

15 July 2026

Ms Nicole Brewer  
Director, Energy Assessments  
Planning and Assessments  
Department of Planning, Housing and Infrastructure

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By email: [nicole.brewer@planning.nsw.gov.au](mailto:nicole.brewer@planning.nsw.gov.au)

Dear Ms Brewer

Re: SSI-9687 Main Works Schedule 3, Condition 67

In accordance with Condition 67(a), Snowy Hydro Limited (SHL) submits the independent environmental audit of the Subsidence Management Plan for Marica West Adit.

Two recommendations have been made following the audit. Snowy Hydro's response to the recommendations, including actions to address the recommendations, is provided below in accordance with Condition 67(b) and (c). The progress and completion of these actions will be tracked in the project's compliance management system.

**Table 1 - SHL response to recommendations and proposed audit action plan**

| No. | Recommendation                                                                                                                                                                                                                                                                                                                       | Response                                                                                                                                                                      | SHL Action                                                                                                                                                                                                                                                                         | Action Due Date                                          | Action Status |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|---------------|
| 1   | Convergence measurements undertaken in the tunnel continue to be included in all future Fortnightly Advance and Monitoring Reports.                                                                                                                                                                                                  | Agreed. SHL has already been providing convergence measurements undertaken in the tunnel since the 5th fortnightly report (issued on 27 May 2026) and will continue to do so. | Ensure tunnel convergence measurements are consistently included in all future Fortnightly Advance and Monitoring Reports.                                                                                                                                                         | Commenced 27 May 2026<br><br>Ongoing during construction | Closed.       |
| 2   | The tunnel now extends beyond the end of the horizontal inclinometer and as a result will not record subsidence due to tunnelling. If the ground above is disturbed, ongoing movement of material may be recorded, however it will be difficult to assess trends. On this basis monitoring of this instrument is no longer required. | Comment noted.                                                                                                                                                                | In accordance with this recommendation, horizontal inclinometer readings will be excluded from the 8th fortnightly monitoring report and subsequent issues. Data collection will be maintained, and records will be presented in the geotechnical monitoring meeting twice-weekly. | 2 July 2026<br><br>(8th fortnightly report onwards)      | Closed.       |

This letter, inclusive of Snowy Hydro's response and action plan, has been prepared to address this action.

Should you require further information, please don't hesitate to contact me on 0455 234 765 or [Lisa.mckeown@snowyhydro.com.au](mailto:Lisa.mckeown@snowyhydro.com.au).

Yours sincerely,

DocuSigned by:  
*Lisa McKeown*  
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Prepared for  
SNOWY HYDRO LIMITED  
ABN: 17 090 574 431



# MOD3 Marica - Independent Environmental Audit

09-Jul-2026

**AECOM**

MOD3 Marica - Independent Environmental Audit

## MOD3 Marica - Independent Environmental Audit

**Client: SNOWY HYDRO LIMITED**

ABN: 17 090 574 431

**Prepared by**

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MOD3 Marica - Independent Environmental Audit

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|     |               |                   | Name/Position                 | Signature                                                                             |
| A   | 12-June-2026  | Draft for Comment | Alec Palmer – Project Manager |                                                                                       |
| 0   | 03-July-2026  | Revision B        | Alec Palmer – Project Manager |                                                                                       |
| 1   | 09-Jul-2026   | Final             | Alec Palmer – Project Manager |  |
|     |               |                   |                               |                                                                                       |

## Table of Contents

|            |                                                        |    |
|------------|--------------------------------------------------------|----|
| 1.0        | Introduction                                           | 1  |
| 1.1        | Background                                             | 1  |
| 1.2        | Scope of the Audit                                     | 1  |
| 1.3        | Audit Team                                             | 1  |
| 1.4        | Monitoring and Tunnelling Works                        | 1  |
| 2.0        | Audit Methodology                                      | 3  |
| 2.1        | Selection and endorsement of audit team                | 3  |
| 2.2        | Compliance evaluation                                  | 3  |
| 2.2.1      | Audit Meetings                                         | 3  |
| 2.2.2      | Task 1 - Data Collation                                | 3  |
| 2.2.3      | Task 2 - Site Visit                                    | 3  |
| 2.2.4      | Task 3 - Consultation with Agencies                    | 4  |
| 2.2.5      | Task 4 Document Review                                 | 5  |
| 2.2.6      | Task 5 Audit Report                                    | 5  |
| 3.0        | Data Collation                                         | 6  |
| 4.0        | Site Visit                                             | 7  |
| 4.1        | Site Discussions                                       | 7  |
| 4.2        | Site Observations                                      | 8  |
| 5.0        | Consultation with Agencies                             | 9  |
| 5.1        | Relevant Agencies                                      | 9  |
| 5.2        | Agency Responses                                       | 9  |
| 6.0        | Document Review                                        | 10 |
| 6.1        | Snowy 2.0 Main Works – TBM4-Subsidence Management Plan | 10 |
| 6.2        | Fortnightly Advance and Monitoring Reports             | 10 |
| 7.0        | Audit Findings                                         | 11 |
| 7.1        | Environmental Performance of the Works                 | 11 |
| 7.2        | Non-compliances                                        | 11 |
| 7.3        | Adequacy of the Plan                                   | 11 |
| 7.4        | Recommendations                                        | 11 |
| 7.5        | Independent Audit Declaration                          | 11 |
| Appendix A | Photographs                                            | A  |
| Appendix B | Agency Questionnaire Responses                         | B  |
| Appendix C | IEA Team Endorsement                                   | C  |
| Appendix D | Audit Declaration                                      | D  |

## 1.0 Introduction

### 1.1 Background

In December 2025, a Subsidence Management Plan was developed by Snowy Hydro Limited (SHL) in response to the Snowy 2.0 Main Works Modification Application (SSI-9687-MOD 3). In accordance with Schedule 3, condition 66 of the Department of Planning, Housing and Infrastructure (DPHI) Conditions of Approval, AECOM Australia Pty Ltd (AECOM) was engaged by SHL to undertake an Independent Environmental Audit (IEA) of the Subsidence Management Plan.

AECOM was engaged under the Professional Service Framework and with reference to the assignment confirmation 940901 – Assignment 19.

### 1.2 Scope of the Audit

Details of the Audit are:

|                            |                                                           |
|----------------------------|-----------------------------------------------------------|
| Requested by:              | Department of Planning, Housing and Infrastructure (DPHI) |
| Request/Commencement Date: | 29/04/2026                                                |
| Lead Auditor:              | Tim Rannard                                               |

The Audit was implemented in accordance with Schedule 3, condition 66 of the DPIE Conditions of Approval, as outlined below:

- Perform the required Independent Environmental Audit (IEA) with a suitably qualified team
- Include consultation with relevant agencies
- Assess the environmental performance of the works and determine if they are complying with the requirements of the Subsidence Management Plan and the requirements of conditions 63 and 64 in the consolidated version of the CSSI approval CSSI-9687
- Review the adequacy of the approved strategies, plans and programs
- Recommend appropriate measures or actions to meet the requirements of condition 63 and 64 above.

### 1.3 Audit Team

**Lead Auditor – Timothy Rannard:** Technical Director and engineering geologist with over 30 years' experience as a designer in the geotechnical and tunnelling industry.

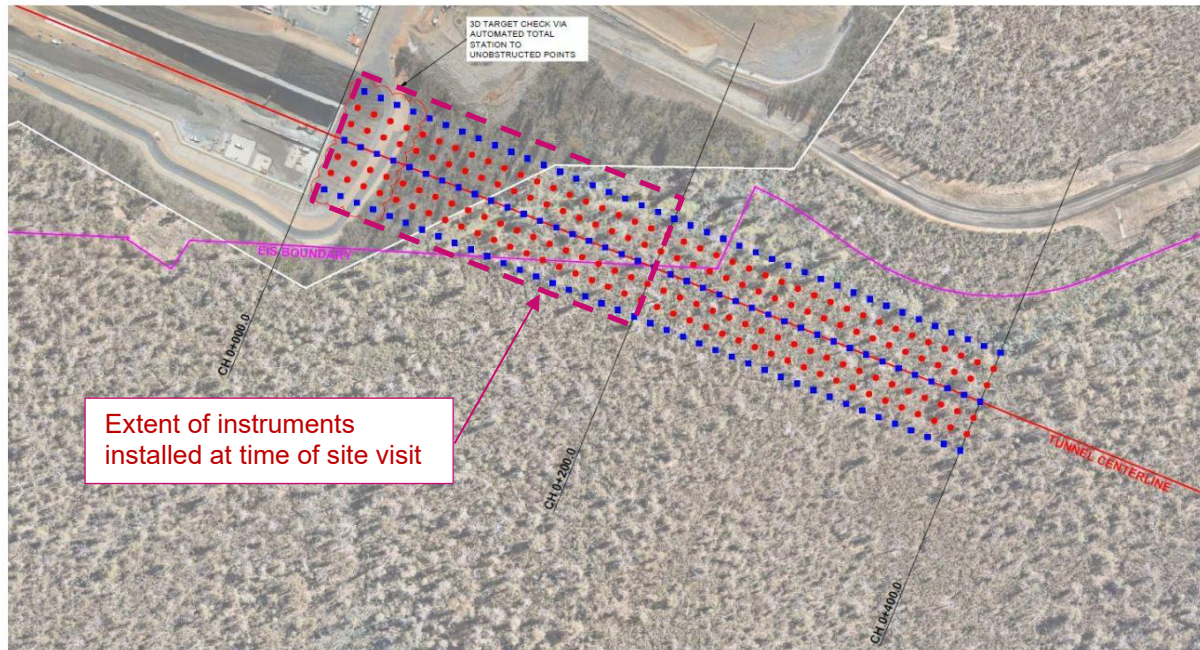
**Project Manager – Alec Palmer;** Principal Project Manager and Environmental Scientist with over 10 years' experience in the environmental industry.

### 1.4 Monitoring and Tunnelling Works

On 5 March 2026, surface subsidence monitoring instrumentation over the first 200m of the Marica Adit Tunnel alignment was installed, with recording of baseline readings commencing. The surface monitoring array included:

- 105 Tilt Sensors installed in an array spaced 10 m by 10 m.
- 14 Displacement Monitoring Points (DPMs) installed on the headwall slope above the TBM launching cradle.

A sketch showing the proposed layout of the surface instruments is shown below in **Figure 1**.



**Figure 1 Marica Adit Tunnel Subsidence Monitoring Survey Sketch (from TBM Monica - Fortnightly Advance and Monitoring Report\_01 13/03/2026 to 26/03/2026).**

On receiving the Modification of Infrastructure Approval for the MOD 3 to Snowy 2.0 Main Works Submissions Report and the supporting Snowy 2.0 Main Works TBM4 - Subsidence Management Plan, mining activities commenced on the Snowy 2.0 Marica Adit Tunnel using Tunnel Boring Machine Monica (also known as TBM4) on 13 March 2026.

## 2.0 Audit Methodology

### 2.1 Selection and endorsement of audit team

The audit team was officially endorsed by the Department of Planning, Housing and Infrastructure on 8 April 2026 (**Appendix C**), in accordance with the requirements in the CSSI 9687 Approval Section 66, which states that the audit must:

- a. *be conducted by a suitably qualified, experienced and independent team of experts, including a lead auditor, whose appointment has been endorsed by the Planning Secretary.*

### 2.2 Compliance evaluation

To evaluate the compliance of the Subsidence Management Plan, AECOM completed the following tasks, as outlined in the methodology of the proposal.

#### 2.2.1 Audit Meetings

The following meetings were held to formalise, and track actions for the Audit.

**Table 1 Audit Meetings**

| Meeting Type  | Date         | Attendee's                                                                                                                                                                                                                                      | Actions                                                                                                                                                                                                                                                                           |
|---------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Audit Opening | 05 May 2026  | SHL: <ul style="list-style-type: none"> <li>- Jordan Chenery</li> <li>- Nicole Damaggio</li> <li>- Maja Heath</li> <li>- Samuel Pevere</li> </ul> AECOM: <ul style="list-style-type: none"> <li>- Tim Rannard</li> <li>- Alec Palmer</li> </ul> | <ul style="list-style-type: none"> <li>- AECOM to confirm suitability for Site visit 26 May 2026 (closed)</li> <li>- AECOM to detail documents required for review (closed)</li> <li>- AECOM to confirm secure location for sharing of project documentation (closed).</li> </ul> |
| Audit Close   | 09 July 2026 | SHL: <ul style="list-style-type: none"> <li>- Jordan Chenery</li> <li>- Nicole Damaggio</li> </ul> AECOM: <ul style="list-style-type: none"> <li>- Tim Rannard</li> <li>- Alec Palmer</li> </ul>                                                | <ul style="list-style-type: none"> <li>- Agreement on SHL action plan to address audit (closed)</li> </ul>                                                                                                                                                                        |

#### 2.2.2 Task 1 - Data Collation

Section 1.3 in the Subsidence Management Plan lists several named documents that were provided by SHL for review. This section also notes several other document types relevant to the audit including:

- Design Drawings, Reports and Specifications;
- Project Geotechnical Instrumentation and Monitoring Plan;
- Construction Method Statements;
- Inspection and Test Plans;
- History of Monitoring results;
- Timeline of tunnel excavation and support installation;
- Documentation related to relevant environmental impact assessment and monitoring.

#### 2.2.3 Task 2 - Site Visit

The Lead Auditor, accompanied by SHL, conducted a site visit on May 26, 2026. The site visit assessed the site conditions and was an opportunity to observe the site works.

#### **2.2.4 Task 3 - Consultation with Agencies**

SHL facilitated communication between AECOM with New South Wales Parks and Wildlife Services (NPWS) to understand their involvement in undertaking, reviewing or witnessing the monitoring of the works. It also provided an opportunity to confirm that there is no missing or outstanding documentation.

The following questions were provided to NPWS using a questionnaire.

1. Was NPWS involved in reviewing or witnessing work undertaken as part of the subsidence monitoring?
2. If yes, who undertook the above work and what were their project role, experience, and qualifications?
3. Has NPWS been provided with copies of the results from the subsidence monitoring?
4. Does NPWS have any concerns regarding the way the subsidence monitoring was undertaken?
5. Any other commentary relating to the Marica Audit

### 2.2.5 Task 4 Document Review

The collated documentation and data was reviewed and outcomes compared against the requirements of the Subsidence Management Plan and the requirements of conditions 63 and 64 mentioned in the consolidated version of the CSSI approval CSSI-9687, that is:

- *63. The Proponent must ensure that any project related subsidence impacts do not cause greater than negligible environmental consequences on the National Park Estate, including but not limited to water, biodiversity and heritage values.*
- *64. Prior to recommencing tunnelling using tunnel boring machine Florence as described in MOD 2 or commencing tunnelling for the Marica west adit as described in MOD3, the Proponent must prepare a Subsidence Management Plan in respect of the tunnelling works by tunnel boring machine Florence and the Marica west adit, to the satisfaction of the Planning Secretary and in consultation with NPWS. This plan must:*
  - a. be prepared by a suitably qualified geotechnical expert;*
  - b. include detailed measures and controls that would be implemented to ensure performance measure in condition 63 is met;*
  - c. include a detailed description of subsidence monitoring prior to tunnelling recommencing and ongoing monitoring at surface or within the tunnel;*
  - d. include a risk assessment and trigger action response plan (TARP) to identify and manage settlement risk; and*
  - e. include a contingency plan and adaptive management process.*

### 2.2.6 Task 5 Audit Report

This Independent Environment Audit, addressing:

- The environmental performance of the works;
- Areas where the works are not complying with the requirements of the Subsidence Management Plan and the requirements of conditions 63 and 64 in the consolidated version of the CSSI approval CSSI-9687;
- Comments regarding the adequacy of the approved strategies, plans and programs; and
- Recommendations regarding appropriate measures or actions to improve environmental performances.

### 3.0 Data Collation

**Table 2** details the documentation provided to support the investigations of this Audit Report.

**Table 2 Agency Documentation**

| Document Title                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Agency    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| S2-CIV-CT-HAD-REP-6410 MA01B.1 - Marica Adit Tunnel - Geomechanical Report                                                                                                                                                                                                                                                                                                                                                                                              | FGJV      |
| - S2-CIV-CT-MAD-REP-6501 [02]- Marica Adit Segmental Lining - Technical Report                                                                                                                                                                                                                                                                                                                                                                                          | FGJV      |
| S2-CIV-HT-HTU-REP-6001 HT02C.2 - Long Plain Fault Zone - Technical Report                                                                                                                                                                                                                                                                                                                                                                                               | FGJV      |
| Snowy 2.0 Main Works - Modification 2, Appendix C Water Assessment, August 2023                                                                                                                                                                                                                                                                                                                                                                                         | EMM / SHL |
| S2-FGJV-ENV-DPE-LET-0032_A_HRT Subsidence Update September 2023                                                                                                                                                                                                                                                                                                                                                                                                         | FGJV      |
| S2-FGJV-ENV-PLN-0010_-_P_-_Main_Works_-_Water_Management_Plan_Clean                                                                                                                                                                                                                                                                                                                                                                                                     | FGJV      |
| S2-FGJV-ENV-PLN-0011_-_O_-_Surface_Water_Management_Plan_Clean                                                                                                                                                                                                                                                                                                                                                                                                          | FGJV      |
| S2-FGJV-ENV-PLN-0012_-_O_-_Groundwater_Management_Plan_Clean                                                                                                                                                                                                                                                                                                                                                                                                            | FGJV      |
| Design Drawings, Reports and Specifications relevant to the area covered by the TBM4 – Subsidence Management Plan <ul style="list-style-type: none"> <li>- MA01A.1 Portal design - S2-CIV-CT-MAD-REP-6100 &amp; S2-CIV-CT-MAD-DRG-6100</li> <li>- MA01A.2 TBM launching design - S2-CIV-CT-MAD-REP-6201 &amp; S2-CIV-CT-MAD-DRG-6200</li> <li>- MA01B.2 Marica Adit segments design - S2-CIV-CT-MAD-REP-6501 &amp; S2-CIV-CT-MAD-DRG-6500'</li> </ul>                   | FGJV      |
| Project Geotechnical Instrumentation and Monitoring Plans <ul style="list-style-type: none"> <li>- S2-GEO-GN-REP-1005 [E]</li> <li>- S2-FGJV-TEC-REP-2004[1]</li> </ul>                                                                                                                                                                                                                                                                                                 | FGJV      |
| Construction Method Statements: <ul style="list-style-type: none"> <li>- S2-FGJV-CON-CMS-0310[B]</li> </ul>                                                                                                                                                                                                                                                                                                                                                             | FGJV      |
| Inspection and Test Plans: <ul style="list-style-type: none"> <li>- S2-FGJV-QUA-ITP-9023</li> <li>- S2-FGJV-QUA-ITP-9025</li> </ul>                                                                                                                                                                                                                                                                                                                                     | FGJV      |
| History of Monitoring results: <ul style="list-style-type: none"> <li>- TBM Monica - Fortnightly Advance and Monitoring Report_01 (13.03.2026 to 26.03.2026)</li> <li>- TBM Monica - Fortnightly Advance and Monitoring Report_02 (27.03.2026 to 09.04.2026)</li> <li>- TBM Monica - Fortnightly Advance and Monitoring Report_03 (10.04.2026 to 23.04.2026)</li> <li>- TBM Monica - Fortnightly Advance and Monitoring Report_04 (24.04.2026 to 07.05.2026)</li> </ul> | SHL       |
| Timeline of tunnel excavation and support installation                                                                                                                                                                                                                                                                                                                                                                                                                  | SHL       |
| Agency Questionnaire Response                                                                                                                                                                                                                                                                                                                                                                                                                                           | NPWS      |

## 4.0 Site Visit

Details of the Site Visit were as follows:

**Table 3 Site visit details**

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Date:            | 26 May 2026                                                                                                                                                                                                                                                                                                                                                                                                                      |
| AECOM Attendees: | Timothy Rannard                                                                                                                                                                                                                                                                                                                                                                                                                  |
| SHL Attendees:   | Jordan Chenery<br>Diego Avi<br>Nick Chapman                                                                                                                                                                                                                                                                                                                                                                                      |
| Agenda:          | <p><b>8:30 am:</b> Arrive at the Marica gatehouse and complete inductions and sign-in process.</p> <p><b>9:00 am:</b> Meet SHL and FGJV Engineers at the site office to receive Site briefing, discuss works completed and monitoring undertaken.</p> <p><b>9:40 am:</b> Site walkover of surface monitoring array</p> <p><b>10:10 am:</b> Site walkover of portal face monitoring array</p> <p><b>11:10 am:</b> Leave Site.</p> |

Photographs from the site visit are included in **Appendix A**.

## 4.1 Site Discussions

Key site personnel were made available for discussions during the site visit. These included the Project Manager (Andrew Calvert) the Senior Underground Engineer (Vikum Chathuranag), and the Survey Manager (Dave Ibbotson).

- At the time of the site visit, the tunnel face is located approximately at CH90 with the TBM stopped for two weeks to complete commissioning of the spoil conveyor.
- Monitoring undertaken in the tunnel includes:
  - a reconciliation between cut volume and spoil volume
  - toolbox talks with the TBM pilot for recognising indications of face instability
  - convergence monitoring in the tunnel.
- A comment made by the project team noted the difficulties in reconciling the cut volume and spoil volume related to operation of the TBM as an earth pressure balance machine, where volumes of spoil remain at the face and in the screw conveyor between cuts. This can result in differences of over 10% between spoil and cut volumes that are unrelated to face or crown instability. When calculated over several cuts there is good reconciliation between the cut volume and spoil volume.
- It was noted the convergence monitoring was not included in Fortnightly Advance and Monitoring Reports 1 – 4, however was included in Reports 5 and 6. This data is to be included in future reports.
- A horizontal inclinometer located above the tunnel crown was used to assess the performance of the canopy tubes in the first 30m of the tunnel. Data from this instrument was included in the Fortnightly Advance and Monitoring Report.
- Monitoring undertaken at the surface includes:
  - Monitoring of an array of tiltmeters spaced at 10m by 10m grid along the tunnel centreline for a distance of 200 m.

- The first two arrays include prisms for displacement monitoring using the total station.
- Prisms are also located at the crest of the portal, on the portal face, and on the southern wall of the dive structure.
- Instruments along the tunnel centreline are re-levelled regularly (typically in response to rainfall or similar events). Photograph 4 shows the star picket used for the re-levelling adjacent to the tiltmeter.
- The tiltmeters have recorded significant noise due to a combination of rainfall and thermal events.
- Ground movements measured to date remain below alert levels and monitoring array appears to be performing satisfactorily.

## **4.2 Site Observations**

The following site observations were made:

- The surface monitoring array appears to have been installed in accordance with the Subsidence Management Plan.
- Minimal clearing has been undertaken outside the area disturbed for construction of the portal.

## 5.0 Consultation with Agencies

### 5.1 Relevant Agencies

In reference to the MOD3 - Remediation and Ground Consolidation submission (CSSI-9687) – Modification Report, the following agencies provided responses:

- NSW Environment Protection Agency (NSW EPA)
- Transport for NSW (TfNSW)
- Department of Climate Change, Energy, The Environment, and Water
- Snowy Monaro Regional Council

A summary of the agency responses to the MOD3 – Additional Audit submission are shown within **Table 4**. On the basis of these responses, it was assessed that NPWS was a key stakeholder and should be consulted as part of the audit.

All other agencies were not considered to be key stakeholders in relation to this audit.

**Table 4 - Agency responses to MOD3**

| Agency                                                           | Comments                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NSW EPA                                                          | <p>Commented on the following areas:</p> <ul style="list-style-type: none"> <li>• Proposed Stormwater Management Objectives and Erosion and Sediment Control Design Standards</li> <li>• Leachate Management</li> <li>• Material Characterisation and Management</li> <li>• Beneficial Reuse of Construction Water and Stormwater</li> </ul> <p>No recommendations made regarding subsidence or subsidence management</p> |
| TfNSW                                                            | <p>Commented on the road connection to Snowy Mountains Highway.</p> <p>No recommendations made regarding subsidence or subsidence management</p>                                                                                                                                                                                                                                                                          |
| Department of Climate Change, Energy, The Environment, and Water | <p>Commented on the following areas:</p> <ul style="list-style-type: none"> <li>• Water Take and Licencing</li> <li>• Waterfront Land</li> <li>• Modelling Groundwater</li> </ul> <p>No recommendations made regarding subsidence or subsidence management</p>                                                                                                                                                            |
| Snowy Monaro Regional Council                                    | No comments made regarding subsidence or subsidence management.                                                                                                                                                                                                                                                                                                                                                           |

### 5.2 Agency Responses

Responses from NPWS indicated that they had been involved in development of the Subsidence Management Plan and they expected to remain involved as the tunnelling works continue.

Copies of the responses to IEA questionnaires is provided in **Appendix B**.

## 6.0 Document Review

### 6.1 Snowy 2.0 Main Works – TBM4-Subsidence Management Plan

The document titled Snowy 2.0 Main Works– TBM4-Subsidence Management Plan, Version C dated 12 December 2025 was reviewed. Key outputs from the plan include:

- Tunnel sections with more than 100m of ground cover have negligible risk of surface subsidence. The only tunnel stretch with a ground cover of less than 100m is located in the Marica Adit, between Ch. 0+000 and Ch. 0+400. Consequently, this section was designated for surface subsidence monitoring.
- the surface subsidence monitoring was split into two sections:
  - Surface subsidence monitoring within EIS boundary (Ch. 0+000 to Ch. 0+200)
  - Surface subsidence monitoring outside EIS boundary (Ch. 0+200 to Ch. 0+400), if required
- A Trigger Action Response Plan, including trigger levels for action or alarm.
- Reporting, including
  - A fortnightly subsidence monitoring report
  - Notifications to NSW DPE in the event of Action (yellow) or Alarm (Red) trigger levels are reached.

### 6.2 Fortnightly Advance and Monitoring Reports

The following documents tracked on a fortnightly basis the work activities undertaken in the tunnel:

1. TBM Monica - Fortnightly Advance and Monitoring Report\_01 13/03/2026 to 26/03/2026
2. TBM Monica - Fortnightly Advance and Monitoring Report\_02 27/03/2026 to 09/04/2026
3. TBM Monica - Fortnightly Advance and Monitoring Report\_03 10/04/2026 to 23/04/2026
4. TBM Monica - Fortnightly Advance and Monitoring Report\_04 24/04/2026 to 07/05/2026
5. TBM Monica – Fortnightly Advance and Monitoring Report\_05 08/05/2026 to 21/05/2026
6. TBM Monica – Fortnightly Advance and Monitoring Report\_05 22/05/2026 to 04/06/2026

The fortnightly reports are summarised below.

**Table 5 Summary of Fortnightly Reports**

| Report No. | Period                   | Ch. From and To    | Subsidence issues recorded |
|------------|--------------------------|--------------------|----------------------------|
| 1          | 13/03/2026 to 26/03/2026 | -1.24 m to 2.27 m  | Nil                        |
| 2          | 27/03/2026 to 09/04/2026 | 2.27 m to 11.99 m  | Nil                        |
| 3          | 10/04/2026 to 23/04/2026 | 11.9 m to 27.7 m   | Nil                        |
| 4          | 24/04/2026 to 07/05/2026 | 27.7 m to 55.0 m   | Nil                        |
| 5          | 08/05/2026 to 21/05/2026 | 55.0 m to 86.09 m  | Nil                        |
| 6          | 22/05/2026 to 04/06/2026 | 86.09 m to 92.06 m | Nil                        |

## 7.0 Audit Findings

### 7.1 Environmental Performance of the Works

Based on the observations made during the site visit and on review of the provided documentation it is considered that the works have not caused greater than negligible environmental consequences on the National Park Estate, including water, biodiversity and heritage values.

### 7.2 Non-compliances

No non-compliances were recorded during this audit.

### 7.3 Adequacy of the Plan

The subsidence management plan is technically sound and appears to be operating as intended.

### 7.4 Recommendations

- Convergence measurements undertaken in the tunnel continue to be included in all future Fortnightly Advance and Monitoring Reports.
- The tunnel now extends beyond the end of the horizontal inclinometer and as a result will not record subsidence due to tunnelling. If the ground above is disturbed, ongoing movement of material may be recorded, however it will be difficult to assess trends. On this basis monitoring of this instrument is not longer required.

### 7.5 Independent Audit Declaration

The final Independent Audit Report Declaration Form is included in **Appendix D**.

# Appendix A

## Photographs

## Appendix A    Photographs from Site Visit



Photograph 1 – General view of the crest of the Portal Cut showing prisims located at crest of cutting



Photograph 2 - Prism and tiltmeter located on centreline of tunnel at the crest of the portal



Photograph 3 – Foot track along line of tiltmeters over tunnel centreline. Note tiltmeter at CH10m near tree line.



Photograph 4 – monitoring location at CH100 located on the Tunnel centreline. Note Tiltmeter, timber peg with flagging tape, and star picket used for re-levelling



Photograph 5 – Looking along the tunnel centreline from tiltmeter at CH120 (in foreground) towards CH200



Photograph 6 – Portal Face.

# Appendix B

## Agency Questionnaire Responses

## Appendix B Agency Questionnaire Responses

### Agency Questionnaire – NPWS

**1. Has NPWS been involved in reviewing or witnessing work undertaken as part of the subsidence monitoring and/or other related management activities at the Marica site?**

- NPWS provided comment and endorsement for the now approved Snowy 2.0 Main Works – TBM4 Subsidence Management Plan (Rev C dated 12 December 2025)
- NPWS reviewed and gave approval for surface monitoring works (as per the TBM4 Subsidence Management Plan) to occur within the national park outside the Snowy 2.0 Main Works EIS boundary. As part of this the following correspondence occurred:
  - 17 February 2026 - NPWS received Conservation Risk Assessment (CRA) for exempt development to undertake surface monitoring outside the Snowy 2.0 Main Works EIS construction boundary at Marica, along the TBM4 alignment route between CH200 – CH400. Consent for the activity was finalised on 27 February 2026
  - 02 March 2026 - Snowy Hydro advised that installation of the subsidence monitoring equipment would commence on 02/03/2026, under conditions as outlined in the CRA
  - 13 March 2026 - SHL advised that TBM#4 had commenced tunnelling on 13 March 2026
  - 22 April - SHL provided the Precautionary Survey Report
  - 12 May 2026 - NPWS officers visited the monitoring area to review the installation works

**2. If yes, who undertook the above work and what was their position, experience, and qualifications?**

- Bernadette Zanet, Senior Project Officer, Snowy 2.0 Team, NPWS
- Nicole Shotter, Manager, Snowy 2.0 Team, NPWS
- Karl Daniels, Project Officer, Snowy 2.0 Team, NPWS

**3. Has NPWS been provided with copies of the results from the subsidence monitoring at Marica?**

NPWS has received the *TBM Monica – Fortnightly Advance and Monitoring Report No.1, No. 2 and No. 3*, specifically for 13 March to 23 April 2026.

**4. Does NPWS have any concerns regarding the way the subsidence monitoring and or management is being undertaken?**

Nil issue. NPWS will rely on being notified of any potential issue in the event a TARP is activated.

**5. Does NPWS have any other commentary relating to the Marcia Audit**

No further comments.

# Appendix C

## IEA Team Endorsement



## Department of Planning, Housing and Infrastructure

Reference: SSI-9687-PA-408  
Mr Jordan Chenery  
Environmental Compliance Lead  
SNOWY HYDRO LIMITED

08/04/2026

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**Subject: Snowy 2.0 - Main Works - Auditor Team endorsement request for the Marica West Adit - Subsidence Management Plan (MOD 3) - 1 April 2026**

Dear Mr Chenery

Reference is made to your post approval matter, SSI-9687-PA-408, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Environmental Audit (IEA) of the Marica West Adit Subsidence Management Plan for Snowy 2.0 - Main Works.

This request was submitted in accordance with Condition 66 of the CSSI-9687 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (the Department) on 1 April 2026.

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

Consequently, as nominee of the Planning Secretary, I approve the appointment of Mr Tim Rannard and Mr Alec Palmer of AECOM Australia Pty Ltd (AECOM) to undertake the Independent Audit for Marica West Adit - Subsidence Management Plan.

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

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of approval and the Independent Audit Post Approval Requirements (2020).

Failure to meet these requirements will require revision and resubmission.

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

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

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

Yours sincerely

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

Katrina O'Reilly



## Department of Planning, Housing and Infrastructure

Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

# Appendix D

## Audit Declaration

# Appendix

## Independent Audit Report Declaration Form Template

| Final Independent Audit Report Declaration Form – Lead Auditor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|
| Project Name                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Snowy 2.0 - Independent Environmental Audit (MOD 3)          |
| Application Number                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | SSI-9687                                                     |
| Project Address                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Marica West Adit - Snowy Hydro Project Site Marica and Cooma |
| Proponent                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Snowy Hydro Limited                                          |
| Title of Audit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | MOD3 Marica - Independent Environmental Audit                |
| Date                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 09 July 2026                                                 |
| <p>I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:</p> <ul style="list-style-type: none"> <li>i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);</li> <li>ii. the findings of the audit are reported truthfully, accurately and completely;</li> <li>iii. I have exercised due diligence and professional judgement in conducting the audit;</li> <li>iv. I have acted professionally, objectively and in an unbiased manner;</li> <li>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;</li> <li>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;</li> <li>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</li> <li>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.</li> </ul> <p>Notes:</p> <ul style="list-style-type: none"> <li>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</li> </ul> |                                                              |

|                                                                                                                                                                                                                         |                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| Final Independent Audit Report Declaration Form – Lead Auditor                                                                                                                                                          |                                                                       |
| 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                                                                                                                                                                                                         | Tim Rannard                                                           |
| Signature                                                                                                                                                                                                               | <div>DocuSigned by:<br/><i>Lisa McKeown</i><br/>4AE6147FE87842F</div> |
| Qualification                                                                                                                                                                                                           | Bachelor of Applied Science (Geology) (Hon)                           |
| Company                                                                                                                                                                                                                 | AECOM Australia Pty Ltd (AECOM)                                       |
| Company Address                                                                                                                                                                                                         | Civic Quarter, Lvl 4 68 Northbourne Ave, Canberra ACT 2601            |

## Certificate Of Completion

Envelope Id: B00710EF-70CB-8BAA-80AC-132EBCD12D82

Status: Completed

Subject: Complete with Docusign: 20260715\_SHL\_IEA-Marica-West-Adit-DPHI-Submission.pdf

Category: Snowy 2.0

Source Envelope:

Document Pages: 33

Signatures: 2

Envelope Originator:

Certificate Pages: 4

Initials: 0

Nicole Damaggio

AutoNav: Enabled

PO Box 332

Envelopeld Stamping: Enabled

Cooma, New South Wales 2630

Time Zone: (UTC+10:00) Canberra, Melbourne, Sydney

Nicole.Damaggio@snowyhydro.com.au

IP Address: 203.33.193.4

## Record Tracking

Status: Original  
15-Jul-26 | 13:18

Holder: Nicole Damaggio  
Nicole.Damaggio@snowyhydro.com.au

Location: DocuSign

## Signer Events

Lisa McKeown

Lisa.McKeown@snowyhydro.com.au

GM HSE

Security Level: Email, Account Authentication  
(Optional)

## Signature

DocuSigned by:  
*Lisa McKeown*  
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## Timestamp

Sent: 15-Jul-26 | 13:45

Viewed: 15-Jul-26 | 14:24

Signed: 15-Jul-26 | 14:24

## Electronic Record and Signature Disclosure:

Accepted: 01-Feb-24 | 14:30

ID: a3994001-2856-4e75-a343-cdfcb7f1deb4

## In Person Signer Events

## Signature

## Timestamp

## Editor Delivery Events

## Status

## Timestamp

## Agent Delivery Events

## Status

## Timestamp

## Intermediary Delivery Events

## Status

## Timestamp

## Certified Delivery Events

## Status

## Timestamp

## Carbon Copy Events

## Status

## Timestamp

## Witness Events

## Signature

## Timestamp

## Notary Events

## Signature

## Timestamp

## Envelope Summary Events

## Status

## Timestamps

Envelope Sent

Hashed/Encrypted

15-Jul-26 | 13:45

Certified Delivered

Security Checked

15-Jul-26 | 14:24

Signing Complete

Security Checked

15-Jul-26 | 14:24

Completed

Security Checked

15-Jul-26 | 14:24

## Payment Events

## Status

## Timestamps

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| Email:                  | Access to a valid email account                                      |
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