Proponent Response to Segment Factory Independent Environmental Audit Findings

Table 1: Response to Non-Compliances

Condition	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action	Target Completion Date
Schedule 3 Condition 12	The Proponent must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2.	Noise compliant received from R16 and noise monitoring undertaken found exceedances for the three receivers during the evening and night periods. DPHI was notified on 18 November 2021. As recommended a vibration specialist was engaged that identified the noise source. The power setting of vibrating motors was reduced, and additional mitigation measures were implemented.	Based on the quarterly noise monitoring and reports there has been undertaken to date no further exceedances have been recorded. Additionally, there has been no recent relevant noise complaints. No further actions are required.	**SHL Response:** SHL acknowledges this non-compliance and that no further actions are required. **FGJV Response:** FGJV acknowledges this non-compliance and that no further actions are required.	N/A
Schedule 4 Condition 2	The Proponent must: (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 (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 except the Traffic Management Plan (TMP) were revised after the first independent environmental audit completed August 2021. There is no evidence that the TMP (May 2021) was reviewed and revised after the first independent environmental audit (August 2021).	Develop a procedure and assign responsibility to ensure all management plans are reviewed and if necessary, revised in accordance with this condition. It is understood that all plans have recently been reviewed and revised and submitted to DPHI. Open	**SHL Response:** SHL acknowledges this recommendation. The Traffic Management Plan was updated and submitted to DPHI on 31 July 2025. DPHI approved the plan on 13 October 2026. **FGJV Response:** FGJV acknowledges this recommendation. The Traffic Management Plan was updated and submitted to DPHI on 31 July 2025. DPHI approved the plan on 13 October 2026.	N/A
Schedule 4	Within 7 days of becoming aware of any	The first independent environmental audit	No further actions are	**SHL Response:** SHL acknowledges	N/A

Condition 6	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.	non-compliances were not reported to DPHI within 7 days of the Final Audit Report being issued on 23 September 2021. The letter of non-compliances was issued to DPHI on 6 October 2021. The two other non-compliances that occurred during the audit period were submitted to DPHI within the required timeframe and in accordance with this condition.	required.	this non-compliance and that no further actions are required. **FGJV Response:** FGJV acknowledges this non-compliance and that no further actions are required.	
Schedule 4 Condition 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: (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	The second audit was not undertaken within two years after commencing operation (18 June 2021).	This audit is the second audit for the Project. No further actions are required.	**SHL Response:** SHL acknowledges this non-compliance and that no further actions are required. **FGJV Response:** FGJV acknowledges this non-compliance and that no further actions are required.	N/A

	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.				

Table 2: Response to Opportunities for Improvement

Condition	Compliance Requirement	Independent Audit Opportunity for Improvement	Proponent's Proposed Action	Target Completion Date
Schedule 3, Condition 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.	Record each deployment of the temporary traffic signals at the Snowy Mountains Highway / Bombala Street intersection (date and photos), and reference them in the revised TMP. It is noted that TMP has been updated and submitted to DPHI on the 31st July 2026.	**SHL Response:** SHL acknowledges this recommendation to record each deployment of temporary traffic signals. The Traffic Management Plan has been updated and submitted to DPHI on 31 July 2026. DPHI approved this Management Plan on 13 October 2026. **FGJV Response:** FGJV acknowledges this recommendation.	N/A
Schedule 3 Condition 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;	Update the TMP to reflect current operations, including IVMS on heavy vehicles, current workforce travel arrangements, inspection arrangements, shuttle bus arrangements, current agency names and update any broken cross-references.	**SHL Response:** SHL acknowledges this recommendation and has incorporated the recommendations to reflect current operations. The plan was submitted to DPHI on 31 July and has been approved by DPHI on 13 October 2026. **FGJV Response:** FGJV acknowledges this recommendation.	Completed. DPHI approved 13 October 2026.

	(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; (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; (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 (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; (f) measures to minimise dirt and weeds being tracked onto the public road network. Following the Planning Secretary's approval, the Proponent must implement the Traffic Management Plan.			
Schedule 3	Prior to commencing operation, the Proponent	Update Table 6-2 of	**SHL Response:**	June 2027

Condition 13	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.	Plan to align with EPL (minimum number of assessment period) and what is occurring with the quarterly monitoring. Update Australian standard references in the NMMP.	SHL acknowledges the recommendations. The most recent version of this plan was approved by DPHI on 7 September 2026. **FGJV Response:** The referenced Table 6-2 as titled has been updated to identify the noise monitoring locations and includes all relevant EPL location (EPL1, EPL2 and EPL3). Quarterly noise monitoring requirements are confirmed in tables 4-1 (Operational PTNLs), 6-1 (noise monitoring program) and 6-2 (noise monitoring locations). The next revision of the Management Plan will include the replacement of AS1055.1:1997 with AS1055:2018 and AS IEC 61672.1-2004 with AS/NZS IEC 61672.1:2019.	
Schedule 3 Condition 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.	Review and update the AES to align with the monitoring and reporting being undertaken for the Project.	**SHL Response:** SHL acknowledges these recommendations. The AES is currently being updated. **FGJV Response:** FGJV acknowledges the recommendation and will update the AES to align with current reporting being undertaken for the Project. The Management Plan is currently under review and will be submitted to DPHI.	January 2027
Schedule 4 Condition 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	Section 1.7.1 Revision outlines the EMS and subplans are to be reviewed at least annually. Based on the revision record tables in each of the plans, the EMS, AES, NMMP, FERP and TMP are overdue (2021	**SHL Response:** SHL acknowledges this improvement opportunity. **FGJV Response:** While the Management Plan review frequency specified within the EMS has not been met, the site's function, operations and associated processes as a segment factory, including its	June 2027

	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.	and 2022)	environmental risk profile, have remained unchanged since the approval of the previous version of the Management Plans. Accordingly, the plans have remained current, fit for purpose, and continue to address all relevant environmental risks and requirements of the Approval. As such, the intent and objectives of the Approval have continued to be met despite the administrative delay in completing the scheduled review. The 2026 update to the Snowy 2.0 Approvals Lifecycle Monitor will include annual review tracking to ensure this improvement requirement is addressed.	