

Friday, 4 July 2025

Katrina O'Reilly
Team Leader - Compliance
Department of Planning, Housing and Infrastructure

Submitted via Major Projects Portal

Dear Katrina,

SSI-9717 Snowy 2.0 Transmission Connection – Independent Environmental Audit Construction Audit 3 – Proponent Responses to Audit Findings

The Proponent, Transgrid, submits the Proponent Response to Audit Findings for Independent Environmental Audit (IEA) – Construction Audit 3 Report (the Report) prepared by Umwelt (Australia) Pty Ltd (the Auditor), in accordance with State Significant Infrastructure (SSI) approval SSI-9717 Condition C11 for the Snowy 2.0 Transmission Connection Project (the Project) to the NSW Department of Planning, Housing and Infrastructure (the Department) for review in accordance with the NSW Department of Planning, Industry and Environment (2020) *Independent Audit Post Approval Requirements (PAR)*.

Transgrid appreciates the Independent Audit Findings and Recommendations and Opportunities for Improvement afforded by the IEA outcomes with the Report concluding on ground environmental management practices and environmental management practices being applied at the Project are appropriate and a reasonable level of environmental compliance is being achieved.

Out of 115 conditions and 129 mitigation measures assessed for the IEA, the Auditor found 16 non-compliances. Transgrid accepts six non-compliance findings and has already commenced improvement opportunities. Per the Proponent Response to Audit Findings, the Proponent disagrees with ten of the Independent Audit Findings and associated non-compliances, as follows:

Infrastructure Approval SSI-9717

- **NC-02:** Condition B10:
 - Enhanced erosion and sediment controls were not observed on the eastern side of the Project alignment. Controls were inconsistent and did not align with the Projects Primary Erosion and Sediment Control Plan.
- **NC-04:** Condition B21:
 - This audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in Appendix 4.
- **NC-06:** Condition B32:
 - Monthly inspections of transport routes and traffic monitoring were not undertaken during the audit period as required.
- **NC-07:** Condition B46:
 - Transgrid has been unable to obtain waste dockets to verify the disposal locations of waste.

Amendment Report Mitigation Measures

- **NC-13:** Mitigation Measure B11:
 - The audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in Appendix 4.
- **NC-14:** Mitigation Measure B17:
 - The audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in Appendix 4.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev0.13) Management Measures

- **BMP4**
 - During the site audit inspection the retention of managed shrub and groundcover vegetation was observed to be compromised due to extensive application of woodchip mulch, specifically across Project Area West Project West between the Switch yard and Track 1 over approximately 1.5km area of the easement.
 - The initial use of the forestry mulcher within the Project West area did not comply with the BMP's requirement to use an excavator mulcher. A forestry mulcher is not considered a similar machine.
- **BMP11 and BMP12**
 - Clearing along Track 5C was observed beyond the installed red ropes and pegs which delineated the clearing limits. This non-compliance is due to the established BMP boundary controls not being properly followed.
 - During the site audit inspection blue ropes were observed to be incorrectly used to delineate clearing limits (blue ropes are used for demarcation of Heritage Sites) which is also not compliant with the procedures set in the BMP.
- **BMP46**
 - Additional *Caladenia montana* plants were identified during the audit period but were located outside of the species polygon areas assessed in the final BDAR. It is considered that the location of additional plants outside of the 30 metre buffer areas, assessed in the final BDAR, should be considered as being unexpectedly encountered. Unexpected finds protocol should be followed.
- **BMP47**
 - During the site inspection active weed spraying was observed on Track 6. Contractors were observed broadly applying Grazon Extra herbicide on black berry using a vehicle-mounted, motorised pump and hose. The broad-scale application of Grazon Extra presents a risk to retained shrubs and broad-leaved native species and is not considered appropriate for use in partial clearing zones, where selective vegetation retention is required.

Transgrid provides supporting evidence and justification for those items where disagreement is identified. Transgrid considers that its responses provide sufficient clarification where disagreement has been identified to facilitate the Department's review of the Report and Audit Findings. Transgrid looks forward to

providing any further information the Department may request of the Proponent to facilitate the Department's review.

The Proponent will provide a copy of the Report and Proponent Responses to the following agencies for consultation regarding items relating to SSI-9717 Condition B21 and the Project Biodiversity Management Plan (BMP) following submission to the Department, unless otherwise advised by the Department:

- NSW National Parks and Wildlife Service
- Regional Delivery Division of Conservation Programs, Heritage and Regulation
- NSW Environment Protection Authority
- Forestry Corporation of NSW
- Australian Government Department of Climate Change, Energy the Environment and Water

Please do not hesitate to contact Jason Snape via email at jason.snape@transgrid.com.au or by phone on 0472 756 143 should you require any further information.

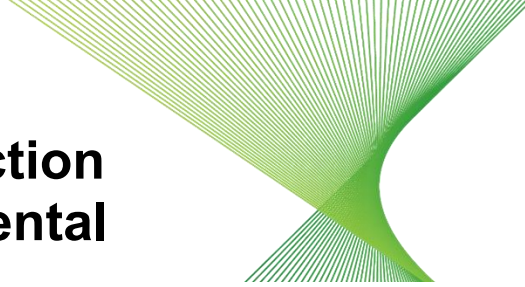
Yours faithfully,



Jason Snape
Senior Environmental Advisor | Delivery
Transgrid

Snowy 2.0 Transmission Connection Project - Independent Environmental Audit Construction Audit 3

Proponent Responses



Snowy 2.0 Transmission Connection Project Independent Environmental Audit – Construction Audit 3
Proponent Responses – Non-Compliances

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI-9717 – MOD-1							
SCHEDULE 2							
PART A ADMINISTRATIVE CONDITIONS							
TERMS OF APPROVAL							
A2.	<p>The development must be carried out:</p> <ul style="list-style-type: none"> (a) in compliance with the conditions of this approval; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 2. 		Non-compliant	<p>(a) The Snowy Hydro 2.0 Transmission Connection Project is being carried out generally in accordance with the conditions of this Infrastructure Approval and the EIS. Non-Compliances against conditions have been identified during the audit period and are recorded in this table and in the main Audit Report.</p> <p>(b) No written direction by the Planning Secretary has been received during the reporting period (J. Snape pers. comm).</p> <p>(c) No changes to layout during the audit period, however it is noted changes are expected to occur during the next audit period (J. Snape pers. comm).</p> <p>(d) All works during the reporting period were carried generally in accordance with the development layout outlined in Appendix 2.</p>	NC - 01	<p>The Proponent acknowledges the Independent Audit Findings and Recommendations and associated non-compliance for Condition A2. The non-compliances against the conditions identified during the audit period are as follows:</p> <p>SSI-9717 – MOD 1</p> <ul style="list-style-type: none"> • NC-02: Condition B10: <ul style="list-style-type: none"> ○ Enhanced erosion and sediment controls were not observed on the eastern side of the Project alignment. Controls were inconsistent and did not align with the Projects Primary Erosion and Sediment Control Plan. ○ The Proponent disagrees with the Independent Audit Findings and Recommendations for Condition B10 and non-compliance NC-02 as detailed in the Proponent's Response. • NC-03: Condition B11: <ul style="list-style-type: none"> ○ During the audit period six incidents were reported involving the discharge of turbid water. ○ The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Condition B11 including confirmation all incidents were reported to relevant agencies as required in accordance with Condition C7 of the Infrastructure Approval. • NC-04: Condition B21: <ul style="list-style-type: none"> ○ This audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in Appendix 4. ○ Refer BMP Management Measures Compliance Table. • NC-05: Condition B29: <ul style="list-style-type: none"> ○ The dilapidation surveys have not been undertaken 6 monthly as required in the Road Maintenance Agreement with Snowy Valleys Council (SVC). ○ The Proponent confirms the Road Maintenance Agreement with Snowy Valleys Council (SVC) as detailed by the auditor has been revised to update dilapidation reporting to annually. Refer Attachment A for supporting correspondence with SVC. • NC-06: Condition B32: <ul style="list-style-type: none"> ○ Monthly inspections of transport routes and traffic monitoring were not undertaken during the audit period as required. ○ The Proponent disagrees with the Independent Audit Findings and Recommendations for Condition B32 and non-compliance NC-07. The Proponent's Principal Contractor, UGL, notes monthly inspections and audits of transport routes and traffic monitoring have been undertaken in accordance with Section 8.5 of the approved Traffic and Transport Management Plan (TTMP). However, the approved TTMP does not currently specify a deliverable to be provided for verification of monthly inspections, and the Proponent recommends this is addressed as an improvement opportunity for the TTMP. UGL have developed a specific Transport Route Monthly Inspection procedure which 	N/A

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						<p>reflects those items listed within Section 10.2 of the TTMP and have been utilising the Traffic Management Inspection Checklist where traffic controls are utilised onsite. These documents will be provided for review during the next Independent Environmental Audit.</p> <ul style="list-style-type: none"> • NC-07: Condition B46: <ul style="list-style-type: none"> ○ Transgrid has been unable to obtain waste dockets to verify the disposal locations of waste. ○ The Proponent disagrees with the Independent Audit Findings and Recommendations for B46 and NC-08 relating to appropriate records and disposal dockets (waste dockets) to verify the appropriate disposal of waste. The Proponent confirms all waste removed from site is classified in accordance with the EPA's Waste Classification Guidelines with supporting waste tracking records maintained by their Principal Contractor, UGL. ○ The Proponent notes UGL are currently implementing a contract amendment with J.J. Richards & Sons to oversee the removal of all waste types from the Project for the remaining duration of the Project. • NC-08: Condition C4: <ul style="list-style-type: none"> ○ There is no verifiable evidence to support that the Department were notified that Stage 2 works have commenced. ○ The Proponent agrees with the Independent Audit Findings and Recommendations for Condition C4. ○ The Proponent will seek clarification from the Department on whether this is a non-compliance with Condition C4. • NC-09: Condition C11: <ul style="list-style-type: none"> ○ The Additional Easement Strategy has not been uploaded to the Project Website. ○ The Proponent acknowledges the administrative non-compliance NC-10 detailed in the Independent Audit Findings and Recommendations for Condition C11. The Proponent confirms the Additional Easement Rehabilitation Strategy and recent summaries from water quality monitoring reports have been uploaded to the Project Website. <p>EPBC 2018/8363</p> <ul style="list-style-type: none"> • NC-10: Condition 3: <ul style="list-style-type: none"> ○ Non-Compliance was triggered in relation to not all management measures were implemented as per the requirements of the BMP in particular partial clearing. Refer to Condition B21 in Table 4.1 for further detail. ○ Refer BMP Management Measures Compliance Table. • NC-11: Condition 6: <ul style="list-style-type: none"> ○ Non-Compliance was triggered in relation to not all management measures were implemented as per the requirements of the BMP in particular partial clearing. Refer to Condition B21 in Table 4.1 for further detail. ○ Refer BMP Management Measures Compliance Table. <p>Amendment Report Mitigation Measures</p> <ul style="list-style-type: none"> • NC-12: Mitigation Measure B5: <ul style="list-style-type: none"> ○ The audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in Appendix 4. ○ The Proponent confirms clearing along Track 5C was situated within the approved disturbance boundary. The Proponent's 	

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						<p>Principal Contractor, UGL, engaged a surveyor to verify the boundaries along Track 5C on the 13 March 2025. Data was shared between UGL and their civil subcontractor, OCON, for verification of the conservative boundary (white rope) and disturbance boundary (red rope). The surveyor verified clearing was within the disturbance boundary. Refer BMP Management Measures Compliance Table and Proponent Response to Mitigation Measure B5 and NC-13.</p> <ul style="list-style-type: none"> • NC-13: Mitigation Measure B11: <ul style="list-style-type: none"> ○ The audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in Appendix 4. ○ The Proponent disagrees with the Independent Audit Findings and Recommendations for Amendment Report Mitigation Measure B11 and non-compliance NC-14. Refer BMP Management Measures Compliance Table and Proponent Response to Mitigation Measure B11 and NC-14. • NC-14: Mitigation Measure B17: <ul style="list-style-type: none"> ○ The audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in Appendix 4. ○ The Proponent disagrees with the Independent Audit Findings and Recommendations for Amendment Report Mitigation Measure B17 and non-compliance NC-15. Refer to Proponent's Proposed Action/Action taken/Response (as applicable) to BMP4 in Biodiversity Management Plan Mitigation Measures table. • NC-15: Mitigation Measure W3: <ul style="list-style-type: none"> ○ During the site inspection erosion and sediment controls were observed to be inconsistent and did not align with the Projects Primary Erosion and Sediment Control Plan. ○ As per response to SSI-9717 Condition B10 and NC-02, the Proponent disagrees with the Independent Audit Findings and Recommendations and non-compliance NC-02 and confirms erosion and sediments control are consistent and align with the Projects Primary Erosion and Sediment Control Plan and supporting Progressive Erosion and Sediment Control Plans. • NC-16: Mitigation Measure T4: <ul style="list-style-type: none"> ○ No verifiable evidence could be provided to show any updates to the dilapidation report were undertaken during the audit period. ○ The Proponent confirms annual dilapidation reporting has been undertaken during construction on June 2024 and April 2025 in accordance with SSI-9717 Condition B29 (a) (ii). The Proponent is currently reviewing the Road Maintenance Agreement with Snowy Valleys Council (SVC) as detailed by the auditor and commits to reviewing and updating dilapidation survey requirements in consultation with SVC. 	
PART B ENVIRONMENTAL CONDITIONS – GENERAL							
SOIL AND WATER							
Erosion and Sedimentation							
B10.	The Proponent must: <ul style="list-style-type: none"> (a) minimise erosion and control sediment generation; (b) take all reasonable and feasible measures to prevent a discharge to 	Soil And Water Management Plan (Rev 0.10) dated 24/10/2024 PESCP Register	Non-compliant	(a) An Erosion and Sediment Control Plan (ESCP) (sighted) has been prepared for the development and is incorporated within the SWMP. The ESCP documents the planned measures to minimise erosion and control sediment generation. Progressive ESCPs have	NC-02	The Proponent disagrees with the Independent Audit Findings and Recommendations for Condition B10 and non-compliance NC-02 and as per response to Amendment Report Mitigation Measure W3 and non-compliance NC-16.	It is considered that this condition has been met.

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	<p>waters. This may include, but need not be limited to:</p> <p>i) adopt enhanced erosion and sediment controls, taking into consideration the best available information from the Snowy 2.0 Main Works project;</p> <p>ii) minimising the volume of dirty water generated onsite; and</p> <p>iii) exploring and implementing beneficial reuse opportunities such as irrigation and dust suppression.</p>	<p>Water Irrigation and Disposal Permit (DW_067) dated 07/02/2025</p> <p>Water Irrigation and Disposal Permit (DW_068) dated 14/02/2025</p> <p>Track 4 PESCP dated 27/11/2024</p> <p>Track 5c PESCP dated 2/09/2024</p>		<p>also been prepared to accompany the Primary ESCP. The progressive ESCPs are updated based on changes to site conditions and can take the form of "red line" mark ups of drawings. A register is maintained onsite (sighted) documenting all revisions to progressive ESCPS.</p> <p>(b)</p> <p>i) Confirmed during the Initial Construction Audit. The ESCPs consider best available information from Snowy 2.0 Main Works Project and have been designed to use "better than Blue Book" erosion and sediment controls. Learnings from Snowy 2.0 discussed during the audit include increased size of diversion bunds, early rehabilitation and diverting of water earlier upslope with catch drains rather than relying on sediment basins.</p> <p>During the site audit inspection it was noted that the installed ESC controls on the western side (Maragle) of the development included well installed enhanced erosion controls, including (but not limited to) mulch, soil binder and rock lining covering the majority of exposed surfaces. The installed ESC controls on the western side of the development were observed to be well maintained.</p> <p>Inspection of the works being undertaken on the Eastern side (Lobs Hole) of the development highlighted some areas were in need of improvement regarding installed controls. It was noted that there were more extensive 'active' work areas and steeper slopes on the Eastern side which is located within the Kosciuszko National Park. Active works included installation of access tracks and tower pads on the north western side of Sheep Station Creek specifically Track 5A, Track 5-T8R Track 5 b and Track 4. Review of the Progressive ESCPs for the Western Section indicate that proposed controls should primarily consist of stabilised or lined diversion bunds and/or mulch bunds on either side of the tracks being installed, with runoff diverted to regular sediment traps with rock filter dams to be placed at the discharge point. During the inspection it was observed that some of the installed sediment traps had been sprayed with soil binder however the outlets did not have rock filter dams placed at the discharge point as committed to in the Progressive ESCP. The Progressive ESCP indicates that bunds will incorporate returns with regular "lined spillway weirs", however very few of these were observed to be installed on some of the tracks in the Eastern Section. Some had been installed and sprayed with soil binder but not lined (as indicated in the Progressive ESCP drawings).</p>		<p>The PESCP referred to by the auditor, included in Appendix E of the SWMP, was not current at the time of the audit and as such was no longer applicable to the works undertaken. The PESCP was superseded to reflect micro siting and site-specific changes where required in accordance with Section 1.1 of the Appendix D Primary Erosion and Sediment Control Plan. The PESCPs are reviewed monthly between the CPESC, Principal Contractor and subcontractors during site audits, and updated to reflect micro siting and site-specific changes where required. These updates are also reflected in the PESCP register. Per Section 1.1 of Appendix D, the Progressive ESCPs are live documents and will be periodically updated as required to reflect current works, environmental factors and conditions. Per Section 6.4 of Appendix D, Preparation of Progressive ESCPs as required by the Primary ESCP do not warrant updating the Primary ESCP unless one of the following update triggers occurs as part of preparing the Progressive ESCP:</p> <ul style="list-style-type: none"> To take into account changes to the environment or generally accepted environmental management practices, new risks to the environment, or changes in law; Where required by the client, NSW EPA or any other regulatory authority; or In response to internal or external audits or regular management reviews <p>The Proponent's Principal Contractor, UGL, in consultation with the Project Certified Professional in Erosion and Sediment Control (CPESC) during onsite inspections, confirmed excavated sediment traps that are likely to remain for an extended period of time (greater than three months) would be lined, demonstrating best practice. The Blue Book does not provide specific design details on excavated sediment traps, and as such, design information is obtained from International Erosion Control Association (IECA) standards. IECA standards do not stipulate that excavated sediment traps are required to be lined..</p> <p>The excavated sediment traps identified by the auditor (from above Pad 9 to Pad 11) were temporary controls (required for less than three months) and as such were not lined in accordance with the PESCP.</p> <p>The Proponent will ensure current PESCPs are made available for review during the next Independent Environmental Audit.</p>	

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				<p>ii) Confirmed during previous Construction Audits minimising dirty water is outlined in the SWMP. No groundwater dewatering has occurred during the audit period (B. Toohey pers. comm).</p> <p>One sediment basin located at the base of Track 8 has been installed during the audit period, which makes two sediment basins currently in operation onsite. No discharges from either basin have occurred during the audit period (J. Snape pers. comm).</p> <p>Staged clearing is occurring to minimise the amount of "open" catchment available to generate dirty water runoff. Clean water diversion catch drains are being installed as a priority. Due to staged clearing and bulk earthworks, the catchments are shaped and sizes of controls are evolving to split the catchments up further to minimise the volume of dirty water being generated on site.</p> <p>iii) Confirmed during previous Construction Audits water reuse is detailed in the SWMP. During this audit period no additional opportunities have been explored. Any water captured in the on-site sediment controls is used for dust suppression via watercart as required and irrigation back onto the site. A water irrigation and disposal permit system is in place (sighted) to detail the required control measures during irrigation of water around the site. It is noted irrigation is only applicable in total clear zones and not to be used in areas identified as partial clearing zones (J. Snape pers comm).</p> <p>Recommendation: It is recommended that the installed ESCs and Progressive ESCP in the Eastern Section of the development, particularly from Track 4 to Track 5, are reviewed to ensure installed controls are compliant with the Progressive ESCP. In particular, focus should be given to ensuring that bunds include regular returns with regular lined spillway weird and that the outlets of sediment traps have rock filter dams placed at the discharge points as per the Progressive ESCP.</p>			
Pollution of Waters							
B11.	Unless otherwise authorised by an EPL the Proponent must ensure the development	Major Projects Notification - Track 8 Turbid Water Discharge	Non-compliant	During the audit period six incidents were reported involving the discharge of turbid	NC-03	The Proponent notes EPL 21753 requires reporting in the event discharge of water results in change beyond natural variability from Australian and New Zealand	N/A

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	does not cause any water pollution, as defined under Section 120 of the POEO Act.	<p>(rev 1) dated 19/10/2024</p> <p>Major Projects Notification - Track 8 Turbid Water Discharge (rev 3) dated 1/12/2024</p> <p>Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 28/12/2024</p> <p>Major Projects Notification - Track 5 and Track 8 Turbid Water Discharge 5-7 December 2024 (rev 2) dated 19/10/2024</p> <p>Major Projects Notification - Track 2 Turbid Water Discharge dated 8/12/2024</p> <p>Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 8/12/2024</p> <p>Major Projects Notification - Track 8 Turbid Water Discharge dated 11/01/2025</p> <p>Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 11/01/2025</p> <p>Major Projects Notification - Maragle Switchyard Turbid Water Discharge dated 11/01/2025</p> <p>Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 11/01/2025</p>		<p>water. An overview of the incidents is provided below:</p> <ul style="list-style-type: none"> October Track 8 Turbid Water: A heavy rainfall event of approximately 45.4 mm affected the development area on 18 October 2024. During the rain event, approximately at 4:00pm, a heavy downpour of 9.6 mm in 15 minutes was received, overwhelming the ESC along Track 8. This caused turbid water to flow into the roadside drain on Mine Trail Road towards Wallaces Creek. Water quality sampling was undertaken upstream and downstream of the landslip within the clean water drain as well as the EPL reference and impact site of Wallaces Creek. Water quality sampling confirmed that turbidity levels at both the impact and reference sites in Wallaces Creek were similar, indicating no significant impact on the creek's water quality. November Track 5 and Track 8 Turbid Water: A heavy rainfall event of approximately 80.8 mm affected the development area (East) over the period of 27-29 November 2024 within a 120 hour, 90th percentile rainfall event. Post-rainfall inspections undertaken between 28 November 2024 and 1 December 2024 noted turbid water had discharged from Track 5 towards the western side of Sheep Station Creek and Track 8 towards Cave Gully and Yarrangobilly River within the development area. Water quality sampling was undertaken at Sheep Station Creek, Cave Gully and Yarrangobilly River with results indicating elevated turbidity levels. December Track 5 and Track 8 Turbid Water: Approximately 85.4 mm of rainfall was recorded within development area East over the period of 5-7 December 2024 within a 120 hour, 90th percentile rainfall event. Post-rainfall inspections on 5, 6 and 7 December 2024 indicated turbid water had discharged from Track 5 towards the western side of Sheep Station Creek and Track 8 towards Cave Gully and Yarrangobilly River within the development area. Water quality 		<p>Guidelines for Fresh and Marine Water Quality (ANZG 2018) for upland rivers and a species protection level of 99%.</p> <p>The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Condition B11 including confirmation all incidents were reported to relevant agencies as required in accordance with Condition C7 of the Infrastructure Approval.</p> <p>The Proponent notes the turbid water discharge incidents associated with Track 5 and Track 8 were primarily driven by intensive rainfall events associated with each incident which exceeded design capacities for erosion and sediment controls in conjunction with steep and exposed catchments.</p> <p>Lessons learnt from each event were reflected through corrective actions applied in response to the incidents detailed in the Independent Audit Findings and for Condition B11 and included:</p> <ul style="list-style-type: none"> Inspection and maintenance of erosion and sediment controls in preparation for forecast rainfall Review of and enhancement of controls in each incident location in consultation with the project Certified Professional in Erosion and Sediment Control (CPESC), including: <ul style="list-style-type: none"> Track 8 <ul style="list-style-type: none"> Installation of a dedicated sediment basin for Track 8. Installation of a silt separator between Track 8 and Wallaces Creek. Reshaping of batters to reduce water velocity and sediment generation including application of soil binder. Temporary rock-lining of all drains and installation of gravel capping on access track surfaces and tower pads to reduce sediment generation whilst civil construction activities are in progress. Track 5 <ul style="list-style-type: none"> Installation of additional catch drains and rock-lined outlets Expedited gravel capping on access track surfaces to reduce sediment generation Maragle Switchyard <ul style="list-style-type: none"> Increased frequency of inspection and maintenance of rock checks in drains adjoining Maragle Switchyard laydown, particularly after rain events and high-wind activity. 	

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				<p>sampling was undertaken at Sheep Station Creek, Cave Gully and Yarrangobilly River with results indicating elevated turbidity levels.</p> <ul style="list-style-type: none"> • Track 2 and Tower Pad 1R/2R-12 Turbid Water: Approximately 55.6 mm of rainfall was recorded within development area (West) over the period of 6-7 December 2024 within a 120 hour, 90th percentile rainfall event. Post-rainfall inspections on 8 December 2024 indicated turbid water had discharged from Track 2 and Tower Pad 1R/2R-12 beyond the development area boundary. No water was sampled during this event. • Track 8 Turbid Water: Approximately 11.2 mm of rainfall was recorded within Project Area East on 11 January 2025. Post-rainfall inspections indicated turbid water had discharged from Track 8 towards Wallaces Creek within the development area. Water quality sampling was undertaken at Sheep Station Creek, Cave Gully and Yarrangobilly River with results indicating elevated turbidity levels. • Maragle Switchyard Turbid Water: A severe storm impacted the development area (West) on the 15 January 2025 resulting in approximately 26.2 mm of rainfall. The storm event lasted approximately 30 minutes with a peak rainfall intensity of 228.6 mm/hour and wind gusts exceeding 100 km/h. Post-rainfall inspections undertaken on the 15 January 2025 following the storm event indicated turbid water had discharged into the "V" drain along an access track immediately adjacent to the Maragle Switchyard towards New Zealand Gully within the development area. Water quality sampling was undertaken at New Zealand Gully with results indicating elevated turbidity levels. <p>All incidents were reported to relevant agencies as required with further details provided in Condition C7 of this Infrastructure Approval Table.</p>			
BIODIVERSITY							
Biodiversity Management Plan							

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
B21.	<p>Prior to carrying out any development that could impact biodiversity values, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s in consultation with NPWS, BCS, FCNSW and DCCEEW;</p> <p>(b) be prepared in accordance with the Biodiversity Development Assessment Report (Revision 7, dated 22 August 2022);</p> <p>(c) include a description of the measures that would be implemented to:</p> <p>i) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> <p>ii) minimise the clearing of native vegetation and habitat within the disturbance area;</p> <p>iii) minimise the impacts of the development on threatened flora and fauna species within the disturbance area and its surrounds, including the:</p> <ul style="list-style-type: none"> • <i>Caladenia montana</i>; • Gang-gang Cockatoo; • Masked Owl; • Eastern Pygmy-possum; • Yellow-bellied Glider; and • Booroolong Frog <p>iv) minimise the potential indirect impacts on threatened flora and fauna species, migratory species and 'at risk' species;</p> <p>v) minimise potential fauna strike in sensitive habitat areas on the road network within the site, including reducing speed limits between sunset and sunrise;</p> <p>vi) minimise the impacts on fauna on site, including undertaking pre-clearance surveys;</p> <p>vii) protect native vegetation and key fauna habitat outside the approved disturbance area;</p>	<p>Biodiversity Management Plan (Rev 0.13) dated 30/10/2024</p> <p>DPHI BMP Approval Letter dated 14/02/2025</p> <p>24hr Preclearing Checklist - E06, East ▶ West of Sheep Station Creek ▶ T10 to T11 dated 17/03/2025</p> <p>24hr Preclearing Checklist – E04 dated 17/03/2025</p> <p>24hr Preclearing Checklist – E08 dated 3/17/2025</p> <p>24hr Preclearing Checklist – E18, East ▶ West of Sheep Station Creek ▶ Access Track 5 from T9 to T10 dated 12/03/2025</p> <p>24hr Preclearing Checklist – E19, East ▶ West of Sheep Station Creek ▶ Access Track 5 from T9 to T10 dated 12/03/2025</p> <p>24hr Preclearing Checklist – E05, East ▶ West of Sheep Station Creek ▶ T11 dated 11/03/2025</p> <p>Fauna Rescue & Event Record (Antechinus - E-05) dated 21/02/2025</p> <p>Fauna Rescue & Event Record (Antechinus - E-07) dated 09/02/2025</p> <p>Fauna Rescue & Event Record (Sugar Glider - E-07) dated 09/02/2025</p> <p>Fauna Rescue & Event Record (Microbat - E-13) dated 09/02/2025</p> <p>Fauna Rescue & Event Record (Crayfish - E-08) dated 08/02/2025</p> <p>Pre-construction ecological survey report - Maragle East, Towers 10 and 11 dated 29/11/2024</p>	Non-compliant	<p>During the audit period, the BMP has been updated to reflect Stage 2 Works. As approved by the Planning Secretary, the BMP was not required to be submitted for consultation as updates were minor in nature. The revised BMP was approved by the Planning Secretary on the 14 February 2025. The BMP addresses all requirements outlined by Condition B21 with exception of the items identified in previous Construction Audits. Changes to the BMP to reflect recommendations in previous audits is still subject to ongoing consultation and subsequent approval by the Secretary (J. Snape pers. comm).</p> <p>It is noted the Operational Vegetation Management Plan has not been prepared during the audit period. During the audit period a request was made to extend the submission timeframe for the preparation of the Operational Vegetation Management Plan was sought. This request was consulted with CPHR and NPWS, both of whom approved the extension. As a result, the submission deadline was extended by four months, with the new due date set for April 4, 2024 and this has been included in the BMP.</p> <p>Evidence of implementation of the BMP was observed during the site audit inspection and thorough review of documentation.</p> <p>This audit has identified a number of non-compliances with the implementation of the BMP. A detailed compliance review and findings is presented in the BMP Management Measures Compliance Table (refer Table 2 in Appendix 4).</p>	NC-04	Refer BMP Management Measures Compliance Table.	Refer BMP Management Measures Compliance Table.

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	<ul style="list-style-type: none"> viii) monitor the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols; ix) maximise the salvage of resources within the disturbance area for reuse in the restoration of vegetation and habitat on site, including native vegetative material, hollow logs, ground timber, and topsoil containing vegetative matter and native seed bank; x) collect seeds within the approved disturbance area for use in the ecological rehabilitation of the site; xi) minimise the spread of weeds, pathogens and feral pests on site, and import or export of these matters to or from the site; xii) minimise the generation and dispersion of sediment to watercourses, particularly the Sheep Station Creek, Lick Hole Gully, Cave Gully, Wallaces Creek and Yarrangobilly River; xiii) minimise the light spill from night works, including using directional and LED lighting; and xiv) minimise bushfire risk. (d) include construction clearing and operation vegetation management protocols (e) include a strategy to address: <ul style="list-style-type: none"> i) management of activities within the 50 m exclusion zone of the Yarrangobilly River and its tributaries; ii) a trigger action response plan identifying actions to be implemented should any water quality criteria be exceeded focusing on the extent to which exceedances might affect the Booroolong Frog; and 	<ul style="list-style-type: none"> Clearing and Grubbing EWMS dated 17/02/2025 Jones Environmental Consulting Asbestos in Soil Analysis - Stockpile Assessment Results dated 30/10/2024 Weed Spraying Register UGL last entry dated 13/02/2025 SLR Pest and Predator Data and Monitoring Report – Quarter 4 dated 26/02/2025 					

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	(f) include a program to monitor, evaluate and publicly report on the effectiveness of these measures. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.						
TRAFFIC AND TRANSPORT							
Road Maintenance							
B29.	<p>The Proponent must:</p> <p>(a) undertake an independent dilapidation survey to assess the:</p> <p>i) existing condition of all local roads on the transport route shown in the figure in Appendix 4 (including local road crossings) prior to construction, upgrading or decommissioning works; and</p> <p>ii) condition of all local roads on the transport route (including local road crossing):</p> <ul style="list-style-type: none"> within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority/manager; on an annual basis during construction, or within a timeframe agreed to by the relevant roads authority/manager; <p>(b) repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings):</p> <p>(c) rehabilitate and/or make good any development related damage:</p> <p>i) identified during the construction and/or decommissioning works if it could endanger road safety, as soon as possible after it is identified but within 7 days at the latest, unless the relevant road authority/manager agrees otherwise; and</p> <p>ii) identified in any dilapidation survey completed after the construction, upgrading or decommissioning works within 2 months of the completion of the survey</p>	<p>Project: Maragle Project, Tumbarumba to Old Quarry entrance (Elliot Way), New South Wales Dilapidation Survey Report Streetscape dated June 2024</p> <p>SVC Road Maintenance Agreement – Execution Version dated 19/12/2023</p>	Non-compliant	<p>(a) Confirmed during the Initial Construction Audit, a Dilapidation Report has been prepared encompassing the existing conditions (pre-construction) between Tumbarumba and O'Hares Campground, New South Wales (Tooma Road and Elliot Way) in November 2023.</p> <p>In accordance with the Road Maintenance Agreement – Execution Version between Transgrid and SVC, as per Condition 2.1.2 the dilapidation report is required to be updated every 6 months. No verifiable evidence was provided to demonstrate that the dilapidation report prepared in June 2024 had been updated every six months, or that any such update was undertaken during the audit period.</p> <p>(b) No damage to local roads have been caused during the audit period. For details relating to the status of the repairs raised in Construction Audit 2 refer to Condition A9 (b).</p> <p>(c) No rehabilitation of roads has been undertaken during the audit period (B. Toohey pers. comm). Recommendation: It is recommended Transgrid updates the existing dilapidation report to assess the requirements outlined by Condition B29(a) as per the requirements of the Road Maintenance Agreement.</p>	NC-05	<p>The Proponent confirms annual dilapidation reporting has been undertaken during construction in June 2024 and April 2025 in accordance with SSI-9717 Condition B29 (a) (ii). The April 2025 dilapidation report will be provided for review during the next Independent Environmental Audit.</p> <p>Informal surveys of Elliott Way between the Switchyard and Track 2 have been conducted, notifying NPWS by email when damage was observed. The Proponent's Principal Contractor, UGL, notes a specific Transport Route Monthly Inspection checklist is currently in development to provide further verifiable evidence to be reviewed during the next Independent Environmental Audit.</p> <p>NC-05 and NC-16: The Proponent confirms the Road Maintenance Agreement with Snowy Valleys Council (SVC) as detailed by the auditor has been revised to update dilapidation reporting annual. Refer Attachment A for supporting correspondence with SVC.</p>	It is considered that this condition has been met

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	to the satisfaction of the relevant roads authority/manager.						
Traffic and Transport Management Plan							
B32.	<p>Prior to commencing construction or road upgrades identified in condition B27 (whichever comes first), the Proponent must prepare a Traffic Management Plan for the development in consultation with FCNSW, NPWS, TfNSW, Snowy Valleys Council, Snowy Monaro Regional Council and NSW Police, and to the satisfaction of the Planning Secretary. This plan must include:</p> <p>(a) details of the transport route to be used for all development-related traffic;</p> <p>(b) details of the road upgrade works required by condition B27 of this approval;</p> <p>(c) details of the measures that would be implemented to comply with the transport management requirements in conditions B25 to B30 above;</p> <p>(d) details of the measures that would be implemented to:</p> <p>i) minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including:</p> <ul style="list-style-type: none"> a description of the proposed dilapidation surveys required by condition B29 of this approval; a description of the proposed measures for managing traffic flow around the work sites, construction compounds and accommodation camp; scheduling heavy vehicle movements to avoid peak periods; minimising convoy lengths; reducing the speeds of development-related traffic at key intersections along the Snowy Mountains Highway, including the Link Road intersection; temporary traffic controls, including detours and signage; procedures for stringing cables and transmission lines across roads and Talbingo Reservoir; 	<p>Traffic And Transport Management Plan (rev.018) dated 14/06/2024</p> <p>Snowy 2.0 Transmission Connection Review TTMP, TfNSW Comment Response Letter dated 10/02/2025</p> <p>Weekly HSE Workplace Inspection dated 20/01/2025</p>	Non-compliant	<p>Confirmed during the Initial Construction Audit, a staged approach for the TTMP has been adopted. Stage 1 of the TTMP has been prepared and approved, addressing all requirements outlined in Condition B32.</p> <p>At the time of the audit, the TTMP for Stage 2 was pending approval from the Planning Secretary (J. Snape pers. comm).</p> <p>Evidence of implementation of the TTMP (rev.018) was observed during the site audit inspection. Management measures included:</p> <ul style="list-style-type: none"> Enforcement of speed limit signs, along with additional warning signs when approaching the development. No observed use of mobile phones in moving vehicles. Mandatory breath testing for all personnel upon entry to both Project sites, requiring a 0.00 Blood Alcohol Concentration. All cars when not in use were reversed parked in designated carparking areas. Availability of drip trays on-site. <p>The approved TTMP requires that loaded vehicles entering or leaving the site have their loads covered.</p> <p>During the site audit, one loaded truck was observed entering the Maragle Compound with an uncovered load. It is noted that load coverage is checked weekly in accordance with the Weekly Environmental Inspection Checklist, with no issues reported during the audit period (J. Snape pers. comm). Based on available information, this appears to be an isolated incident.</p> <p>Additionally, no verifiable evidence could be provided to show monthly inspections of transport routes and traffic monitoring were being undertaken during the audit period as required by Section 8.5 of the approved TTMP. UGL provided the HSE Weekly Inspection for review; however, review of this document found that it contains minimal information related to traffic management and does not fulfill the requirements of the TTMP in this regard. It is noted inspections and discussions are undertaken on site informally through weekly construction meetings, safety conversations, sub-contractor meetings and site-based walkthroughs (J. Snape pers. comm).</p> <p>Opportunity for Improvement: It is recommended that all relevant personnel,</p>	NC-06	<p>The Proponent disagrees with the Independent Audit Findings and Recommendations for non-compliance NC-06.</p> <p>The Proponent's Principal Contractor, UGL, notes monthly inspections and audits of transport routes and traffic monitoring have been undertaken in accordance with Section 8.5 of the approved Traffic and Transport Management Plan (TTMP). However, the approved TTMP does not currently specify a deliverable to be provided for verification of monthly inspections, and the Proponent recommends this is addressed as an improvement opportunity for the TTMP.</p> <p>UGL have developed a specific Transport Route Monthly Inspection procedure which reflects those items listed within Section 10.2 of the TTMP and have been utilising the Traffic Management Inspection Checklist where traffic controls are utilised onsite. These documents will be provided for review during the next Independent Environmental Audit.</p> <p>The Proponent notes the auditors' observations relate to a standalone event where a single truck loaded with DGS gravel for the Switchyard was observed entering the Maragle compound uncovered, not multiple trucks. Prior to and following the audit, subsequent inspections of trucks entering and leaving site with loads undertaken by UGL have confirmed that loads are being covered in accordance with site requirements. The uncovered truck observed on the day of the audit appears to have been a single occurrence.</p> <p>Load coverage is checked weekly in accordance with the Weekly Environmental Inspection Checklist (WEIC) with no issues reported during the audit period. Furthermore, UGL has been undertaking toolbox talks in relation to Transport and Traffic Management (refer to previously supplied Toolbox undertaken on 22 November 2024). To ensure that external delivery drivers who may not attend the site specific inductions are made fully aware of the Driver Code of Conduct (including the requirement to cover loads), the Pre-Arrival Flyer has been updated with information from the Transport and Traffic Management Plan (refer to updated copy attached). UGL will continue to monitor incoming and outgoing loads as part of the WEIC and remind site personnel and sub-contractors of the requirement.</p> <p>The Proponent and their Principal Contractor, UGL, acknowledge the auditor findings that the HSE Weekly Inspection contains generalised information relating to transport route and traffic monitoring. However, this is considered to be an opportunity for improvement. Inspections and discussions have been undertaken on site informally through weekly construction meetings, safety conversations, sub-contractor meetings and site-based walkthroughs, with UGL acknowledging that a dedicated checklist is required to capture these informal discussions and inspections. As detailed above, UGL have developed a specific Transport Route Monthly Inspection procedure which reflects those items listed within Section 10.2 of the TTMP and have been utilising the Traffic Management Inspection Checklist where traffic controls are utilised onsite. These documents will be provided for review during the next Independent Environmental Audit.</p>	It is considered that this condition has been met.

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	<ul style="list-style-type: none"> • notifying the local community about development-related traffic impacts; • procedures for receiving and addressing complaints from the community about development-related traffic; • minimising potential cumulative traffic impacts with other projects in the area; • minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queueing on the public road network; • minimising impacts to the public using Talbingo Reservoir and any water related infrastructure such as the O'Hares campground boat ramp; • implementing measures to minimise development-related traffic on the public road network outside standard construction hours; • minimising dirt and debris tracked on to the public road network from development related-traffic; • details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; • encouraging car-pooling or ride sharing by employees; • scheduling the haulage vehicle movements to minimise convoy lengths or platoons; • responding to local climate conditions that may affect road safety, such as snow, ice, fog, dust, wet weather and flooding; • ensuring loaded vehicles entering or leaving the site have their loads covered or contained and leave site in a forward direction; • responding to any emergency repair or maintenance requirements; 			<p>contractors and delivery drivers are aware of the requirements under the TTMP for loaded vehicles travelling to site to be covered and contained.</p> <p>Recommendation: It is recommended monthly inspections of transport routes be undertaken as required by Section 8.5 of the approved TTMP to ensure compliance, safety, and effective traffic management.</p>			

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	<ul style="list-style-type: none"> • provisions for maintaining access to the site for FCNWS, NPWS and emergency vehicle access to the site at all times; • a traffic management system for managing over-dimensional vehicles; and • fatigue management; ii) minimise the impacts of the road and intersection upgrades of the development; iii) provide sufficient parking on site for all vehicles and ensure vehicles associated with the development do not park on the public road network; iv) maintain all roads and water-related infrastructure on site in a safe and serviceable condition; iii) minimise the traffic noise impacts of the development; (e) details of the haulage of spoil to be disposed within Kosciuszko National Park in accordance with condition B7; (f) ensure any vessel or structure occupying waters must display appropriate shapes and lights in accordance with the Marine Safety (Domestic Commercial Vessel) National Law 2012; (g) include a detailed: <ul style="list-style-type: none"> i) Heavy Vehicle Salvage Plan; ii) Driver's Code of Conduct; iii) Marine Transport Management Plan; iv) Snow & Ice Traffic Management Plan; v) Communication Strategy to keep the public informed about the impacts of the development; (h) include a program to: <ul style="list-style-type: none"> i) ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan; ii) record and track vehicle movements; and 						

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	<p>iii) monitor and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Traffic Management Plan.</p>						
WASTE							
B46.	All waste that is removed from site must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal docket retained for audit purposes.	<p>Transgrid C1611 Maragle 330kv Switching Station And 330kv Transmission Line Connections Monthly Project Update dated January 2025</p> <p>Transgrid C1611 Maragle 330kv Switching Station And 330kv Transmission Line Connections Monthly Project Update dated February 2025</p>	Non-compliant	<p>Consistent with previous Construction Audits, waste removed from site is tracked by UGL and is reported monthly within UGL Monthly Status Reports. Waste reported in these documents are also further broken down in accordance with the EPA's Waste Classification Guidelines.</p> <p>In response to the recommendation from Construction Audit 2, Transgrid have been unable to obtain waste docket to verify the appropriate disposal of waste. Due to the absence of waste docket and the specific requirements of B46, this condition has been marked as non-compliant.</p> <p>While formal waste tracking is only mandated for Schedule 1 wastes under the Protection of the Environment Operations (Waste) Regulation 2014, it is noted that oily rags may fall under the classification of "waste hydrocarbons" under Schedule 1 if they are contaminated with hydrocarbon-based substances. In such cases, formal tracking requirements would apply.</p> <p>In addition, record-keeping obligations apply more broadly to all waste management activities to support transparency, traceability, and accountability. This includes maintaining accurate records of waste type, quantity, source, and disposal location typically evidenced through weighbridge docket, waste receipts, or equivalent documentation. The applicable condition specifically requires that such records and disposal docket be retained for audit purposes; however, these records were not available for review.</p> <p>Recommendation: It is recommended Transgrid obtain appropriate records and waste docket from JJ Richards and Belletes for all waste removed from Project Site East and West for disposal as required by condition B46.</p>	NC-07	<p>The Proponent disagrees with the Independent Audit Findings and Recommendations for B46 and NC-07 relating to appropriate records and disposal docket (waste docket) to verify the appropriate disposal of waste.</p> <p>The Proponent confirms all waste removed from site is classified in accordance with the EPA's Waste Classification Guidelines with supporting waste tracking records maintained by their Principal Contractor, UGL.</p> <p>UGL have reviewed the auditor's recommendation and advise that B46 requires all waste removed from site to have "appropriate records and docket" and that whilst the NSW EPA Metropolitan Levy Area (MLA) requires all waste types to be tracked regardless of its risk profile, General Solid Waste arising outside of the MLA is deemed to have "appropriate records and docket" where it can be shown to have been accepted by a lawful waste receiver and does not specifically require tracking. The waste receipts provided by UGL's licensed waste contractor are deemed to be appropriate for this pre-classified waste type and clarification of this is being sort from the EPA. UGL has reviewed the waste tracking register for the Project and is confident that waste removed from site has been received by a lawful waste receiver with appropriate records and docket being provided for the classification of the waste type removed.</p> <p>The Proponent notes UGL are currently implementing a contract amendment with J.J. Richards & Sons to oversee the removal of all waste types from the Project for the remaining duration of the Project.</p>	31/08/2025
PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING							
NOTIFICATIONS							
Notification of Department							
C4.	Prior to commencing development, construction, operations, upgrading or decommissioning of the development, the Proponent must notify the Department in	Biodiversity Management Plan (Rev 0.12) dated 22/11/2023	Non-compliant	Confirmed during the Initial Construction Audit prior to commencing construction Transgrid submitted a notification in writing to Major Projects website portal, FCNSW, NPWS and	NC-08	The Proponent agrees with the Independent Audit Findings and Recommendations for Condition C4.	

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	<p>writing via the Major Projects website portal and NPWS and FCNSW of the date of commencing the relevant phase.</p> <p>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>DCCEEW. At the time of the audit the development was described as being in Stage 1 of construction. A review of post-clearing reports indicates that clearing associated with Stage 2 has commenced. The BMP was reviewed, and it is noted that clearing requirements for the substation area are included in Appendix B – Clearing Procedure. However, the SWMP defines Stage 1 works as being limited to transmission line construction only.</p> <p>At the time of the audit, there was no verifiable evidence available to confirm that the Department, NPWS, or FCNSW were notified that Stage 2 works had commenced, as required under the project's regulatory commitments.</p> <p>Recommendation: It is recommended that Transgrid notify the Department, NPWS and FCNSW in writing that Stage 2 works have commenced.</p>		<p>The Proponent notes the notification of commencement of construction issued 27 November 2023, as reviewed in the Initial Construction Audit prior to commencing construction. The notification was issued “to commence the construction stage of the Project” but was non-specific as to whether the construction was limited to Stage 1 (330kV) or Stage 2 (500kV) activities. The intent of commencement of construction issued on 27 November 2023 included clearing of the Substation Zone, as detailed in Table 5-2 Clearing Zones under Section 5.3 of the Project Biodiversity Management Plan (BMP). The Substation Zone is described in Table 5-2 as follows:</p> <ul style="list-style-type: none"> This zone will be cleared and permanently modified by surface hardenings (concrete, bitumen, crushed rock or similar, built structures etc.) to support construction and installation of the 500/330 kV switchyard. This area incorporates the Substation access road and Substation Asset Protection Zone also. <p>The Proponent will submit a letter to the Department clarifying when each stage of the construction works commenced, and the development being carried out during each stage.</p>	31/08/2025
ACCESS TO INFORMATION							
C11.	<p>The Proponent must:</p> <ol style="list-style-type: none"> make the following information and documents publicly available on its website as relevant to the stage of the development: <ol style="list-style-type: none"> 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 and/or decommissioning of the development is to be staged; a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this approval; how complaints about the development can be made; any independent environmental audit, and the Proponent's response to the recommendations in any audit; and 	Project website (sighted 03/03/2025)	Non-compliant	<p>Transgrid generally provides all information required under this condition on its website: https://www.TransGrid.com.au/projects/snowy-2-0-transmission-connection-project/.</p> <p>All relevant documents, including the previous independent environmental audit, are available on the website with exception of the Additional Easement Strategy.</p> <p>At the time of the audit the Additional Easement Strategy had not been uploaded to the Project Website.</p> <p>It is also noted recent summaries from water quality monitoring reports have not been uploaded. The most recent publicly available report is from August 2024. Transgrid did reiterate that monitoring reports are currently being finalised and will be made available upon receipt (J. Snape pers. comm).</p> <p>Recommendation: It is recommended the Additional Easement Strategy is uploaded to the Project website.</p> <p>Opportunity for Improvement: It is recommended the Project website is updated regularly to include monitoring results of the development.</p>	NC-09	<p>The Proponent acknowledges the administrative non-compliance NC-09 detailed in the Independent Audit Findings and Recommendations for Condition C11.</p> <p>The Proponent confirms the Additional Easement Strategy and recent summaries from water quality monitoring reports have been uploaded to the Project Website.</p>	It is considered that this condition has been met.

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	removal, and any other adjacent and important habitat trees and features, also identified for retention and to avoid disturbance during the felling activity should also be clearly marked and included in maps within the CEMP.			as incorrect rope colours or inadequate boundary marking should be documented and addressed promptly. All delineation measures should be recorded in a central register to support traceability and compliance monitoring.		boundaries subject to clearing activity. Refer Proponent's Proposed Action/Action taken/Response (as applicable) for BMP20.	
B11	<p>A Soil and Water Management Plan (SWMP) will be prepared and implemented as part of the CEMP. The plan will include stringent controls to mitigate impacts of runoff and sediment transfer from the project area during construction and operation. Control measures will remain in situ until site stabilisation completion criteria are met. The plan will ensure protection of aquatic habitat in the tributaries crossed by the project, and particularly aimed at protecting the habitat for the Booroolong Frog associated with Yarrangobilly Creek. An assessment of the current sediment basin design for the Main Works project will occur, to determine if the design specifications are suitable for the additional sediment load expected during construction of the easement. Where modification or augmentation is required, sediment basins will be increased in size to cope with any additional expected sediment load. Sedimentation will be managed through implementation of effective sediment control management plans will be implemented to ensure that sediment does not enter the waterways and result in changes to the habitat structure of riparian areas or areas downstream of the project area. Effective control measures will include:</p> <ul style="list-style-type: none"> Erosion and sediment control plans for all stages of construction The implementation of sediment control measures across the project area - sediment control ponds and sediment basins, coir logs and sediment fencing to control sediment run-off, catch drains and perimeter bunds and diversion drains A schedule will be included for cleaning sediment basins with intervals to be informed from the outcomes of monitoring basins from Snowy 2 Main Works construction and catchment modelling. The schedule will include additional checks after rainfall events of >50 mm in 24 hours Additional or supplementary control measures (i.e. sediment fencing, 		Non-compliant	<p>As identified in assessment against BMP Biodiversity Mitigation Measures (refer Table 2 in Appendix 4) during the audit period, four rainfall events occurred that resulted in potential impacts to Booroolong Frog habitat due to sediment-laden water discharges. These events are summarised below (further details refer to Condition B11):</p> <ul style="list-style-type: none"> 18 October 2024 – Turbid water discharge from Track 8 28–30 November 2024 – Turbid water discharges from Track 5 and Track 8 5 December 2024 – Turbid water discharges from Track 5 and Track 8 11 January 2025 – Turbid water discharge from Track 8 <p>Each event involved significant rainfall that overwhelmed erosion and sediment control measures, resulting in the discharge of turbid water into areas known to support Booroolong Frog habitat.</p> <p>In accordance with the Trigger Action Response Plan, Stochastic monitoring was undertaken following the October 2024, November 2024, December 2024 and January 2025. As outlined in Section 4.4 of the Booroolong Frog Monitoring Program, NPWS was notified within the required two-hour timeframe following each incident with the exception of the 11 January incident. Transgrid became aware of the incident at 5:00pm, NPWS were notified at 8:20pm.</p> <p>During the site audit inspection, areas identified as Booroolong Frog habitat were inspected. In some locations, appropriate signage and rope barriers were in place to restrict access and protect sensitive areas. However, near Track 8—particularly in the vicinity of Wallaces Creek, where previous Booroolong Frog sightings have been recorded (J. Snape pers. comm), erosion and sediment control measures were also inspected and found to be ineffective. Specifically, sediment fences installed along the creek edge were not properly embedded into the ground, significantly reducing their effectiveness. This improper installation creates a risk of sediment entering the creek during rainfall events, potentially impacting the water quality and the frog's habitat. During the audit it was</p>	NC-13	<p>The Proponent disagrees with the Independent Audit Findings and Recommendations for Amendment Report Mitigation Measure B11 and non-compliance NC-13.</p> <p>The Proponent confirms monitoring of Booroolong Frog Habitat was undertaken following the subsequent events in November and December 2024 and January 2025. Draft reports are currently subject to internal review prior to distribution by 31 August 2025.</p> <p>The Proponent confirms the Department, NPWS, CPHR, EPA and AG DCCEEW were notified immediately of becoming aware of each incident detailed in the Independent Audit Findings and Recommendations in accordance with SSI-9717 Condition C7 and EPL 21753 Condition R.3 which met the intent of immediate notification (within 2 hours) for NPWS as defined under Section 4.4 of the Booroolong Frog Monitoring Program. The Proponent suggests this is identified as an improvement opportunity for consultation with NPWS to address the notification commitments specified Section 4.4 of the BFMP. The approximate time between the Proponent becoming aware of each event referred to by the auditor and notification to NPWS was:</p> <ul style="list-style-type: none"> 18 October 2024 – Turbid water discharge from Track 8 <ul style="list-style-type: none"> Proponent aware: approx. 8:00am, 19 October 2024 Notification issued: 9:47am, 19 October 2024 28–30 November 2024 – Turbid water discharges from Track 5 and Track 8 <ul style="list-style-type: none"> Proponent aware: approx. 4:00pm, 28 November 2024 Notification issued: 4:30pm, 28 November 2024 5 December 2024 – Turbid water discharges from Track 5 and Track 8 <ul style="list-style-type: none"> Proponent aware: approx. 12:00pm, 6 December 2024 Notification issued: 12:03pm, 6 December 2024 11 January 2025 – Turbid water discharge from Track 8 <ul style="list-style-type: none"> Proponent aware: approx. 5:00pm, 11 January 2025 Notification issued: 8:20pm, 11 January 2025 <p>The Proponent notes the Independent Audit Findings and Recommendations regarding installation and maintenance of erosion and sediment controls near Track 8 and Wallaces Creek are situated under the care, control and management of an external third-party Principal Contractor. The Proponent confirms notification was issued on 2 July 2025 to the external third-party Principal Contractor of the Independent Audit Findings and Recommendations for action. The Proponent confirms enhanced erosion and sediment controls have been installed within areas under the care, control and management of the Proponent and their Principal Contractor, UGL, including:</p> <ul style="list-style-type: none"> A dedicated sediment basin for Track 8. Installation of a silt separator between Track 8 and Wallaces Creek. Reshaping of batters to reduce water velocity and sediment generation including application of soil binder. Temporary rock-lining of all drains and installation of gravel capping on access track surfaces and tower pads to reduce sediment generation whilst civil construction activities are in progress. 	<p>31/08/2025</p> <p>31/08/2025</p>

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	<p>diversions, and detention ponds) will be implemented at high risk areas such as the bridge crossings at Sheep Station Creek, Cave Gully and Wallaces Creek and at structures sites and access roads on the slopes around Yarrangobilly Creek and associated tributaries</p> <ul style="list-style-type: none"> • Additional water quality monitoring points will be installed and monitored in locations to be agreed with NPWS and BCS, which are downhill of the construction footprint and upstream of Booroolong Frog habitat. An adaptive monitoring plan will be developed to trigger a rapid response if sediment loads detrimental to Booroolong frog are detected • Runoff from spoil piles will be managed through the above listed control measures to ensure that there is no contamination or sediment entering waterways or adjacent areas • Accidental spills will be reported to the contractors environmental representative as soon as the incident is observed so that the site can be remediated rapidly • Implementation of tannin leachate management controls may be required as determined by the monitoring program • Sediment traps or filters (targeting removal of coarse sediment) will be maintained at all discharge locations and will be monitored and maintained as per the scheduled requirements • Other source controls, such as mulching, matting and sediment fences may be used in consultation with BCS and NPWS and need to be approved in the CEMP and any deviation from measures by DPE will need to be sought. Similarly, natural erosion controls incorporating organic materials, micro water capture and contour shaping will need to be approved in the CEMP where appropriate • Disturbed areas will be stabilised and rehabilitated to reduce erosion potential (i.e. exposure period of bare earth). This will be particularly important for revegetation of slopes as soon as possible, in accordance with the rehabilitation plan. Landscaping of pervious surfaces using native indigenous species only. Soil 			<p>unclear if the area was part of development area or under a joint management area.</p> <p>Opportunity for Improvement: It is recommended that, in future instances where rainfall events may potentially impact Booroolong Frog habitat, Transgrid ensure NPWS is notified within two hours of identifying the risk. All such notifications should be recorded in a central register to ensure accountability and traceability.</p> <p>Recommendation: It is recommended erosion and sediment controls near Track 8 and Wallaces Creek should be properly installed and maintained to prevent runoff into the creek.</p> <p>Opportunity for Improvement: It is recommended that erosion and sediment controls near the Booroolong Frog habitat be included in both pre- and post-rainfall inspections for the development. This will help ensure the controls are functioning effectively and provide ongoing protection for the nearby Booroolong Frog habitat.</p>			

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	<p>loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder)</p> <ul style="list-style-type: none"> Any imported fill will be certified at source locations to ensure it is pathogen and weed free Excavated Natural Material or Virgin Excavated Natural Material) An induction protocol will be mandatory for all personnel involved in construction and operation works <ul style="list-style-type: none"> There needs to be acknowledgement of imported material e.g. road base being washed off tracks etc in the surrounding environment and how that will be dealt with. 						
B17	The ECZ will be maintained as per the VMP, with the preservation of low ground cover vegetation to provide cover for small ground-dwelling fauna and birds to cross the easement		Non-compliant	Clearing of the ECZ assessed as non-compliant under BMP Biodiversity Management Measure BMP14, refer to Table 2 in Appendix 4. for further details of non-compliance and associated recommendations for remedial actions.	NC-14	The Proponent disagrees with the Independent Audit Findings and Recommendations for Amendment Report Mitigation Measure B17 and non-compliance NC-14. Refer to Proponent's Proposed Action/Action taken/Response (as applicable) to BMP4 in Biodiversity Management Plan Mitigation Measures table.	Refer to Proponent's Proposed Action/Action taken/Response (as applicable) to BMP4 in Biodiversity Management Plan Mitigation Measures table.
Water							
W3	<p>A SWMP will be prepared and implemented prior to and during construction. During the preparation of SWMP, Transgrid will working closely with the EPA in developing and designing key sediment and erosion controls as to prevent any change to the existing baseline surface water quality within and adjoining the project area. The SWMP will include:</p> <ul style="list-style-type: none"> Erosion and sediment control plans for all stages of construction that will be submitted for approval prior to its implementation. Initially the principal SWMP will be prepared, and it will be followed by the Progressive SWMP that will be regularly updated during the construction phase to take into consideration changes that may occur that require revised erosion and sediment controls Details on the construction and management of sediment basin if determined to be required Protection of waterways such as scour protection, stabilisation and revegetation Any imported fill will be certified at source locations as pathogen and 		Non-compliant	<p>Confirmed as part of the Initial Construction Audit, the SWMP and primary ESCP addresses all requirements outlined by this condition.</p> <p>An ESCP (sighted) has been prepared for the Project and is incorporated within the SWMP. The ESCP documents the planned measures to minimise erosion and control sediment generation. Progressive ESCPs have also been prepared to accompany the Primary ESCP. The Progressive ESCPs are updated regularly based on changes to site conditions and can take the form of "red line" mark ups of drawings. Revisions are documented in a Progressive ESCP register (sighted).</p> <p>No fill has been imported to site during the audit period.</p> <p>During the site inspection the following observations were made with respect to erosion and sediment controls:</p> <ul style="list-style-type: none"> One sediment basin located at the base of Track 8 has been installed during the audit period, which makes two sediment basins currently in operation onsite. No discharges from either basin have occurred 	NC-15	<p>As per response to SSI-9717 Condition B10 and NC-02, the Proponent disagrees with the Independent Audit Findings and Recommendations and non-compliance NC-15.</p> <p>The PESCP referred to by the auditor, included in Appendix E of the SWMP, was not current at the time of the audit and as such was no longer applicable to the works undertaken. The PESCP was superseded to reflect micro siting and site-specific changes where required in accordance with Section 1.1 of the Appendix D Primary Erosion and Sediment Control Plan. The PESCPs are reviewed monthly between the CPESC, Principal Contractor and subcontractors during site audits, and updated to reflect micro siting and site-specific changes where required. These updates are also reflected in the PESCP register. Per Section 1.1 of Appendix D, the Progressive ESCPs are live documents and will be periodically updated as required to reflect current works, environmental factors and conditions. Per Section 6.4 of Appendix D, Preparation of Progressive ESCPs as required by the Primary ESCP do not warrant updating the Primary ESCP unless one of the following update triggers occurs as part of preparing the Progressive ESCP:</p> <ul style="list-style-type: none"> To take into account changes to the environment or generally accepted environmental management practices, new risks to the environment, or changes in law; Where required by the client, NSW EPA or any other regulatory authority; or In response to internal or external audits or regular management reviews <p>The Proponent's Principal Contractor, UGL, in consultation with the Project Certified Professional in Erosion and Sediment Control (CPESC) during onsite inspections, confirmed excavated sediment traps that are likely to remain for an extended period of time (greater than three months) would be lined, demonstrating best practice. The Blue Book does not provide specific design</p>	It is considered that this condition has been met.

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	<p>weed free Excavated Natural Material or Virgin Excavated Natural Material)</p> <ul style="list-style-type: none"> • Management of stockpiles and spoil • Tannin leachate management controls • Management of accidental spills, response and reporting • An induction protocol • Responsibilities for all management measures. <p>All erosion and sediment control measures will be designed, implemented, progressively rehabilitated and maintained in accordance with relevant sections of Managing Urban Stormwater: Soil and Construction Volume 1 (Landcom, 2004) ('the Blue Book') (particularly Section 2.2) and Managing Urban Stormwater: Soil and Construction Volume 2A – Installation of Services (DECC, 2008).</p>			<p>during the audit period (J. Snape pers. comm).</p> <ul style="list-style-type: none"> • Appropriate erosion and sediment controls were installed surrounding the temporary Sheep Station Creek Bridge. The temporary bridge deck includes a lip along the edge of the bridge and geofabric slung underneath the bridge deck to catch sediment. However, some sediment was observed accumulating on the temporary bridge deck, within the lip and was likely being washed over the sides during rain events. This was evident through the presence of sediment on beams underneath the bridge and sediment on the geofabric slung underneath the bridge deck. • Stockpiles were managed appropriately with drainage controls installed upslope and sediment controls installed downslope. • Accidental spills have been reported and documented as per incident reports. Six incidents reports regarding turbid water were documented and reported during the audit period. • It was noted that the installed ESC controls on the western side (Maragle) of the development included well installed enhanced erosion controls, including (but not limited to) mulch, soil binder and rock lining covering the majority of exposed surfaces. The installed ESC controls on the western side of the development were observed to be well maintained. • Inspection of the works being undertaken on the Eastern side (Lobs Hole) of the development highlighted some areas were in need of improvement regarding installed controls, particularly around Tracks 4 and 5. It was noted that there were more extensive active work areas and steeper slopes on the Eastern side. Active works included installation of access tracks and tower pads. Review of the Progressive ESCPs for the Eastern Section indicate that proposed controls should primarily consist of stabilised or lined diversion bunds and/or mulch bunds on either side of the tracks being installed, with runoff diverted to regular sediment traps with rock filter dams to be placed at the discharge point. . • It was observed that some of the installed sediment traps had been sprayed with soil binder however the outlets did not have rock filter dams placed at the discharge 		<p>details on excavated sediment traps, and as such, design information is obtained from International Erosion Control Association (IECA) standards. IECA standards do not stipulate that excavated sediment traps are required to be lined..</p> <p>The excavated sediment traps identified by the auditor (from above Pad 9 to Pad 11) were temporary controls (required for less than three months) and as such were not lined in accordance with the PESCP.</p> <p>The Proponent will ensure current PESCPs are made available for review during the next Independent Environmental Audit.</p>	

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				<p>point as indicated in the Progressive ESCP. The Progressive ESCP indicates that bunds will incorporate returns with regular "lined spillway weirs", however very few of these were observed to be installed on some of the tracks in the Eastern Section. Some had been installed and sprayed with soil binder but not lined (as indicated in the Progressive ESCP drawings).</p> <p>This condition states "Transgrid will work closely with the EPA in developing and designing key sediment and erosion controls as to prevent any change to the existing baseline surface water quality within and adjoining the project area.". Water Quality monitoring results have been published on the Project's website up to January 2025. Monitoring Reports were sighted for all months except February, which was in preparation at the time of the audit. A review of the available reports identified exceedances of various water quality parameters at multiple locations and timeframes across the project site. However, the reports to date have not identified any exceedances as being attributable to construction activities associated with the development.</p>			
Transport							
T4	<p>Road maintenance will be managed through the following measures:</p> <ul style="list-style-type: none"> A road dilapidation survey of Elliott Way and other potential local roads utilised by the project will be carried out prior to commencing construction as agreed to with Snowy Valleys Council and NPWS. Any impacts identified as caused by the project will be rectified as specified with any road maintenance agreements Routine defect identification and rectification of the access roads and tracks will be managed as part of the project maintenance procedure Access roads and tracks will be designed in accordance with the relevant vehicle loading requirements. 		Non-compliant	<p>In accordance with the Road Maintenance Agreement – Execution Version between Transgrid and SVC, the dilapidation report is required to be updated every 6 months. No verifiable evidence could be provided to show any updates to the dilapidation report have been undertaken during the audit period. See Condition B29 of the Infrastructure Approval Table for details.</p> <p>Recommendation: It is recommended Transgrid updates the existing dilapidation report to assess the requirements outlined by Condition B29(a) as per the requirements of the Road Maintenance Agreement.</p>	NC-16	<p>The Proponent confirms annual dilapidation reporting has been undertaken during construction in June 2024 and April 2025 in accordance with SSI-9717 Condition B29 (a) (ii). The April 2025 dilapidation report will be provided for review during the next Independent Environmental Audit.</p> <p>Informal surveys of Elliott Way between the Switchyard and Track 2 have been conducted, notifying NPWS by email when damage was observed. The Proponent's Principal Contractor, UGL, notes a specific Transport Route Monthly Inspection checklist is currently in development to provide further verifiable evidence to be reviewed during the next Independent Environmental Audit.</p> <p>NC-05 and NC-16: The Proponent confirms the Road Maintenance Agreement with Snowy Valleys Council (SVC) as detailed by the auditor has been revised to update dilapidation reporting annual. Refer Attachment A for supporting correspondence with SVC.</p>	It is considered that this condition has been met.

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Design						
BMP4	Detailed design will focus on the retention of managed shrub and groundcover vegetation zones, within the ECZ, HCZ and HTZ to avoid and minimise the loss of vegetation and habitat and movements of fauna across the landscape and to minimise the impact of predation on displaced fauna. This will be undertaken by UGL applying the clearing methodology and clearing zones presented in Appendix K of the Project BDAR (Jacobs, Rev 7, Aug 2022) to their detailed design.	LENECO Post-clearing Vegetation Integrity Monitoring Report in Partial Clearing Zones dated 13/04/25	Non-Compliant	<p>During the site audit inspection, partial clearing areas in both Project East and Project West areas were inspected. In Project areas works within the Hazard Tree Zone (HTZ) had generally not commenced. Where work had occurred, it was limited to tree trimming activities only.</p> <p>In Project East, Hand Clearing Zones (HCZs) areas and Easement Clearing Zones (ECZs) treated as HCZ areas appeared to be well managed, with appropriate levels of grass and shrub cover observed to have been retained and efforts taken to minimise disturbance. However, in Project Area East during the site audit inspection a contractor was observed in one area applying the herbicide Grazon Extra using a vehicle-mounted, motorised pump and hose. It was advised that the herbicide was being applied to control invasive species such as blackberry (<i>Rubus</i> spp.) During the audit it was advised that within areas infested by blackberry the regrowth eucalypts are also targeted (J. Snape pers. comm). Although the herbicide is approved by NPWS, the broad-scale application of Grazon Extra through the use of a vehicle-mounted, motorised pump and hose potentially poses a risk to retained shrubs and understorey/ground cover species and is not considered appropriate for use in partial clearing zones, where selective vegetation retention is required. Refer to BMP 47 for further detail.</p> <p>Within the ECZ on the Project West, significant groundcover disturbance was observed. Specifically, the retention of managed shrub and groundcover vegetation appeared to be compromised due to extensive application of woodchip mulch, particularly between the western extent of the Project Area, west from Track 1 over an area of approximately 1.5km of the easement.</p> <p>Following the site audit inspection, a Post-clearing Vegetation Integrity Monitoring Report (LENECO, April 2025) was provided for review (due to the report being finalised outside the audit period, it will be subject to detailed review next audit). The report identified that from February to May 2024, vegetation clearing within the ECZ was initially undertaken using an excavator-mounted mulcher. During the earlier stages of this period, this method resulted in the removal of trees less than 200 mm DBH within tall shrubby forests associated with PCTs 300, 729, and 1196.</p> <p>Transgrid also advised that forestry mulchers were used during clearing but were restricted to clearing undertaken in Project Area West during March 2024, and were not used after this period due to their unsuitability for operation on steeper or undulating terrain. In particular, clearing activities conducted between the Switch yard and Track 1 over approx. 1.5km area of the easement produced an average mulch cover of approximately 95% (sighted), with mulch depths ranging from 10 to 20 cm (sighted). Such high levels of ground coverage are characteristic of forestry mulchers, which are designed to process entire trees and understorey vegetation into finely shredded mulch, often in a single pass. The extent and uniformity of mulch cover observed in this area appears to be the result of using a forestry mulcher rather than a standard excavator mulcher.</p> <p>It is not considered that a forestry mulcher is a similar machine or method for mulching when compared to the excavator-mounted mulcher which is the machine that was proposed for use under the BMP and BDAR. There are key operational differences between the two pieces of equipment:</p> <ul style="list-style-type: none"> Forestry mulchers are designed for full clearing, reducing both canopy and understorey vegetation into a uniform mulch layer 	<p>The Proponent disagrees with the Independent Audit Findings and associated non-compliance for Biodiversity Management Plan (BMP) Mitigation Measure BMP4.</p> <p>The Proponent notes Grazon Extra Herbicide has been endorsed by NPWS for use on the Project in accordance with Section 5.3 of the Weed and Pathogen Control Monitoring Program (WPCMP). The Proponent confirms the application of Grazon Extra Herbicide using a vehicle-mounted, motorised pump and hose, as detailed in the Independent Audit Findings and Recommendations, has been restricted to areas of weed monoculture presence (i.e. Blackberry (<i>Rubus fruticosus</i> spp. agg.)) via spot-spraying application methods. Grazon Extra is highly effective for woody weeds and minimizes harm to non-target species like grasses. Drift is reduced by using LI 700, a soy-oil-derived, non-ionic penetrating surfactant that decreases off-target spray drift and enhances droplet size. The Proponent's Principal Contractor, UGL, has confirmed post-spraying monitoring indicated negligible impact on vegetation surrounding the weed infestations.</p> <p>The Proponent notes the auditor has misinterpreted herbicide application discussions surrounding the use of Grazon Extra Herbicide to control eucalypt regrowth in partial clearing areas in Project Area East. The Proponent confirms application of Grazon Extra Herbicide for eucalypt regrowth has been restricted to eucalypt regrowth situated within areas comprised of Blackberry monoculture to ensure impacts to retained shrubs and groundcovers is avoided.</p> <p>The Proponent recommends an opportunity for improvement for revision of the WPCMP in consultation with NPWS and CPHR to review suitability of herbicide application methodologies including use of backpack/knapsack sprayers and vehicle-mounted sprayers.</p> <p>The Proponent disagrees with the Independent Audit Findings and Recommendations regarding the use of excavator mulchers and forestry mulchers. The auditor has assumed, based on the draft Post-clearing Vegetation Integrity Monitoring Report, that a mulcher not a forest harvester was used to clear vegetation over 200mm DBH in the ECZ, contrary to the ECZ clearing methodology outlined in the approved BMP. The Proponent notes this assumption is incorrect. To clarify, the Post-clearing Vegetation Integrity Monitoring Report identified that (historically) from February to May 2024, clearing in the ECZ was initially undertaken using an excavator mulcher. This resulted in a large amount of woodchip mulch, especially in the taller forest areas on the western side of the Project. However, the Post-clearing Vegetation Integrity Monitoring Report did not identify the size of material cleared using an excavator-mounted mulcher from February to May 2024. To clarify, the excavator-mounted mulcher was used to mulch vegetation less than 200mm DBH, including canopy vegetation which had been cut from trees over 200mm DBH. Trees over 200mm DBH were cleared using a forestry harvester and/or by hand clearing. This is compliant with the</p>	31/08/2025

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				<p>across the entire surface area. They operate at a high processing rate, result in greater impacts to groundcover and soil and are indiscriminate leaving minimal vegetation intact.</p> <ul style="list-style-type: none"> Excavator mulchers, by contrast, are generally smaller, more precise, and better suited to selective or partial clearing. They can be operated in a way that retains groundcover and understorey vegetation. <p>Due to these functional differences and the observed outcomes, it is considered that forestry mulchers are not appropriate for partial clearing and their use is inconsistent with the approved clearing methods specified in the BMP. The forestry mulcher is not considered to be a similar machine to an excavator mulcher. This non-compliance specifically relates to clearing activities conducted west of Track 1 along the alignment toward the Maragle site. The method of clearing used in this area resulted in increased disturbance to shrubs and groundcover vegetation, contrary to the intended retention requirements of partial clearing.</p> <p>Furthermore, the application of mulch over much of the easement in this area and at such depth (10- 20 cm) has likely elevated ground temperatures, potentially degrading the soil seedbank. It is important to note that spreading mulch is not considered a form of rehabilitation and, in this case, may have had the opposite effect by impeding vegetation recovery. The extent of the impacts observed have the potential to have resulted in environmental harm (as defined under the Infrastructure Approval).</p> <p>In conclusion a combination of unapproved clearing methods (i.e., use of a forestry mulcher instead of an excavator mulcher) and poor mulch management has likely resulted in negative ecological outcomes (particularly in areas where partial clearing was required) and is inconsistent with the intent of the BMP.</p> <p>Lastly evidence of implementation of the following recommendations for improvement related to partial clearing from the last audit (Construction Audit 2) was not observed and could have improved the outcomes of the clearing through timely implementation of corrective actions where excessive deposition of woodchip mulch had occurred in the ECZ:</p> <ul style="list-style-type: none"> Rapid monitoring of partial clearing works once they have occurred Consideration of whether any restrictions or amendments to mulch spreading rates or locations are required to support vegetation regeneration outcomes. <p>Transgrid advised during Construction Audit 3 that these recommendations were incorporated into an updated revision of the BMP (replacing Rev 0.13), which was submitted to CPHR, FCNSW, and NPWS for consultation on 12 August 2024. Feedback was received from NPWS on 28 August 2024 and from CPHR on 11 September 2024, both noting that further consultation would be required to address the proposed amendments relating to partial clearing. Further consultation was contingent upon the provision of the Post-clearing Vegetation Integrity Monitoring Report to support discussion. This was not completed during the audit period.</p>	<p>BMP methodology. Please refer to Attachment B for further clarification provided by Leneco Environmental Management regarding this item.</p> <p>The use of a forestry mulcher was restricted to clearing of <200mm DBH trees and <200mm diameter material undertaken in total clearing zones for the Maragle 330kV switchyard in March 2024 and use of a forestry mulcher was discontinued beyond this period due to unsuitability for steeper/undulating terrain. The use of a forestry mulcher complies with the Appendix B Clearing Procedure in the approved Biodiversity Management Plan as an equivalent methodology to using an excavator-mounted mulcher (defined for Easement Clearing Zone – Machine Accessible): In areas safely accessible to a machine, smaller trees (or other tall growing vegetation) <200 mm DBH will be removed using an excavator-mulcher to mulch from the top down (or an equivalent methodology). The Proponent notes the machinery used by the clearing subcontractors in partial clearing zones (Easement Clearing Zones) does not remove the groundcover. Likewise, tree root balls remain, reducing disturbance of the underlying soils.</p> <p>The proponent does not agree with the two recommendations made by the auditor on this issue (that is, the recommendation for the commissioning of an independent ecological assessment, and the recommendation for remedial actions to be taken in the ECZ areas west of Track 1 and other areas not meeting long-term vegetation integrity targets).</p> <p>The Proponent has received independent advice relating to the audit's findings related to partial clearing (refer Attachment C). The expert advice concluded:</p> <ul style="list-style-type: none"> Clearing of vegetation in areas west of Track 1 (Switchyard to Track 10) referred to by the audit has been largely consistent with the BDAR and BMP, with the exception of lack of retention of midstory vegetation and mulch depths >50mm in areas. Active intervention (i.e. remedial action) is not warranted at this time. Impacts within partial clearing areas do not meet the threshold of "material" at this time, thus no actual and/or potential for material harm as defined under SSI-9717. It is noted that the auditor uses the term "environmental harm" not "material harm". "Environmental harm" is not defined under SSI-9717. Ongoing monitoring should be undertaken to assess vegetation regeneration and will assist to determine if early intervention/adaptive management is necessary. Clarification should be sought regarding wording detailed within the post-clearing VI monitoring report surrounding clearing methods used between March-May 2024. <p>The post-clearing vegetation integrity monitoring report prepared by Leneco (Draft Leneco Report) referred to in the Independent Audit Findings and Recommendations was issued in draft for review and comment to NPWS, CPHR, FCNSW and AG DCCEEW on 9 May 2025. The</p>	

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				<p>Although Transgrid's intent to address the recommendations through a revised BMP was appropriate, the delay in submitting the Post-clearing Vegetation Integrity Monitoring Report which was required following three months of partial clearing monitoring (construction commencement) meant that corrective actions were developed too late to influence on-ground clearing practices. As vegetation clearing has now been completed, the practical value of incorporating these measures has been significantly reduced and remedial actions have been recommended.</p> <p>Recommendation: It is recommended that an independent ecological assessment be commissioned to verify whether environmental harm has occurred as a result of the identified impacts within the partial clearing areas between Track 1 and the Maragle Site. The assessment should:</p> <ul style="list-style-type: none"> Evaluate the extent of impacts to retained shrub and groundcover vegetation, Determine whether the soil seedbank or other regeneration processes have been adversely impacted as a result of the heavy application of mulch, Identify any potential ongoing risks to ecosystem recovery, Review vegetation integrity scores and Recommend appropriate remedial and corrective actions, including restoration of groundcover, removal or redistribution of excessive mulch, and review of vegetation management practices. <p>The findings of the independent assessment should be documented in a written report and used to inform any necessary revisions to the BMP and associated clearing procedures to prevent recurrence.</p> <p>Recommendation: It is recommended that the ECZ areas west of Track 1 on the Project West site and any other areas (Project East and Project West sites) not meeting the long-term vegetation integrity targets at the completion of clearing be classified and mapped as heavily impacted due to impacts associated with deep cover of woodchip deposited during clearing operations. Heavily impacted areas should be subject to rehabilitation in accordance with the Rehabilitation Management Plan which is in preparation. Remedial works west of Track 1 on the Project West site are required to address the harm caused to managed shrub and groundcover vegetation zones. Remedial measures should include:</p> <ul style="list-style-type: none"> Reduction of woodchip cover and depth to expose soil for native plants to regenerate, this will need to be undertaken progressively and in a sensitive manner so that existing native vegetation is not removed and erosion and sediment control issues do not occur. Monitoring and reporting on native plant regeneration for the ECZ area west of Track 1. Direct seeding of collected seed and/or propagation and planting of plants from collected seed within the parts of the ECZ west of Track 1 (subject to further approval from FCNSW). Monthly weed monitoring and monthly targeted weed control during the growth period for any weed infestations. 	<p>supporting Biodiversity Offsets and Agreement Management System (BOAMS) case is currently under review by CPHR in consultation with Leneco Consulting.</p> <p>The Draft Leneco Report concludes: <i>Photographic monitoring has shown that vegetation regeneration is progressing, although at a slower rate in areas with high mulch cover—particularly on the western side. Nonetheless, native species germination and increased vegetation cover are evident in the March 2025 imagery, especially on lower slopes (refer to Attachment D). It is therefore recommended that no intervention (e.g., mulch removal or thinning) be undertaken until further monitoring is completed. It is likely that the VI score in some of these areas, particularly within PCT 300 (which has a low BDAR future VI score of 12.3), has improved and may now exceed the predicted target. Additionally, the mulch is providing effective soil stabilisation on steep slopes, delivering environmental benefits.</i></p> <p>Given the findings of the Draft Leneco Report, the Proponent commits to undertaking a review of the Project Rehabilitation Management Plan (RMP) within three (3) months of submission of the Audit Report and Proponent Response to Audit Findings in consultation with NPWS, CPHR, FCNSW and AG DCCEEW. This will have regard to the findings of the Draft Leneco Report (and any updates which may be made to that report following consultation) and any further regeneration monitoring that is undertaken, to determine whether any remedial actions (including those proposed in the Independent Audit Findings and Recommendations) are required for areas within partial clearing zones, inclusive of the ECZ, where larger amounts of woodchip mulch were deposited.</p>	31/08/2025

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				<ul style="list-style-type: none"> Installation of fauna friendly temporary exclusion fencing to prevent feral horses and deer from grazing on regenerating plants and transporting weeds into the ECZ area west of Track 1 (subject to further approval from FCNSW). <p>Recommendation: It is recommended that Transgrid use a targeted application method for the use for Grazon Extra herbicide in partial clearing zones, to ensure targeted weed control is occurring and herbicide does not harm retained shrubs and other native vegetation. Foliar application of herbicide is considered to not be a suitable method for clearing or maintenance of broad areas of regrowth eucalypts in the ECZ. Monitoring of areas treated with broad application of Grazon Extra should be undertaken and where dieback of retained shrub and groundcover vegetation has occurred these areas should also be classified as heavily impacted areas and subject to rehabilitation in accordance with the Rehabilitation Management Plan which is in preparation.</p>		
Pre-construction						
BMP9	A Soil and Water Management Plan (SWMP) will be prepared and implemented as part of the CEMP in consultation with NPWS and BCD. The plan will include stringent controls to mitigate impacts of runoff and sediment transfer from the Project area during construction and operation. Control measures will remain in-situ until site stabilisation completion criteria are met. The plan will ensure protection of aquatic habitat in the tributaries crossed by the Project, and particularly aimed at protecting the habitat for the Booroolong Frog associated with Yarrangobilly River. An Operational Management Plan for biodiversity will be prepared in consultation with BCD and NPWS and approved within 12 months of the commencement of construction. The CEMP will replicate the requirements detailed in the BMP for all	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	Non-compliant	<p>Implementation assessed as non-compliant. During the audit period, four rainfall events occurred that resulted in potential impacts to Booroolong Frog habitat due to sediment-laden water discharges. These events are summarised below (further details refer to Condition B11):</p> <ul style="list-style-type: none"> 18 October 2024 – Turbid water discharge from Track 8 28–30 November 2024 – Turbid water discharges from Track 5 and Track 8 5 December 2024 – Turbid water discharges from Track 5 and Track 8 11 January 2025 – Turbid water discharge from Track 8 <p>Each event involved significant rainfall that overwhelmed erosion and sediment control measures, resulting in the discharge of turbid water into areas known to support Booroolong Frog habitat.</p> <p>In accordance with the Trigger Action Response Plan, Stochastic monitoring was undertaken following the October 2024, November 2024, December 2024 and January 2025. As outlined in Section 4.4 of the Booroolong Frog Monitoring Program, NPWS was notified within the required two-hour timeframe following each incident with the exception of the 11 January incident. Transgrid became aware of the incident at 5:00pm, NPWS were notified at 8:20pm.</p> <p>During the site audit inspection, areas identified as Booroolong Frog habitat were inspected. In some locations, appropriate signage and rope barriers were in place to restrict access and protect sensitive areas. However, near Track 8—particularly in the vicinity of Wallace’s Creek, where previous Booroolong Frog sightings have been recorded (J. Snape pers. comm), erosion and sediment control measures were also inspected and found to be ineffective along the creek edge (sediment fences installed along the creek edge were not properly embedded into the ground). It was unclear if the area was part of development area or under a joint management area.</p> <p>Opportunity for Improvement: It is recommended that, in future instances where rainfall events may potentially impact Booroolong Frog habitat, Transgrid ensure NPWS is notified within two hours of identifying the risk. All such notifications should be recorded in a central register to ensure accountability and traceability.</p>	<p>The Proponent confirms the Department, NPWS, CPHR, EPA and AG DCCEEW were notified immediately on becoming aware of each incident detailed in the Independent Audit Findings and Recommendations in accordance with SSI-9717 Condition C7 and EPL 21753 Condition R.3 which met the intent of immediate notification for NPWS as defined under Section 4.4 of the Booroolong Frog Monitoring Program. The approximate time between the Proponent becoming aware of each event referred to by the auditor and notification to NPWS was:</p> <ul style="list-style-type: none"> 18 October 2024 – Turbid water discharge from Track 8 <ul style="list-style-type: none"> Proponent aware: approx. 8:00am, 19 October 2024 Notification issued: 9:47am, 19 October 2024 28–30 November 2024 – Turbid water discharges from Track 5 and Track 8 <ul style="list-style-type: none"> Proponent aware: approx. 4:00pm, 28 November 2024 Notification issued: 4:30pm, 28 November 2024 5 December 2024 – Turbid water discharges from Track 5 and Track 8 <ul style="list-style-type: none"> Proponent aware: approx. 12:00pm, 6 December 2024 Notification issued: 12:03pm, 6 December 2024 11 January 2025 – Turbid water discharge from Track 8 <ul style="list-style-type: none"> Proponent aware: approx. 5:00pm, 11 January 2025 Notification issued: 8:20pm, 11 January 2025 <p>The Proponent suggests this is identified as an improvement opportunity for consultation with NPWS to address the notification commitments specified Section 4.4 of the BFMP to ensure consistency with incident notification requirements as defined under project approvals.</p> <p>The Proponent notes the Independent Audit Findings and Recommendations regarding installation and maintenance of erosion and sediment controls near Track 8 and Wallaces Creek are situated under the care, control and management of an external third-party Principal Contractor and are not the responsibility of the Proponent under the SSI-9717 approval. . The Proponent confirms notification was issued on 2 July 2025 to the external third-party Principal Contractor of the Independent Audit Findings and Recommendations for action. The</p>	31/08/2025

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Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	safeguards/mitigation measures, particularly preclearing and clearing during construction (including B104-B108).			<p>Recommendation: It is recommended erosion and sediment controls near Track 8 and Wallace's Creek should be properly installed and maintained to prevent runoff into the creek.</p> <p>Opportunity for Improvement: It is recommended that erosion and sediment controls near the Booroolong Frog habitat be included in both pre- and post-rainfall inspections for the development. This will help ensure the controls are functioning effectively and provide ongoing protection for the nearby Booroolong Frog habitat.</p>	<p>Proponent confirms enhanced erosion and sediment controls have been installed within areas under the care, control and management of the Proponent and their Principal Contractor, UGL, including:</p> <ul style="list-style-type: none"> • A dedicated sediment basin for Track 8. • Installation of a silt separator between Track 8 and Wallaces Creek. • Reshaping of batters to reduce water velocity and sediment generation including application of soil binder. • Temporary rock-lining of all drains and installation of gravel capping on access track surfaces and tower pads to reduce sediment generation whilst civil construction activities are in progress. 	
Vegetation Clearing, Protection and Management						
BMP11	The boundary of the clearing limits for each clearing zone will be clearly marked on site by a surveyor in accordance with the Clearing Procedure before vegetation clearing commences. The edge of the clearing boundary will be marked with high visibility fencing and signage.	Visual observation.	Non-compliant	<p>During the audit, clearing activity within the eastern project alignment along Track 5C was observed to extend close to or potentially beyond the approved disturbance boundaries, with the audit inspection observing areas where clearing had occurred outside of installed pegs and red and blue ropes which were installed to demarcate the limit of clearing. During the audit UGL and Transgrid noted that the pegs and ropes had been installed with conservative buffers in place. UGL engaged a surveyor to verify the boundaries along Track 5C on the 13 March 2025. The surveyor verified clearing was within the disturbance boundary noting that in this instance the ropes delineating the clearance limits had conservatively been placed inside the actual limit of disturbance.</p> <p>Despite this, the methodology used was inconsistent with BMP 11, which requires all clearing boundaries to be clearly delineated using high-visibility fencing and appropriate signage. Even if ropes were reportedly in short supply, the set exclusion zone boundaries were still crossed during clearing activities, undermining the intent of using flagging and delineation to protect sensitive areas. Additionally, blue ropes which are not the approved colour for marking exclusion zones were incorrectly used, creating further potential for confusion and non-compliance. The 24hr pre-clearing checklists provided for Project East site also identified that there were some issues with ropes missing in this general area (T9 to T11).</p> <p>Recommendation: It is recommended that, in future clearing activities, any deviations such as incorrect rope colours or inadequate boundary marking should be documented and addressed promptly. All delineation measures should be recorded in a central register to support traceability and compliance monitoring.</p>	<p>The Proponent disagrees with the Independent Audit Findings and Recommendations and associated non-compliance NC-13 for Amendment Report Mitigation Measure BMP5 and BMP Biodiversity Mitigation Measure BMP11 and BMP12.</p> <p>The Proponent confirms clearing along Track 5C was situated within the approved disturbance boundary. The Proponent confirms the disturbance boundary was demarcated prior to commencement of clearing in accordance with Mitigation Measure BMP11 and Appendix B Clearing Procedure of the Project Biodiversity Management Plan including use of high visibility fencing.</p> <p>The Proponent's Principal Contractor, UGL, engaged a surveyor to verify the boundaries along Track 5C on the 13 March 2025. Data was shared between UGL and their civil subcontractor, OCON, for verification of the conservative boundary (white rope) and disturbance boundary (red rope). The surveyor verified clearing was within the disturbance boundary.</p> <p>The Proponent notes the conservative boundary (white rope) was established to minimise clearing for the access track. Blue ropes were used in place of white and red ropes in areas along Track 5c due to restricted supply white and red rope at the time of installation.</p> <p>The Proponent confirms an independent surveyor was engaged to review the actual clearing in Project East at Track 5c and Track 4 against the defined Project Disturbance Limits in the approval and verifies clearing has remained within the Approved Project Disturbance Footprint (refer Attachment D).</p> <p>The Proponent recommends this is identified as an opportunity for improvement to review the Appendix B.2 Pre-clearing Checklist detailed in the BMP to include further detail for confirmation boundary fencing (currently detailed in item 1 of checklist) and demarcation including mandatory use of physical barrier (rope) for boundaries subject to clearing activity. Refer Proponent's Proposed Action/Action taken/Response (as applicable) for BMP20.</p>	<p>It is considered that this condition has been met.</p> <p>31/08/2025</p>
BMP12	Exclusion Zones, or 'No-Go' zones, will be clearly marked at the edge of the	Visual observation	Non-compliant	Refer to findings and recommendations for BMP11 for details.	Refer to Proponent's Proposed Action/Action taken/Response (as applicable) for BMP11.	N/A

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Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	total clearing zones and ECZs to protect the vegetation to be retained outside the Project from inadvertent direct impacts. Exclusion Zones will be marked by surveyor with high visibility fencing and signage.					
BMP16	Implement clearing in accordance with the clearing protocol provided in Appendix B.		Non-compliant	<p>Non-compliance related to the implementation of staged clearing requirements was also identified. A Fauna Habitat Salvage Relocation Form from 15 March 2025 identified that a Sugar Glider was found after a habitat tree was required to be felled during Stage 1 clearing to facilitate critical construction of access track 5. The Clearing Supervision Form for Access Track 5 from T10 to T11 provided also identified that machine clearing in some parcels was not staged due to steep terrain. Both habitat and non-habitat trees were felled. Habitat trees were checked immediately after being felled with no presence of fauna.</p> <p>Clearing on Track 5 was not fully compliant with the BMP Clearing Protocol requirements for staged clearing where habitat-bearing trees are identified.</p> <p>Recommendation: Prior approval should be sought for variations to staged-clearing requirements by relevant CHPR, NPWS, FCNSW and AG DCCEEW.</p>	<p>The Proponent notes the Independent Audit Findings and Recommendations for BMP16 and non-compliance relates to the auditor's review of documentation which indicated clearing on Track 5 was not fully compliant with the BMP Clearing Protocol requirements for staged clearing where habitat-bearing trees are identified.</p> <p>The Proponent confirms the staged clearing procedure as detailed in Appendix B Clearing Procedure of the Project Biodiversity Management Plan was adhered to for construction of Access Track 5. Consultation was undertaken with supervising ecologists to ensure WHS compliance due to unstable and steep terrain during Stage 1 clearing activities. Select trees subject to substantial WHS risks for clearing subcontractors and plant operators were felled using Stage 2 – habitat vegetation / tree removal methods. The felled trees were subject to pre-clearing monitoring in accordance with the approved Clearing Procedure (Appendix B of the BMP) prior to commencement of clearing and were immediately and systematically checked for the presence of fauna. A Sugar Glider was found in one felled tree immediately post-clearing and successfully relocated to a predetermined fauna release location without injury.</p> <p>Notwithstanding the above outcomes, the Proponent acknowledges the audit recommendation and will seek prior approval for any proposed variations to staged-clearing requirements in consultation with CPHR, NPWS, FCNSW and AG DCCEEW.</p>	N/A
BMP22	The vegetation and habitat clearing methods within each zone of the Project area will be undertaken in accordance with the Clearing Procedure provided in Appendix B.		Non-compliant	Non-compliance related to the implementation of staged clearing requirements was identified. Refer to BMP 16 above.	Refer to Proponent's Proposed Action/Action taken/Response (as applicable) for BMP16 above.	N/A
BMP23	Clearing will be undertaken as part of a single or two stage process: <ul style="list-style-type: none"> Stage 1 clearing of non-habitat vegetation e.g., shrubs, regrowth, ground cover 	Visual Observation	Non-compliant	Non-compliance related to the implementation of staged clearing requirements was identified. Refer to BMP 16 above.	Refer to Proponent's Proposed Action/Action taken/Response (as applicable) for BMP16 above.	N/A

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	<p>and non-habitat trees). Allow at least 24 hours for fauna to vacate habitat before removing habitat trees.</p> <ul style="list-style-type: none"> • Stage 2 clearing of habitat vegetation (hollow-bearing trees, habitat trees, and bushrock) supervised by a qualified ecologist. - Habitat features marked as "HBT" will be mechanically shaken or 'nudged' prior to felling to encourage any remaining animals to either leave, or at least attempt to leave and therefore become visible, at which point observed by the Project Ecologist/a suitably qualified ecologist and safely captured and released elsewhere in accordance with the Fauna Rescue and Relocation Procedure (Appendix C). - Subsequent to felling, habitat trees marked as "HBT" will be systematically checked for any remaining fauna. If fauna is encountered, the Project Ecologist/a suitably qualified ecologist with 					

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	<p>experience in fauna handling should capture any animal that emerges, inspect for injuries and, if uninjured, relocate to predetermined fauna release area or if injured, referred to a vet or wildlife carer for treatment in accordance with the Rescue and Release Procedure (Appendix C of the BMP).</p> <ul style="list-style-type: none"> - Trees marked as 'LxL,' to demarcate those trees which have multiple hollows and potential hollows in limbs, would be inspected by the Project Ecologist/ a suitably qualified ecologist via an elevated work platform (EWP) where possible. - Soft felling techniques are to be used for the sectional removal of habitat trees >130cm DBH. A range of measures can be applied, including the use of a mulching head and/or shears on an excavator to remove non-habitat limbs on standing trees. Such activity will be mindful that hollows and resident fauna will not be directly impacted by the operation. This will 					

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	<p>help minimise tracking in partially cleared areas, aide a safe clearing methodology, and create room for EWP access to hollow limbs for subsequent fauna detection and removal</p> <ul style="list-style-type: none"> - Felled habitat trees will be left for a short time (1 – 2 hours) to allow any undetected fauna further opportunity to escape - Nests and on-ground logs will be carefully inspected by the Project Ecologist or a suitably qualified ecologist. Logs should be carefully rolled and inspected beneath the log. Any fauna species are to be relocated to habitat identified during the preclearing process or, if injured, transported to a veterinarian or wildlife carer. If nest boxes are deemed an appropriate mitigation measure by the Project Ecologist to utilise during fauna relocations, these will be established in consultation with Transgrid and BCD. 					
Unexpected Threatened Species						
BMP46	Where threatened species are unexpectedly identified during pre-construction, or	General Correspondence from UGL RE: Notification of Scarlet Robin Nest	Non-compliant	<p><u>Scarlet Robin</u> A nesting Scarlet Robin was identified under Threatened Species Unexpected Finds for the audit period. Notification was provided to Transgrid on 10 November 2024, which identified that the find was not</p>	The Proponent disagrees with the Independent Audit Findings and Recommendations for BMP46 and associated non-compliance. The Proponent confirms a pre-construction ecological survey report (the Report) prepared by Leneco Environmental Management (September	

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	<p>construction, follow the Unexpected Threatened Species Procedure in Appendix D.</p>	<p>Discovery and Buffer Zone Implementation for Track 5 Clearing dated 10/11/2024 Fauna Rescue & Event Record (Crayfish - E-08) dated 08/02/2025</p>		<p>unexpected. Suitable protective measures were implemented to protect the nest while it was being actively used. The handling of this find has not triggered a non-compliance.</p> <p><u>Unidentified Spiny Crayfish Species</u> A spiny crayfish species was reported from in clearing area E-08 on 8 February 2025. The crayfish was relocated upstream to minimise disturbance from clearing activities, however, the exact species was not identified at the time. Given the recorded history of the threatened species of crayfish including the Spiny Alpine Crayfish (<i>Euastacus crassus</i>) and Murray Crayfish (<i>Euastacus armatus</i>) occurring in the locality, further identification should have been sought. In response to these findings, Transgrid have since engaged SLR to identify the species. The crayfish has been identified as the North-Eastern Burrowing Crayfish (<i>Engaeus cymus</i>), which is not classified as a threatened species. The respective fulcrum record has been updated to reflect the correct species identification (J. Snape pers. comm).</p> <p><u>Caladenia montana</u> This species was identified during surveys completed in late 2020, following a bushfire in January 2020, noting that difficulties with formal identification of the species by the Australian National Botanic Gardens in Canberra is documented in the Amended BDAR. The Amended BDAR identifies that this species was assessed based on plant clusters which were recorded, varying from 1 to 12 plants. The species polygon for offsetting purposes was drafted with a 30 metre buffer drawn around each cluster of plants. The BDAR identified that the creation of a species polygon based on PCT, and vegetation zone was inappropriate due to most terrestrial orchid species being constrained by the presence of a particular mycorrhizal fungi species in the soil. The species polygon generated using the 30 metre buffer was calculated at 18.6 ha and refined to 9.35 ha when clipped to the disturbance footprint. During pre-clearing surveys, additional Caladenia montana specimens were located outside of the species polygon areas assessed in the final BDAR. As a result of the findings of this audit, Transgrid have advised that EMM Consulting have been engaged to evaluate the field-verified records of <i>Caladenia montana</i> located outside the mapped species polygons assessed in the BDAR, to determine whether the development has resulted in impacts exceeding the approved 9.35 ha of habitat (J. Snape pers. comm). The outcome of this assessment will be subject to review during the next audit.</p> <p>The Unexpected Threatened Species Find Procedure identifies that the procedure is relevant to unexpected encounters of threatened species during construction activities (such as, but not limited to, breeding locations for the Masked Owl and Gang-Gang Cockatoo which are listed in the Procedure in Appendix D of the BMP). Table 2.2 of the BMP also identifies that any threatened species found in a location previously unknown during construction or operation must be immediately notified to NPWS, as per the mitigation measure BIO7 of the final BDAR. It is acknowledged that <i>Caladenia concolor</i> was initially reported as a potential unexpected threatened species find; however, no verifiable evidence was provided to confirm the identification, nor to demonstrate whether relevant stakeholders were notified of the corrected identification</p>	<p>2024) for Project Area East – Access Track 5 and Towers 7, 8 and 9 was issued to NPWS, CPHR, FCNSW and AG DCCEEWW in accordance with Biodiversity Management Plan Mitigation Measure BMP21 on 1 October 2024 prior to the commencement of clearing activities for Access Track 5 inclusive of tower pad 7, 8 and 9 in Project Area East. Threatened species observations are detailed in Section 5.2 of the Report including the following detail for <i>Caladenia montana</i>:</p> <p><i>Approximately 244 Caladenia montana individuals were recorded within the Subject site during the pre-clearing survey period.</i> <i>These records overlapped with the Caladenia montana habitat mapped for the BDAR, however also extended beyond these areas throughout the Subject Site.</i></p> <p>The Report determined the observations for <i>Caladenia montana</i> were not an unexpected find as the species is known to occur in the Project Area as <i>Caladenia montana</i> was considered under the Project Biodiversity Development Assessment Report (BDAR) prepared by Jacobs (rev7, August 2022). As such, the Unexpected Threatened species Find Procedure was not applied to the additional <i>Caladenia montana</i> specimens referred to by the auditor and the Proponent is compliant with the Unexpected Threatened Species Find Procedure.</p>	<p>It is considered that this condition has been met.</p>

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				<p>as <i>Caladenia montana</i>. Although <i>Caladenia montana</i> is listed in the BDAR and considered likely to occur within the Project Area, the audit considers the find as "unexpected" because it occurred outside the areas mapped for this species in the BDAR.</p> <p>Recommendation: It is recommended that further assessment of the current known extent of <i>Caladenia montana</i> is undertaken to demonstrate that no more than 9.35 ha of habitat for this species will be cleared for the development or seek approval for additional clearing of habitat.</p> <p>Recommendation: It is recommended that all steps of the Unexpected Threatened Species Procedure should be followed and the relevant requirements implemented for the observations of <i>Caladenia montana</i> outside of the mapped species polygon assessed in the final BDAR, including notifying all relevant stakeholders and authorities in accordance with regulatory requirements.</p>		
Weeds, Pathogens And Pests						
BMP47	Follow the Weed and Pathogen Control and Monitoring Procedure in Appendix H to prevent or minimise spread of weeds and pathogens	Weed mapping for towers 9 to 11. UGL Weed Spraying Register for spray events between 22/03/24 to 13/02/25 Visual observation of washdown stations and restricted areas.	Non-compliant	<p><u>Weed Control</u> Weed mapping is required to be undertaken during initial pre-clearance surveys and revised bi-annually within and adjacent to the Project area, including a 50-metre buffer, as outlined in Section 6.2 of the Weed and Pathogen Control Monitoring Program. This includes updating the mapping after each monitoring period to incorporate newly affected areas and to assess the effectiveness of applied management measures.</p> <p>It is acknowledged that in the previous audit, weed mapping was provided for the Project, with the exception of Towers 9–11 due to site inaccessibility. During this audit, weed mapping for the Project East including Towers 9–11, was reviewed. However, no verifiable evidence was provided to demonstrate that weed mapping for the remainder of the Project area has been monitored and updated as required. However it was noted that these reports are in progress and will be made available during the next audit. In reference to Appendix H of the BMP states that "broad-spectrum, non-specific weed treatments are potentially problematic in areas where weed species occur in conjunction with native plants." During the site inspection active weed spraying was observed on Track 6. Contractors were observed broadly applying Grazon Extra herbicide using a vehicle-mounted, motorised pump and hose. The broad-scale application of Grazon Extra presents a risk to retained shrubs and broad-leaved native species and is not considered appropriate for use in partial clearing zones, where selective vegetation retention is required.</p> <p>While Transgrid has indicated that contractors actively avoid applying herbicide within partially cleared zones and focus only on targeted weed infestations, this was not consistent with observations made during the audit. Furthermore, Transgrid have advised of an informal agreement between the Environmental Manager and weed control contractors which reportedly allows for the opportunistic spraying of post-clearing regrowth of tall-growing native eucalypt species (i.e. those potentially exceeding four metres in height) in areas comprising of blackberry monoculture as part of ongoing weed control activities. This method, however, is not documented or approved in the BMP and therefore does not represent an authorised approach to clearing or managing native vegetation.</p>	<p>The Proponent confirms weed mapping within and adjacent to (with a 50m buffer of) the Project area has been undertaken bi-annually in accordance with Section 6.2 of the Weed and Pathogen Control Monitoring Program. The Autumn 2024 and Spring 2024 weed monitoring reports were not available at the time of the audit as they were in draft, however, these have now been finalised with copies of the report issued for information to the relative stakeholders and to be made available on the Project website. Weed mapping for the Project has now been completed and will continue to be updated throughout bi-annual monitoring reports. Verifiable evidence will be provided for review during the next Independent Environmental Audit.</p> <p>The Proponent disagrees with the Independent Audit Findings regarding the opportunistic spraying of all post-clearing regrowth tall-growing native eucalypt species (i.e. those potentially exceeding four meters in height) as part of ongoing weed control activities. As detailed in response to BMP Mitigation Measure BMP4, the Proponent notes the auditor has misinterpreted herbicide application discussions surrounding the use of Grazon Extra Herbicide to control eucalypt regrowth in partial clearing areas in Project Area East and no informal agreement has been established as per the Independent Audit Findings. The Proponent confirms application of Grazon Extra Herbicide for eucalypt regrowth has been restricted to eucalypt regrowth situated within areas comprised of Blackberry monoculture to ensure impacts to retained shrubs and groundcovers is avoided.</p> <p>The Proponent notes the Project Biodiversity Development Assessment Report (BDAR, rev 7, Aug 2022) assumed the following vegetation maintenance methods for easement clearing zone (partial clear) areas:</p> <p><i>During operation, potential future slashing and mulching of the ECZ may be required to manage flashover and bushfire risks posed by tall and/or dense growing and mid-storey vegetation. A range of mechanical and manual vegetation management methods will be employed including:</i></p>	

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)						
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
				<p>Additionally, in Project West, areas where deep mulch cover has resulted from the works, were observed to be supporting emerging weed growth. Targeted weed management in these areas is required to prevent further colonisation by weed species.</p> <p>As part of the audit, the Weed Spray Register was reviewed. It was noted that one spraying activity was recorded as having occurred during wind speeds of up to 35 km/hr. Such conditions significantly increase the risk of spray drift, potentially resulting in unintended impacts to non-target and surrounding vegetation. The register did not include specific details regarding the type of spraying undertaken during this activity. However, Transgrid advised that the activity involved ground-based spraying, and therefore considered that the wind speed limit was not applicable in this instance.</p> <p>In summary, the use of unapproved vegetation management practices and lack of alignment with BMP requirements raise concerns regarding compliance with approved procedures.</p> <p>Opportunity for Improvement: It is recommended that the weed spraying register be updated to include details of spraying methodologies (including the adoption of backpack sprayers only in areas of partial clearing/where retained vegetation is required), observations of surrounding vegetation, justification for weather-related decisions, and photographic evidence where practical.</p> <p><u>Pathogen Control</u> Dieback of <i>Banksia canei</i> was observed during the audit site inspection.</p> <p>Recommendation: Implement restricted access and hygiene measures in areas experiencing dieback of <i>Banksia canei</i> until further soil testing is undertaken. Notify NPWS, CHPR and FCNSW regarding soil testing and undertake mapping and adaptive management as necessary to comply with the BMP.</p>	<ul style="list-style-type: none"> Removal and/or herbicidal application of any regrowth with potential to infringe on safe electrical clearances Selective hand clearing and/or application of a herbicide to control growth Selective slashing and/or mulching with slasher/mulcher set to 200 mm above the ground level across the easement, particularly below the conductors or to establish safe access during maintenance <p>The Proponent recommends an opportunity for improvement for revision of the WCPMP in consultation with NPWS and CPHR to review suitability of herbicide application methodologies including use of backpack/knapsack sprayers and vehicle-mounted sprayers.</p> <p>The Proponent agrees with the Independent Audit Recommendations to review and update the weed spraying register. The Proponent's Principal Contractor, UGL, has reviewed and updated the weed spraying register as necessary to include details of spraying methodologies (as detailed in Section 5.3 of the Weed and Pathogen Control Monitoring Program), observations of surrounding vegetation, justification for weather-related decisions, and photographic evidence where practical.</p> <p>The Proponent confirms further investigation into the dieback of <i>Banksia canei</i> has been undertaken in accordance with Section 6.5 of the WPCMP. No pathogens were recorded following soil pathogen sampling undertaken in March 2024 within the area subject to <i>B. canei</i> dieback. In March 2025, annual sampling was performed with two samples collected from the area affected by <i>Banksia</i> dieback. The results of the DNA analysis from these samples were received 23 May 2025 confirming no presence of pathogens within the area subject to <i>B. canei</i> dieback.</p>	<p>31/08/2025</p> <p>It is considered that this condition has been met.</p> <p>It is considered that this condition has been met.</p>
Rehabilitation						
BMP51	Disturbed areas are to be progressively stabilised to prevent erosion and weed establishment	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	Non-compliant	Refer to mitigation measure W3 in the Amendment Report Mitigation Measures for findings and recommendation details.	Refer to Proponent's Proposed Action/Action taken/Response (as applicable) for mitigation measure W3 in the Amendment Report Mitigation Measures.	N/A

Attachment A

Jason Snape

From: Glen McGrath <gmcgrath@svc.nsw.gov.au>
Sent: Wednesday, 25 June 2025 2:21 PM
To: Andrew Buttigieg
Cc: Jason Snape
Subject: RE: Transgrid Delap report for Tumbarumba to the Old Quarry Rd Elliott Way April 2025 [Official]

Follow Up Flag: Follow up
Flag Status: Completed

Hi Andrew,

Yes agreed. Delap received.

Cheers

Glen

Glen McGrath

Manager Technical Services



76 Capper Street, Tumut, NSW 2720
P: 02 6941 2735
M: 0458 223 002
W: www.svc.nsw.gov.au

Leading, engaging and supporting strong and vibrant communities



Snowy Valleys Council proudly acknowledges the traditional owners and custodians of this land and water and pay respects to their Elders past and present.

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From: Andrew Buttigieg <Andrew.Buttigieg@transgrid.com.au>
Sent: Wednesday, 25 June 2025 1:26 PM
To: Glen McGrath <gmcgrath@svc.nsw.gov.au>
Cc: Jason Snape <Jason.Snape@transgrid.com.au>
Subject: Transgrid Delap report for Tumbarumba to the Old Quarry Rd Elliott Way April 2025 [Official]

Hi Glen,

Email to note the delap report for Tumberumba to the Old Quarry Rd Elliott Way April 2025 has been handed to SVC today via a hard drive.

See attached photo.

Note – The delap reports will be carried out annually as agreed.

Regards

Andrew Buttigieg
Senior Project Manager | Delivery

Transgrid | Wallgrove, NSW,
T: (02) 9620 0576 **M:** 0436 166 667,
E: Andrew.Buttigieg@transgrid.com.au **W:** www.transgrid.com.au



We acknowledge the long-standing connection to Country shared by the Traditional Custodians of the lands, skies, and waterways we live and work on. We honour this connection with respect for the Elders who came before us, those with us today, and those who will shape the future.



Data Classification: Official

From: Andrew Buttigieg <Andrew.Buttigieg@transgrid.com.au>
Sent: Wednesday, 25 June 2025 1:21 PM
To: Andrew Buttigieg <Andrew.Buttigieg@transgrid.com.au>
Subject: Hardrive [Official]

Get [Outlook for iOS](#)

Data Classification: Official

Disclaimer:

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Please consider the environment before printing this e-mail.

Attachment B

Peter Monsted
Leneco Pty Ltd

3 July 2025

Attention: Jason Snape
Senior Environmental Advisor | Delivery
Transgrid

Dear Jason

RE: Clarification of UGL Snowy 2.0 Transmission Connection Project Post-clearing Vegetation Integrity Monitoring Report in Partial Clearing Zones (Leneco, April 2025)

Leneco was engaged by UGL to provide a BAM-accredited ecologist (myself) for Transgrid's Snowy 2.0 Transmission Connection Project. In this role, I was responsible for supporting UGL in coordinating pre-clearing surveys and clearing supervision in accordance with the Project's Biodiversity Management Plan (BMP). The pre-clearing surveys and clearing supervision were undertaken by consultant ecologists from SLR, Kleinfelder, Lesryk Environmental, and Land Eco. Based on the data collected by these ecologists, I prepared the pre-construction ecological survey reports.

During the clearing period, I visited the site monthly to review data collection processes, assist UGL, and attend multi-agency meetings. However, I did not participate directly in the pre-clearing surveys or on-ground clearing supervision.

At a Project Multi-Agency Site Visit on 19 June 2024, Miranda Kerr (CPHR, formerly BCS) requested that sample plots be established to assess Vegetation Integrity (VI) scores within the Easement Clearing Zones (ECZ), as soon as practicable following completion of clearing. In response, and in accordance with Condition B21(c)(viii), monitoring of the partial clearing areas commenced in July 2024—within three months of the start of clearing in the Partial Clearing Zones. The results of this monitoring were presented in the *UGL Snowy 2.0 Transmission Connection Project Post-clearing Vegetation Integrity Monitoring Report in Partial Clearing Zones* (Leneco, 2025).

The Project's Biodiversity Development Assessment Report (BDAR) (Jacobs, December 2021; Table 2-1) and BMP describe vegetation clearing under three disturbance zones:

- **Easement Clearing Zone (ECZ)** – Involves the use of machinery (including tracked equipment) to remove vegetation, with smaller trees (<200 mm DBH) cleared using an excavator-mulcher. Vegetation >200 mm DBH is removed with a forestry harvester. Tree branches and canopy may be mulched in situ.
- **Hand Clearing Zone** – Vegetation is removed/felled by hand. Felled trees remain in place, with crowns cut and laid flat.
- **Hazard Tree Zone** – Individual trees are felled by hand in areas where machine access is limited by terrain or other constraints.

(Refer to Attachment 1 for an extract from the BDAR describing these methods in further detail.)

In Section 4.3 of the Post-clearing VI Monitoring Report, I referred to three modes of clearing within the ECZ:

- Machine clearing (including excavator-mulcher)
- Machine clearing (with forestry harvester)

- Hand clearing

At the time of reporting, no hazard tree removal had occurred.

The distinction between “machine clearing including excavator-mulcher” and “machine clearing with forestry harvester” was made to provide context for observations regarding the degree of mulch generation and its potential ecological implications. Broadly, areas referred to as “machine clearing including excavator-mulcher” were those cleared during the initial phase (March–May 2024), prior to the 2024 winter shutdown.

Following the June Multi-Agency Site Visit and subsequent monitoring in July, feedback was provided to UGL indicating that the excavator-mulcher was generating more mulch than anticipated in the BDAR and BMP. As a result, UGL revised its clearing protocols to reduce or eliminate the use of the excavator-mulcher during post-winter clearing (commencing September 2024).

It has since come to my attention—via your feedback—that the terminology used in Section 4.3 may have been misinterpreted by some readers to suggest that “machine clearing including excavator-mulcher” excluded the use of forestry harvesters or other clearing methods. This was not the intent.

Based on my site observations and discussions with UGL’s Environmental Manager (Brendan Toohey) and other personnel, clearing in areas described as “machine clearing including excavator-mulcher” also involved the use of tracked machinery and forestry harvesters—particularly for felling trees >200 mm DBH and hollow-bearing trees. Additionally, trees exceeding 1300 mm DBH were felled limb-by-limb using an elevated work platform (“spider boom”) and chainsaws.

The intention of the wording in Section 4.3 was to highlight the reduction or elimination of the excavator-mulcher from clearing practices post-winter shutdown. This was supported by the observed reduction in mulch generation in these later-cleared areas.

If you have any further questions regarding this matter or require additional information, please do not hesitate to contact me on 0437 685 224 or via email at peter@leneco.au.

Your Sincerely



Peter Monsted,
Director,
BAM Accredited Assessor #BAAS22011

Leneco Pty Ltd
Ph. 0437 685 224
E. Peter@leneco.au

Attachment 1 – BDAR Section 2.3.1 – Vegetation Clearing Areas

2.3 Construction

2.3.1 Vegetation clearing areas

The project will involve the removal of vegetation to allow the construction of, and ongoing operational maintenance of the asset for the life of the project. Total clearing will be required in areas that have been identified for future infrastructure, which includes the substation, transmission structures, tension and pulling pads and the access tracks. Partial clearing will occur in areas that are safe to retain low growing vegetation within the operational limits of the asset. This includes large sections of the project area (see **Figure 2-3**). The resulting modified vegetation will be maintained in this state for the life of the project, thereby retaining some of the original biodiversity values in the lower stratum and preserving the surface soil structure (the operational requirements are discussed in **Section 2.4**). Details of the proposed total and partial clearing activities required for construction are summarised in **Table 2-1** and a Vegetation Clearing Method document is provided in **Appendix K**.

Table 2-1: Summary of the vegetation clearing method proposed for construction

General impact	Disturbance zones	Vegetation clearing methods (construction)
Total vegetation clearing areas	Substation	Mechanical vegetation clearing methods would be employed to completely remove vegetation.
	Transmission structures	In areas subject to civil works (such as construction benches, structure footings, access track surface, substation bench), complete removal of the root balls would be required. As such, a tree pusher would typically be used in these areas. Removed trees would be passed through a tub grinder with the material then re-used for erosion and sediment control and stabilisation of disturbed areas during and in post construction rehabilitation. Mulched material would only be stored within the cleared footprint.
	Access tracks	
	Tension and pulling pads	In the areas where civil works is not required, a forest harvester or excavator-mulcher would be used. Mulched material will be evenly spread on bare, disturbed or exposed areas within the full clearing area to assist in protection of the soil. Where low growing vegetation, grasses or ground cover exists, care will be taken to avoid excess debris build up/smothering as to promote regeneration of the grass layer.

General impact	Disturbance zones	Vegetation clearing methods (construction)
Partial vegetation clearing areas	<p>Easement Clearing Zone (ECZ): defined as the vegetation zone along the transmission line easement which would require the clearing and ongoing maintenance of tall growing vegetation which may intrude on the operational line operating conditions</p>	<p>During construction, machinery (including tracked machinery) would be used to clear the ECZ. In areas safely accessible to a machine, smaller trees (or other tall growing vegetation) <200 mm DBH will be removed using an excavator-mulcher. As such, ground cover species and low growth shrubs would be affected (particularly by trampling) during the mechanical clearing process as part of the movement of the machinery throughout the ECZ.</p> <p>Vegetation > 200 mm DBH will be removed using a forest harvester, noting that tree branches/canopy may be mulched in-situ. The tree barrels will either be:</p> <ul style="list-style-type: none"> ▪ Tub ground to provide material for erosion/sediment control and rehabilitation for use outside of the ECZ ▪ Relocated to the edge of the easement and retained as habitat where applicable ▪ The mulching of vegetation debris would also be dispersed as much as possible throughout the zone during clearing, and designed to minimise heaped mulch that will limit the rehabilitation/emergence of ground cover species following construction.
	<p>Hand-clearing Zone (HCZ) – defined sections of the ECZ not suitable for machine access</p>	<p>In areas of the ECZ that are not safely or practicably accessible for machine clearing during construction, removal/management of vegetation will be undertaken by hand clearing/felling. Felled trees will remain in-situ with the crowns/heads being cut/docked and laid flat.</p>
	<p>Hazard Tree Zone (HTZ): the off-easement HTZ is defined as the areas external to the ECZ which contain trees of a sufficient height which, if they were to fall, would strike the overhead conductors or the transmission structures (known as Hazard Trees)</p>	<p>LiDAR (Light Detection and Ranging) analysis was performed on the transmission connection concept design modelled under Maximum Line Operating conditions to identify Hazard Trees. The outer boundary of the mapped trees was then buffered with consideration of potential future tree height within the PCTs assessed. This resulted in identifying a HTZ that varies in width adjacent to the project from between 6 to 40 ms, depending on tree canopy height. The total area comprising the mapped hazard trees is 2.46 ha which contains an estimated 164 trees to be trimmed, lopped or removed. Individual hand felling of trees will be the preferred method where terrain (or other constraints) preclude management by machine. The broader HTZ which incorporates the necessary buffer area to account for potential future hazard trees is approximately 5.8 hectares (ha).</p>

Attachment C

03 July 2025

Jason Snape
Senior Environmental Advisor | Delivery
Transgrid
Via email: Jason.Snape@transgrid.com.au

Dear Jason

Re: Environmental advice – Snowy 2.0 Transmission Connection

Transgrid and UGL are constructing the Snowy 2.0 Transmission Connection Project (the Project). The Project received approval under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) on 2 September 2022 (SSI-9717) and under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 21 October 2022 (EPBC 2018/8363).

An Independent Environmental Audit (IEA), the third construction audit, was undertaken by Umwelt (2025) in March 2025 in accordance with, and against the conditions of, the Infrastructure Approval (SSI-9717). This IEA concludes that management of partial clearing and use of inappropriate clearing methods have potential for environmental harm as defined under the Infrastructure Approval (SSI-9717).

Transgrid has requested advice regarding whether the audit finding regarding potential for environmental harm is justified.

Findings of the IEA and post-clearing monitoring

The IEA found that clearing works within the Easement Clearing Zone (ECZ) on the Project West site "west of Track 1 along the alignment to the Maragle site" (Umwelt, 2025, p. 29), shown in red in Figure 1, did not comply with the Biodiversity Management Plan [BMP] (Transgrid, 2024).

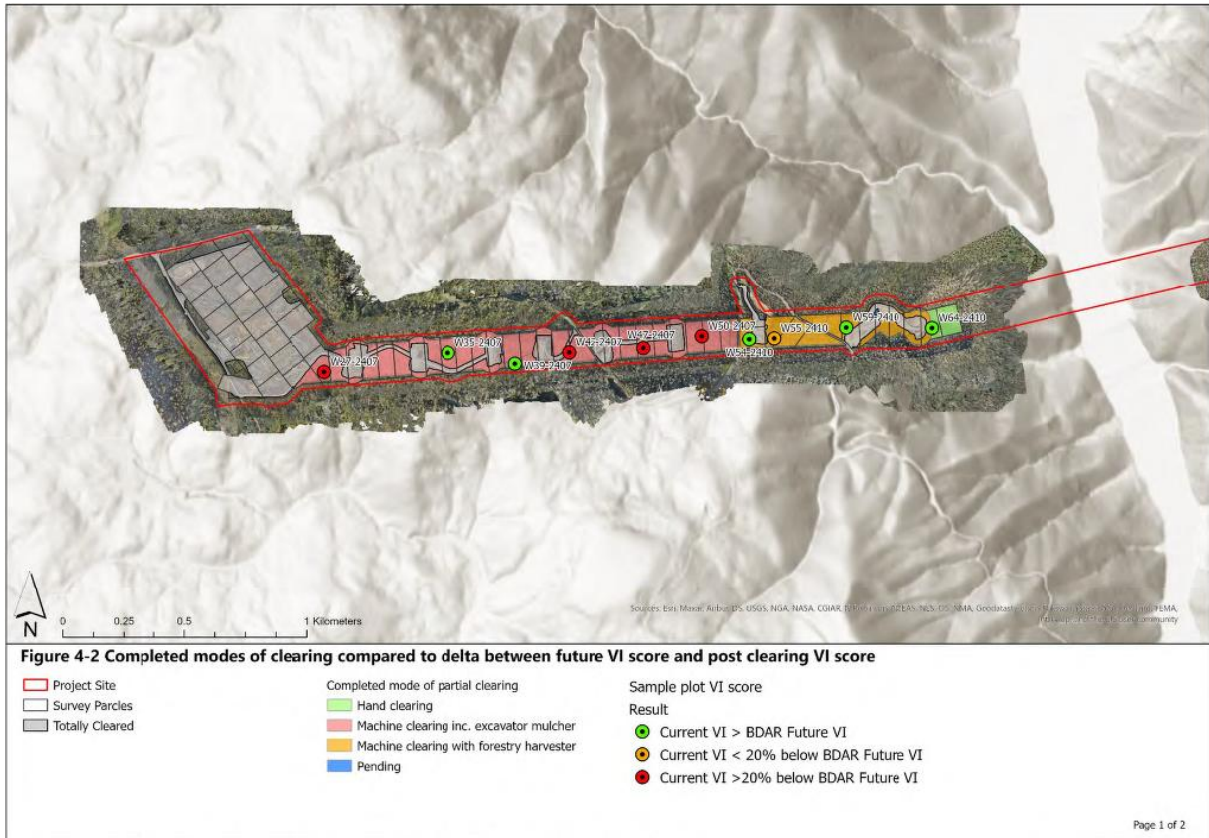


Figure 1: Area where clearing works were assumed to have been undertaken using an excavator mulcher, shown in red (Source Leneco, 2025)

Specifically, the IEA found that during vegetation clearing undertaken between February and May 2024 the use of an excavator mulcher and a forestry mulcher, rather than a forest harvester, for removal of trees over 200 mm diameter at breast height (DBH) has resulted in the extensive application of wood mulch, to depths of 200 mm and that the excessive application of mulch is likely to have resulted in significant groundcover disturbance and compromised the retention of managed shrub and groundcover vegetation.

The IEA attributes observed impacts to the “use of the excavator mulcher and forestry mulcher for the removal of trees over 200mm DBH on the Project West site” and this does “not comply with the BMP’s requirement to use a forest harvester for trees over 200 mm DBH” (Umwelt, 2025, p. 29).

Umwelt (2025) makes a number of recommendations to redress impacts, including:

- commissioning of an independent ecological assessment to verify whether environmental harm has occurred as a result of the above, and
- remedial works are required for the areas outlined above, including reduction in woodchip cover and depth, installation of fencing, direct seeding and monitoring.



A post-clearing vegetation monitoring report, prepared by Leneco (2025), documents the vegetation integrity (VI) scores three months post-clearing against the assumptions of the Biodiversity Development Assessment Report [BDAR] (Jacobs, 2022) providing an indication of regeneration post-clearing. Importantly, the Leneco (2025) report documents that an excavator mulcher was used for clearing within the ECZ from February to May 2024, and use of a forestry harvester from March to May 2024 (p. 21). The report states that use of an excavator mulcher has resulted in generation of mulch with “average mulch cover of 95%, with depths ranging from 10–20 cm” (Leneco, 2025, p. 26), with regeneration in these areas progressing more slowly than other areas but with increased native cover and diversity since clearing. However, contrary to the IEA findings, the report does not appear to report use of a forestry mulcher.

Table 1 provides a summary of post-clearing VI scores against target VI score for plots undertaken within the area impacted. It should be noted that the future VI scores used by Jacobs (2022) were based on VI data collected by EMM (2020) from Line 2, which was cleared prior to 1965 (more than 50 years prior to data collection). These future VI scores were expected to be achieved long-term, once full restoration post-clearing had occurred. Scores three months post-clearing should be considered progress scores towards targets, rather than final-state scores. Data indicates post-clearing VI scores for two out of six plots are at or above target, while two others are around 50% of the target VI score. Two areas, plots W27-2407 and W50-2407 may warrant monitoring to ensure progress over the next 12–24 months

Table 1: Post-clearing VI score data for the area

Plot ID	Vegetation zone	Post-clearing VI score	Target VI score	Percentage of target
W27-2407	1196_Good	9.4	44	21%
W35-2407	300_Good	12.3	12.3	100%
W39-2407	300_Good	28.8	12.3	234%
W42-2407	729_Good_wet_slopes	18.7	38	49%
W47-2407	300_Good	6.8	12.3	55%
W50-2407	300_Good	1.6	12.3	13%

1. Target VI score is based on future VI scores assumed for partial clearing by Jacobs (2022) as reported in Leneco (2025).

Consistency with the BDAR and BMP

Partial clearing of the ECZ was anticipated by the BDAR (Jacobs, 2022), with a Vegetation Clearing Method provided at Appendix K of the BDAR. The Construction Clearing Methodology for the ECZ is outlined in Section 2.5.2 of this document and states:

- in areas safely accessible by machinery, small trees or taller vegetation <200 mm DBH will be removed using an excavator mulcher with the aerial portion mulched to ground level, and
- vegetation >200 mm DBH will be removed using a forest harvester type machine, noting tree branches and canopy may be mulched in-situ.



Retention of mulch within the ECZ was anticipated, including spreading of mulch on bare earth to stabilise soils and minimise soil erosion. However, it was expected that the mulch layer would not exceed 50 mm in thickness and would not restrict or limit the regeneration of groundcover, grasses or understorey vegetation. There is a commitment for felled trees to remain in situ with crowns removed.

These commitments were largely carried through to the BMP (Transgrid, 2024) with minor modifications. The BMP states:

- in areas safely accessible by machinery, smaller trees (or other tall growing vegetation) <200 mm DBH will be removed using an excavator-mulcher to mulch from the top down (or an equivalent methodology), and
- vegetation over 200 mm DBH will be removed using a forest harvester type machine (or similar), noting tree branches and canopy may be mulched in-situ.

Tree trunks were to be mulched for erosion or sediment control or relocated to the edge of the easement. Shrubs and vegetation below 4 m were to be left intact and unimpacted as best as possible. However, the BMP anticipates impacts to all strata but expected regeneration to occur rapidly, with heavily impacted areas to be rehabilitated.

In considering whether clearing was consistent with the BDAR and the BMP, the machinery used must be considered. The IEA (Umwelt, 2025) assumes use of an excavator mulcher in these areas. It appears this assumption is based on statements in the Leneco (2025) report (see above). However, review of photographs from Umwelt (2025) indicate that a forest harvester, not an excavator mulcher, is likely to have been used, at least in some areas, with large tree trunks evident (Plate 1), consistent with use of a tree harvester and not an excavator mulcher. Rather than leaving large trunks intact on the ground an excavator mulcher would have chipped all vegetation and resulted in only mulch (i.e. no large trunks).



Plate 1: Plates 10 and 11 from Umwelt (2025) appearing to show large trunks left in situ

The use of a forestry harvester for clearing of vegetation over 200 mm DBH has been confirmed by Transgrid (Jason Snape, pers. comm. 3 July 2025). The amount of mulch observed may be a result of the volume of vegetation <200 mm DBH.

It is my view that clearing is largely consistent with the BDAR and BMP. Based on advice from Transgrid, clearing was undertaken using the correct machinery, with use of an excavator mulcher



restricted to clearing of vegetation <200 mm DBH and a forestry harvester for clearing of vegetation over 200 mm DBH. There is evidence that groundcover vegetation has been retained and that felled trees have been left in situ. The BDAR and BMP anticipated that some mulching would occur. However, both the BDAR and BMP make commitments to retention of midstorey vegetation, either as partial midstorey removal (BDAR) or leaving shrubs and vegetation with growth potential below 4 m intact (BMP); this outcome was not achieved. Further, the BDAR states that mulch will not exceed 50 mm in thickness, with both the IEA (Umwelt, 2025) and Leneco (2025) report documenting mulch depths in excess of this.

Ultimately, the key outcome is the regeneration and long-term biodiversity value of the easement following clearing. The BMP aims to maintain long-term VI targets.

Material harm

The IEA (Umwelt, 2025) states that the vegetation clearing as outlined above has “potential to have resulted in environmental harm (as defined under the Infrastructure Approval)” (p. 29). It is noted that Umwelt (2025) uses the term “environmental harm” and not “material harm”. Environmental harm is not defined in Infrastructure Approval SSI-9717. For the purpose of this report, it is assumed that Umwelt is referring to material harm.

Material harm is defined in the definitions of the Infrastructure Approval:

Is harm that:

- involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or*
- results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).*

This definition excludes “harm” that is authorised under either this approval or any other statutory approval.

The assertion from Umwelt (2025) that an excavator mulcher and forestry mulcher were used in the removal of trees over 200mm DBH on the Project West site appears to be derived from the Leneco report (2025). However, photos from the IEA (Plate 1) show trunks of trees present in the ECZ consistent with use of a forestry harvester and Transgrid has confirmed that a forestry harvester was used for clearing of vegetation over 200 mm DBH, consistent with the BMP (Transgrid, 2024).

The definition of material harm specifically excludes harm authorised by the Infrastructure Approval. Given the BMP is a requirement under Condition B21 of the Infrastructure Approval, and the BMP has been approved by the Planning Secretary, clearing undertaken in a manner consistent with the requirements of the BMP would be authorised by the Infrastructure Approval and therefore excluded.

Regarding the depth of mulch exceeding the depths assumed by the BDAR and BMP, any impacts can be presumed to be unintentional and could be considered minor or negligible if no



long-term harm occurs. The intent of the clearing procedures for the ECZ were to ensure that some biodiversity value was retained long-term, as assessed via the future VI score. Ongoing monitoring is required to determine if this is the case. If monitoring indicates vegetation is regenerating and making progress towards target VI scores, then the impacts of clearing can be considered trivial.

Recommendations

Transgrid may wish to clarify statements in the Leneco (2025) report regarding use of an excavator mulcher for clearing (p. 21; p. 26) and update the report to reflect the machinery used.

The IEA (Umwelt, 2025) makes a number of recommendations to redress impacts. Regardless of whether the correct machinery was used, Umwelt have identified that deep mulch may be inhibiting regeneration of native vegetation post-clearing and consideration of remedial action is warranted. However, at this stage, the recommendations outlined by Umwelt (2025) may have more of an impact than a benefit.

- Reduction of woodchip cover (mulch) may cause damage to regenerating vegetation and, if undertaken, should be strictly limited to areas where little to no regeneration is occurring.
- Seeding is likely to result from the substantial seed bank now present in the soil, so direct seeding is unlikely to be warranted at this stage.
- I agree that monitoring of vegetation regeneration should occur, and it is recommended that this is done via a combination of VI plots and photo point monitoring as well as visual inspections. VI plots and photo point monitoring will help document and quantify vegetation regeneration, while visual inspections will help identify areas outside of formal monitoring which may warrant early intervention and adaptive management.

Conclusions

The clearing of native vegetation in the area west of Track 1 along the alignment to the Maragle site has been largely consistent with the BDAR and BMP. Machinery used was consistent with the BMP. However, the lack of retention of midstorey vegetation and deposition of mulch to depths greater than 50 mm is inconsistent. This may have been rectified following a review following clearing in March to May 2024. There are inconsistencies around whether midstorey vegetation will be retained and, if so, the degree of retention. This should be clarified in any updates to the BMP.

Active intervention is not considered warranted at this stage as the areas appear to be regenerating naturally and progressing towards target VI scores, in line with the aim of maintaining some biodiversity values within the easement long-term. Monitoring will help to determine whether areas are regenerating following clearing. If not, adaptive management may be required.

Given vegetation clearing was undertaken consistent with the BMP it is authorised by the Infrastructure Approval and excluded from the definition of material harm. The depth of mulch is likely an unintentional outcome and requirements for active intervention and adaptive



management should be determined based on whether regeneration occurs and vegetation progresses towards target VI scores. If so, adaptive management is not warranted.

If you have any questions regarding this advice, please don't hesitate to get in touch.

Kind regards,

Nathan Garvey
Director | Principal Advisor

References



- EMM. (2020). *Snowy 2.0 Main Works Biodiversity Development Assessment Report (Revised)*. Newcastle: EMM Consulting Pty Ltd.
- Jacobs. (2022). *Snowy 2.0 Transmission Connection Project Biodiversity Development Assessment Report*. Newcastle: Jacobs Group (Australia) Pty Ltd.
- Leneco. (2025). *UGL Snowy 2.0 Transmission Connection: Post-clearing Vegetation Integrity Monitoring Report in Partial Clearing Zones*. Leneco Pty Ltd.
- Transgrid. (2024). *Biodiversity Management Plan: Snowy 2.0 Transmission Connection Project*. Transgrid.
- Umwelt. (2025). *Snowy 2.0 Transmission Connection Project Independent Environmental Audit*. Umwelt Australia Pty Ltd.

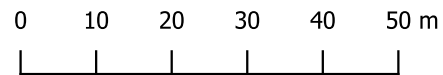
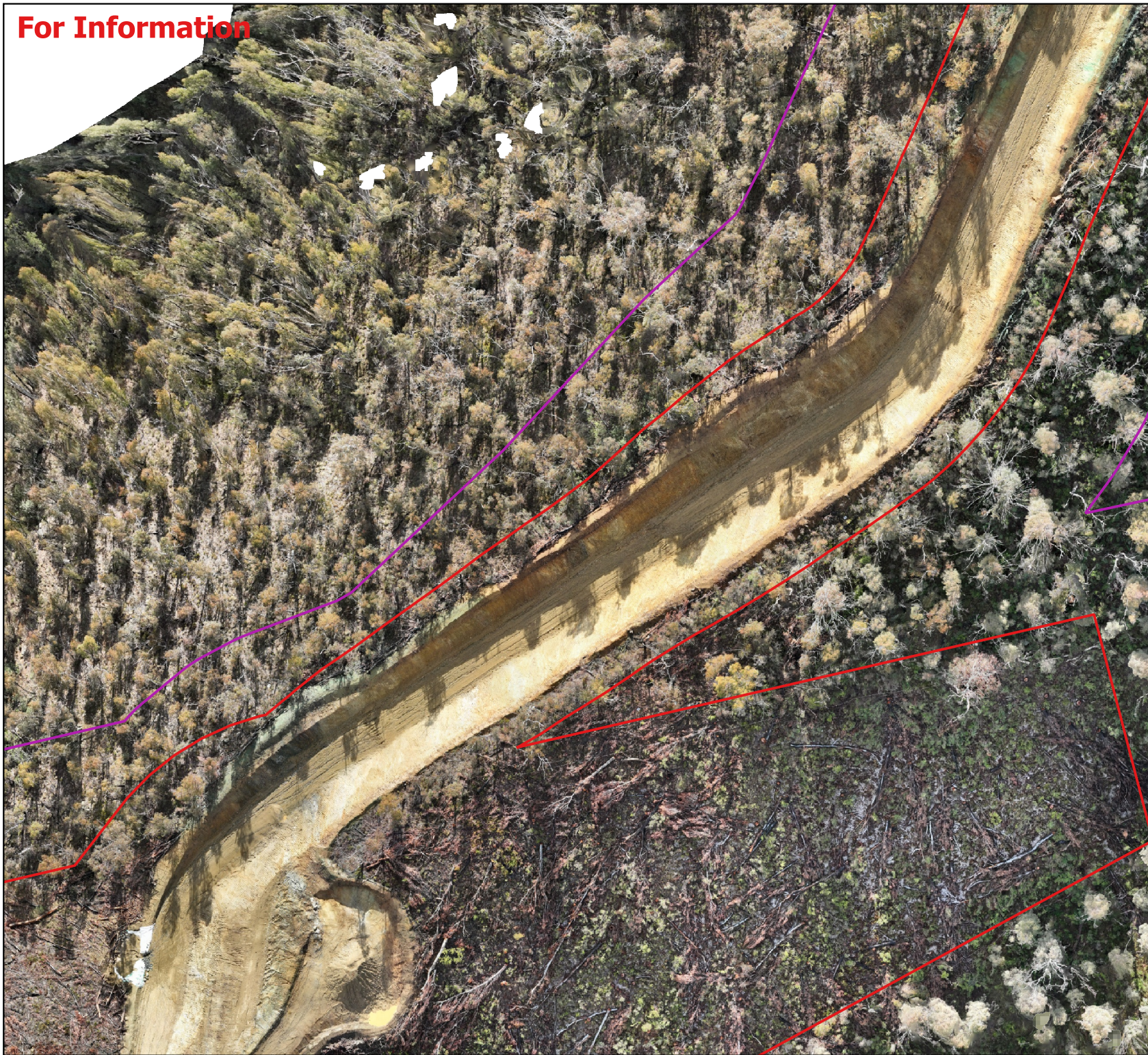
Attachment D

For Information

Snowy 2.0 Transmission Connection

Legend



-  Disturbance_Zone_Boundary
-  Project_Boundary

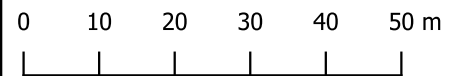


For Information

Snowy 2.0 Transmission Connection

Legend

-  Disturbance_Zone_Boundary
-  Project_Boundary



GDA94 / MGA zone 55



Author: JS

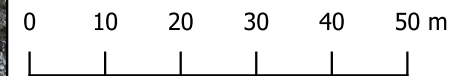
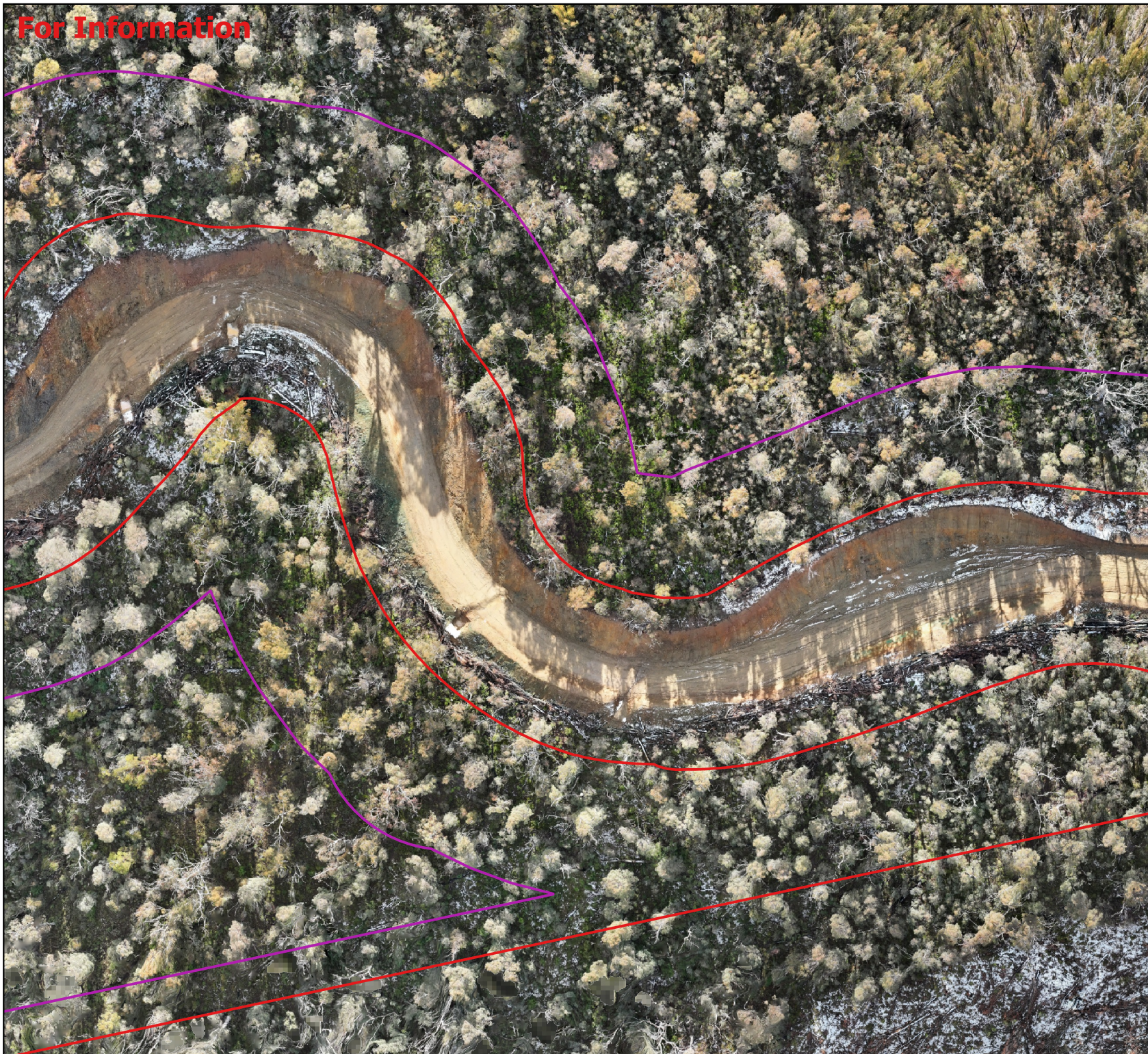
02/07/2025

For Information

Snowy 2.0 Transmission Connection

Legend

-  Disturbance_Zone_Boundary
-  Project_Boundary





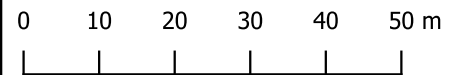
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Snowy 2.0 Transmission Connection

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-  Disturbance_Zone_Boundary
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