

Friday, 28 November 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 4 – Proponent Responses to Audit Findings

The Proponent, Transgrid, submits the Proponent Response to Audit Findings for Independent Environmental Audit (IEA) – Construction Audit 4 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 nine non-compliances. Transgrid accepts seven of the non-compliance findings and has already commenced improvement opportunities. Per the Proponent Response to Audit Findings, the Proponent disagrees with two of the Independent Audit Findings and associated non-compliances, as follows:

Infrastructure Approval SSI-9717

- **NC-03:** Condition B17:
 - Based on the outcomes of the EMM Consulting Investigation, it would appear that the habitat clearing extents provided for *Caladenia montana* exceed approved clearing limits.
- **NC-04:** Condition B21:
 - During the audit period, Transgrid requested extensions to the submission timeframe of the OVMP on two occasions which reflected in two minor revisions of the BMP. There is no verifiable evidence to support the extension was consulted with FCNSW.
 - 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.

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

- **BMP46**

- Records of *Caladenia montana* occurring outside the species polygons identified in the Project Biodiversity Development Assessment Report have not been reported as an Unexpected Find, contrary to advice from EMM Consulting and recommendations made in Construction Audit 3.

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.

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.

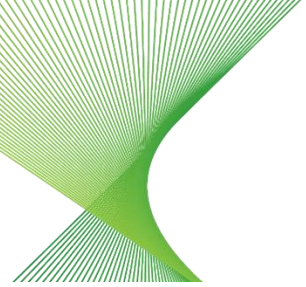
Yours faithfully,



Jason Snape
Senior Environmental Advisor | Delivery
Transgrid

Snowy 2.0 Transmission Connection Project - Independent Environmental Audit Construction Audit 4

Proponent Responses



Proponent Responses – Non-Compliances

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)							
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
SCHEDULE 2							
PART A ADMINISTRATIVE CONDITIONS							
TERMS OF APPROVAL							
A2.	<p>The development must be carried out:</p> <ol style="list-style-type: none">in compliance with the conditions of this approval;in accordance with all written directions of the Planning Secretary;generally in accordance with the EIS; andgenerally in accordance with the Development Layout in Appendix 2. <p>(a) any strategies, plans or correspondence that are submitted in accordance with this approval;</p> <p>(b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and</p> <p>(c) the implementation of any actions or measures contained in these documents.</p>		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.</p> <p>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 the approved development layout occurred during this audit period. It is noted that an assessment of the constructed batters is currently being undertaken by UGL to confirm that final batter profiles and extents are consistent with the approved design and development layout. The results of this assessment may lead to changes being implemented during the next audit period, with any required adjustments or stabilisation works to be undertaken based on the assessment outcomes (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 B11:<ul style="list-style-type: none">During the audit period five 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-03: Condition B17:<ul style="list-style-type: none">An unauthorised clearing event was recorded during the audit period on 24 March 2025.Based on the outcomes of the EMM Consulting Investigation, it would appear that the habitat clearing extents provided for <i>Caladenia montana</i> exceed approved clearing limits.The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Condition B17 and commits to maintaining a central delineation register to support traceability, compliance monitoring, and verification of clearing boundary controls prior to any future clearing activities.The Proponent disagrees with the Independent Audit Findings and Recommendations for Condition B17 and associated non-compliance relating to clearing of <i>Caladenia montana</i> habitat and confirms clearing is compliant with the restrictions on clearing and habitat defined for <i>C. montana</i> species habitat per SSI-9717 Schedule 2 Condition B17 (a) (i).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. <p>EPBC 2018/8363</p> <ul style="list-style-type: none">NC-05: Condition 3:<ul style="list-style-type: none">Condition B21 was triggered non-compliant due to a number of non-compliances with the BMP. A detailed review and findings are presented in the BMP Management Measures Compliance Table (refer Table 2 in Appendix 4).Refer BMP Management Measures Compliance Table.NC-06: Condition 6:<ul style="list-style-type: none">Implementation of the BMP has commenced and is ongoing however a number of non-compliances have been identified with the BMP. A detailed review and findings is presented in the BMP Management Measures Compliance Table (refer Table 2 in Appendix 4).	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)							
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						<ul style="list-style-type: none"> Refer BMP Management Measures Compliance Table. <p>Amendment Report Mitigation Measures</p> <ul style="list-style-type: none"> NC-07: Condition B3: <ul style="list-style-type: none"> The Rehabilitation Management Plan TARP does not include notification to NPWS and BCS in the event if remedial actions have been triggered. The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Condition B3 and commits to updating the Rehabilitation Management Plan TARP in consultation with NPWS and CPHR (previously BCS) to include notification to NPWS and CPHR in the event, remedial actions are triggered. NC-08: Condition B5: <ul style="list-style-type: none"> The absence of adequate delineation between No-Go Zone, Hazard Tree Zone, Partial Clearing Zone, and Total Clearing Zone led to unauthorised clearing incident. The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Condition B5 and commits to maintaining a central delineation register to support traceability, compliance monitoring, and verification of clearing boundary controls prior to any future clearing activities. NC-09: Condition B17: <ul style="list-style-type: none"> Clearing of the Easement Clearing Zone assessed as non-compliant under BMP Biodiversity Management Measure BMP12 (unauthorised clearing incident). Refer BMP Management Measures Compliance Table 	
PART B ENVIRONMENTAL CONDITIONS – GENERAL							
Pollution of Waters							
B11.	Unless otherwise authorised by an EPL the Proponent must ensure the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	<p>Major Projects Notification - Maragle Turbid Water Discharge Rev 1 dated 24/06/2025</p> <p>Major Projects Notification - Maragle Turbid Water Discharge Rev 2 dated 26/06/2025</p> <p>Major Projects Notification - Maragle Substation Discharge dated 08/07/2025</p> <p>Major Projects Notification - Maragle Switchyard Basin Overtop dated 28/07/2025</p> <p>Major Projects Notification - Maragle Substation Discharge dated 29/08/2025</p>	Non-compliant	<p>During the audit period five incidents were reported involving the discharge of turbid water. An overview of the incidents is provided below:</p> <ul style="list-style-type: none"> Maragle Turbid Water Discharge June 2025: Approximately 58 mm of rain was recorded within Project Area on 24 June 2025 and further heavy snowfall was recorded within Project Area West between 25-26 June 2025 within a 120 hour, 90th percentile rainfall event. Post-rainfall inspections undertaken by UGL on 24 June 2025 indicated turbid water had discharged from the Maragle 500kV Substation towards the unnamed creek on the western boundary of the Project area and from a box culvert north of Elliott Way into a vegetated swale. Further post-rainfall inspections were undertaken by UGL on 26 June 2025 following heavy snowfall which indicated overtopping of the 	NC-02	<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>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 Maragle Switchyard and Substation sediment basins: <ul style="list-style-type: none"> Dewatering of sediment basins was undertaken prior to and following each incident in accordance with the Project Soil and Water Management Plan Appendix D Primary Erosion and Sediment Control Plan and Appendix I Water Irrigation and Disposal Permit. <p>The Proponent will ensure any future incidents grab samples are also taken for lab testing to include a full suite of parameters to appropriately determine potential environmental impact.</p>	N/A

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				<p>sediment basin adjoining the Maragle 330kV Switchyard via the basin spillway.</p> <ul style="list-style-type: none">• Maragle Substation Discharge July 2025 Event 1: Approximately 13.6 mm of rain was recorded within Project Area West between the 6 - 7 July 2025. Post-rainfall inspections undertaken by UGL-CPB, indicated turbid water had discharged from the Maragle 500kV Substation towards the unnamed creek on the western boundary of the Project area and from a box culvert north of Elliott Way into a vegetated swale.• Maragle Substation Discharge July 2025 Event 2: Approximately 30.6mm of rain was recorded within Project Area West between the 22 - 23 July 2025. Pre-rainfall inspections undertaken by the UGLCPB indicated turbid water had discharged from the Maragle 500kV Substation towards the unnamed creek on the western boundary of the Project area.• Maragle Switchyard Basin Overtop: Approximately 116.7 mm of rain was recorded within Project Area West between 26-27 July 2025. Post-rainfall inspections undertaken by UGL, on 28 July 2025 indicated overtopping of the sediment basin adjoining the Maragle 330kV Switchyard via the basin spillway to New Zealand Gully.• Maragle Substation Discharge August 2025: Approximately 68.5mm of rain was recorded within Project Area West by 2:15PM on 28 August 2025, this had reached 95mm by 9:00AM on 29 August 2025. Pre-rainfall inspections undertaken by UGL-CPB indicated turbid water had discharged from the Maragle 500kV Substation towards the unnamed creek on the western boundary of the Project area. Water was observed leaving the site via the sediment trap (aka the ‘Duck Pond’) which leads to Unnamed Creek via the culvert under the Snowy 2.0 site access road approx. 635m from Yorkers Creek. <p>All incidents were reported to relevant agencies as required with further details</p>			

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				<p>provided in Condition C7 of this Infrastructure Approval Table.</p> <p>All five incident reports were reviewed with particular focus on the water quality monitoring undertaken as part of the incident response. It was noted that upstream, downstream, and confluence/mixing zone monitoring was conducted in each case. For some incidents, monitoring comprised in-situ measurements using a probe, with results reported for turbidity only, while others included both turbidity and pH. It remains unclear whether laboratory samples were also collected and analysed.</p> <p>Recommendation: It is recommended that for any future incidents grab samples are also taken for lab testing to include a full suite of parameters to appropriately determine potential environmental impact.</p>																								
BIODIVERSITY																												
Restrictions on Clearing and Habitat																												
B17.	<p>Unless otherwise agreed with the Planning Secretary, the Proponent must:</p> <p>(a) ensure that no more than:</p> <p>i) 9.35 ha of <i>Caladenia montana</i> species habitat</p> <p>ii) 89.06 ha of Gang-gang Cockatoo (breeding) species habitat</p> <p>iii) 10.86 ha of Masked Owl (breeding) species habitat</p> <p>iv) 117.29 ha of Eastern Pygmy-possum species habitat</p> <p>v) 59.03 ha of Yellow-bellied Glider species habitat; and</p> <p>vi) 1.67 ha of Booroolong Frog species habitat</p> <p>vii) is cleared for the development; and</p> <p>(b) minimise:</p> <p>i) the impacts of the development on hollow-bearing trees;</p> <p>ii) the impacts of the development on threatened species; and</p>	<p>Biodiversity Management Plan (Rev 0.13) dated 30/10/2024</p> <p>UGL Maragle Form 09 - 24hr Preclearing Checklist – E08 dated 19/03/2025</p> <p>UGL Maragle Form 09 - 24hr Preclearing Checklist – E19 Sheep Station Creek dated 26/03/2025</p> <p>EMM - Snowy 2.0 Transmission Connection Project: Advice in response to Independent Environmental Audit Findings with respect to Caladenia montana dated 20/06/2025</p>	Non-compliant	<p>(a) Consistent with previous Construction Audits, the development continues to operate under a staged clearing permit system to manage and control vegetation clearing within the specified limits. This system includes the review of clearing data captured through surveyor records and georeferenced drone imagery. However, despite these controls, an unauthorised clearing event was recorded during the audit period on the 24 March 2025. Extent of clearing by the Project to date has been provided by Transgrid as presented in the table below</p> <p>Table 2 Habitat Clearing Extent</p> <table><tr><th>Species</th><th>Extent of Clearing (Ha)</th><th>Clearing Limit (Ha)</th></tr><tr><td><i>Caladenia montana</i></td><td>8.06*</td><td>9.35</td></tr><tr><td>Gang-gang Cockatoo</td><td>78.58</td><td>89.06</td></tr><tr><td>Masked Owl</td><td>10.20</td><td>10.86</td></tr><tr><td>Pygmy-possum</td><td>98.58</td><td>117.29</td></tr><tr><td>Yellow-bellied Glider</td><td>54.19</td><td>59.03</td></tr><tr><td>Booroolong Frog</td><td>0.93</td><td>1.67</td></tr></table>	Species	Extent of Clearing (Ha)	Clearing Limit (Ha)	<i>Caladenia montana</i>	8.06*	9.35	Gang-gang Cockatoo	78.58	89.06	Masked Owl	10.20	10.86	Pygmy-possum	98.58	117.29	Yellow-bellied Glider	54.19	59.03	Booroolong Frog	0.93	1.67	NC-03	<p>The Proponent acknowledges the Independent Audit Findings and Recommendations for Condition B17 and associated non-compliance relating to an unauthorised clearing event which was recorded during the audit period on the 24 March 2025 including confirmation this incident was reported to relevant agencies as required in accordance with Condition C7 of the Infrastructure Approval.</p> <p>The Proponent disagrees with the Independent Audit Findings and Recommendations for Condition B17 and associated non-compliance relating to clearing of <i>Caladenia montana</i> habitat.</p> <p>A pre-construction ecological survey report (the Report) prepared by Leneco Environmental Management (September 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></p> <p><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</i></p>	<p>It is considered that this condition has been met</p>
Species	Extent of Clearing (Ha)	Clearing Limit (Ha)																										
<i>Caladenia montana</i>	8.06*	9.35																										
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	iii) the clearing of native vegetation and key habitat.			<p>Notes: * The orange numbers as provided by Transgrid do not reflect or align with the findings of the investigation completed by EMM Consulting.</p> <p>During Construction Audit 3, it was identified that clearing of <i>Caladenia montana</i> occurred outside the known extent / species polygons defined in the Biodiversity Development Assessment Report (BDAR) and at the time of completing Audit 3 Transgrid had commissioned an independent biodiversity specialist (EMM Consulting) to complete an investigation. The investigation completed by EMM Consulting (Advice in response to Independent Environmental Audit Findings with respect to <i>Caladenia montana</i>, dated 20 June 2025) found that based on the quantum of <i>Caladenia montana</i> habitat already cleared, being 10.77 ha within the procedural clearing layer or 12.31 ha within the disturbance zones layer (assuming that an updated species polygon using a 30 m buffer from all records is utilised as per the BDAR), the level of clearing permitted under the Infrastructure Approval has already been surpassed.</p> <p>Consistent with the findings of EMM Consulting, it's not clear which of these layers (10.77 ha or 12.31 ha) represents clearing that has been carried out. However, both amounts exceed the 9.35 ha limit on approved clearing of <i>Caladenia montana</i> under consent conditions.</p> <p>EMM agreed with the recommendation raised in Construction 3 and noted that records of <i>Caladenia montana</i> occurring outside of the species polygons identified in the Project BDAR constitutes an unexpected find (refer to B21 for details of non-compliance). It was advised by EMM Consulting that the Unexpected Threatened Species Finds Procedure be implemented in accordance with Appendix D of the BMP to notify relevant agencies, acknowledging that the ability to stop work has now passed.</p> <p>During this current audit (Audit 4) Transgrid advised that there position was they did not agree with the findings of EMM Consulting's investigation. Given the independence and technical expertise of EMM Consulting in preparing the assessment, the findings are considered credible and warrant further review to confirm compliance with approved disturbance limits. Based on the outcomes of the EMM Consulting Investigation, it would</p>		<p><i>montana</i> specimens referred to by the auditor and the Proponent is compliant with the Biodiversity Management Plan.</p> <p>The Proponent confirms further on-ground verification of clearing extent in <i>Caladenia montana</i> habitat was completed following provision of the procedural clearing layer referred to by the auditor and assessed by EMM Consulting. The current extent of clearing for <i>Caladenia montana</i> habitat is 7.87 ha and is under the restrictions on clearing habitat for <i>C. montana</i> of 9.35 ha as defined under SSI-9717 Schedule 2 Condition B17 (a) (i).</p> <p>In the event additional <i>Caladenia montana</i> specimens require an updated species polygon using a 30 m buffer from all records is utilised as per the BDAR, the total extent of clearing for <i>Caladenia montana</i> habitat is 9.13 ha and is under the restrictions on clearing and habitat for <i>C. montana</i> of 9.35 ha as defined under SSI-9717 Schedule 2 Condition B17 (a) (i).</p> <p>Transgrid commits to consulting with DPHI and CPHR regarding the Independent Audit Findings and Recommendations for Condition B17 including review of findings in EMM Consulting's investigation and management of observations from pre-clearing surveys.</p>	

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				<p>appear that the habitat clearing extents provided for <i>Caladenia montana</i> in the table above are not considered to reflect the actual clearing of <i>Caladenia montana</i>.</p> <p>Recommendation: It is recommended that the findings of EMM Consulting's investigation and advice relating to clearing of <i>Caladenia montana</i> be provided to and discussed with DPHI and CPHR as the relevant regulatory agencies in order to determine if the clearing limits have been exceeded and determine appropriate supplementary measures to mitigate the loss of the additional habitat for <i>Caladenia montana</i> through securing additional offsets for this species.</p> <p>(b) Measures to minimise impacts to threatened species were observed during the site audit inspection. Measures include the demarcation of exclusion zones and the retention of limb-removed hollow bearing trees which were located within the outer edges of the approved clearing area (sighted).</p>			
Biodiversity Management Plan							
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> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced biodiversity expert/s in consultation with NPWS, BCS, FCNSW and DCCEEW; (b) be prepared in accordance with the Biodiversity Development Assessment Report (Revision 7, dated 22 August 2022); (c) include a description of the measures that would be implemented to: <ul style="list-style-type: none"> i) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance footprint; ii) minimise the clearing of native vegetation and 	<p>Biodiversity Management Plan (Rev 0.13) dated 30/10/2024</p> <p>NPWS and CPHR Endorsement Email Correspondence dated 28/07/2025</p>	Non-compliant	<p>Confirmed during the Initial Construction Audit, a BMP has been prepared and approved for the development. The BMP addresses all requirements outlined by Condition B21 with exception of the items identified in previous Construction Audits.</p> <p>In Construction Audit 2 and 3, it was noted the BMP was undergoing consultation regarding updates in relation to recommendations outlined in previous Construction Audits. Transgrid has advised consultation is still ongoing and this would be subject to a subsequent approval (J. Snape pers. comm).</p> <p>It is noted that the OVMP was not prepared during the audit period.</p> <p>During the audit period, Transgrid requested extensions to the submission timeframe of the OVMP on two occasions which reflected in two minor revisions of the BMP. The first extension revised the deadline from 16 to 20 months after construction commencement making the submission date the 31 July 2025. A subsequent request was submitted, further extending the timeframe from 16 to 22 months now making it the 31 October 2025.</p>	NC-04	<p>Refer BMP Management Measures Compliance Table.</p> <p>The Proponent disagrees with the Independent Audit Findings and associated non-compliance for Condition B21 relating to no verifiable evidence to support the Operational Vegetation Management Plan (OVMP) extension was consulted with FCNSW.</p> <p>Mitigation Measure BIO9 of the Snowy 2.0 Transmission Connection Biodiversity Development Assessment Report (BDAR, Rev 7, Jacobs 2022) requires preparation of the OVMP in consultation with CPHR (previously BCS) and NPWS and excludes FCNSW from consultation requirements. Verifiable evidence to support the OVMP extension was consulted with FCNSW is not required, and the Proponent has met consultation requirements for the OVMP extension in accordance with BIO9.</p> <p>The Proponent confirms the revised Biodiversity Management Plan (rev0.14) was submitted to the Department in accordance with SSI-9717 Schedule 2 Condition C3, as follows:</p> <p><i>C3. With the approval of the Planning Secretary, the Proponent may:</i></p> <ul style="list-style-type: none"> <i>(a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</i> <i>(b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</i> <i>(c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</i> 	It is considered that this condition has been met

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	<p>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>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;</p> <p>ix) maximise the salvage of resources within the disturbance area for reuse in the restoration of vegetation and</p>			<p>Both extensions were discussed with CPHR and NPWS, who supported the revised submission dates (sighted). There is no verifiable evidence to support the extension was consulted with FCNSW. The updated timeframe has been reflected in the revised BMP (Rev 0.14) which is pending approval.</p> <p>Evidence of implementation of the BMP was observed during the site audit inspection and thorough review of documentation.</p> <p>Recommendation: It is recommended the revised Biodiversity Management Plan Rev (0.14) is provided to FCNSW for comment.</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>		<p><i>If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval.</i></p> <p>The revised BMP (rev0.14) was submitted to the Department noting minor amendments had been applied to document with consultation being undertaken with NSW NPWS and RDD as required to be consulted with for the OVMP preparation in accordance with Condition C3.</p>	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1

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	<div>habitat on site, including native vegetative material, hollow logs, ground timber, and topsoil containing vegetative matter and native seed bank;</div> <div>x) collect seeds within the approved disturbance area for use in the ecological rehabilitation of the site;</div> <div>xi) minimise the spread of weeds, pathogens and feral pests on site, and import or export of these matters to or from the site;</div> <div>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;</div> <div>xiii) minimise the light spill from night works, including using directional and LED lighting; and</div> <div>xiv) minimise bushfire risk.</div> <div>(d) include construction clearing and operation vegetation management protocols</div> <div>(e) include a strategy to address:</div> <div>i) management of activities within the 50 m exclusion zone of the Yarrangobilly River and its tributaries;</div> <div>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</div> <div>(f) include a program to monitor, evaluate and</div>						

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	publicly report on the effectiveness of these measures. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.						

Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)							
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
Part A – Conditions Specific to Action							
3	To mitigate impacts on protected matters, the approval holder must implement conditions B21, B41 and C1 of the State Infrastructure Approval, in so far as they relate to monitoring, mitigating and avoiding impacts to protected matters.	Biodiversity Management Plan (rev 0.13) dated 30/10/2024 Environmental Management Strategy (rev 0.08) dated 5/08/2024	Non-compliant	Condition B21 was triggered non-compliant due to a number of non-compliances with the BMP. A detailed review and findings are presented in the BMP Management Measures Compliance Table (refer Table 2 in Appendix 4). The audit has identified Condition B41 is compliant. Condition C1 is compliant.	NC-05	Refer BMP Management Measures Compliance Table.	
6	The approval holder must implement the Biodiversity Management Plan and Environmental Management Strategy approved by the Minister until the end date of this approval, unless otherwise agreed by the Minister in writing.	Biodiversity Management Plan (rev 0.13) dated 30/10/2024	Non-compliant	Implementation of the BMP has commenced and is ongoing however a number of non-compliances have been identified with the BMP. A detailed review and findings is presented in the BMP Management Measures Compliance Table (refer Table 2 in Appendix 4).	NC-06	Refer BMP Management Measures Compliance Table.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))							
Mitigation Measure	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
Biodiversity							
B3	A Rehabilitation Plan will be prepared and approved prior to construction in consultation with BCS, NPWS and FCNSW. The Rehabilitation Plan will inform the implementation of rehabilitation within the lease/licence area. Such areas will be identified in the final detailed design and will also include areas disturbed during construction that are not required to be maintained or cleared for the operation of the project. <ul style="list-style-type: none"> The plan will focus on the implementation of soil erosion prevention, re- 	Rehabilitation Management Plan Rev 0.06 dated 06/06/2025 DPHI Rehabilitation Management Plan Approval Letter dated 27/06/2025	Non-compliant	The RMP has been prepared in consultation with CPHR and FCNSW and was approved on the 26 June 2025 by the Planning Secretary. <ul style="list-style-type: none"> Implementation of the RMP is detailed in Section 5 and rehabilitation measures to be undertaken are detailed Table 5-6 Riparian vegetation is detailed in Section 5.1.7.3 The Trigger Action Response Plan (TARP) does not include notification to NPWS or CPHR in the event that remedial actions are triggered. It is 	NC-07	The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Condition B3 and commits to updating the Rehabilitation Management Plan TARP in consultation with NPWS and CPHR (previously BCS) to include notification to NPWS and CPHR in the event if remedial actions have been triggered.	28-02-2026

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))

Mitigation Measure	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>establishment of local endemic plant species suitable to the vegetation formation and habitat and outline the details of rehabilitation objectives and how their outcomes for success will be measured, locations, target landforms and plant community types</p> <ul style="list-style-type: none">• Restoration of riparian vegetation (i.e. weed control) will be implemented to protect and improve key habitat areas of the Booroolong Frog• The plan will include a program for adaptive monitoring of specific success measures and reporting and include a Trigger Action Response Plan (TARP). The TARP will include notification to NPWS and BCS that remedial actions have been triggered and agreement about the response• Revegetation of slopes will be undertaken in accordance with the rehabilitation plan• Landscaping of pervious surfaces using native indigenous species only• Soil loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder)• Ongoing maintenance of the rehabilitation work will be required, including management of weeds and pathogens• Topsoil and subsoil generated during construction will be stockpiled separately on-site to be used for			<p>noted that Section 6 of the Plan includes provisions for notifying NPWS, FCNSW, RDD, and DPHI in the event of non-conformance with the performance metrics outlined within the RMP. However, the Plan indicates that this process is further detailed in a TARP, which appears to be absent. The only reference to NPWS relates to consultation regarding the control of browsing animals, and CPHR is not referenced at all.</p> <ul style="list-style-type: none">• Revegetation of batters is included in Table 5-2 with performance indicators included in Table 6-1• Planting is detailed in Section 5.1.7• Soil stabilisation is detailed in Section 5.• Ongoing maintenance of rehabilitation works is detailed in Table 5-6 and Appendix B: Trigger Action Response Plan• Managing soils is detailed in Section 5.1.3. <p>Recommendation: It is recommended the TARP in the Rehabilitation Management Plan be revised to include notification to NPWS and BCS in the event if remedial actions have been triggered.</p>			

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))							
Mitigation Measure	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
	rehabilitation. Stockpiles will be managed according to best management practices (Managing Urban Stormwater: Soils and Construction).						
B5	<ul style="list-style-type: none"> The boundary of the clearing limits for each disturbance zone will be clearly marked on site by a surveyor before vegetation clearing commences. Exclusion zones, or ‘No-Go’ zones, will be clearly marked at the edge of the total clearing zones and ECZ to protect the vegetation to be retained outside the project from inadvertent direct impacts Exclusion zones and the edge of the clearing boundary will be marked with high visibility fencing and signage Booroolong Frog: A 50 metre exclusion zones will be marked and clearly delineated from other survey markers with signage place around the tributaries that flow downhill into the Yarrangobilly Creek, this includes the limits of clearing on the lower end of Sheep Station Creek, Cave Gully, Lick Hole Gully and Wallace Creek that are crossed by the project to protect the downstream habitat of Booroolong Frog Booroolong Frog: The 50 metre exclusion zone adopted for the Main Works project on Yarrangobilly Creek, will be retained for construction of the transmission line Hazard trees identified from the LiDAR 	Major Projects Notification - Track 4 Unauthorised Clearing in Project Area dated 27/03/2025	Non-compliant	<p>During the audit period, an unauthorised clearing incident occurred adjoining Access Track 4. The incident investigation identified that some delineation materials, including rope and caps on marker pegs, were absent between the boundaries of the No-Go Zone, Hazard Tree Zone, Partial Clearing Zone, and Total Clearing Zone at the time of the incident. The absence of adequate delineation between these four management zones led to misinterpretation of the approved clearing boundaries and subsequent clearing within an unauthorised area.</p> <p>In response to the previous recommendation, it was advised that for future clearing activities, any deviations such as incorrect rope colours or inadequate boundary marking should be documented and addressed promptly. UGL has confirmed that sufficient delineation materials (including rope, pegs, and peg caps) are now available on site for future clearing activities. However, a central register documenting delineation measures has not yet been established.</p> <p>Recommendation: It is recommended that all delineation measures be recorded and maintained in a central register to support traceability, compliance monitoring, and verification of clearing boundary controls prior to any future clearing activities.</p>	NC-08	The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Condition B5 and commits to maintaining a central delineation register to support traceability, compliance monitoring, and verification of clearing boundary controls prior to any future clearing activities.	28-02-2026

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))							
Mitigation Measure	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
	assessment are to be flagged for 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.						
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 BMP12, refer to Table 2 in Appendix 4, for further details of non-compliance and associated recommendations for remedial actions.	NC-09	Refer BMP Management Measures Compliance Table. The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Mitigation Measure BMP12 and commits to maintaining a central delineation register to support traceability, compliance monitoring, and verification of clearing boundary controls prior to any future clearing activities.	N/A

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
General						
BMP2	No clearing will occur outside the approved project footprint / disturbance area without prior approval from DPE, in consultation with BCD and NPWS.	<p>NPWS and CPHR Track 4 Unauthorised Clearing Email Correspondence dated 27/03/2025</p> <p>WSP Consistency Assessment Report Snowy 2.0 Transmission Connection Project dated 5/02/2025</p> <p>Major Projects Notification - Track 4 Unauthorised Clearing in Project Area dated 27/03/2025</p>	Non-compliant	<p>During the audit period, vegetation clearing for the development was completed, with only hazard tree removal remaining subject to further assessment.</p> <p>An unauthorised clearing incident was reported on 24 March 2025 involving approximately 507 m² of vegetation, comprising 158 m² within the Hazard Tree Zone and 349 m² within the adjoining no-go zone near Access Track 2 and Tower Pad 11. The incident was located within the approved project boundary and involved non-habitat-bearing vegetation. Corrective actions, including toolbox talks and lessons-learned sessions, were implemented to prevent recurrence (J. Snape pers. comm). A formal response from the Department, NPWS and CPHR regarding this incident remains outstanding at the time of the audit.</p> <p>As vegetation clearing is now complete, Transgrid as recommended in Construction Audit 3 should review and revise the Consistency Assessment (WSP, 5 February 2025) to incorporate all as-built disturbance information, including areas affected by the unauthorised clearing. This will ensure that all final disturbance areas, species polygons, and plant community types (PCTs) are accurately reconciled and remain consistent with the approved disturbance limits and biodiversity</p>	The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Mitigation Measure BMP2 and commits to preparing a revised Consistency Assessment incorporate the unauthorised clearing event and final as-built disturbance extents, providing further assessment of whether disturbance impacts to species polygons and plant community types are consistent with the development.	28-02-2026

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>credit requirements identified in the Biodiversity Development Assessment Report (BDAR).</p> <p>Recommendation: It is recommended that the revised Consistency Assessment be prepared to incorporate the unauthorised clearing event and final as-built disturbance extents, providing further assessment of whether disturbance impacts to species polygons and plant community types are consistent with the development.</p>		
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.	Major Projects Notification - Track 4 Unauthorised Clearing in Project Area dated 27/03/2025	Non-compliant	<p>During the audit period, an unauthorised clearing incident occurred adjoining Access Track 4. The incident investigation identified that some delineation materials, including rope and caps on marker pegs, were absent between the boundaries of the No-Go Zone, Hazard Tree Zone, Partial Clearing Zone, and Total Clearing Zone at the time of the incident. The absence of adequate delineation between these four management zones led to misinterpretation of the approved clearing boundaries and subsequent clearing within an unauthorised area.</p> <p>In response to a recommendation raised in Construction Audit 3, it was advised that for future clearing activities, any deviations such as incorrect rope colours or inadequate boundary marking should be documented and addressed promptly. UGL has confirmed that sufficient delineation materials (including rope, pegs, and peg caps) are now available on site for future clearing activities. However, a central register documenting delineation measures has not yet been established.</p> <p>Recommendation: Noting all clearing apart from hazard tree zones has been completed, it is recommended that all delineation measures be recorded and maintained in a central register to support traceability, compliance monitoring, and verification of clearing boundary controls prior to any future clearing activities.</p>	The Proponent acknowledges the Independent Audit Findings and associated non-compliance for Mitigation Measure BMP11 and commits to maintaining a central delineation register to support traceability, compliance monitoring, and verification of clearing boundary controls prior to any future clearing activities.	28-02-2026
BMP12	Exclusion Zones, or 'No-Go' zones, will be clearly marked at the edge of the 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.	Major Projects Notification - Track 4 Unauthorised Clearing in Project Area dated 27/03/2025	Non-compliant	Refer to findings and recommendations for BMP11 for details.	Refer to Proponent's Proposed Action for BMP11.	N/A

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
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 11 above.	Refer to Proponent's Proposed Action for BMP11.	N/A
Unexpected Threatened Species						
BMP46	Where threatened species are unexpectedly identified during pre-construction, or construction, follow the Unexpected Threatened Species Procedure in Appendix D.	EMM - Snowy 2.0 Transmission Connection Project: Advice in response to Independent Environmental Audit Findings with respect to <i>Caladenia montana</i> dated 20/06/2025	Non-compliant	<p>No threatened species were unexpectedly encountered during the audit period.</p> <p>During Construction Audit 3, it was identified that clearing of <i>Caladenia montana</i> occurred outside the known extent / species polygons defined in the Biodiversity Development Assessment Report (BDAR) and at the time of completing Audit 3 Transgrid had commissioned an independent biodiversity specialist (EMM Consulting) to complete an investigation. The investigation completed by EMM Consulting (Advice in response to Independent Environmental Audit Findings with respect to <i>Caladenia montana</i>, dated 20 June 2025) found that based on the quantum of <i>Caladenia montana</i> habitat already cleared, being 10.77 ha within the procedural clearing layer or 12.31 ha within the disturbance zones layer (assuming that an updated species polygon using a 30 m buffer from all records is utilised as per the BDAR), the level of clearing permitted under the Infrastructure Approval has already been surpassed.</p> <p>Consistent with the findings of EMM Consulting, it's not clear which of these layers (10.77 ha or 12.31 ha) represents clearing that has been carried out. However, both amounts exceed the 9.35 ha limit on approved clearing of <i>Caladenia montana</i> under consent conditions.</p> <p>EMM agreed with the recommendation raised in Construction 3 and noted that records of <i>Caladenia montana</i> occurring outside of the species polygons identified in the Project BDAR constitutes an unexpected find (refer to B21 for details of non-compliance). It was advised by EMM Consulting that the Unexpected Threatened Species Finds Procedure be implemented in accordance with Appendix D of the BMP to notify relevant agencies, acknowledging that the ability to stop work has now passed.</p> <p>Recommendation: It is recommended that the Unexpected Threatened Species Finds Procedure be implemented in accordance with Appendix D of the BMP to formally notify the relevant agencies of the occurrence of</p>	<p>The Proponent disagrees with the Independent Audit Findings and Recommendations for Condition B17 and associated non-compliance relating to clearing of <i>Caladenia montana</i> habitat. A pre-construction ecological survey report (the Report) prepared by Leneco Environmental Management (September 2024) for Project Area East – Access Track 5 and Towers 7, 8 and 9 was issued to NPWS, CPHR, FCNSW and AG DCCEEW 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></p> <p><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 Biodiversity Management Plan.</p> <p>The Proponent confirms further on-ground verification of clearing extent in <i>Caladenia montana</i> habitat was completed following provision of the procedural clearing layer referred to by the auditor and assessed by EMM Consulting. The current extent of clearing for <i>Caladenia montana</i> habitat is 7.87 ha and is under the restrictions on clearing habitat for <i>C. montana</i> of 9.35 ha as defined under SSI-9717 Schedule 2 Condition B17 (a) (i).</p> <p>In the event additional <i>Caladenia montana</i> specimens require an updated species polygon using a 30 m buffer from all records is utilised as per the BDAR, the total extent of clearing for <i>Caladenia montana</i> habitat is 9.13 ha and is under the restrictions on clearing and habitat for <i>C. montana</i> of 9.35 ha as defined under SSI-9717 Schedule 2 Condition B17 (a) (i).</p> <p>Transgrid commits to consulting with DPHI and CPHR regarding the Independent Audit Findings and Recommendations for Condition B17 including review of findings in EMM Consulting's investigation and management of observations from pre-clearing surveys.</p>	It is considered that this condition has been met

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
				<i>Caladenia montana</i> , acknowledging that the opportunity to halt works has now passed.		

Proponent Responses – Opportunities for Improvement

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)						
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SCHEDULE 2						
PART B ENVIRONMENTAL CONDITIONS – GENERAL						
NOISE AND VIBRATION						
Construction and Decommissioning						
B5.	The Proponent must implement mitigation measures with the aim of achieving the road traffic noise assessment criteria for land uses from NSW Road Noise Policy (DECCW, 2011).	Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.22) Appendix L Driver Code Of Conduct For Maragle Project and Appendix L Driver Code Of Conduct For HLJV dated 18/03/2025	Compliant	<p>Confirmed in the Initial Construction Audit the Drivers Code Of Conduct For Maragle Project (sighted) includes measures to reduce noise with the aim of achieving the road traffic noise assessment criteria for land uses from NSW Road Noise Policy (DECCW, 2011).</p> <p>During the audit period, the TTMP was revised to reflect Stage 2 of the Project. The revision incorporated an additional Drivers Code of Conduct, included as Appendix K. It is noted that this Code of Conduct is based on the Hume Link Joint Venture Project.</p> <p>Opportunity for Improvement: It is recommended that the Drivers Code of Conduct for Stage 2 be updated to reflect and cover the Snowy Hydro 2.0 Transmission Connection Project.</p>	The Proponent acknowledges the Independent Audit Findings and Recommendations for Condition B5 and commits to reviewing the Drivers Code of Conduct for Stage 2 to reflect and cover the Snowy Hydro 2.0 Transmission Connection Project.	28-02-2026
Erosion and Sedimentation						
B10.	<p>The Proponent must:</p> <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 waters. This may include, but need not be limited to: <ul style="list-style-type: none"> i) adopt enhanced erosion and sediment controls, taking into consideration the best available information from the Snowy 2.0 Main Works project; ii) minimising the volume of dirty water generated onsite; and iii) exploring and implementing beneficial reuse opportunities such as irrigation and dust suppression. 	<p>Soil And Water Management Plan (Rev 0.09) dated 24/11/2023</p> <p>Progressive Erosion and Sediment Control Plans (PESCPs) – Track 8, Track 4, Track 5a, Track 5b, Track 12, Switching Station & Future Substation PESCP, Track 1</p> <p>Email Correspondence UGL and SVC - Waste Water from Maragle Site Compound dated 08/09/2025</p> <p>Water Disposal - Maragle to Tumbarumba WWTP Register dated June to August 2025</p> <p>Water Irrigation and Permit Disposal Register received 19/09/2025</p>	Compliant	<p>(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 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>A review of the Progressive ESCPs prepared for the development highlighted that some plans (though not all) do not include a date or revision history marked on the drawing itself, with this information sometimes only noted in the PDF file name. When printed, the absence of a revision history on the document may make it difficult to confirm whether the most up-to-date version is being viewed.</p> <p>Opportunity for Improvement: It is recommended that a date/revision number is incorporated on all versions of each Progressive ESCP.</p>	<p>The Proponent acknowledges the Independent Audit Findings and Recommendations for Condition B10 and commits to:</p> <ul style="list-style-type: none"> • Reviewing all versions of each Progressive ESCP to incorporate a date/revision number. • Inspection and maintenance of erosion and sediment controls installed on Track 8 including the fallen sediment fence and installed geofabric lining identified by the auditor. 	<p>28-02-2026</p> <p>28-02-2026</p>

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				<p>(b)</p> <p>i) Confirmed during the Initial Construction Audit. The ESCP's 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.</p> <p>During the site audit inspection it was noted that the installed ESC controls 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 were observed to be well maintained. It was noted that despite steep gradients on the eastern side (Lobs Hole) of the development that installed controls were operating effectively with minimal scouring observed within drains (installed controls included regular rock and sandbag checks in drains, rock lined drains, and soil binder). A notable improvement on the quality of installed controls, particularly on the Lobs Hole side of the development was observed during the audit period.</p> <p>One area of improvement in installed ESCs was identified at Track 8 during the site inspection. It was noted that on Track 8 a sediment fence had fallen over (although it's likely the sediment fence was redundant with surrounding controls in place to capture any potential sediment laden water), this sediment fence should be removed (if redundant) or repaired (if still required). It was also noted that the installed geofabric lining some batters along track 8 had deteriorated (likely due to age) and should be replaced.</p> <p>Opportunity for Improvement: It is recommended that the fallen sediment fence on Track 8 should be removed (if redundant) or repaired (if still required). It is also recommended that the installed geofabric lining some batters along track 8 that has deteriorated (likely due to age) be replaced.</p> <p>ii) As confirmed during the Initial Construction Audit, measures to minimise dirty water are outlined in the SWMP. Consistent with Construction Audit 3, the development maintains two sediment basins: one located on the eastern side of the alignment (Lobs Hole) near Track 8, and one on the western side (Maragle) near the switchyard. During the audit period, an additional sediment basin was constructed at the Maragle 500 kV Substation,</p>		

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				<p>where Hume Link West Joint Venture is the Principal Contractor.</p> <p>Also during the audit period, a silt separator was installed at the outlet of the Track 8 sediment basin. This provides an additional treatment method for overflow from the basin, as well as runoff from sections of Track 8 that do not drain directly into the basin. A progressive rollout of permanent erosion and sediment controls was observed, which appeared to be effective and well maintained. Clean water diversion catch drains are being installed as a priority, along with the application of soil binder to exposed surfaces.</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>As part of site dewatering, water is also extracted from sediment basins, collected by water carts, and transported offsite for disposal at the Tumbarumba Wastewater Treatment Plant. This management measure was implemented to prevent uncontrolled discharge to the surrounding environment. During the audit period, wet weather conditions meant that stored water was not required for dust suppression (C. Palmer pers. comm).</p>		
Water Management Plan						
B16.	<p>Prior to the commencement of construction, the Proponent must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This sub-plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person in consultation with the EPA, FCNSW, NPWS, the Water Group and NSW DPI;</p>	<p>Soil And Water Management Plan (rev 0.10) dated 24/10/2024</p> <p>Monthly Water Quality Monitoring Reports for March 2025 and April 2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit, a Water Management Plan (referred to as the SWMP) has been prepared and approved for the development. The SWMP addresses all requirements outlined by Condition B16.</p> <p>In Construction Audit 2 and 3, it was noted the SWMP was undergoing consultation regarding updates in relation to recommendations</p>	<p>The Proponent acknowledges the Independent Audit Findings and Recommendations for Condition B16 and commits to undertaking a review of the data management procedures in the Water Quality Monitoring Program and associated timing of data entry and analysis.</p>	28-02-2026

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)						
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	<p>(b) include provisions for:</p> <p>i) detailed baseline data on surface water flows and quality in the watercourses that could be affected by the development, and a program to augment this baseline data over time;</p> <p>ii) detailed criteria for determining surface water impacts of the development (flows, quality and flooding), including criteria for triggering remedial action (if necessary); and</p> <p>iii) a description of the measures that would be implemented to minimise the surface water impacts of the development and comply with the relevant water management requirements in conditions B10 to B15 are complied with; and</p> <p>(c) managing flood risk during construction.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Water Management Plan.</p>			<p>outlined in the Initial Construction Audit. Transgrid has advised consultation is still ongoing and this would be subject to a subsequent approval.</p> <p>Evidence of implementation of the SWMP was observed during the site audit inspection, management measures included (but were not limited to):</p> <ul style="list-style-type: none"> • Installation of appropriate ESC controls as per the PESCPs across the development (sighted). • ESCP register updated regularly. • Presence of spill kits at various locations across the site (sighted). • Installation of appropriate bunds for plant and vehicle washdown (sighted). • Bunded chemical storage containers (sighted). • Evidence of site training including posters and notes displayed in Crib Sheds relating to ESC measures (sighted). • Monthly water quality monitoring was undertaken throughout the audit period (C. Palmer pers. comm). • Monthly Monitoring Reports were reviewed for March and April 2025. Consistent with findings from previous Construction Audits, there continues to be a delay in finalising and publishing the Water Quality Monitoring Reports. As such, during this audit period, reports for May to August 2025 were not yet available and will be reviewed as part of Audit 5. <p>Raw water quality data was reviewed, which included results for all months up to August 2025, except for July, for which no data was provided. Water Quality Monitoring Field Sheets were also reviewed and confirmed that monitoring had been undertaken; however, the data had not yet been entered into the spreadsheet, resulting in a gap in the monitoring record for this period. No lab raw lab results were sighted for July 2025. A review of the available reports identified exceedances of various water quality parameters at multiple locations and timeframes across the development. However, the reports to date have not identified any exceedances as being attributable to</p>		

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)						
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				<p>construction activities associated with the development.</p> <p>In Construction Audit 3, it was recommended that the water quality reports include both the upper and lower range of Site-Specific Guideline Values (SSGVs) graphed within the main body of the Monthly Monitoring Reports to allow for easier assessment of the development's impact on pH. No verifiable evidence was provided during this audit to demonstrate that this recommendation has been implemented. However, it is acknowledged that the full table of results presented in Appendix C of the monitoring reports provides a comparison against the pH range.</p> <p>Opportunity for Improvement: It is recommended that data management procedures in the Water Quality Monitoring Program be reviewed and strengthened to prevent future delays in data entry and analysis and ensure that all monitoring results are available for inclusion in monthly reporting as this will enable prompt assessment of potential water quality impacts as a result of construction.</p>		
BIODIVERSITY						
PARK VALUES						
B38.	<p>Within 6 months of the commencement of construction, the Proponent will prepare an Additional Easement Rehabilitation Strategy to the satisfaction of NPWS, to undertake the following infrastructure projects, that addresses:</p> <p>(a) Providence Portal substation to Tantangara Dam – removal of transmission line, replacement with a standalone supply or underground line between the Snowy 2.0 Tantangara intake/portal area and Tantangara Dam area, and rehabilitation of the easement;</p> <p>(b) Eucumbene Portal to Happy Jacks transmission – transmission lines being removed and replaced by an alternative standalone power supply and rehabilitation of the easement; and</p> <p>(c) timing for each program of works.</p>	<p>11 kv Line Rehabilitation Strategy dated 11/05/2024</p> <p>Snowy 2.0 Transmission Connection - Additional Easement Rehabilitation Strategy Status Email Correspondence dated 13/08/2025</p>	Compliant	<p>Confirmed during the Construction Audit 2, an Additional Easement Rehabilitation Strategy was prepared within 6 months of the commencement of construction and was prepared in consultation with and to the satisfaction of NPWS.</p> <p>(a)(b) An overview of Infrastructure Projects is briefly included in Section 1, with location of the proposed works illustrated in Figure 1 and Figure 2. The removal of infrastructure is detailed in Section 7 with rehabilitation approach included in Section 8. It is noted further detail retaining to soil and vegetation rehabilitation will be detailed in future REF(s) and Rehabilitation Management Plans.</p> <p>(c) The timing of program works is included in Section 11 which outlines:</p> <ul style="list-style-type: none"> The removal of the Eucumbene to Happy Jacks Transmission line is scheduled to commence in Summer 2024/2025 – It was confirmed that works commenced in late February 	The Proponent acknowledges the Independent Audit Findings and Recommendations for Condition B38 and commits to developing a central tracking mechanism in consultation with Snowy Hydro Limited to monitor the implementation status of management commitments across the Additional Easement Rehabilitation Strategy and associated documentation to ensure consistency and accountability.	28-02-2026

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Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent’s Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	Following approval, the Proponent must implement the Additional Easement Rehabilitation Strategy.			<p>2025 and concluded in mid- April 2025 (sighted).</p> <ul style="list-style-type: none">The removal of Providence Portal to Tantangara Transmission line is scheduled to occur late 2027. During the audit period Transgrid removed all transmission lines from Eucumbene to Happy Jacks as per the timings outlined in the Additional Easement Rehabilitation Strategy (J. Snape pers. comm). <p>In response to a Recommendation from Construction Audit 3, Transgrid has provided an update on the status of management commitments outlined in the strategy; however, it remains unclear how these activities are being tracked or monitored for implementation. Correspondence from the Snowy Hydro 2.0 Main Works indicates that Review of Environmental Factors and Rehabilitation Management Plans have been prepared and drafted prior to this audit period.</p> <p>Opportunity for Improvement: It is recommended that Transgrid develop a central tracking mechanism to monitor the implementation status of management commitments across the strategy and associated documentation to ensure consistency and accountability.</p>		

HAZARD AND RISK

Emergency Plan

B42.	<p>Prior to commencing construction, the Proponent must prepare and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with the Local Emergency Management Committee and to the satisfaction of the NPWS, FCNSW, RFS and FRNSW. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by NPWS and FCNSW;</p> <p>(b) be consistent with:</p> <p>i) the Department’s Hazardous Industry Planning Advisory Paper No. 1, ‘Emergency Planning’,</p> <p>ii) Kosciuszko National Park Fire Management Strategy 2008-2013 (NPWS, 2008),</p>	<p>Emergency Plan (Rev 0.07) dated 25/06/2024</p> <p>20250316 Maragle and Lobs Emergency Evacuation Drill Email Correspondence dated 16/03/2025</p> <p>Notification of Previous Emergency Exercises Email Correspondence dated 02/09/2025</p>	Compliant	<p>Confirmed during previous Construction Audits, an Emergency Plan has been prepared and approved for the development, addressing all requirements outlined in Condition B42. The Emergency Plan was not revised during the audit period.</p> <p>A review of the Emergency Plan (Rev 0.07) during this audit period identified that Section 7.3 requires the plan to be provided annually to the Local Emergency Management Committee, NSW Rural Fire Service (RFS), NSW State Emergency Service (SES), Fire and Rescue NSW (FRNSW), NPWS, and FCNSW for comment.</p> <p>There is no verifiable evidence that the plan has been distributed to these agencies during the audit period. However, as the annual submission timeframe has not yet elapsed, this will be verified during the next audit period.</p> <p>In response to a recommendation raised in Construction Audit 3, it was noted that the</p>	<p>The Proponent acknowledges the Independent Audit Findings and Recommendations for Condition B38 and confirms all relevant emergency management stakeholders, including NSW RFS, FCNSW, FRNSW, and NPWS, will be formally invited to participate in future emergency evacuation drills, site familiarisation visits, and fire response training, with records of invitations and attendance retained to demonstrate compliance with Section 6.3 of the Emergency Plan.</p>	N/A
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Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)						
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	<p>iii) FCNSW Guidelines including the Code of Practice for Timber Harvesting in Softwood Plantations 2022;</p> <p>iv) RFS's Planning for Bushfire Protection 2019 (or equivalent);</p> <p>v) RFS's Development Planning – A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (RFS, 2014);</p> <p>vi) the Fire and Rescue NSW Act 1989; and</p> <p>vii) the Work Health and Safety (WHS) Act 2011;</p> <p>(c) include evacuation protocols for the site;</p> <p>(d) describe the measures that would be implemented to:</p> <p>i) minimise the risk of bushfire on site;</p> <p>ii) protect the assets on site from bushfires;</p> <p>iii) respond to any bushfires on or in the vicinity of the site;</p> <p>iv) minimise flood risks on site, including flooding response procedures;</p> <p>v) minimise the risk of landslips on site, including landslip response procedures;</p> <p>vi) evacuate the site in an emergency; and</p> <p>(e) include details on how live transmission infrastructure can be safely isolated in an emergency.</p> <p>The Proponent must implement the Emergency Plan for the duration of the development.</p>			<p>Emergency Plan should be submitted to the Local Emergency Management Committee and NSW SES for comment as soon as practicable, as it had not previously been provided in accordance with the annual requirement. No verifiable evidence has been provided to confirm that this action has since been completed.</p> <p>As outlined in Section 6.3 of the Emergency Plan, the development is required to invite representatives from the RFS, FCNSW, FRNSW, and NPWS to attend site familiarisation visits, fire response training, and evacuation drills.</p> <p>No verifiable evidence was provided to demonstrate that these stakeholders were invited to attend the emergency evacuation drill held on 16 March 2025.</p> <p>In response to a recommendation raised in Construction Audit 3, Transgrid provided correspondence confirming that an evacuation drill was held in 2024, along with supporting emergency evacuation drill summary checklists. The correspondence also indicated that the next evacuation drills are scheduled for September 2025, with invitations to be extended to NSW RFS, FCNSW, FRNSW, and NPWS.</p> <p>Additionally, as outlined in Section 5.1.5.2 of the Emergency Plan, simulation exercises are required to be undertaken every six months. Records indicate that simulation exercises were conducted at both the Maragle site Lobs Hole site on 16 March 2025, with an emergency evacuation drill held on 16 March 2025.</p> <p>A consequence management guide has been developed for the development.</p> <p>In response to an Opportunity for Improvement raised in Construction Audit 3, Transgrid is revising Appendix F of the Emergency Plan to ensure all contact details are current and relevant. However, no verifiable evidence has been provided to confirm that this update has been completed, and the matter remains outstanding.</p> <p>Opportunity for Improvement: It is recommended that Transgrid ensure all relevant emergency management stakeholders, including NSW RFS, FCNSW, FRNSW, and NPWS, are formally invited to participate in future emergency evacuation drills, site familiarisation visits, and fire response training, with records of invitations</p>		

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)						
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
				and attendance retained to demonstrate compliance with Section 6.3 of the Emergency Plan.		
REHABILITATION						
Rehabilitation Management Plan						
B48.	<p>Within 12 months following commencement of construction, the Proponent must prepare a Rehabilitation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, FCNSW, BCS, EPA, NSW DPI and TfNSW; (b) be consistent with the Spoil Management Plan, Long-Term Road Strategy and Visual Mitigation Management Plan; (c) include a conceptual plan for the rehabilitation of the whole site; (d) include the detailed program for the rehabilitation of roads in the Kosciuszko National Park in accordance with the approved Long-Term Road Strategy; (e) include a topsoil balance for the site, which includes a strategy for: <ul style="list-style-type: none"> i) maximising the reuse of topsoil on site (provided it is suitable for reuse); ii) using other suitable growth media; and iii) importing additional topsoil to the site (if necessary); (f) include a native seed collection and propagation program in accordance with Florabank (www.florabank.org.au) and/or NPWS guidelines for the site, which includes a strategy for: <ul style="list-style-type: none"> i) maximising the collection and use of native seed resources from the site prior to disturbance; ii) collecting seed from the surrounding area, including other parts of the Kosciuszko 	<p>Rehabilitation Management Plan Rev 0.06 dated 06/06/2025</p> <p>Rehabilitation Management Plan Notification Letter dated 01/09/2025</p> <p>CHPR and NPWS Endorsement Email Correspondence dated 18/06/2025</p> <p>DPHI Rehabilitation Management Plan Post Approval Review dated 02/04/2025</p> <p>DPHI Rehabilitation Management Plan Approval Letter dated 27/06/2025</p>	Compliant	<p>During Construction Audit 3, an extension was sought to revise the submission date for the RMP, which was originally required to be approved by 4 April 2025. The RMP was submitted to the Planning Secretary on 3 February 2025, with feedback received from DPHI on 2 April 2025. DPHI requested that responses to its comments be provided by 6 June 2025; however, both CPHR and NPWS supported Transgrid's request to extend the response timeframe to 20 June 2025. It remains unclear whether the Planning Secretary formally agreed to this revised deadline.</p> <p>Transgrid received approval for the RMP from the Planning Secretary on 26 June 2025, noting that a revised version of the RMP would be provided no later than 30 August 2025. On 1 September 2025, Transgrid submitted a request to extend this deadline by an additional eight weeks to allow sufficient time for stakeholder review and endorsement of the proposed amendments, which are contingent on the finalisation of the Post-Clearing Vegetation Integrity Monitoring Report. Pending agreement from the Planning Secretary, the revised submission timeframe for the updated RMP is proposed to be no later than 27 October 2025.</p> <p>(a) As outlined in Section 1.5 of the RMP, the RMP has been prepared in consultation with NPWS, CPHR, FCNSW, NSW DPI and TfNSW. There is no details in Section 1.5 showing that the RMP has been prepared in Consultation with the EPA.</p> <p>(b) Section 5.1.4</p> <p>(c) Rehabilitation completion criteria for the development is included in Table 4-3;</p> <p>(d) Long-term Road Strategy (note is not required to be prepared during the audit period);</p> <p>(e) Section 5:</p> <p>(f) Appendix E of the BMP.</p> <p>(g) The RMP</p>	<p>The Proponent acknowledges the Independent Audit Findings and Recommendations for Condition B48 and commits to reviewing the Rehabilitation Management Plan to:</p> <ul style="list-style-type: none"> • Include details of consultation undertaken with the EPA. • Include a public reporting program to ensure transparency in rehabilitation progress, demonstrate the effectiveness of mitigation measures, and track performance against completion criteria and indicators. 	28-02-2026

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)						
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	<p>National Park (with the approval of the NPWS); and</p> <p>iii) prioritising the use of local sources of seed for the ecological rehabilitation of the site;</p> <p>(g) include a detailed ecological rehabilitation management plan for the development that:</p> <p>i) provides an overarching description of the proposed ecological rehabilitation works, identifying the:</p> <ul style="list-style-type: none"> plant community types to be established; and area of land to be established for each plant community type; <p>ii) provides maps showing the proposed location of each plant community type;</p> <p>iii) describes the detailed measures that would be implemented to comply with the ecological rehabilitation objectives in Table 3;</p> <p>(h) identify the key risks to the successful completion of the rehabilitation and describe the contingency measures that would be implemented to address these risks;</p> <p>(i) include detailed completion criteria and performance indicators for the rehabilitation of the development (having regard) to the criteria and indicators in Table 3, including criteria for triggering remedial action (if necessary); and</p> <p>(j) include a program to monitor and publicly report on:</p> <p>i) the rehabilitation of the site;</p> <p>ii) the implementation of the each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and</p> <p>iii) progress against the detailed completion criteria and performance indicators.</p>			<p>i) Section 5</p> <p>ii) Appendix A Project Maps;</p> <p>iii) Table 3;</p> <p>(h) Section 3</p> <p>(i) Section 6</p> <p>(j) Given that the RMP has only recently been prepared during the audit period, and rehabilitation works have only just commenced, there has been limited opportunity to demonstrate implementation or assess performance against completion criteria. While the RMP outlines key rehabilitation objectives and monitoring requirements, there is currently no program for publicly reporting on the progress of site rehabilitation, the implementation and effectiveness of mitigation and contingency measures, or performance against the detailed completion criteria.</p> <p>Opportunity for Improvement: It is recommended that the Rehabilitation Management Plan be revised to include details of consultation undertaken with the EPA.</p> <p>Opportunity for Improvement: It is recommended the Rehabilitation Management Plan is revised to include a public reporting program to ensure transparency in rehabilitation progress, demonstrate the effectiveness of mitigation measures, and track performance against completion criteria and indicators.</p>		

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)						
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	Following the Planning Secretary's approval, the Proponent must implement the Rehabilitation Management Plan.					
PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
REVISION OF STRATEGIES, PLANS AND PROGRAMS						
C2.	<p>The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the:</p> <ul style="list-style-type: none"> (a) the submission of an incident report under condition C7; (b) the submission of an Independent Audit under condition C10; (c) the approval of any modification of the conditions of this approval; or (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review. 	20240708_Summary_DCR_All_Plans	Compliant	<p>Consistent with previous Construction Audits, a number of key strategies, plans, and programs were required to be reviewed during the audit period, as triggered by the requirements of this condition. These include the EMS, BMP, SWMP, TTMP, NVMP, VIMP, Emergency Plan, and Additional Easement Strategy.</p> <p>Consistent with Construction Audit 3, Transgrid continues to maintain all document reviews through the Management Plan Summary Document Control Register (sighted). The register identifies whether each plan has been reviewed and whether any revisions were required. A review of the register confirmed that all key management plans and strategies, such as the EMS, BMP, SWMP, TTMP, Additional Easement Strategy, and NVMP have been reviewed and, where necessary, updated.</p> <p>It is noted that the Visual Impact Management Plan and Emergency Plan are not yet included in the register; however, Transgrid has advised that both plans have been reviewed, with no amendments deemed necessary (J. Snape pers. comm).</p> <p>Opportunity for Improvement: It is recommended going forward for completeness that all plans including Visual Impact Management Plan and Emergency Plan should be included in the Management Plan Summary Document Control Register to accurately document the requirement of condition C2 has been implemented.</p>	The Proponent acknowledges the Independent Audit Findings and Recommendations for Condition C2 and confirms the Management Plan Summary Document Control Register has been updated to include all plans including the Visual Impact Management Plan and Emergency Plan to accurately document the requirements of Condition C2 have been implemented.	N/A

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))						
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
Biodiversity						
B11	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		Compliant	Confirmed during the Initial Construction Audit, a SWMP has been prepared and approved for the development.	The Proponent acknowledges the Independent Audit Findings and Recommendations for Mitigation Measure B11 and commits to continuing consultation with Snowy Hydro Limited and Future Generation Joint Venture and	N/A

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))

Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent’s Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	<p>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.</p> <p>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 constructionThe 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 drainsA 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 hoursAdditional or supplementary control measures (i.e. sediment fencing, diversions, and detention ponds) will be implemented at high risk areas such as the bridge crossings at Sheep Station Creek, Cave Gully	<p>Soil And Water Management Plan (rev 0.10) dated 24/10/2024</p> <p>NPWS Meeting Minutes - Weed and Pathogen Control Monitoring Program dated 04/09/2025</p> <p>Meeting Minutes Fortnightly Environmental Interface - Lobs Hole dated 02/09/2025</p>		<p>In response to a recommendation from Construction Audit 3, erosion and sediment controls near Track 8 and Wallace’s Creek were to be properly installed and maintained to prevent runoff into the creek. During the current audit period, a silt separator was installed at the outlet of the Track 8 sediment basin, providing an additional treatment measure for basin overflow and runoff from sections of Track 8 that do not drain directly into the basin. A progressive rollout of permanent erosion and sediment controls was also observed during the audit period, which appeared effective and well maintained. Clean water diversion catch drains are being installed as a priority, along with the application of soil binder to exposed surfaces.</p> <p>However, erosion and sediment controls located downstream of Track 8 along Wallace Creek have not yet been repaired and remain non-functional. Transgrid has been in consultation with Snowy Hydro Limited and FGJV as the area is located within Snowy Hydro Main Works Project Area. This issue has been raised during fortnightly environment interface meetings but no action has been undertaken to date.</p> <p>Opportunity for Improvement: It is recommended that Transgrid continue consultation with Snowy Hydro Limited and Future Generation Joint Venture and prioritise the reinstatement of erosion and sediment control devices along Wallace Creek to prevent further sedimentation impacts.</p> <p>In response to an Opportunity for Improvement raised in Construction Audit 3 regarding the requirement to notify NPWS within two hours of identifying a risk or impact to Booroolong Frog habitat, Transgrid met with NPWS on 4 September 2025 (sighted) to discuss the matter. NPWS agreed that the wording should be revised to align with the Infrastructure Approval, changing the notification timeframe from “within two hours” to “immediately” upon becoming aware of any turbid water incidents relevant to Booroolong Frog habitat. This change will be incorporated into the next revision of the BMP.</p>	<p>prioritise the reinstatement of erosion and sediment control devices along Wallace Creek to prevent further sedimentation impacts.</p>	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))

Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent’s Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	<p>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					

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))						
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent’s Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	<ul style="list-style-type: none"> 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 loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder) 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 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. 					
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 	<p>Soil And Water Management Plan (rev 0.10) dated 24/10/2024</p> <p>Progressive Erosion and Sediment Control Plans (PESCPs) – Track 8, Track 4, Track 5a, Track 5b</p>	Compliant	<p>Confirmed as part of the Initial Construction Audit, the SWMP and primary ESCP addresses all requirements outlined by this condition. 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). No fill has been imported to site during the audit period. During the site inspection the following observations were made with respect to erosion and sediment controls:</p> <ul style="list-style-type: none"> The sediment basin located at the base of Track 8 was observed to be in place and operational during the audit period, 	<p>The Proponent acknowledges the Independent Audit Findings and Recommendations for Mitigation Measure W3 and commits to:</p> <ul style="list-style-type: none"> Reviewing all versions of each Progressive ESCP to incorporate a date/revision number. Inspection and maintenance of erosion and sediment controls installed on Track 8 including the fallen sediment fence and installed geofabric lining identified by the auditor. 	28-02-2026

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))						
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	<p>occur that require revised erosion and sediment controls</p> <ul style="list-style-type: none"> 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 weed free Excavated Natural Material or Virgin Excavated Natural Material) 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>bringing the total number of active sediment basins onsite to two. The second basin is located at the Maragle Switchyard, adjacent to the construction compound. Both basins appeared stable and well maintained, with no discharges recorded during the audit period. In addition, one sediment basin and a clean water basin are located within the 500 kV Substation Project Area. These basins were initially under the responsibility of the Project; however, project control has since been transferred to the HumeLink Project, which now holds responsibility for their ongoing management and maintenance (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 and the deck of the bridge was observed to be maintained free of sediment during the site inspection. 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. Five incidents reports regarding turbid water were documented and reported during the audit period. It was noted that the installed ESC controls across the site included well installed enhanced erosion controls, including (but not limited to) mulch, soil binder and rock lining covering the majority of exposed surfaces and velocity checks (using rock, sand bags and woah-boys). The installed ESC controls were observed to be well maintained. Only two areas for improvement were identified during the site inspection: <ul style="list-style-type: none"> A fallen sediment fence was observed on Track 8. It is likely this sediment was redundant and sediment was still being captured from the upslope catchment by surrounding ESCs, however this sediment fence should be repaired (if required) or removed (if no longer required). The geofabric installed as ground cover on some of the batters on Track 8 was seen to 		

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				<p>be degrading (likely due to age) and requires replacement.</p> <ul style="list-style-type: none"> - Review of the supplied Progressive ESCPs showed that some of the Progressive ESCPs did not have dates or version numbers written (or correctly updated) on the actual drawings (some had versioning listed only in the file name). <p>The SWMP indicates that tannin leachate will be monitored for in the weekly inspections however it was identified in Audit 3 that were no triggers/sections included within the weekly inspection checklist regarding tannins. This has now been rectified and the weekly inspection updated.</p> <p>Opportunity for Improvement: It is recommended that a review of Progressive ESCPs be undertaken to ensure each document has the correct date/version included on each drawing so that if the documents are printed personnel know which version they are viewing.</p> <p>Opportunity for Improvement: It is recommended that the fallen sediment fence located on Track 8 be repaired (if still required) or removed (if no longer required) and the degraded geofabric on the batters at Track 8 be replaced.</p>		
W4	<p>A water quality monitoring program will be developed as part of the SWMP as described in Appendix E. It will be developed and implemented to gain an appreciation of background water quality, to observe any changes in surface water quality that may be attributable to the project and inform appropriate management responses.</p> <p>The surface water quality monitoring program will be carried out during the pre-construction, construction, and operational stages of the project.</p>	<p>Soil And Water Management Plan (rev 0.10) dated 24/10/2024</p> <p>Baseline Water Quality Report (rev Final V3.1) dated June 2025 (NGH)</p>	Compliant	<p>A Water Quality Monitoring program (WQMP) has been developed and is included as Appendix F of the SWMP. The WQMP documents the methodology for the implementation of a background water quality monitoring program including distribution of sampling locations, frequency and type of analytes to monitor and trigger values for determining potential environmental impact and the associated trigger action response plan (TARP).</p> <p>Baseline water quality monitoring was undertaken from 2022 to 2024 with reports being available on the projects website up to April 2025.</p> <p>A “Baseline Water Quality Report” has been prepared which presents the results from the 24 months of sampling undertaken prior to construction commencement and provides site specific guideline values for three reference sites for the project.</p> <p>Consistent with previous Construction Audits, there is a lag in preparing and publishing the</p>	<p>The Proponent acknowledges the Independent Audit Findings and Recommendations for Mitigation Measure W4 and commits to undertaking a review of the data management procedures in the Water Quality Monitoring Program and associated timing of data entry and analysis.</p>	28-02-2026

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				<p>Water Quality Monitoring Reports and as such during the review period of this audit water quality monitoring reports for May through to August 2025 were not yet available and will be reviewed in Audit 5. Raw water quality monitoring data was reviewed which included monitoring results for all months to August 2025 except July for which data was not presented. Water Quality Monitoring Field Sheets were also reviewed and confirmed that monitoring had been undertaken; however, the data had not yet been entered into the spreadsheet, resulting in a gap in the monitoring record for this period. No lab raw lab results were sighted for July 2025</p> <p>Opportunity for Improvement: It is recommended that data management procedures in the Water Quality Monitoring Program be reviewed and strengthened to prevent future delays in data entry and analysis and ensure that all monitoring results are available for inclusion in monthly reporting as this will enable prompt assessment of potential water quality impacts as a result of construction.</p>		

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)						
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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.	<p>LENECO Post-clearing Vegetation Integrity Monitoring Report in Partial Clearing Zones dated 13/04/25</p> <p>CPHR Snowy 2.0 Transmission Connection – Draft Post-Clearing Vegetation Integrity (VI) Monitoring Report Letter dated 12/08/2025</p> <p>NPWS Meeting Minutes - Weed and Pathogen Control Monitoring Program dated 04/09/2025</p>	Compliant	<p>During the audit period, no significant changes or progress have been made in relation to the partial clearing areas previously observed across Project West in Construction. Conditions observed during the site audit inspection remain consistent with those reported during Construction Audit 3.</p> <p>Works within the Hazard Tree Zone (HTZ) have generally not commenced (J. Snape pers. comm).</p> <p>In Project East, Hand Clearing Zones (HCZs) and Easement Clearing Zones (ECZs) treated as HCZ areas continue to appear well managed, with grass and shrub cover retained and disturbance minimised. In contrast, within the ECZ on Project West, groundcover disturbance remains evident, with the retention of shrub and groundcover vegetation continuing to be compromised due to the extensive application of mulch, particularly along the western extent of the Project Area west of Track 1, spanning approximately 1.5 kilometres of the easement.</p> <p>During the audit period, the draft Post-Clearing Vegetation Integrity Monitoring Report (LENECO,</p>	The Proponent acknowledges the Independent Audit Findings and Opportunity for Improvement identified for Condition BMP4 and will continue to be progress all recommendations from previous audits and closed out to demonstrate proactive environmental management and ensure compliance with project approval commitments.	28-02-2026

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				<p>April 2025) was provided to CPHR for comment. On 12 August 2025, CPHR provided a response requesting further clarification and justification of the methodology and approach adopted in the report. A meeting between Transgrid and CPHR is being arranged for the next audit period to discuss the management of BAM calculator data for subsequent monitoring, as data errors have been identified that may be influencing the resulting Vegetation Integrity (VI) scores.</p> <p>No further review of this document has occurred and will be postponed until agreement has been reached between Transgrid, and CPHR.</p> <p>Since Construction Audit 3 there has been a very limited growing season that would support the re-establishment or recruitment of native groundcover and shrub species. During this Audit it was noted that areas of thinly applied mulch and exposed soils were showing signs of native recruitment. It is expected that with time some areas will continue to respond and regenerate with others such as heavy mulch loads are unlikely to respond in the same manner that would see an increase in species diversity and cover without some level of assistance or intervention.</p> <p>No progress has been made on implementing the previous recommendation for an Independent Ecological Assessment to verify whether environmental harm has occurred within the partial clearing areas, pending the outcomes of the Post-Clearing Vegetation Integrity Report review. Transgrid has indicated that the findings of the LENEKO Report (including any updates following consultation) and any subsequent regeneration monitoring will be used to determine whether remedial actions are required for areas within partial clearing zones, including the ECZ, where substantial woodchip mulch was deposited.</p> <p>Recommendation: It is emphasised that all recommendations from previous audits should continue to be progressed and closed out to demonstrate proactive environmental management and ensure compliance with project approval commitments.</p> <p>In response to a recommendation from Construction Audit 3, Transgrid was advised to adopt a targeted application method for Grazon Extra herbicide in partial clearing zones to ensure effective weed control without impacting retained shrubs and native</p>		

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				<p>vegetation. Transgrid engaged with NPWS to discuss the matter, with a meeting held on 4 September 2025. NPWS advised that broadscale application may be acceptable when using a vehicle-mounted sprayer with a hand-gun and appropriate calibration and controls; however, they recommended the use of an indicator dye to improve visibility and ensure precision during spraying.</p> <p>Transgrid has noted that the Pest and Predator Monitoring Program is currently being revised and will be subject to subsequent approval. As such, the matter remains ongoing.</p>		
Pre-construction						
BMP9	<p>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 safeguards/mitigation measures, particularly preclearing and clearing during construction (including B104-B108).</p>	<p>Soil And Water Management Plan (rev 0.10) dated 24/10/2024</p> <p>NPWS Meeting Minutes - Weed and Pathogen Control Monitoring Program dated 04/09/2025</p> <p>Meeting Minutes Fortnightly Environmental Interface - Lobs Hole dated 02/09/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit, a SWMP has been prepared and approved for the development.</p> <p>In response to a recommendation from Construction Audit 3, erosion and sediment controls near Track 8 and Wallace's Creek were to be properly installed and maintained to prevent runoff into the creek. During the current audit period, a silt separator was installed at the outlet of the Track 8 sediment basin, providing an additional treatment measure for basin overflow and runoff from sections of Track 8 that do not drain directly into the basin. A progressive rollout of permanent erosion and sediment controls was also observed during the audit period, which appeared effective and well maintained. Clean water diversion catch drains are being installed as a priority, along with the application of soil binder to exposed surfaces.</p> <p>However, erosion and sediment controls located downstream of Track 8 along Wallace Creek have not yet been repaired and remain non-functional. Transgrid has been in consultation with Snowy Hydro Limited and FGJV as the area is located within Snowy Hydro Main Works Project Area. This issue has been raised during fortnightly environment interface meetings but no action has been undertaken to date.</p> <p>Opportunity for Improvement: It is recommended that Transgrid continue consultation with Snowy Hydro Limited and Future Generation Joint Venture and prioritise the reinstatement of erosion and sediment control devices along Wallace Creek to prevent further sedimentation impacts.</p> <p>In response to an Opportunity for Improvement raised in Construction Audit 3 regarding the requirement to notify NPWS within two hours of identifying a risk or impact to Booroolong Frog habitat, Transgrid met with NPWS on 4 September 2025 (sighted) to discuss the matter. NPWS agreed that the wording should be revised to align with the</p>	<p>The Proponent acknowledges the Independent Audit Findings and opportunity for improvement identified for Condition BMP9 and will continue consultation with Snowy Hydro Limited and Future Generation Joint Venture regarding the reinstatement of erosion and sediment control devices along Wallace Creek to prevent further sedimentation impacts.</p>	N/A

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				Infrastructure Approval, changing the notification timeframe from “within two hours” to “immediately” upon becoming aware of any turbid water incidents relevant to Booroolong Frog habitat. This change will be incorporated into the next revision of the BMP.		