Licence holder notifying EPA of the commencement of each stage listed in A1.2. Acknowledgement from the EPA via email received on the 25 May 2021
	A1.4	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. > 50000 m3 annual production capacity	Boral manages the batch plant and daily batch records are provided. Batch records sighted and provided as evidence from the 23/8/2021. Also, segments are numbered and counted.	C	Total production is documented to meet licence condition
A2 Premises or plant to which this licence applies	A2.1	The licence applies to the following premises: POLO FLAT SEGMENT FACTORY 115 CARLAMINDA ROAD POLO FLAT NSW 2630 LOT 3 DP 238762, PART LOT 14 DP 250029		NT	

<p>A3 Information supplied to the EPA</p>	<p>A3.1</p>	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	<p>verified during site inspection</p>	<p>C</p>	<p>Batching concrete is the scheduled activity. No other scheduled activities were observed during the site inspection</p>																
<p>EPL 21419 - 2 Discharges to Air and Water and Applications to Land</p>																					
<p>P1 Location of monitoring/discharge points and areas</p>	<p>P1.1</p>	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1" data-bbox="647 667 1380 892"> <thead> <tr> <th colspan="4" style="text-align: center;"><i>Air</i></th> </tr> <tr> <th>EPA identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>Air emissions monitoring</td> <td>Air emissions monitoring</td> <td>Exhaust stack from Steam Boiler 1, identified as EPA 4 on the document titled "EPL 21419 - Polo Flat Segment Factory Premise Map" (EPA reference: DOC21/265021-7)</td> </tr> <tr> <td>5</td> <td>Air emissions monitoring</td> <td>Air emissions monitoring</td> <td>Exhaust stack from Steam Boiler 2, identified as EPA 5 on the document titled "EPL 21419 - Polo Flat Segment Factory Premise Map" (EPA reference: DOC21/265021-7)</td> </tr> </tbody> </table>	<i>Air</i>				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	4	Air emissions monitoring	Air emissions monitoring	Exhaust stack from Steam Boiler 1, identified as EPA 4 on the document titled "EPL 21419 - Polo Flat Segment Factory Premise Map" (EPA reference: DOC21/265021-7)	5	Air emissions monitoring	Air emissions monitoring	Exhaust stack from Steam Boiler 2, identified as EPA 5 on the document titled "EPL 21419 - Polo Flat Segment Factory Premise Map" (EPA reference: DOC21/265021-7)		<p>NT</p>	<p>Air monitoring is required annually and will be completed when the facility is fully operational</p>
<i>Air</i>																					
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<p>P1 Location of monitoring/discharge points and areas</p>	<p>P1.2</p>	<p>The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</p>	<p>No liquid or solid are received or disposed of on site.</p>	<p>NT</p>																	
<p>P1 Location of monitoring/discharge points and areas</p>	<p>P1.3</p>	<p>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises</p>	<p>Quarterly noise monitoring results from the 29/6/2021 have been provided and meet the requirements of the condition.</p>	<p>C</p>	<p>The noise monitoring results from the monitoring event undertaken on the 29/6/2021 meets the condition</p>																
<p>EPL 21419 - 3 Limit Conditions</p>																					
<p>L1 Pollution of waters</p>	<p>L1.1</p>	<p>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.</p>		<p>C</p>	<p>No water pollution events have occurred during construction and operation. A Stormwater Detention basin is located at the northern end of the site.</p>																

L2 Concentration limits	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.	Quarterly noise monitoring results from the 29/6/2021 have been provided and meet the requirements of the condition.	C	All required monitoring has been completed and provided as evidence. No exceedances have occurred.
	L2.2	Air Concentration Limits. See EPL for limits		NT	Air monitoring is required annually and will be completed when the facility is fully operational
L3 Noise limits	L3.1	Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2. See EPL for limits	Quarterly noise monitoring results from the 29/6/2021 have been provided and meet the requirements of the condition.	C	The noise monitoring results from the monitoring event undertaken on the 29/6/2021 meets the condition
L4 Hours of operation	L4.1	Construction hours must be limited to: Construction Monday to Saturday 7am to 6pm Operation & production: 24 hours		C	The site is not yet fully operational but will operate 24 hours a day towards the end of 2021
	L4.2	Exemptions to standard construction hours As per the Interim Construction Noise Guidelines (2009), the five categories of works that may be undertaken outside the standard hours of construction permitted by Condition L2.1 are: a) the delivery of oversized plant or structures that police or other authorised authorities determine require special arrangements to transport along public roads; b) emergency work to avoid the loss of lives or damage to property, or to prevent environmental harm; c) maintenance and repair of public infrastructure where disruption to essential services and/or considerations of worker safety do not allow work within standard hours; d) public infrastructure works that shorten the length of the project and are supported by the affected community; and e) works where a proponent demonstrates and justifies a need to operate outside the recommended standard hours. As per Conditions of Approval, the proponent may carry out works that are inaudible at the nearest sensitive receivers outside the standard hours of construction permitted by condition L2.1. The licensee must notify the EPA within 24 hours of undertaking any works referred to in Condition L2.2 a) - c). The licensee must seek written approval from the EPA before undertaking any works referred to in Condition L2.2 d) or e).	OOHW occurred on Sunday 25 October 2020. A request for approval under L2.2 was sent to the EPA on the 22 October 2020. Approval was received via email on the 23 October 2021.	C	The project has been operating in accordance with this condition. One Out of Hours Work event has taken place on Sunday 25 October 2020. A request for approval under L2.2 was sent to the EPA on the 22 October 2020. Approval was received via email on the 23 October 2021.
EPL 21419 - 4 Operating Conditions					
O1 Activities must be carried out in a competent manner	O1.1	Licensed activities must be carried out in a competent manner. This includes: 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.	Waste register including Waste disposal records has been sighted and provided as evidence. Lab results and letter from the EPA has been sighted and provided as evidence for reuse of Polo Flat topsoil as Landfill cover. Further evidence provided for waste disposal is below: Liquid waste receipts from Dec 2020 Waste register from Sept 2020 Waste register from July 2021 Landfill receipts from Nov 2020 Liquid waste receipt 7000L 16/4/2021	C	Waste register including Waste disposal records has been sighted and provided as evidence. The storage of materials was observed to be very good. All materials were undercover and protected from wind and rain. The movement and handling of materials was done in a competent manner.
O2 Maintenance of plant and equipment	O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Verified during site inspection	C	All Plant and equipment observed during the site inspection was found to be in good working order. Most plant and equipment was new.

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.	Verified during site inspection	C	The site had received 20mm of rain prior to the site inspection. So, no dust was observed. A water cart was present on the site to suppress dust.
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 or latest equivalent version. Any waste generated at the premises must be taken to a facility that can lawfully receive it.	Waste register including Waste disposal records has been sighted and provided as evidence. Lab results and letter from the EPA has been sighted and provided as evidence for reuse of Polo Flat topsoil as Landfill cover. Further evidence provided for waste disposal is below: Liquid waste receipts from Dec 2020 Waste register from Sept 2020 Waste register from July 2021 Landfill receipts from Nov 2020 Liquid waste receipt 7000L 16/4/2021	C	The project is managing waste in accordance with this condition. The waste register was up to date and included waste classification. Waste disposal receipts were sighted as evidence
EPL 21419 - 5 Monitoring and Recording Conditions					
M1 Monitoring records	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	Noise monitoring results from the 29/6/2021 have been sighted as evidence.	C	Monitoring data is saved on project SharePoint site
	M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; 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.	Noise monitoring results from the 29/6/2021 have been sighted as evidence.	C	Records are on project website and field sheets are on project SharePoint
	M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	https://www.futuregenerationjv.com.au/approvals-and-management-plan	C	Noise monitoring results from the 29/6/2021 have been sighted as evidence. Records are on project website and field sheets are on project SharePoint
M2 Requirement to monitor concentration of pollutants discharged	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:		NT	Air monitoring is required annually
M2 Requirement to monitor concentration of pollutants discharged	M2.2	Air Monitoring Requirements See EPL for Table		NT	Air monitoring is required annually

<p>M3 Testing methods - concentration limits</p>	<p>M3.1</p>	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</p>		<p>NT</p>	<p>Air monitoring is required annually</p>
<p>M4 Recording of pollution complaints</p>	<p>M4.1</p>	<p>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.</p>	<p>Individual Communication Report 21 May 2021 https://www.futuregenerationjv.com.au/approvals-and-management-plan</p>	<p>C</p>	<p>A comprehensive complaints management system is in place. A start to finish complaint investigation record was provided as evidence</p>
	<p>M4.2</p>	<p>The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; 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; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.</p>	<p>Individual Communication Report 21 May 2021 https://www.futuregenerationjv.com.au/approvals-and-management-plan FUTURE GENERATION - SNOWY 2.0 COMPLAINTS REGISTER FOR SEGMENT FACTORY AT POLO FLAT</p>	<p>C</p>	<p>A complaint record from the 21 May 2021 was provided as evidence. The records meets the requirements of the condition.</p>
	<p>M4.3</p>	<p>The record of a complaint must be kept for at least 4 years after the complaint was made.</p>	<p>Individual Communication Report 21 May 2021 https://www.futuregenerationjv.com.au/approvals-and-management-plan</p>	<p>C</p>	<p>A complaint record from the 21 May 2021 was provided as evidence. The records meets the requirements of the condition.</p>
	<p>M4.4</p>	<p>The record must be produced to any authorised officer of the EPA who asks to see them.</p>	<p>Individual Communication Report 21 May 2021 https://www.futuregenerationjv.com.au/approvals-and-management-plan FUTURE GENERATION - SNOWY 2.0 COMPLAINTS REGISTER FOR SEGMENT FACTORY AT POLO FLAT</p>	<p>C</p>	<p>A complaint record from the 21 May 2021 was provided as evidence. The records meets the requirements of the condition.</p>
<p>M5 Telephone complaints line</p>	<p>M5.1</p>	<p>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.</p>	<p>verified during audit</p>	<p>C</p>	<p>Complaints number is on Project Website During business hours complaints go to Sydney Reception During after-hours go to Community and Stakeholder Engagement Manager.</p>
	<p>M5.2</p>	<p>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.</p>	<p>https://www.futuregenerationjv.com.au/approvals-and-management-plan March 2021 community notification letter</p>	<p>C</p>	<p>Complaints number is on Project Website During business hours complaints go to Sydney Reception During after-hours go to Community and Stakeholder Engagement Manager. The March 2021 community notification letter contains all the project contact information</p>
	<p>M5.3</p>	<p>The preceding two conditions do not apply until immediately the date of the issue of this licence.</p>		<p>NT</p>	

EPL 21419 - 6 Reporting Conditions					
R1 Annual return documents	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 a copy of the form that must be completed and returned to the EPA.	Annual Return for Licence 21419 issued in accordance with condition R1.1. Report sighted and provided as evidence eConnect EPA Annual Return submitted WEBUILD S.P.A. Environment Protection Licence 21419 Annual Return due 16-07-2021 submission record	C	Annual Return for Licence 21419 issued in accordance with condition R1.1. Report sighted and provided as evidence
	R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Annual Return for Licence 21419 issued in accordance with condition R1.1. Report sighted and provided as evidence	C	Annual Return for Licence 21419 issued in accordance with condition R1.1. Report sighted and provided as evidence
	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 period and ending on the date the application for the transfer of the licence to the new licensee is granted; and 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.		NT	This licence has not been transferred or surrendered during the audit period.
	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: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.		NT	This licence has not been surrendered or revoked during the audit period.
	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').	Annual Return for Licence 21419 issued on 22/6/2021 in accordance with condition R1.5. Report sighted and provided as evidence Annual Return for Licence 21419 issued in accordance with condition R1.1. Report sighted and provided as evidence eConnect EPA Annual Return submitted WEBUILD S.P.A. Environment Protection Licence 21419 Annual Return due 16-07-2021 submission record	C	Annual Return for Licence 21419 issued on 22/6/2021 in accordance with condition R1.5. Report sighted and provided as evidence
	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.	Saved on project SharePoint	C	Saved on project SharePoint

	R1.7	<p>Within the Annual Return, the Statements of Compliance must be certified, and the Monitoring and Complaints Summary must be signed by:</p> <p>a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</p>	Annual Return has been signed by FGJV Project Director and WeBuild Director. Annual return has been sighted and provided as evidence	C	Annual Return has been signed by FGJV Project Director and WeBuild Director. Annual return has been sighted and provided as evidence
R2 Notification of environmental harm	R2.1	<p>Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p>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.</p>	External Agency Incident Notification Form – Polo Flat EPL 21419	C	An incident occurred on the 5 August 2021 that was not complaint with the construction hours listed in condition L2.1 and L2.2 (superseded EPL) The incident was reported to the EPA via the Environmental Line service on 131 555 in accordance with this condition. A follow up email was sent to the EPA at 9:45am
	R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	External Agency Incident Notification Form – Polo Flat EPL 21420 Email trail between the FGJV and EPA from 5 to 11 August 2021	C	An incident occurred on the 5 August 2021 that was not complaint with the construction hours listed in condition L2.1 and L2.2 (superseded EPL). The incident was reported to the EPA via the Environmental Line service on 131 555 in accordance with this condition. The Environmental Investigation Report into the Out of Hours non-conformance at the Polo Flat Segment Factory was issued to the EPA via email on the 11 August 2021 This process is robust and meets the requirements of the EPL
R3 Written report	R3.1	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <p>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, 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.</p>		NT	The EPA has not requested a written report for any event.
R3 Written report	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.		NT	The EPA has not requested a written report for any event.
R3 Written report	R3.3	<p>The request may require a report which includes any or all of the following information:</p> <p>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</p>		NT	The EPA has not requested a written report for any event.

	R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.		NT	The EPA has not requested a written report for any event.
EPL 21419 - 7 General Conditions					
G1 Copy of licence kept at the premises or plant	G1.1	A copy of this licence must be kept at the premises to which the licence applies	Verified during site inspection	C	License is kept on site in EM office
	G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Verified during site inspection	C	License is kept on site in EM office
	G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Verified during site inspection	C	License is kept on site in EM office
EPL 21419 - 8 Special Conditions					
E1 Air Emissions - Control Measures	E1.1	<p>Prior to the commencement of operations, the proponent must engage a suitably qualified person/s to verify the air quality impacts identified in the modelling undertaken in the Air Quality Impact Assessment included in the Environmental Impact Statement for the project (The Verification Study).</p> <p>The Verification Study must be undertaken within 3 months of commissioning the segment factory. The Verification Study must, as a minimum:</p> <ul style="list-style-type: none"> i) identify all particulate matter emission sources at the premises; ii) quantify particulate matter emissions (TSP, PM10, PM2.5) from all sources identified in (i); iii) assess the particulate matter emissions in (ii) against the criteria documented in Section 7 of the <i>Approved Methods for Modelling and Assessment of Air Pollutants in New South Wales 2016 (the Approved Methods)</i>. iv) identify all mitigation measures implemented at the premises for each source identified in (i); v) identify any additional feasible and reasonable measures that could be implemented to meet or exceed the criteria identified in the Approved Methods; vi) quantify the emission reductions that could be achieved with the implementation of feasible and reasonable measures identified in (v); vii) nominate a timeframe for the implementation of the feasible and reasonable mitigation measures identified in (v). 		C	Wilkinson Murray have been engaged by the project to undertake the Verification Study. As of the 26/8/2021 the Verification Study has not been completed. A letter will be issued to the EPA requesting an extension due to the Segment Factory not operating at full capacity.
	E1.2	The suitably qualified person engaged as per Condition E1.1 above must develop a report identifying the findings of E1.1. The licensee must provide a copy of this report to the Manager – Regional Operations, South East Region NSW EPA within 2 weeks of the Verification Study being completed.		NT	

<p>E2 Noise Verification Study</p>	<p>E2.1</p>	<p>Within 6 months of commissioning the automated concrete batch plants at the Premises, the Licensee must complete a Noise Verification Study. The Noise Verification Study must: i) be in accordance with the NSW Noise Policy for Industry (2017); ii) assess whether operational noise emissions from the Premises are consistent with the predicted noise levels identified in the Noise and Vibration Impact Assessment included in the Environmental Impact Statement for the project; iii) assess whether noise emissions from the Premises comply with the noise limits contained in licence condition L3.1; and iv) identify any reasonable and feasible measures that could be implemented to address any exceedances identified in (ii) and (iii) above, and nominate timeframes for their implementation</p>		<p>C</p>	<p>This Noise verification study has not yet been completed. However, six months has not passed, and an extension has been requested. The Auditor supports this action because the segment factory is not fully operational.</p>
<p>E2 Noise Verification Study</p>	<p>E2.2</p>	<p>The Licensee must provide a report detailing the findings of the Noise Verification Study to the Manager – Regulatory Operations, Regional South NSW EPA within 2 weeks of the Noise Verification Study being completed.</p>		<p>NT</p>	<p>This Noise verification study has not yet been completed. However, six months has not passed, and an extension has been requested. The Auditor supports this action because the segment factory is not fully operational.</p>

Environmental Management Plans

Reference (Clause or Paragraph)	Requirement	Evidence Provided / Comments	Result	Audit Findings
Environmental Management Strategy				
1.7.1	Revision	If an incident report under condition 5 of schedule 4 has occurred, the EMS must be reviewed	S2-FGJV-ENV-PLN-0065-G-Segment Factory-Environmental Management Strategy. Letter received from DPIE (6/4/2021) sighted and provided as evidence of the commencement of operation and EMS update.	NC All plans have been updated for operation in June 2021 and submitted to DPIE. Letter received from DPIE sighted and provided as evidence. However, the plans were not reviewed following the incident triggered under condition 5 of Schedule 4; on the 7 August 2020.
2.3	General changes to the Project	consistency assessments will be submitted to Snowy Hydro for determination by Snowy Hydro's Representative.	A change to the site layout and owner supply Consistency Assessment was completed on 13/1/2021 and approved by SHL. Consistency Assessment sighted and provided as evidence.	C A change to the site layout and owner supply Consistency Assessment was completed on 13/1/2021 and approved by SHL. Consistency Assessment sighted and provided as evidence.
3.6	Approvals, Permits and Licences	Road occupancy licence	ROL received from Snowy Monaro Regional Council on 31/7/2020	C ROL received from Snowy Monaro Regional Council on 31/7/2020 for the Construction of new access road. ROL sighted and provided as evidence
3.6	Approvals, Permits and Licences	Part 13 permit	Part 13 Permit E2020-0174 received 29/4/2020 from DAWE.	C Part 13 Permit E2020-0174 received 29/4/2020 from DAWE.
4.1.2	Table 4-3: Objectives and targets	Disseminate regular Project updates and other information to keep the community informed of the Project.	Project community update issued March 2021.	C The project issues regular community updates. The march 2021 community update was provided as evidence.
4.1.2	Table 4-3: Objectives and targets	Develop and maintain a program of ongoing environmental training.	Toolbox Talk delivered on Spill Management on 25/8/2021 and sign on record.	C The project is providing an adequate level of environment training that addresses the risk and meets the requirements of the EMS and project approval. Environment Training via Toolbox talks and Pre starts. Toolbox Talk delivered on Spill Management on 25/8/2021. Sign on records provided.
4.1.2	Table 4-3: Objectives and targets	Encourage and reward innovation and effort throughout the workforce.	Monthly Environment Award (\$50 Bunning Voucher)	C The project is encouraging environment best practice by providing a monthly environment award.
4.1.5	Work Packs	The Work Packs will be prepared prior to commencement of the works to which they relate. All project personnel and sub-contractors undertaking a task governed by a Work Pack must participate in training and acknowledge that they have read and understood their obligations prior to commencing work.	Work pack for Roads and Pad Seal 21/5/2020. Environment commitments included in section 5.	C The work packs are a sound method to provide relevant environmental obligations for each package of work
4.1.6	Sensitive Area Plans	A copy of each of the worksite SAPs will be available for Future Generation personnel and subcontractors and at each of the worksite locations.	SAP is available. S2-FGJV-ENV-PLN-0085 (19/5/2020)	C The Sensitive Rea Plans are adequate and meet the requirements of the EMS

4.1.7	Erosion and Sediment Control Plans	An erosion and sediment control plan (ESCP) has been developed for the project displaying the site layout and approximate location of erosion and sediment control structures on site.	PESCP has been completed (S2-FGJV-ENV-PLN-0084) 1/5/2020.	C	PESCP has been completed (S2-FGJV-ENV-PLN-0084) 1/5/2020. However, the PESCP is not a representation of the current site layout and needs to be updated.
4.3.2	Environmental Risk Register	Future Generation will maintain the environmental risk register in its project files (separate to this EMS) to address risks specific to the scope. Risks will be required to be reviewed on a regular basis and will also be reviewed in response to incidents, changes in legal requirements, change in project scope, findings of inspections and audits and management reviews.	Environmental Risk Register sighted and is adequate. However, a review would be beneficial	C	The project is managing environmental Risk adequately and meets the requirements of the EMS. However, a review would be beneficial
5.1	Site Induction	All personnel (including sub-contractors) will be required to attend a compulsory site induction that includes an environmental component prior to commencement on-site.	Induction has been provided and the record keeping is via E7.	C	The project induction meets the requirements of the EMS and is being delivered effectively. Site entry is prohibited with induction card
5.3	Toolbox Talks and Environmental Awareness	Toolbox talks, environmental awareness training and activity methodology briefings will be delivered by Future Generation as necessary to achieve a suitable level of workforce awareness and competence appropriate to the activities.	Environment Training via Toolbox talks and Pre starts. Toolbox Talk delivered on Spill Management on 25/8/2021. Sign on records provided.	C	The project is providing an adequate level of environment training that addresses the risk and meets the requirements of the EMS and project approval. Environment Training via Toolbox talks and Pre starts. Toolbox Talk delivered on Spill Management on 25/8/2021. Sign on records provided.
6.1.1	Internal Communication	Future Generation will discuss environmental issues as a regular component of their toolbox and site meeting agenda.	Environment Training via Toolbox talks and Pre starts. Toolbox Talk delivered on Spill Management on 25/8/2021. Sign on records provided.	C	The project is providing an adequate level of environment training that addresses the risk and meets the requirements of the EMS and project approval. Environment Training via Toolbox talks and Pre starts. Toolbox Talk delivered on Spill Management on 25/8/2021. Sign on records provided.
6.2	Complaint Management	A complaints management system including the complaints register will be maintained by Snowy Hydro and the Future Generation consistent with AS4269: Complaints Handling.	A complaint record from the 21 May 2021 was provided as evidence. The records meets the requirements of the condition	C	A comprehensive complaints management system is in place that meets the requirements of the EMS. A start to finish complaint investigation record was provided as evidence.
7.2	Incident reporting	Snowy Hydro are to be informed of any environmental incidents or regulatory compliance incidents immediately verbally and within 24 hours in writing.	Incident 29/6/2021 - Diesel Spill at Segment Factory.	C	Incident 29/6/2021 - Diesel Spill at Segment Factory. Initial Incident Notification Form completed. SHL informed verbally by phone. Initial Incident Notification Form sent via Acconex within 24 Hours on 30 June 2021. The management of this incident meets the requirements of the EMS
8.1	Environmental Inspections	The effectiveness of environmental protection measures described in this EMS and management plans will be inspected and assessed on a weekly basis by Future Generation's environmental staff.	Weekly Environmental Inspection Form Doc No: S2-FGJV_ENV-CHK-0004. Week starting 20/8/2021. Actions go to management and closed out.	C	The environmental inspection process is adequate and meets the requirements of the EMS. There is a robust process in place to close out actions.
8.1	Environmental Inspections	Joint Environmental Site Inspection Fortnightly or at a greater frequency as requested by Snowy Hydro. This may also form the weekly inspection.	Joint Inspections SHL, EPA, DPIE. Inspection from August 2021 provided. Joint inspection Action Register maintained with actions	C	The environmental inspection process is adequate and meets the requirements of the EMS. There is a robust process in place to close out actions.
8.1	Environmental Inspections	Site preparation rainfall inspection	Last Pre-Rainfall inspection completed 23/8/2021. Sighted as adequate	C	Pre and post rainfall inspections are being completed in accordance with the EMS requirements

8.2.2	Monitoring Results Outside of Expected Range	Where monitoring results are outside of the expected range, the process described below implemented	Up and down stream turbidity results from the Detention basin.	C	Stormwater Detention Basin overflow. Up and down stream samples taken. Turbidity difference was high but not attributed to overflow. Process in section 8.2.2 was followed and meets the requirements of the EMS
8.4.1	Reporting Non-Compliances	Future Generation is to notify Snowy Hydro as soon as possible and at least within 24 hours of becoming aware of a non-compliance.	Incident 29/6/2021 - Diesel Spill at Segment Factory Incident report and notification form.	C	Incident 29/6/2021 - Diesel Spill at Segment Factory. Initial Incident Notification Form completed. SHL informed verbally by phone. Initial Incident Notification Form sent via Acconex within 24 Hours on 30 June 2021
8.4.3	Project Website	A website will be maintained that includes the following: <ul style="list-style-type: none"> • links to the EIS; • final layout plans for the development; • current statutory approvals for the development; • approved strategies, plans or programs required under the conditions of this approval; • the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; • how complaints about the development can be made; • a complaints register; • compliance reports; • any independent environmental audit, and the Proponent's response to the recommendations in any audit; and • any other matter required by the Planning Secretary. 	Future Generation Joint Venture (futuregenerationjv.com.au)	C	The project website meets the requirements of the EMS. All items listed in 8.4.3 are on the FGJV website
Noise Monitoring and Management Plan					
1.3	Approved Project	Why isn't section 1.3 of the NMMP in the EMS?	S2-FGJV-ENV-PLN-0071-H-Segment Factory-Noise Monitoring and Management Plan	C	An error was identified in the NMMP and will be addressed in the next review
1.4	Management System	The heading in the TOC does not match s1.4 heading in the plan	S2-FGJV-ENV-PLN-0071-H-Segment Factory-Noise Monitoring and Management Plan	C	An error was identified in the NMMP and will be addressed in the next review
1.5	Purpose	Should this section reference Schedule 3 CoC 13?	S2-FGJV-ENV-PLN-0071-H-Segment Factory-Noise Monitoring and Management Plan	C	An error was identified in the NMMP and will be addressed in the next review
2.3	Revised Environmental Management Measures	The EMP would include measures to monitor operational noise levels during commissioning (or within 3 months of operation) to validate the predicted noise levels. The EMS would also include a review of noise mitigation measures and site management to reduce levels where required;	To be completed in accordance with EPL condition E2.2 once Segment Factory is fully operational	C	To be completed in accordance with EPL condition E2.2 once Segment Factory is fully operational
Table 5-1	Noise management measures	The residents at assessment location R2, R18, R15, R16 and R17 would be notified prior to commencement of operation.	March 2021 Community Newsletter notified R2, R18, R15, R16 and R17 of commencement of operation.	C	The residents at R2, R18, R15, R16 and R17 have been notified in accordance with the EMS
Table 5-1	Noise management measures	Mobile plant (e.g., forklifts) used during night-time, outdoor operation of the Segment Factory are to be fitted with mufflers and squawker reversing alarms, as alternatives to tonal alarms	Compliance validated during site inspection.	C	The project plant and equipment is mostly new and kept in a very high standard. The reverse alarms meet the requirements.
6.1.1	Noise Monitoring	Validation noise monitoring for operational road traffic noise, specifically the impact related to heavy vehicle movements associated with the project		NT	To be completed when Segment Factory is fully operational. An extension request has been submitted to EPA due to the segment factory not being fully operational.

6.1.1	Noise Monitoring	Validation noise monitoring for operational noise levels		NT	To be completed when Segment Factory is fully operational. An extension request has been submitted to EPA due to the segment factory not being fully operational.
6.1.1	Noise Monitoring	Attended noise monitoring at nearest sensitive receivers (quarterly)	Noise monitoring results from the 29/6/2021 have been sighted as evidence.	C	The noise monitoring completed on the 29/6/2021 meets the requirements of the EMS
6.1.1	Noise Monitoring	All acoustic monitoring equipment shall meet the requirements of AS IEC 61672.1 – 2004 'Electroacoustics – Sound level meters – Specifications' and carry current NATA or manufacturer calibration certificates. A minimum Class 2 instrument is required. Instrument calibration shall be checked before and after each measurement survey, with the variation in calibrated levels not exceeding ±0.5 dB.	Internal calibration completed during each event. manufacturer calibration certificates sighted	C	All monitoring equipment has been calibrated in accordance with the EMS and manufacturer's instructions.
6.2	Noise Incidents	Has a noise incident occurred?		NT	No noise incidents have occurred that would trigger the requirements of section 6.2
6.3	Complaints	Have you received a noise complaint?		NT	No noise incidents have occurred that would trigger the requirements of section 6.3
Flood Emergency Response Plan					
4.2	Drainage Design	A stormwater drain with a gated easement was constructed, in conjunction with SMRC and as directed by Snowy Hydro to address local drainage issues and minor flood impacts for the industrial properties to the west of the site; waste and hazardous material storage are located outside the 1% AEP extent; plant, equipment and stockpiles that have the potential to become floating debris in a flood event will be located outside the 1% AEP extent;	Compliance validated during site inspection.	C	The stormwater drain was constructed to address local drainage issues and minor flood impacts for the industrial properties to the west of the site. During the site inspection it was confirmed that all waste and hazardous material storage are located outside the 1% AEP extent; plant, equipment and stockpiles that have the potential to become floating debris in a flood event will be located outside the 1% AEP extent;
5.3	Evacuation	Weather monitoring would provide ample identification of potential flooding risk and would allow safe and orderly evacuation of site personnel as required.	Daily Prestart Wednesday 25 August 2021 including attendance records	C	Prestart has daily weather, which is communicated (Prestart sighted) Polo Flat weather station records rainfall and wind temperature. This meets the requirements of the EMS
6.1	Site Inspections	A post-rainfall inspection will be completed immediately following significant rainfall (i.e., > 80 mm in 24 hours).	Post rainfall inspections the 10/6/2021 was provided following 25mm rain	C	Pre and post rainfall inspections are being completed in accordance with the EMS requirements
Segment Factory–Traffic Management Plan					
1.5	Purpose	ensure appropriate measures are implemented during construction and operation of the Segment Factory to minimise traffic impacts for public road users;	A Daily traffic management meeting agenda 23/7/2021 and 30/7/2021	C	Segment Delivery Manager develops a departure schedule that avoids peak times. This has not been developed yet due to limited production. A traffic management meeting 3.30pm daily to plan the next day's movements. Taking into account weather and traffic predictions.

1.5	Purpose	ensure vehicles transporting products from the Segment Factory to the Exploratory Works and Main Works sites comply with protocols to minimise the risk of spreading weeds from the site.	Validated during site inspection	C	Wheel wash is provided at the front gate of segment factory The site is sealed. Regular weed treatment is being applied on site
5	TRAFFIC MANAGEMENT MEASURES	records of the number of heavy vehicles entering or leaving the site each day, evening and night, for the duration of the development will be kept.	vehicle movement report from July 2021 provided	C	The front gate guards record all vehicle movements. This meets the requirements of the EMS
5	TRAFFIC MANAGEMENT MEASURES	delivery driver inductions will discuss convoying and techniques to avoid this behaviour;	Induction has been provided and the record keeping is via E7.	C	New online driver induction is up and running. Induction and records have been provided as evidence and this meets the requirements of the EMS
5.1	Road and Intersection Upgrades	<ul style="list-style-type: none"> · construction of the site access road and its intersection with Polo Flat Road as a basic right (BAR) turn treatment and basic left (BAL) turn treatment prior to commencing operation; · pavement strengthening works on Polo Flat Road from the Monaro Highway intersection to the site access road prior to transporting concrete segments from the site; and · installation of temporary traffic signals at the intersection of Snowy Mountains Highway and Bombala, to the satisfaction of TfNSW. 	Acceptance of upgrades from Monaro Council provided dated 31/7/2021	C	The construction of the site access road and its intersection with Polo Flat Road has been completed and accepted by Monaro Council
5.4	Scheduling	In order to limit cumulative impacts on the road network and impacts to local residents and pedestrians, scheduling of vehicle movements to avoid peak traffic periods and conflicts with other road users will be implemented.	A Daily traffic management meeting agenda 23/7/2021 and 30/7/2021	C	Segment Delivery Manager develops a departure schedule that avoids peak times. This has not been developed yet due to limited production. A traffic management meeting 3.30pm daily to plan the next day's movements. Taking into account weather and traffic predictions.
5.6.3	Drivers Code of Conduct and Fatigue Management	Prior to involvement in the project all vehicle drivers will be required to have read the DCC and acknowledge their compliance with it throughout their involvement in the project.	All project induction records for July and August 2021 have been provided as evidence.	C	New online driver induction is up and running. Induction and records have been provided as evidence. The induction process is robust and well-presented and addresses the safety and environmental risks on the project. This meets the requirements of the EMS
5.6.3	Drivers Code of Conduct and Fatigue Management	Heavy vehicle haulage routes will be communicated to haulage contractors during the procurement stage and requirements of the Drivers Code of Conduct, route use and compliance included in their contracts.	The project induction has been provided and it includes the haulage routes	C	New online driver induction is up and running. Induction and records have been provided as evidence. The induction process is robust and well-presented and addresses the safety and environmental risks on the project. This meets the requirements of the EMS
5.8	Weed and Hygiene Control	In order to minimise the risk of any weeds originating from the site entering the KNP or elsewhere, a wash-down station will be constructed and operated upon entry / exit to the site	Validated during site inspection	C	Wheel wash is provided at the front gate of segment factory The site is sealed. Regular weed treatment is being applied on site
Table 6.1	Traffic monitoring parameters and frequency	Any breaches to the parameters listed in Table 6-1?	vehicle movement report from July 2021 provided Heavy vehicle Driver Licence audit checklist 12/5/2021	C	Any breach of requirements in Table 6.1 are reported to FGJV monthly. July 2021 Snowy Mountains Transport report provides all details of inspections and tests undertaken and if any breaches were recorded, In addition to this spot licencing checks completed

7.1	Training	Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in traffic, transport and access management	Driver induction version 3 22/7/2021 Induction records July and August 2021 Toolbox record and sign on sheet 25/8/2021	C	Driver training, scheduler and loader training is very robust and comprehensive Additional Training completed: PBS Truck simulator Load restraint training Chain of responsibility Training for Heavy Vehicles Toolbox talks
7.2	Inspections	Monthly during heavy vehicle or over-dimension vehicle use Inspection of heavy vehicle and over dimension vehicle routes for construction related convoys, congestion or level of service impacts during peak traffic periods	Road Inspection checklist 4/6/2021	C	Visual inspection completed prior to heavy vehicle use. The completed Road Inspection checklist meet the requirements of the EMS
7.4	Review and Auditing	Audits will be undertaken to assess the effectiveness of traffic, transport and access management measures, compliance with this TMP, the Driver Code of Conduct, the conditions of Approval, EIS, RTS and other relevant approvals, licences and guidelines. Specific traffic related auditing is identified in Table 7-2.	OSOM Audit Report (no date) Heavy vehicle Driver Licence audit checklist 12/5/2021	C	All OSOM loads are reviewed and audited. Each OSOM movement has a comprehensive Management plan. Monthly audit of work rosters and delivery schedules are provided by each transport company All traffic related complaints are reviewed to identify any trends.
Segment Factory – Accommodation and Employment Strategy					
5	EMPLOYMENT STRATEGY	establish a training centre in Cooma	Tafe is used as the Training Centre	C	The project training centre has been established at Cooma TAFE
5	EMPLOYMENT STRATEGY	create traineeships, apprenticeships and full-time and part-time jobs	Email from Training & HR Mobilisation Manager with training and employment details.	C	FGJV has a Training and HR Mobilisation Manager30 Traineeships have been completed through TAFE and will be starting at the Segment Factory.Apprentices have commenced: Three electrical and one fitter. Parentship evidence has been sighted.
5	EMPLOYMENT STRATEGY	provide work experience as a key component of this project	Evidence of Work experience Year 10 to 12 was sighted. This includes White Card	C	Compliance was confirmed during site inspection.
5.2	Training	A range of apprenticeships and traineeships are expected to be supported by Future Generation and project sub-contractors throughout the life of the Snowy 2.0 project.	Interview with Community and Stakeholder Engagement Manager.	C	Three electrical and one fitter apprenticeship have commenced. Snowy Hydro Discovery Centre Employment Sessions completed Community and Business Presentations and Info sessions completed
5.2.1	Monaro High School	Future Generation has partnered with Monaro High School to establish a pilot programme for students to complete formally recognized school-based traineeships. The initial programme is aimed at Year 10 students who will study a Certificate II in Construction Pathways (CPC20211).	Interview with Community and Stakeholder Engagement Manager and confirmed high school students were on site working during site inspection	C	Training and HR Mobilisation Manager has partnered with Monaro High School. Student were on site undertaking work and training

5.3	Local Employment	Future Generation will conduct regular regional job fairs and other local recruitment activities	Interview with Community and Stakeholder Engagement Manager.	C	The employment opportunities presented to the community are a great initiative and are being implemented effectively. Snowy Hydro Discovery Centre Employment Sessions have been implemented Community and Business Presentations and Info sessions have been completed
6.1	Joule Ridge Accommodation Camp	Where workers are required to be sourced from outside the Snowy Monaro Regional LGA, to minimise housing issues and potential strain on the local housing market, the project has proposed the provision of a staff accommodation camp within Cooma known as 'Joule Ridge'.	Interview with Community and Stakeholder Engagement Manager.	C	Joule Ridge will be operational in quarter 1 2022.

Appendix B - Planning Secretary Audit Team Agreement

Appendix C - Consultation

Greg Byrnes

From: Greg Byrnes
Sent: Thursday, 19 August 2021 10:25 AM
To: Ben Croome; Katrina O'Reilly
Subject: RE: DPIE Contact -Katrina

Hi Katrina

I will be conducting the Independent Environmental Audit on the Snowy Hydro 2.0 Segment Factory (CSSI 10034) next week. Though, there maybe some delays on the site inspection due to Covid Approvals.

The objective of the audit is to fulfil the requirements of CSSI 10034 Schedule 4 Conditions of Consent (CoC) 7. The overall focus of the audit is to assess compliance with CSSI 10034 Conditions of Consent and the associated management plans listed below:

- Segment Factory-Environmental Management Strategy.
- Segment Factory-Flood Emergency Response Plan.
- Segment Factory-Noise Monitoring and Management Plan
- Segment Factory-Traffic Management Plan.

Snowy Hydro Limited also hold Environmental Protection Licence (EPL) 21419. The audit scope will include compliance with the relevant conditions of this EPL.

As a valued stakeholder for the project is there any areas you would like the audit to focus on?

Please contact me if you would like to discuss.

Thanks

Greg Byrnes

Technical Director - Environment

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greg.byrnes@mottmac.com

From: Ben Croome <ben.croome@snowyhydro.com.au>
Sent: Thursday, 19 August 2021 10:19 AM
To: Greg Byrnes <Greg.Byrnes@mottmac.com>
Cc: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Subject: DPIE Contact -Katrina

Greg / Katrina

Apologies for only putting you in touch at the last minute prior to kicking off the Polo Flat Independent Environmental Audit.

Katrina - Thanks for your understanding.

Regards,

Ben

--

Ben Croome

Senior Environmental Advisor

Snowy 2.0 Project
Snowy Hydro Limited
PO Box 332 Cooma NSW 2630
m. +61 456 453 939
e. ben.croome@snowyhydro.com.au

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Greg Byrnes

From: Carlie Armstrong <Carlie.Armstrong@epa.nsw.gov.au>
Sent: Thursday, 5 August 2021 2:59 PM
To: Greg Byrnes
Subject: RE: Snowy Hydro 2.0 Segment Factory

Hi Greg,

Thank you for your email. The scope you have identified below satisfies the areas the EPA is interested in. In that regard, we have no further comments

Kind Regards,

Carlie

Carlie Armstrong
Unit Head
Regulatory Operations
NSW Environment Protection Authority
D 02 6229 7086 | M 0409 746 631

.....



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From: Greg Byrnes <Greg.Byrnes@mottmac.com>
Sent: Thursday, 5 August 2021 2:53 PM
To: Carlie Armstrong <Carlie.Armstrong@epa.nsw.gov.au>
Subject: Snowy Hydro 2.0 Segment Factory

Hi Carlie

I will be conducting the Independent Environmental Audit on the Snowy Hydro 2.0 Segment Factory (CSSI 10034) later this month.

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As a valued stakeholder for the project is there any areas you would like the audit to focus on?

Could you please get back to me by the 12 August 2021 to have your requests included in the audit scope.

Please contact me if you would like to discuss.

Thanks

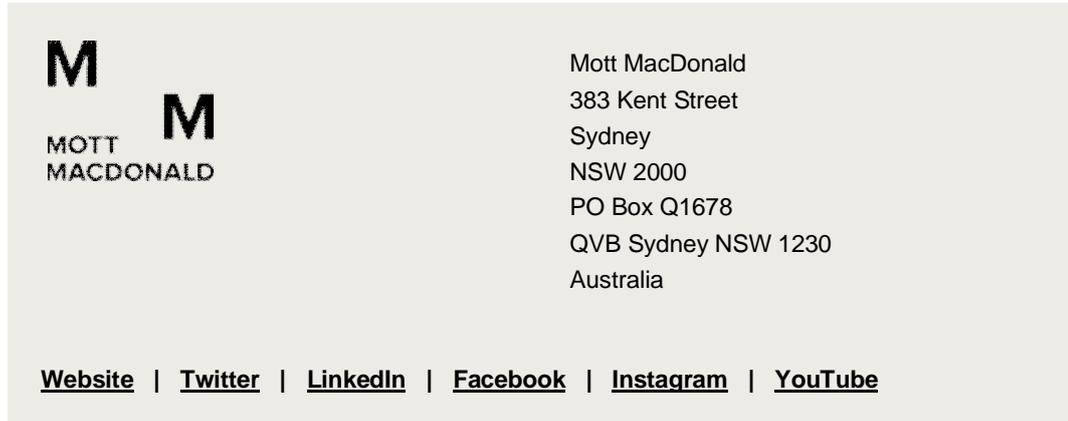
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Technical Director - Environment

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Subject: RE: Snowy Hydro 2.0 Segment Factory

Hi Greg,

Thank you for your email. The scope you have identified below satisfies the areas the EPA is interested in. In that regard, we have no further comments

Kind Regards,

Carlie

Carlie Armstrong
Unit Head
Regulatory Operations
NSW Environment Protection Authority
D 02 6229 7086 | M 0409 746 631



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Report pollution and environmental incidents 131 555 or +61 2 9995 5555

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To: Carlie Armstrong <Carlie.Armstrong@epa.nsw.gov.au>
Subject: Snowy Hydro 2.0 Segment Factory

Hi Carlie

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As a valued stakeholder for the project is there any areas you would like the audit to focus on?

Could you please get back to me by the 12 August 2021 to have your requests included in the audit scope.

Please contact me if you would like to discuss.

Thanks

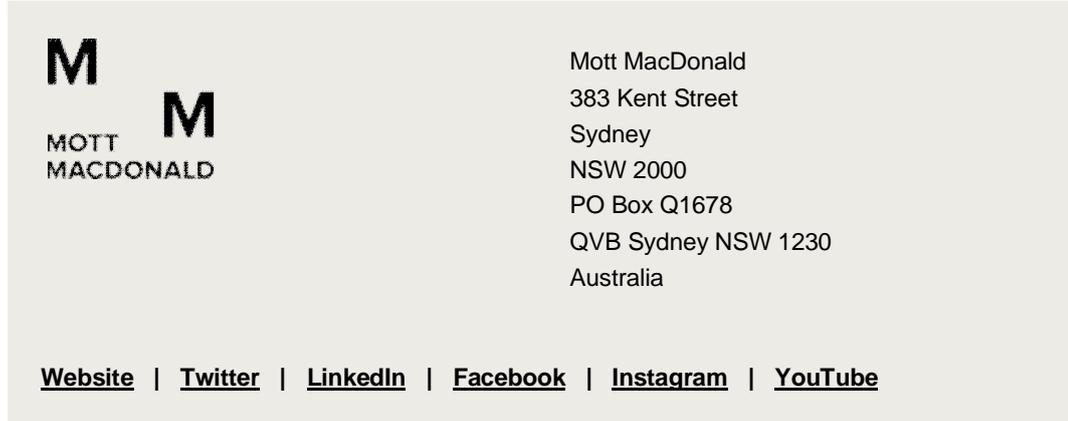
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Greg Byrnes

From: Greg Byrnes
Sent: Tuesday, 17 August 2021 11:51 AM
To: Jeff Morgan; Gary Shakespeare; John Gargett
Subject: RE: Snowy Hydro 2.0 Segment Factory

Hi Jeff
Thanks for your reply.
The Accommodation Strategy will be added to the audit scope.

Thanks

Greg Byrnes

Technical Director - Environment

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greg.byrnes@mottmac.com

From: Jeff Morgan <Jeff.Morgan@snowymonaro.nsw.gov.au>
Sent: Thursday, 5 August 2021 3:00 PM
To: Greg Byrnes <Greg.Byrnes@mottmac.com>; Gary Shakespeare <Gary.Shakespeare@snowymonaro.nsw.gov.au>; John Gargett <John.Gargett@snowymonaro.nsw.gov.au>
Subject: RE: Snowy Hydro 2.0 Segment Factory

Hi Greg,
SMRC has previously also been sent the Accommodation Strategy related to the segment factory for comment by Future Gen and expressed a number of concerns about compliance with that strategy. Are you able to conform if it is part of the audit as well?

Regards,

Jeff Morgan

Chief Operating Officer



PO Box 714
COOMA NSW 2630

Direct 0475 735 922
Phone 1300 345 345
Fax (02) 6456 3337

snowymonaro.nsw.gov.au

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From: Greg Byrnes <Greg.Byrnes@mottmac.com>
Sent: Thursday, 5 August 2021 2:47 PM
To: Gary Shakespeare <Gary.Shakespeare@snowymonaro.nsw.gov.au>; Jeff Morgan <Jeff.Morgan@snowymonaro.nsw.gov.au>; John Gargett <John.Gargett@snowymonaro.nsw.gov.au>
Subject: Snowy Hydro 2.0 Segment Factory

Hi Gary, Jeff and John

I will be conducting the Independent Environmental Audit on the Snowy Hydro 2.0 Segment Factory (CSSI 10034) later this month.

The objective of the audit is to fulfil the requirements of CSSI 10034 Schedule 4 Conditions of Consent (CoC) 7. The overall focus of the audit is to assess compliance with CSSI 10034 Conditions of Consent and the associated management plans listed below:

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As a valued stakeholder for the project is there any areas you would like the audit to focus on?

Could you please get back to me by the 12 August 2021 to have your requests included in the audit scope.

Please contact me if you would like to discuss.

Thanks

Greg Byrnes

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Technical Director - Environment

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Greg Byrnes

From: Andrew Lissenden <andrew.lissenden@transport.nsw.gov.au>
Sent: Thursday, 26 August 2021 5:01 PM
To: Greg Byrnes
Subject: Snowy Hydro 2.0 Segment Factory - TfNSW Audit Input

Hi Greg,

Further to your email below Transport for NSW (TfNSW) thanks you for the opportunity to provide input into the Independent Environmental Audit on the Snowy Hydro 2.0 Segment Factory (CSSI 10034).

TfNSW has reviewed the approval that has been issued and provides the following comments concerning what it believes should be included in the audit from a traffic/state classified road perspective:

1. An assessment of the development's compliance with applicable transport related conditions in the issued approval. Specifically:
 - Schedule 3 Condition 4, 5, 7 (b) and (c), 8, 9 (e) in relation to those access points that connect directly with the state road network (e.g. the Rock Flat holding area), 10 (a), (b), (c), (d), (e) and (f); and
 - Schedule 4 Condition 8.

For each of the above conditions, details should be provided as part of the audit on what the applicant is doing to ensure compliance with these requirements as well as details on how compliance or otherwise has been determined.

2. Is the management of worker movements between the segment factory and the provided workers accommodation/manufactured home estate for segment factory workers being undertaken as detailed in approved documentation (e.g. refer to development consent issued for DA10.2020.147 inclusive of any associated modifications);
3. Confirmation that any complaints received from the community concerning development related traffic impacts are being recorded and addressed as per the approval issued; and
4. Identification of measures to address any non-compliances including a timeframe for the implementation of identified measures.

If you have any questions, please contact me on 0418 962 703.

Regards

Andrew Lissenden
Development Case Officer
Community and Place | South Region
Regional and Outer Metropolitan
Transport for NSW

T 02 4221 2769 | M 0418 962 703
andrew.lissenden@transport.nsw.gov.au
Level 4, 90 Crown Street, Wollongong NSW 2500



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From: Greg Byrnes [<mailto:Greg.Byrnes@mottmac.com>]
Sent: Thursday, 5 August 2021 2:49 PM
To: Andrew Lissenden <andrew.lissenden@transport.nsw.gov.au>
Subject: Snowy Hydro 2.0 Segment Factory

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Hi Andrew

I will be conducting the Independent Environmental Audit on the Snowy Hydro 2.0 Segment Factory (CSSI 10034) later this month.

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Could you please get back to me by the 12 August 2021 to have your requests included in the audit scope.

Please contact me if you would like to discuss.

Thanks

Greg Byrnes

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Technical Director - Environment

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Appendix D - Independent Audit Declaration Form

Appendix E – Independent Audit Report Declaration Form Template

Independent Audit Report Declaration Form	
Project Name	Snowy 2.0 Segment factory
Consent Number	CSSI 10034
Description of Project	Production of concrete segments for the Snowy 2.0 project
Project Address	Polo Flat Road, Polo Flat
Proponent	Snowy Hydro Limited
Title of Audit	Independent Environmental Audit of the Snowy 2.0 Segment Factory CSSI 10034 Schedule 4 Condition of Consent 7
Date	24 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:

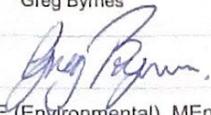
- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

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 Greg Bymes

Signature



Qualification BE (Environmental), MEnvLaw, Exemplar Global Environment Auditor

Company Mott MacDonald Australia Pty Ltd

Company Address Level 10, 383 Kent Street Sydney 2000

Appendix E – Site Inspection Photos



New Segment transport trailers



Self Bunded Generator



Segments assembled



Constructed Open stormwater channel



Sealed access roads around Segment Factory



Stormwater Detention Pond



Stormwater Detention Pond over flow



Weed control



Flora exclusion fencing



Segment forklift – new and well maintained



Completed segments



Segment trailers



Hydraulic tightening straps for segments



Spill kits



Constructed stormwater channel around the site



Constructed stormwater channel around the site



Material stockpile management



Batch plant material storage



Batch plant material storage



Batch plant



Front end loader collecting materials for batch plant



Front end loader collecting materials for batch plant



Steel recycling bin



New power generators with fuel storage



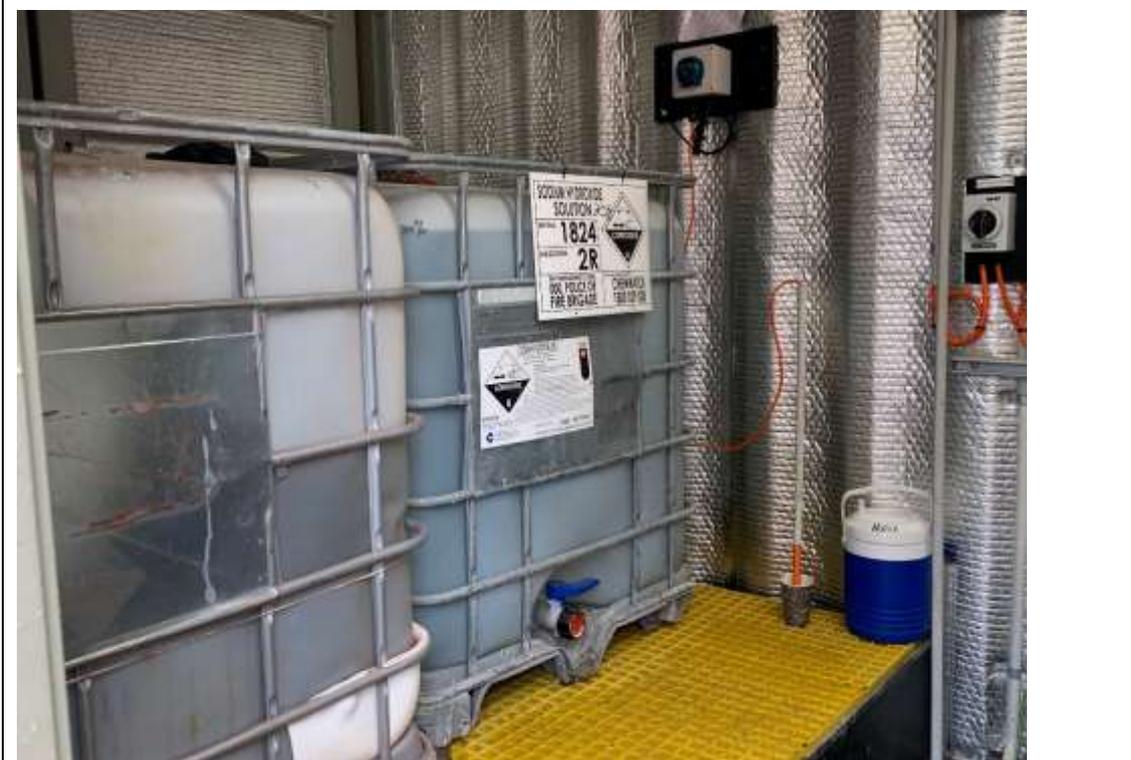
New power generators with fuel storage



Liquid waste pump out



Bunder water treatment plant



Bunded and undercover chemical storage for water treatment plant



Wheel wash



Wheel wash in operation



Bunded refuelling station



Refuelling procedure



Bunded chemicals



Bunded chemical storage container



Segment Carrousal 1 in operation



Segment mould



Completed segments



Work Expeirnce students



Completed Segment factory access road

