

## Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-9717-PA-148

Mr Andrew Buttigieg

Project Manager - Snowy 2.0 Transmission Connection

NSW Electricity Networks Operations Pty Limited

18/12/2025

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Sent via the Major Projects Portal only

**Subject: Snowy 2.0 - Transmission Connection - Independent Environmental Audit #4**

Dear Mr Buttigieg

I refer to your Independent Environmental Audit (IEA) report and Response to Audit Recommendations (RAR), for the period 14 March 2025 to 11 September 2025, submitted to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 28 November 2025, as required by Schedule 2 Condition C10 for the Snowy 2.0 Transmission Connection Project, SSI-9717 (Approval).

NSW Planning considers the IEA report to generally satisfy the reporting requirements of the Approval and the NSW Planning Independent Audit Post Approval Requirements (2020). Please note that NSW Planning's acceptance of this IEA report is not an endorsement of the compliance status of the project.

The non-compliances with Schedule 2 Condition B11 and B17 have been previously assessed by NSW Planning in accordance with its Compliance Policy. However, the non-compliances identified in IEA #3 with Schedule 2 Condition B21, the Biodiversity Management Plan, are still under review and further correspondence will likely be issued in relation to those matters.

It is requested that you implement the recommendations and opportunities for improvement identified in the IEA and include a status update for all actions in the next IEA, until they have been completed.

NSW Planning would like to remind you, in accordance with Schedule 2 Condition C2 you 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 submission of an Independent Audit.

Please ensure that copies of the IEA report and RAR are provided to all relevant agencies for their review and response.

Lastly, as required by Schedule 2 Condition C11, please make publicly available a copy of the IEA Report and RAR on the project website.

## Department of Planning, Housing and Infrastructure

Should you wish to discuss the matter further, please contact Jennifer Rowe, (Senior Compliance Officer) on 0242471851 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly", enclosed in a thin black rectangular border.

Katrina O'Reilly  
Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary



# **Snowy 2.0 Transmission Connection Project**

Independent Environmental Audit Construction Audit 4

**Final**

November 2025



## **Snowy 2.0 Transmission Connection Project**

Independent Environmental Audit Construction  
Audit 4

### **Final**

Prepared by  
Umwelt (Australia) Pty Limited

On behalf of  
Transgrid

Lead Auditor:	Daniel Sullivan
Assistant Auditor:	Joshua Wheatley
Report No.:	22930/R04
Date:	November 2025



This report was prepared using  
Umwelt's ISO 9001 certified  
Quality Management System.



# Acknowledgement of Country

Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky.

We pay our respects to Elders past and present.

The below image is from the artwork *Yapung Maryiyang* (Pathway Forward) by Saretta Fielding.



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## Document Status

Rev No.	Reviewer Name	Date	Approved for Issue Name	Date
V1	Daniel Sullivan	09/10/2025	Daniel Sullivan	10/10/2025
V2	Daniel Sullivan	07/11/2025	Daniel Sullivan	10/11/2025
V3	Daniel Sullivan	24/11/2025	Daniel Sullivan	24/11/2025

# Executive Summary

Umwelt was commissioned by Transgrid to conduct the fourth construction Independent Environmental Audit (IEA) against infrastructure Approval SSI 9717 - MOD 1 for the Snowy 2.0 Transmission Connection Project. This audit was undertaken for the Department of Planning, Housing and Infrastructure (DPHI) for the period 14 March 2025 to 11 September 2025 (audit period). The audit also assessed compliance with the conditions of the Projects Environment Protection and Biodiversity Conservation Act (EPBC) Approval, management plans and other licence documents.

The audit team responsible for completing the audit as endorsed by DPHI included:

- Daniel Sullivan (Lead Auditor) (Exemplar Global International Certified Lead Auditor 113202)
- Joshua Wheatley (Assistant Auditor) (Exemplar Global International Certified Lead Auditor 459118)
- Adam Cavallaro (Biodiversity)
- Luke Wolfe (Aboriginal Cultural Heritage) and
- Melissa Swan (Surface Water/Erosion and Sediment Control).

The audit consisted of a detailed desktop review and onsite audit including interviews with key Transgrid and UGL staff, and contractors and a site inspection which assessed the compliance status of the Snowy 2.0 Transmission Connection Project against the Infrastructure Approval for all construction activities that have occurred within the audit period. The site audit was conducted across the 09–11 September 2025.

The audit was conducted generally consistent with ‘AS/NZS ISO 19011:2018 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and the NSW Department of Planning, Industry & Environment’s Independent Audit – Post Approval Requirements dated May 2020 (Independent Audit Requirements)’.

This audit has concluded that the on the ground environmental management practices being applied at Snowy 2.0 Transmission Connection Project are appropriate. The Maragle (West) and Lobs Hole (East) Project Areas were assessed during the field inspection and were observed to be well managed with supervisory personnel demonstrating a good understanding of management actions required to minimise environmental impacts from construction activities including the specific measures to manage and minimise biodiversity, Aboriginal cultural heritage and water/sediment and erosion control related impacts.

This audit has concluded that the environmental management practices being applied at the Snowy Hydro 2.0 Transmission Connection Project are appropriate and a high level of environmental compliance is being achieved. All areas of the site that were visited during the site inspection were observed to be well maintained and managed with site personnel demonstrating a good understanding of management actions and responsibilities to minimise impacts from construction activities.

Non-compliances identified during this audit are summarised in **Section 4.0**. A review of management plans found that all required plans were in place and generally being implemented well, with some non-compliances against plan commitments identified.

A number of recommendations and opportunities for improvement arising from a review of environmental management documentation, the audit site inspection and identified non-compliances are provided in **Section 6.0**.

# Contents

<b>Executive Summary</b>	<b>i</b>
<b>1.0 Introduction</b>	<b>1</b>
1.1 Audit Scope and Objectives	2
1.1.1 Supporting Approvals	2
1.1.2 Supporting Documents	3
1.2 Audit Criteria - Compliance Status Descriptors	3
1.3 Structure of this Document	4
<b>2.0 Audit Methodology</b>	<b>5</b>
2.1 Audit Team	5
2.2 Agency Consultation	5
2.3 Site Interviews and Inspections	6
2.3.1 Opening Meeting	6
2.3.2 Audit Interviews	7
2.3.3 Data Collection and Verification	8
2.3.4 Site Inspection	8
2.3.5 Closing Meeting	8
2.4 Independent Environmental Audit Reporting	9
2.5 Limitations	9
<b>3.0 Previous Independent Audit Recommendations and Status</b>	<b>10</b>
<b>4.0 Compliance Assessment</b>	<b>28</b>
4.1 Infrastructure Approval for SSI 9717 – MOD 1	28
4.1.1 Compliance Performance Summary	28
4.2 EPBC Approval	29
4.3 Amendment Report Mitigation Measures	29
4.4 Environmental Management Plans	30
4.4.1 BMP Biodiversity Management Measures	33
<b>5.0 Environmental Performance</b>	<b>34</b>
5.1 Management Commitment and Resourcing	34
5.2 Compliance Management	34
5.3 Reportable Environmental Incidents and Complaints	35

5.3.1	Community Complaints	35
5.3.2	Penalty Infringement Notices / Orders	35
5.3.3	Reportable Incidents	35
5.4	Biodiversity Management	36
5.5	Aboriginal Cultural Heritage Management	38
5.6	Erosion and Sediment Control and Water Management	39
5.7	Site Audit Inspection	42
<b>6.0</b>	<b>Recommendations and Opportunities for Improvement</b>	<b>43</b>

## Tables

Table 1.1	Independent Audit Guidelines Compliance Assessment Criteria	4
Table 2.1	Stakeholder Consultation	6
Table 2.2	Opening Meeting Attendees	7
Table 2.3	Personnel Interviewed During the Audit	7
Table 2.4	Closing Meeting Attendees	9
Table 3.1	Previous Audit Findings Update	11
Table 4.1	Non-Compliance with SSI 9717 – MOD 1	28
Table 4.2	Non-Compliance with EPBC 2018/8363	29
Table 4.3	Non-Compliance with Amendment Report Mitigation Measures	29
Table 4.4	Environmental Management Plans	30
Table 4.5	Non-Compliance with BMP Management Measures	33
Table 6.1	Recommendations	43

## Appendices

<b>Appendix 1</b>	Independent Audit Declaration Form
<b>Appendix 2</b>	DPHI Correspondence Approving the Auditor
<b>Appendix 3</b>	Audit Plan and Itinerary
<b>Appendix 4</b>	Compliance Tables
<b>Appendix 5</b>	Photographic Plates

# 1.0 Introduction

On 2 September 2022 Transgrid were granted Infrastructure Approval SSI 9717 for the Snowy Hydro 2.0 Transmission Connection Project (the Project). The Infrastructure Approval for SSI 9717 allows for the construction and operation of new 330 kilovolt (kV) transmission lines and associated infrastructure connecting the Snowy 2.0 Main Works Project to the existing electricity grid. A modification of the Infrastructure Approval was determined on 30 August 2024 (MOD 1). MOD 1 sought to provide a 12-month extended period for Snowy Hydro to implement and deliver the biodiversity offset measures set out in the approved Biodiversity Offset Package to account for the delays experienced in the process.

Transgrid is responsible for the management of the Project and have awarded the design and construction contract to UGL (a national engineering and services provider) to complete the construction phase of the Project.

Transgrid commissioned Umwelt to conduct an Independent Environmental Audit (IEA) as required by Part C, Condition 10 of SSI 9717 – MOD 1. The IEA was conducted in accordance with SSI 9717 – MOD 1, NSW Government’s *Independent Audit – Post Approval Requirements* (Independent Audit Requirements) and with AS/NZS ISO 19011:2018 *Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing*. As per the requirements stated under Condition C10 in SSI 9717 – MOD 1:

*“Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.”*

In accordance with the requirements of Condition C10, the Fourth Construction Audit was completed within six months of the completion of the Third Construction Audit.

This IEA was conducted by Daniel Sullivan (Exemplar Global International Certified Lead Auditor 113202) and Joshua Wheatley (Exemplar Global International Certified Lead Auditor 459118) from Umwelt. Daniel and Joshua were supported during the audit by experts in a number of fields including:

- Adam Cavallaro (Biodiversity)
- Luke Wolfe (Aboriginal Cultural Heritage) and
- Melissa Swan (Surface Water/Erosion and Sediment Control).

This IEA report has been certified by the lead auditor (see **Appendix 1**) as required by the Independent Audit requirements. As required by the Infrastructure Approval, the audit team was approved by DPHI to undertake the audit (refer to **Appendix 2**). The IEA consisted of a detailed desktop review and onsite component including a site inspection and assessed the compliance status of Snowy 2.0 Transmission Connection Project against the Infrastructure Approval and other relevant environmental approvals and licences, for construction occurring between 14 March 2025 and 11 September 2025 (the audit period). The site inspection of the IEA was undertaken between the 09–11 September 2025 (see **Appendix 3** for the audit plan and itinerary).

Some information requested by the audit team was not available on-site at the time of the audit and was subsequently collated and provided following the site audit to the audit team for review. The weather conditions during the IEA site inspection varied, ranging from fine and sunny to overcast with periods of rain across the duration of the site visit.

Over the three days of the site inspection, the maximum temperature was 20.6 °C, recorded on 9 September 2025, and 14.4 mm of rainfall was recorded on 11 September 2025 (Tumbarumba Post Office BoM monitoring station site 072043). In the week preceding the inspection, only two rainfall events were recorded at the Tumbarumba Post Office BoM monitoring station, measuring 14.8 mm and 0.4 mm.

An opening meeting and close out meeting for the IEA was held on site at the Maragle Construction Compound, with the option for Transgrid and UGL employee to join via Microsoft teams. Transgrid and UGL environmental management team were in attendance at the opening meeting and closing meeting.

This report provides an outline of the IEA methodology and results and provides recommended actions for achieving full compliance with environmental approvals.

## **1.1 Audit Scope and Objectives**

The scope and objectives of the IEA were to assess Transgrid's compliance with:

- All conditions of the Infrastructure Approval for SSI 9717 – MOD 1 (dated 30 August 2024).
- All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans.
- All environmental licences and approvals applicable to the Project.

The audit also included:

- A review of the environmental performance of the Project (including a comparison with the predicted impacts contained in the EIS, review of complaints and incidents registers and consideration of any feedback provided during agency consultation).
- A high-level assessment of whether Environmental Management Plans and sub-plans are adequate.
- Any other matters considered relevant by the auditor or the Department as raised during the pre-audit consultation.

### **1.1.1 Supporting Approvals**

The other approvals and statutory documents held by Transgrid for the Project which have been reviewed as part of this IEA include:

- EPBC Approval 2018/8363.
- Water Access Licence (WAL44782 and WAL44788).
- Any strategy, plan or program which has been prepared for the Project.

### 1.1.2 Supporting Documents

In addition to assessing compliance against each of the conditions of the Infrastructure Approval for SSI 9717 – MOD 1 the following documents have also been reviewed as part of this IEA:

- All post approval and compliance documents prepared to satisfy the conditions of consent which include the:
  - Biodiversity Management Plan
  - Biodiversity Offset Package
  - Complaints Management System
  - Complaints Register
  - Construction Environmental Management Plan (CEMP) and all sub-plans
  - Emergency Plan
  - Environmental Management Strategy
  - Final Layout Plans
  - Heritage Management Plan
  - Notification of commencement of development, construction, operations, upgrading or decommissioning
  - Notification of Incident
  - Notification of Non-Compliance
  - Rehabilitation Management Plan
  - Spoil Management Plan
  - Traffic and Transport Management Plan
  - Transport Strategy
  - Visual Impact Management Plan
  - Additional Easement Rehabilitation Strategy
  - Water Management Plan
  - Work as Executed Plans.

## 1.2 Audit Criteria - Compliance Status Descriptors

The compliance status of each approval was assessed in accordance with the compliance assessment criteria detailed within the Independent Audit Requirements and as directed in the letter from DPHI approving the audit team. The criteria have been reproduced in **Table 1.1** below.



**Table 1.1 Independent Audit Guidelines Compliance Assessment Criteria**

Assessment	Criteria
<b>Compliant</b>	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
<b>Non- compliant</b>	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
<b>Not triggered</b>	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

## 1.3 Structure of this Document

This report contains the following sections:

**Section 1.0–** Introduction. An overview of the Project and the purpose and scope of the audit

**Section 2.0–** Audit Methodology. A detailed description of the audit process

**Section 3.0–** Previous Independent Audit Recommendations and Status. An overview of the findings of the previous audit and the action status of each recommendation.

**Section 4.0–** Compliance Assessment. An overview of the findings of the audit, including detailed descriptions of any non-compliance identified

**Section 5.0–** Environmental Performance

**Section 6.0–** Recommendations and Opportunities for Improvement

**Appendix 1 –** Independent Audit Declaration Form

**Appendix 2 –** DPHI Correspondence Approving the Auditor

**Appendix 3 –** Audit Plan and Itinerary

**Appendix 4 –** Compliance Tables for the Infrastructure Approval, BMP Management Commitments, EPBC Approval, Amendment Report Commitments

**Appendix 5 –** Photographic Plates. Photographs of key site features referred to in this report.



## 2.0 Audit Methodology

The audit process involved the interview of personnel and relevant agencies, a review of documentation and samples of records provided by Transgrid. The site audit also included an inspection of the construction activities being undertaken across the Project Area to determine the level of environmental performance and compliance.

### 2.1 Audit Team

The audit team was led by Daniel Sullivan, a qualified and highly experienced lead environmental auditor, who has undertaken a number of DPHI independent environmental audits for infrastructure projects in NSW. Daniel was approved by DPHI to act as the lead auditor for the Project. Joshua Wheatley was approved by DPHI to act as the environmental auditor. DPHI approved the following experts to review their respective areas including:

- Adam Cavallaro (Biodiversity)
- Luke Wolfe (Aboriginal Cultural Heritage) and
- Melissa Swan (Surface Water/Erosion and Sediment Control).

A copy of the independent audit certification form as required by the NSW Audit Guidelines is included within **Appendix 1** with the DPHI correspondence approving the audit team included within **Appendix 2**.

### 2.2 Agency Consultation

Consistent with correspondence with DPHI during the planning phase for the previous Construction Audits, the audit team for the Fourth Construction Audit comprises of suitably qualified and experienced specialists in the areas of Biodiversity, Aboriginal Cultural Heritage and Water/Sediment and Erosion Control. All specialists in the audit team are approved by DPHI as described in **Section 1.0**.

Further to the above as required by the Independent Audit Requirements during the audit teams' preparation for this IEA, input was sought from regulatory agencies to confirm any areas of compliance or environmental management at Snowy Hydro 2.0 Connection Project that should be a particular focus. As requested by DPHI the following agencies were contacted and invited to provide input as part of the scoping phase of this Audit:

- NSW Department of Planning, Housing and Infrastructure (DPHI)
- NSW Department of Primary Industries (DPI)
- NSW Rural Fire Service (RFS)
- Fire and Rescue NSW
- Heritage NSW
- Local Aboriginal Councils
- NSW Department of Planning and Environment—Water (DPE Water)

- Australian Government Department of Climate Change, Energy, the Environment and Water (AG DCCEEW)
- Forestry Corporation of NSW (FCNSW)
- NSW Environmental Protection Agency (EPA)
- Transport for NSW (TfNSW)
- Conservation Programs, Heritage and Regulation Group (CPHR) formerly Biodiversity Conservation Science
- Snowy Monaro Regional Council (SMRC)
- Snowy Valleys Council (SVC)
- National Park and Wildlife Services (NPWS).

An overview of the agency consultation is included in **Table 2.1**. Representatives from CPHR and NPWS responded and provided feedback regarding items to be addressed in addition to the requirements of the Project Approval with their responses summarised in **Table 2.1** below. NSW Fire and Rescue responded noting that they did not have any particular issues or areas to raise as requiring specific attention during the audit. Relevant to Construction Audit 4 no responses were received from DPHI, DPI, RFS, Heritage NSW, Aboriginal Land Council, DPE Water, AG DCCEEW, FCNSW, EPA, TfNSW, SMRC and SVC.

**Table 2.1 Stakeholder Consultation**

Stakeholder	Person Contacted	Agency Comments	Section where Addressed
CPHR	Simon Maffei <i>Senior Project Officer Planning - Regional Delivery Division, South West</i>	Ensure that the BMP is being implemented as required, including the measures set out in Table 5-13 and the clearing procedure detailed at Appendix B.	Section 4.4.1 and Section 5.4
		RD have previously raised concerns with the implementation of BMP 16 and BMP 22, as well as excessive mulch that may inhibit vegetation growth. Please ensure these elements are also considered in the audit.	Section 4.4.1 and Section 5.4
NPWS	Nicole Shotter <i>Manager Snowy 2.0 - Southern Ranges Branch</i>	NPWS noted suggest for inclusion is review of the status of the 16 non-compliances identified in the previous audit report,	Section 3.0

## 2.3 Site Interviews and Inspections

### 2.3.1 Opening Meeting

The opening meeting was held at the UGL Maragle Project Construction Compound and online to personnel who could not attend onsite commencing at 9:00 am on 09 September 2025. The list of participants is provided in **Table 2.2**.

**Table 2.2 Opening Meeting Attendees**

Person	Organisation	Title / Role
Jason Snape	Transgrid	Senior Environmental Advisor
Bradley Parker	Transgrid	Environmental Advisor
Camille Palmer	UGL	Senior Environmental Advisor
Darrell Van Bruchem	UGL	Construction Manager West
Jennifer Miller	UGL	National Environmental Manager
Louis Linde	UGL	Operations (Project Director - Maragle)
Seraj Ranjbar	UGL	Senior Civil Project Engineer
Daniel Sullivan	Umwelt	Lead Auditor
Joshua Wheatley	Umwelt	Auditor

The audit team was introduced, and the scope of their responsibilities was conveyed to the auditees. The purpose, depth and scope of the audit were outlined as per the Audit Plan (refer **Appendix 3**). The methods to be used by the team to conduct the audit were explained. It was stated that the audit team would be interviewing personnel, reviewing site management plans, examining records and conducting a site inspection in order to address specific compliance requirements. Transgrid and UGL personnel were asked to provide an overview of the status of construction and relevant site environmental management measures such as biodiversity management, Aboriginal cultural heritage management, water management and erosion and sediment control.

## 2.3.2 Audit Interviews

During the site audit, interviews were conducted with relevant Transgrid and UGL staff and identified in **Table 2.3**.

**Table 2.3 Personnel Interviewed During the Audit**

Person	Organisation	Title / Role
Jason Snape	Transgrid	Senior Environmental Advisor
Bradley Parker	Transgrid	Environmental Advisor
Camille Palmer	UGL	Senior Environmental Advisor
Darrell Van Bruchem	UGL	Construction Manager West
Jeremy Slattery	HLWJV	Environment Operations Manager
Ron Billiard	HLWJV	Project Certified Professional in Erosion and Sediment Control (CPESC)
Ali Youssef	Transgrid	Delivery Quality Manager
Chris Johnston	Transgrid	Environmental Advisor
Chris Wooll	Transgrid	Environmental Advisor
Jennifer Miller	UGL	National Environmental Manager
Seraj Ranjbar	UGL	Senior Civil Project Engineer

### 2.3.3 Data Collection and Verification

Documents and data collated during the audit process were reviewed whilst on-site where possible. A number of documents were also provided to the auditors prior to the on-site component of the audit and documents that were requested during the on-site component of the audit were provided following the on-site component of the audit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site personnel were verified by viewing documentation and/or site inspections where possible. Where suitable verification could not be provided, this has been identified in the audit findings.

### 2.3.4 Site Inspection

A comprehensive inspection of active construction areas was undertaken as part of the audit. During the audit period, vegetation clearing was completed along the alignment in Project Area East, excluding the hazard tree zone which remains subject to further assessment. As previously noted in Construction Audit 2 and 3, all clearing activities in Project Area West have been completed.

Civil works were substantially completed to Issue for Construction (IFC) design during the audit period, with minor remedial works continuing in both Project Area West and East. Tower foundation drilling advanced during the period, including erection of the S2 tower for the TL64 cut-in and stringing of the earth wire. At the Maragle 330 kV Switchyard, works included installation of the earth grid, gantries, and high-voltage equipment, together with delivery and installation of the Auxiliary Switch room Building, pre-energisation commissioning, and installation of permanent stormwater drainage.

The following locations were inspected during the audit:

- Maragle Project Construction Compound
- Maragle Substation Project Area
- Hume Link 500 KV Compound at Maragle
- Elliott Way/Access Track South Intersection
- Track 1,2 , 4, 5a, 5c, 5e, 8, 10, 12
- Pad 4, Pad 6, Pad 10, Pad 11, Pad 13 and associated easement clearing zones
- Sheep Creek Station Bridge (Temporary)
- Wallaces Creek, and
- Lobs Hole Project Construction Compound.

### 2.3.5 Closing Meeting

The closing meeting was held at the UGL Maragle Project Construction Compound and online to personnel who could not attend onsite commencing at 11:30 am on 11 September 2025. The objective of this meeting was to discuss outstanding matters, present preliminary findings and outline the process for finalising the compliance assessments and audit report. The list of participants who attended the closing meeting is provided in **Table 2.4**.

**Table 2.4 Closing Meeting Attendees**

Person	Organisation	Title / Role
Andrew Buttigieg	Transgrid	Senior Project Manager
Jason Snape	Transgrid	Senior Environmental Advisor
Chris Johnston	Transgrid	Environmental Advisor
Camille Palmer	UGL	Senior Environmental Advisor
Darrell Van Bruchem	UGL	Construction Manager West
Seraj Ranjbar	UGL	Senior Civil Project Engineer
Daniel Sullivan	Umwelt	Lead Auditor
Joshua Wheatley	Umwelt	Auditor

## 2.4 Independent Environmental Audit Reporting

Following completion of the site audit, which included review of Infrastructure Approval conditions and site activities, remaining document reviews and compliance assessments were completed, and site audit notes were reviewed in order to compile a list of outstanding matters to be noted in the audit report.

This report was prepared to provide an overview of the status of compliance by reference to the relevant compliance documentation and any other observations of the audit team during the site inspections and interviews. This report has been prepared on an exception basis, highlighting the compliance issues identified along with any areas where action or improvement is required. This IEA has been prepared in accordance with the Independent Audit Requirements.

## 2.5 Limitations

The findings of the IEA are based upon visual observations of the site and its vicinity, interviews with site personnel and our interpretation of documentation provided by Transgrid.

Opinions presented herein apply to the site as it existed at the time of the audit and from information provided by site personnel and agencies. Any changes to this information of which Umwelt is not aware and has not had the opportunity to evaluate therefore cannot be considered in this report.

The audit team have taken due care to consider all reasonably available information provided whilst undertaking this audit and have taken this information to represent a fair and reasonable characterisation of the environmental status of the site but recognise that any site assessment program is necessarily limited in scope and true site conditions may differ from those inferred from the available data.

## 3.0 Previous Independent Audit Recommendations and Status

The recommendations made in the Third Construction Audit for Snowy 2.0 Transmission Connection Project Independent Environmental Audit (Umwelt, 2025) and the status of the recommendations as of 11 September 2025 are detailed in **Table 3.1**. Outstanding recommendations from previous Construction Audits have also been included to provide an update on their status.

**Table 3.1 Previous Audit Findings Update**

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
		1	2	3	
SSI 9717 – MOD 1 Infrastructure Approval					
A5	It is recommended that Transgrid notify the Planning Secretary of any plans that, while not required under this Infrastructure Approval, are required by the EIS to ensure consistency with Condition A2 (c). Additionally, clarification should be sought to confirm whether submission dates for any such plans have been formally extended and appropriately communicated to the Planning Secretary.			✓	<u>The matter is considered closed.</u>  Transgrid submitted a Clarification Letter to the Department on 29 August 2025 regarding the notification process and revised submission dates for the Operation Vegetation Management Plan (OVMP). The letter sought to confirm that the Department and Planning Secretary were formally notified of the revised timeframes, in accordance with Condition A2(c) and commitments outlined in the EIS. No response has been received from the Planning Secretary; however, the submission of the clarification is considered to have addressed the intent of the previous recommendation.
A9	It is recommended that, in future instances where stakeholder involvement is required, Transgrid follows up on any agreed actions via email to ensure a clear and documented communication trail.			✓	<u>This matter is considered closed.</u>  The Proponent has confirmed that they will ensure in future instances where stakeholder involvement is required, the Proponent will follow up on any agreed actions via email to ensure a clear and documented communication trail.
A13	It is recommended that all contractors and personnel be reminded of the requirement to use site wheel wash facilities where installed and applicable, and to ensure vehicles arrive and depart the site clean and free of soil, weeds, seeds, and pathogens. This could be reinforced through regular toolbox talks and the installation of clear signage at site exit points.			✓	<u>This matter is considered closed.</u>  Toolbox talk “Maragle 330 kV Environmental Training - Hygiene Declarations” held by UGL following Construction Audit 3 including reminder to all contractors and personnel of the requirement to use site wheel wash facilities where installed and applicable, and to ensure vehicles arrive and depart the site clean and free of soil, weeds, seeds, and pathogens. Also addressed in regular pre-start meetings.

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
		1	2	3	
<b>B7</b>	It is recommended that the spoil register be regularly maintained and updated to accurately record ongoing spoil movements, with updates occurring at intervals no greater than one month.			✓	<p><u>The matter is considered closed.</u></p> <p>The Spoil Register is now maintained and updated on a monthly basis to accurately record ongoing spoil movements.</p>
<b>B8</b>	It is recommended Section 6 of the Spoil Management Plan be revised to include details to explain how the management of spoil and the progress against the detailed completion criteria and performance indicators would be publicly reported.	✓			<p><u>The matter is considered partially addressed, pending the revision of the SWMP.</u></p> <p>The SWMP has not been revised to reflect the recommendations outlined from the Initial Construction Audit. SWMP subject to ongoing consultation.</p> <p>During the audit period, an Annual Report detailing spoil results encompassing the period December 2023 to December 2024 was published on the Project website</p> <p>The matter is considered partially addressed, pending the revision of the SWMP.</p>
<b>B10</b>	It is recommended that the installed Erosion and Sediment Controls and Progressive Erosion and Sediment Control Plans (PESCP) in the Eastern Section of the development, particularly from Track 4 to Track 5, are reviewed to ensure installed controls are compliant with the PESCP. In particular, focus should be given to ensuring that bunds include regular returns with regular lined spillway weirs and that the outlets of sediment traps have rock filter dams placed at the discharge points as per the PESCP.			✓	<p><u>This matter is considered closed.</u></p> <p>UGL confirmed inspection and review of erosion and sediment controls and Progressive Erosion and Sediment Control Plans (PESCPs) in the Eastern Section of the development was undertaken following Construction Audit 3. Further revision of controls and PESCPs will be undertaken as necessary prior to completion of civil activities to IFC design.</p>



Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
		1	2	3	
<b>B14</b>	It is recommended to prevent ingress of sediment into Sheep Station Creek from the temporary bridge deck, sandbags or similar (where safety permits) are installed along the outermost edges of the temporary bridge deck to prevent sediment being washed into the creek or more frequent removal of sediment on the bridge deck is undertaken to reduce the build-up of sediment on the bridge deck.			✓	<u>The matter is considered closed.</u> UGL have consulted with the CPESC and onsite subcontractor. The installation of sandbags along the top of the fabricated 'lip' is deemed unsafe and creates a falling hazard of sandbags into the creek. Frequent removal of the sediment from the bridge deck has been deemed a suitable control, including weekly inspection of the geofabric blanket under the bridge to remove excess sediment fines which may have fallen through any gaps in the bridge.
<b>B15</b>	It is recommended that a survey of the installed Erosion and Sediment Controls around Sheep Station Creek should be undertaken to validate that installed controls (notably installed sediment fences) lie outside of the 2-year Average Recurrence Interval (ARI) (where practical) to minimise potential impacts from concentrated water flows (i.e. loss of materials and pollution of waterways during flood events).			✓	<u>The matter is considered closed.</u> UGL have undertaken an initial review of the flood modelling presented by SLR which shows predicted flows at a 1% AEP, which is greater than a 2-year ARI. The 1% AEP modelling indicated that installed erosion and sediment controls would generally lie outside a 2-year ARI flood event. Ongoing consultation with SLR will be occurring until the permanent bridge has been installed during September 2025.
<b>B16</b>	It is recommended that an upper and lower range Site-Specific Guideline Value (SSGV) should be graphed in the main body of the Monthly Monitoring Reports to allow for easy assessment of the impacts of the development on pH.			✓	<u>This matter is considered to be ongoing.</u> 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.
	It is recommended that the existing TARPs be updated or new TARPS prepared to cover general pollution incidents and discharge of sediment laden water and that these be appended to the SWMP.		✓		<u>This matter is considered to be ongoing.</u> The SWMP has not been revised to reflect the recommendations outlined from the Second Audit. SWMP subject to ongoing consultation.

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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	It is recommended the requirements for enhanced erosion controls and examples of what these entail should be documented within project TARPS; regular toolbox talks and site training as appropriate to ensure all staff are aware of the requirements for enhanced erosion and sediment controls for the project.		✓		<u>This matter is considered to be ongoing.</u> The SWMP has not been revised to reflect the recommendations outlined from the Second Audit. SWMP subject to ongoing consultation.
<b>B16 (b) i)</b>	Baseline surface water flow monitoring is recommended to demonstrate compliance with both condition B15 and B16.	✓			<u>This matter is considered to be ongoing.</u> The SWMP has not been revised to reflect the recommendations outlined from the Initial Audit. SWMP subject to ongoing consultation.
<b>B16 (b) ii)</b>	It is recommended given that two years of baseline surface water quality monitoring data is now available it is recommended that the WQMP be updated to incorporate site specific water quality monitoring trigger values.	✓			<u>This matter is considered to be ongoing.</u> The SWMP has not been revised to reflect the recommendations outlined from the Initial Audit. SWMP subject to ongoing consultation.
<b>B18 (b)</b>	It is recommended for completeness the BOP be revised to include additional details of how the cost for each specific biodiversity offset measure was calculated.	✓			<u>The matter is considered partially addressed, pending the approval of the Biodiversity Offset Package.</u> The Biodiversity Offset Package has been revised twice: <ul style="list-style-type: none"> <li>• Rev 6 - Revised to address changes to PCT 285 and application of variation rules</li> <li>• Rev 7 - At the request of the Department of Planning, Housing and Infrastructure a final update to the Snowy 2.0 Transmission Connection Project Biodiversity Offset Package has been made (version 7) to reflect the status of offset credit procurement and retirement, and clarify that payment into the Biodiversity Conservation Fund is not necessary because the required numbers and types of credits have been retired.</li> </ul> All offset obligations have been met by 01 September 2025. Lodged 20 August 2025, awaiting approval.

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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<b>B21</b>	It is recommended partial clearing monitoring is completed and a Verification Report Is prepared for Agency review so that any changes required to the construction vegetation clearing protocols can be identified and implemented during partial clearing works.		✓		<u>The matter is considered closed.</u> The draft Post-Clearing Vegetation Integrity Monitoring Report (LENECO, 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.
	It is recommended Transgrid consult with BCS to update the BMP, ensuring the inclusion of timelines for verification reporting and the approach to updating clearing protocols as might be required regarding the outcomes of partial clearing monitoring.		✓		<u>This matter is considered to be ongoing.</u> The BMP has not been revised to reflect the recommendations outlined from the Second Audit. BMP subject to ongoing consultation.
	A number of measures to improve the management of partial clearing which should be investigated as part of the verification report include: <ul style="list-style-type: none"> <li>• Development of a rapid methodology for monitoring partial clearing areas post clearing to ensure that partial clearing requirements have been followed and improvements can be identified early and implemented quickly.</li> <li>• Completion of rapid monitoring of partial clearing areas within three months of clearing for individual clearing permit areas.</li> </ul>		✓		<u>This matter is considered to be ongoing.</u>

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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	<ul style="list-style-type: none"> <li>Development and implementation of a medium to long-term monitoring methodology for partial clearing to determine whether the BDAR vegetation integrity predictions are being met, for integration with post construction site rehabilitation initiatives.</li> <li>Assessment of locations and depth of mulch deposited in the partial clearing zones and determination of any positive or negative impacts related to vegetation retention and regeneration.</li> <li>Consideration of whether any restrictions or amendments to mulch spreading rates or locations are required to improve or support vegetation regeneration outcomes.</li> <li>Consider practicable initiatives for reduction of machine movements in partial clearing zones, such as locating stockpiles of logs for export in more appropriate areas such as total clearing zones.</li> <li>Description of the successful methods which are currently being implemented to ensure partial clearing works are successful, such as retention of tree stumps. The description of existing successful methods is considered important to ensure a consistent approach is maintained throughout the partial clearing program.</li> </ul>				
	It is recommended the revised Consistency Assessment be prepared to provide further assessment of whether disturbance impacts to species polygons are consistent with the project approval and credit requirements identified in the Biodiversity Development Assessment Report.			✓	<u>This matter is considered to be ongoing.</u>

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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	<p>It is recommended that an independent ecological assessment be commissioned to verify whether environmental harm has occurred as a result of the unapproved use of a forestry mulcher, excessive mulch deposition, and broadscale herbicide application within the Easement Clearing Zones (ECZs) and Hand Clearing Zones (HCZs) of the development. The assessment should:</p> <ul style="list-style-type: none"> <li>• Evaluate the extent of impacts to retained shrub and groundcover vegetation,</li> <li>• Determine whether the soil seedbank or other regeneration processes have been adversely impacted as a result of the heavy application of mulch,</li> <li>• Identify any potential ongoing risks to ecosystem recovery,</li> <li>• Review vegetation integrity scores and</li> <li>• Recommend appropriate remedial and corrective actions, including restoration of groundcover, removal or redistribution of excessive mulch, and review of vegetation management practices.</li> </ul> <p>The findings of the independent assessment should be documented in a written report and used to inform any necessary revisions to the Biodiversity Management Plan and associated clearing procedures to prevent recurrence.</p>			✓	<p><u>This matter is considered to be ongoing.</u></p> <p>Based on the findings of the Draft Leneco Report, Transgrid commits to undertaking a review of the Project Rehabilitation Management Plan (RMP) within three (3) months of submission of the Audit Report and Proponent Response to Audit Findings in consultation with NPWS, CPHR, FCNSW and AG DCCEEW. This will have regard to the findings of the Draft Leneco Report (and any updates which may be made to that report following consultation) and any further regeneration monitoring that is undertaken, to determine whether any remedial actions (including those proposed in the Independent Audit Findings and Recommendations) are required for areas within partial clearing zones, inclusive of the ECZ, where larger amounts of woodchip mulch were deposited.</p>
	<p>It is recommended that the Easement Clearing Zones (ECZ) areas west of Track 1 on the Project West site and any other areas (Project East and Project West sites) not meeting the long-term vegetation integrity targets at the completion of clearing be classified and mapped as heavily impacted due to impacts associated with deep cover of woodchip deposited during clearing operations.</p>			✓	<p><u>This matter is considered to be ongoing.</u></p> <p>Based on the findings of the Draft Leneco Report, Transgrid commits to undertaking a review of the Project Rehabilitation Management Plan (RMP) within three (3) months of submission of the Audit Report and Proponent Response to Audit Findings in consultation with NPWS, CPHR, FCNSW and AG DCCEEW.</p>

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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	<p>Heavily impacted areas should be subject to rehabilitation in accordance with the Rehabilitation Management Plan which is in preparation. Remedial works west of Track 1 on the Project West site are required to address the harm caused to managed shrub and groundcover vegetation zones. Remedial measures should include:</p> <ul style="list-style-type: none"> <li>• Reduction of woodchip cover and depth to expose soil for native plants to regenerate, this will need to be undertaken progressively and in a sensitive manner so that existing native vegetation is not removed and erosion and sediment control issues do not occur.</li> <li>• Monitoring and reporting on native plant regeneration for the ECZ area west of Track 1.</li> <li>• Direct seeding of collected seed and/or propagation and planting of plants from collected seed within the parts of the ECZ west of Track 1 (subject to further approval from FCNSW).</li> <li>• Monthly weed monitoring and monthly targeted weed control during the growth period for any weed infestations.</li> <li>• Installation of fauna friendly temporary exclusion fencing to prevent feral horses and deer from grazing on regenerating plants and transporting weeds into the ECZ area west of Track 1 (subject to further approval from Forestry Corporation of New South Wales).</li> </ul>				<p>This will have regard to the findings of the Draft Leneco Report (and any updates which may be made to that report following consultation) and any further regeneration monitoring that is undertaken, to determine whether any remedial actions (including those proposed in the Independent Audit Findings and Recommendations) are required for areas within partial clearing zones, inclusive of the ECZ, where larger amounts of woodchip mulch were deposited.</p>

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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	It is recommended that Transgrid use a targeted application method (such as back pack sprayers) for the use approved herbicides in partial clearing zones, to ensure targeted weed control is occurring and herbicide does not harm retained shrubs and other native vegetation. Foliar application of herbicide is not considered to be a suitable method for clearing or maintenance of broad areas of regrowth eucalypts in the Easement Clearing Zones. Monitoring of areas treated with broad application of Grazon Extra should be undertaken and where dieback of retained shrub and groundcover vegetation has occurred these areas should also be classified as heavily impacted areas and subject to rehabilitation in accordance with the Rehabilitation Management Plan which is in preparation.			✓	<p><u>The matter is considered partially addressed, pending the revision of the Weed and Pathogen Control Monitoring Program.</u></p> <p>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>
	It is recommended that, in future instances where rainfall events may potentially impact Booroolong Frog habitat, Transgrid ensure National Parks and Wildlife Services is notified within two hours of identifying the risk. All such notifications should be recorded in a central register to ensure accountability and traceability			✓	<p><u>The matter is considered partially addressed, pending the revision of the Biodiversity Management Plan.</u></p> <p>Transgrid met with NPWS on 4 September 2025 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>
	It is recommended erosion and sediment controls near Track 8 and Wallace’s Creek should be properly installed and maintained to prevent runoff into the creek.			✓	<p><u>The matter is considered partially addressed, pending the reinstatement of controls located downstream along Wallace Creek which are under the control of FGJV as part of Snowy 2.0 Main Works.</u></p> <p>Notification was initially issued by Transgrid on 2 July 2025 to Snowy 2.0 Main Works regarding the outstanding recommendation for the reinstatement of erosion and</p>

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
		1	2	3	
					<p>sediment control devices along Wallace Creek. With regard to actions within Transgrid's control, Transgrid confirms enhanced erosion and sediment controls have been installed within their areas including:</p> <ul style="list-style-type: none"> <li>• A dedicated sediment basin for Track 8.</li> <li>• Installation of a silt separator between Track 8 and Wallaces Creek.</li> <li>• Reshaping of batters to reduce water velocity and sediment generation including application of soil binder.</li> <li>• Temporary rock-lining of all drains and installation of gravel capping on access track surfaces and tower pads to reduce sediment generation whilst civil construction activities are in progress.</li> </ul> <p>It is noted that consultation with FGJV and Snowy Hydro Limited is ongoing and is being facilitated through fortnightly integrated environmental meetings.</p>
	It is recommended that erosion and sediment controls near the Booroolong Frog habitat be included in both pre- and post-rainfall inspections for the development. This will help ensure the controls are functioning effectively and provide ongoing protection for the nearby Booroolong Frog habitat.			✓	<p><u>This matter is considered closed.</u></p> <p>Pre- and post-rainfall inspection templates have been updated to include inspection of erosion and sediment controls near Booroolong Frog habitat.</p>
	It is recommended that, in future clearing activities, any deviations such as incorrect rope colours or inadequate boundary marking should be documented and addressed promptly. All delineation measures should be recorded in a central register to support traceability and compliance monitoring.			✓	<p><u>This matter is considered to be ongoing.</u></p> <p>UGL are consulting with the Project ecologist (SLR) to update the Pre-Clearing Checklist and Clearing Permit.</p>



Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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	Prior approval should be sought for variations to staged-clearing requirements by CPHR, NPWS, FCNSW and DCCEEW.			✓	<u>This matter is considered closed.</u> Transgrid confirms prior approval will be sought for variations to staged clearing requirements from CPHR, NPWS, FCNSW and DCCEEW, as required.
	It is recommended that reporting procedures for pre-clearance checklists be reviewed and improved to ensure consistency across reporting structures and improve clarity, accuracy, and compliance.			✓	<u>This matter is considered to be ongoing.</u> UGL are consulting with the Project ecologist (SLR) to update the Pre-Clearing Checklist and Clearing Permit.
	It is recommended that further assessment of the current known extent of <i>Caladenia montana</i> is undertaken to demonstrate that no more than 9.35 ha of habitat for this species will be cleared for the development or seek approval for additional clearing of habitat.			✓	<u>The matter is considered partially addressed, and ongoing pending further actions identified in audit 4 (this report) and engagement with CPHR.</u> The <i>Caladenia montana</i> Findings Assessment, prepared independently by EMM, identified that based on the extent of habitat already cleared, being 10.77 hectares within the procedural clearing layer or 12.31 hectares within the disturbance zones layer (using an updated species polygon derived from a 30-metre buffer around all records), the level of clearing permitted for <i>Caladenia montana</i> has been exceeded. This matter has been assessed further in this audit report as detailed in <b>Section5.4</b> and <b>Appendix 4</b> .
	It is recommended that all steps of the Unexpected Threatened Species Procedure should be followed and the relevant requirements implemented for the observations of <i>Caladenia montana</i> outside of the mapped species polygon assessed in the final Biodiversity Development Assessment Report, including notifying all relevant stakeholders and authorities in accordance with regulatory requirements.			✓	<u>This matter is considered to be outstanding.</u> Observations of <i>Caladenia montana</i> outside of the mapped species polygon was not reported as an unexpected find. This matter has been assessed further in this audit report as detailed in <b>Section5.4</b> and <b>Appendix 4</b> .

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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	It is recommended weed mapping within and adjacent to (with a 50 m buffer of) the Project area is undertaken bi-annually in accordance with Section 6.2 of the Weed and Pathogen Control Monitoring Program.			✓	<u>This matter is considered closed.</u> Transgrid confirms that bi-annual weed mapping has been updated to include areas within and adjacent to (with a 50 m buffer of) the Project area in accordance with Section 6.2 of the Weed and Pathogen Control Monitoring Program. Bi-annual weed reports will be provided for review in future audits.
	It is recommended that the weed spraying register be updated to include details of spraying methodologies (including the adoption of backpack sprayers only in areas of partial clearing/where retained vegetation is required), observations of surrounding vegetation, justification for weather-related decisions, and photographic evidence where practical.			✓	<u>This matter is considered closed.</u> UGL has updated the Weed Spraying Register to include details of spraying methodologies, observations of surrounding vegetation, justification for weather-related decisions, and photographic evidence where practicable.
	Implement restricted access and hygiene measures in areas experiencing dieback of <i>Banksia canei</i> until further soil testing is undertaken. Notify NPWS, CPHR and FCNSW regarding soil testing and undertake mapping and adaptive management as necessary to comply with the Biodiversity Management Plan.			✓	<u>This matter is considered closed.</u> Pathogen testing was undertaken in the areas experiencing <i>Banksia canei</i> dieback observed in Audit 3 between 21-22 March 2025. No pathogens were detected and as such additional hygiene measures beyond those detailed in the approved BMP are not required. Areas will continue to be monitored and sampling as part of annual pathogen testing.
<b>B22</b>	It is recommended the Transgrid updates relevant digital mapping and removes colour-specific rope demarcation around areas or sites that have been confirmed to not be heritage items to prevent worker confusion.			✓	<u>This matter is considered to be outstanding.</u> UGL have not revised mapping or removed colour-specific rope demarcation around areas or sites that have been confirmed to not be heritage items during the audit period. This was acknowledged as an oversight and will be actioned during the next audit period.

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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<b>B24</b>	It is recommended Transgrid consider consultation regarding all relevant activities pertaining to the management of Aboriginal cultural heritage be undertaken with the twenty-one (21) Registered Aboriginal Parties (RAPs) listed in Section 3.2 of the Aboriginal Heritage Management Plan.			✓	<u>This matter is considered to be ongoing.</u> Transgrid has commenced a review of the HMP, including verification of the contact details for the twenty-one (21) Registered Aboriginal Parties (RAPs) listed in Section 3.2 of the Plan.
	It is recommended that Transgrid provide a summary of unexpected finds identified to date, as well as completed clearance works, and invite all Registered Aboriginal Parties to a workshop. The purpose of the workshop would be to discuss the cultural heritage finds, review their context in relation to previously identified cultural heritage values, and assess whether the finds align with the current archaeological model. In particular, Elders and identified Knowledge Holders should be engaged to discuss the findings and, where possible, be given the opportunity to visit Aboriginal sites of interest. The outcomes of the workshop and/or site visits may be used to inform potential updates to the existing Heritage Management Plan, where relevant.			✓	<u>This matter is considered to be ongoing.</u> Transgrid has commenced a review of the HMP, including verification of the contact details for the twenty-one (21) Registered Aboriginal Parties (RAPs) listed in Section 3.2 of the Plan. Upon completion of this review, Transgrid intends to arrange a workshop with all RAPs to discuss the ongoing management of Aboriginal cultural heritage within the Project.
	It is recommended the Weekly Environmental Checklists template be revised to include inspections of 'sensitive areas' identified in the Aboriginal Heritage Management Plan.			✓	<u>This matter is considered to be outstanding.</u> The Weekly Environmental Checklist template has not yet been updated to include inspection of sensitive areas.
<b>B29</b>	It is recommended Transgrid updates the existing dilapidation report to assess the requirements outlined by Condition B29(a) as per the requirements of the Road Maintenance Agreement.			✓	<u>This matter is considered closed.</u> Transgrid sought clarification from SVC regarding the frequency of dilapidation reporting required under the Road Maintenance Agreement. SVC agreed that annual, rather than six-monthly, dilapidation reports are adequate

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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<b>B32</b>	It is recommended that all relevant personnel, contractors and delivery drivers are aware of the requirements under the Traffic and Transport Management Plan for loaded vehicles travelling to site to be covered and contained			✓	<u>This matter is considered closed.</u> UGL have confirmed all relevant personnel, contractors and delivery drivers are aware of the requirements under the TTMP for loaded vehicles travelling to site to be covered and contained. This has been addressed via regular pre-start discussions and as detailed in the Driver Code of Conduct.
	It is recommended monthly inspections of transport routes be undertaken as required by Section 8.5 of the approved Traffic and Transport Management Plan to ensure compliance, safety, and effective traffic management.			✓	<u>This matter is considered closed.</u> UGL has commenced and now undertakes monthly inspections of transport routes, as required under Section 8.5 of the TTMP, to ensure compliance, safety, and effective traffic management.
	It is recommended that the HSE Weekly Inspection form be revised to incorporate traffic monitoring. This will help ensure the development minimises impacts on local traffic, including school bus routes, and preventing the incidence of queuing on public roads.			✓	<u>This matter is considered closed.</u> UGL has incorporated traffic monitoring into the monthly inspection checklist rather than the weekly environmental checklist. This approach aims to better capture traffic-related issues such as interactions with local traffic, including school bus routes, and to prevent queuing on public roads.
<b>B38</b>	It is recommended that the management commitments of the 11 kV Line Rehabilitation Strategy be included in the relevant compliance registers to ensure all required measures are met.			✓	<u>This matter is considered to be ongoing.</u> 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.
<b>B42</b>	It is recommended that the Emergency Plan be submitted to the Local Emergency Management Committee and NSW State Emergency Service for comment as soon as practicable given it has not been submitted annually as required.			✓	<u>This matter is considered to be ongoing.</u> No verifiable evidence has been provided to confirm that this action has since been completed.

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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	It is recommended that Transgrid notify NSW Rural Fire Service Brigade, Forestry Corporation of NSW, Fire and Rescue NSW, and National Parks and Wildlife Service of the evacuation drill that was held and confirm their intention to ensure they are invited to attend future drills.			✓	<u>This matter is considered closed.</u> Transgrid has 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.
	It is recommended that Appendix F Site Environmental Sensitivities of the Emergency Plan be updated to reflect relevant and current contacts, as it is currently outdated.			✓	<u>The matter is considered partially addressed, pending revision of the Emergency Plan.</u> Transgrid is revising Appendix F of the Emergency Plan to ensure all contact details are current and relevant.
<b>B43</b>	It is recommended at the Lobs Hole site that waste under the responsibility of Ocon is included in weekly inspections undertaken by UGL to ensure waste is segregated appropriately across the whole development.			✓	<u>This matter is considered closed.</u> UGL revised its Environmental Inspection Weekly Checklist to include verification of whether waste is being segregated according to waste streams.
<b>B46</b>	It is recommended Transgrid obtain appropriate records and waste dockets from JJ Richards and Bellettes for all waste removed from Project Site East and West for disposal as required by condition B46.	✓	✓	✓	<u>This matter is considered closed.</u> Transgrid has obtained appropriate records and waste dockets from JJ Richards and Bellettes for all waste removed from Project Site East and West during the audit period.
<b>C2</b>	It is recommended going forward for completeness that all plans including strategies should be included in the Management Plan Summary Document Control Register to accurately document the requirement of condition C2 has been implemented.			✓	<u>This matter is considered to be ongoing.</u> The Additional Easement Strategy has been uploaded into the Management Plan Summary Document Control Register but the Emergency Plan and Visual Impact Management Plan remains excluded.
<b>C3</b>	It is recommended that the Biodiversity Management Plan and Soil and Water Management Plan be revised to incorporate the recommendations outlined in previous construction audits, to ensure appropriate mitigation measures can be effectively implemented onsite.			✓	<u>This matter is considered to be ongoing.</u> The BMP and SWMP has not been revised to reflect the recommendations outlined from previous Construction Audits. SWMP and BMP subject to ongoing consultation.

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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	This should be treated as a priority. Consultation with DPHI may be required to facilitate close out of the Departments review and approval of these updates.				
<b>C4</b>	It is recommended that Transgrid notify the Department, National Parks and Wildlife Services and Forestry Corporation of New South Wales in writing that Stage 2 works have commenced.			✓	<u>The matter is considered closed.</u> Transgrid submitted a notification in writing to Major Projects website portal, FCNSW, NPWS and DCCEEW notifying of its intention to commence construction activities associated with Stage 2 of the Development, excluding OSOM deliveries associated with 500 kV componentry of the substation and associated upgrades of roads and bridges, on 28 April 2025
<b>C11</b>	It is recommended the Additional Easement Strategy is uploaded to the Project website.			✓	<u>The matter is considered closed.</u> The Additional Easement Strategy has been uploaded onto the project website.
	It is recommended the Project website is updated regularly to include monitoring results of the development.			✓	<u>This matter is considered to be ongoing.</u> Water Quality Monitoring results are published as soon as the report is prepared. It is acknowledged there is a lag between results and the preparation of the report.
<b>Amendment Report Commitments</b>					
<b>B4</b>	It is recommended that reporting procedures for pre-clearance checklists be reviewed and improved to ensure consistency across reporting structures and improve clarity, accuracy, and compliance.			✓	<u>This matter is considered to be ongoing.</u> UGL are consulting with the Project ecologist (SLR) to update the Pre-Clearing Checklist and Clearing Permit.
<b>W3</b>	It is recommended to update the weekly inspection checklist to include a section/prompt regarding tannin leachate management.			✓	<u>This matter is considered closed.</u> Weekly inspection checklist has been updated to include a section/prompt regarding tannin leachate management.

Condition / Issue	Previous Recommendation and Opportunity for Improvement	Identified in Audit			Status Update
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<b>W10</b>	It is recommended that the environmental inspection weekly checklist and post- rainfall inspection checklists are updated to include a compliance measure relating to the conditions and controls installed around waterway crossings and access tracks to prompt staff completing these inspections to check all tracks and crossings remain in good condition.		✓		<u>This matter is considered closed.</u> Weekly inspection checklist and post- rainfall inspection checklists have been updated to include a compliance measure relating to the conditions and controls installed around waterway crossings and access tracks to prompt staff completing these inspections to check all tracks and crossings remain in good condition.
<b>HA27</b>	It is recommended that the Hot Works procedure be reviewed prior to the start of the next bushfire season.			✓	<u>The matter is considered closed.</u> Hot Work and Fire Risk procedure has been reviewed with no proposed material change from the previous version. This procedure will be circulated for wider consultation within specific business units and published prior to the commencement of the statutory bushfire danger period (1 October to 31 March).
<b>EPBC Conditions 2018/8363</b>					
<b>Part B 25</b>	It is recommended relevant plans including the BMP and EMS are updated to include specifics on what plans are required to report on non-compliances and incident to AG DCCEEW as outlined by AG DCCEEW correspondence dated 4 October 2024.		✓		<u>This matter is considered to be ongoing.</u> The BMP and EMS has not been revised to reflect the recommendations outlined from the Second Audit. BMP and EMS subject to ongoing consultation.

## 4.0 Compliance Assessment

This section provides a discussion of the identified non-compliances and the status of the approval documentation assessed as part of the audit. **Appendix 4** provides a condition-by-condition checklist of the Infrastructure Approval and EPBC Approval and identified compliance status of each condition. **Appendix 4** also includes a review against the BMP Biodiversity Mitigation Measures and Summary of Mitigation Measures committed to in the Projects Amendment Report (Transgrid, 2023).

The scope of approvals assessed as part of this audit is detailed in **Section 1.2**. Recommendations and opportunities for improvement arising from the compliance review and identified non-compliances are included **Section 6.0**.

### 4.1 Infrastructure Approval for SSI 9717 – MOD 1

The Project commenced construction on 4 December 2023 and for the duration of the audit period has been progressing construction activities. Construction activities during this audit period has been primarily associated with vegetation clearing along the alignment in Project Area East, the construction of the Maragle Switchyard and civil works. There were four (4) non-compliances identified against the infrastructure approval. A summary of the identified non-compliances are provided in **Table 4.1** with further details provided in the compliance tables in **Appendix 4**.

**Table 4.1 Non-Compliance with SSI 9717 – MOD 1**

Condition	Non-Compliance
A2	<b>NC-01:</b> Non-Compliances against conditions have been identified during the audit period.
B11	<b>NC-02:</b> During the audit period five incidents were reported involving the discharge of turbid water.
B17	<b>NC-03:</b> 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.
B21	<b>NC-04:</b> This audit has identified a number of non-compliances with the BMP as detailed in of this report and further in <b>Section 4.4.1</b> and <b>Appendix 4</b> .

#### 4.1.1 Compliance Performance Summary

In summary it is considered that Transgrid have demonstrated a high level of compliance against SSI 9717 – MOD 1 during the audit period with 93.9% of the compliance requirements under SSI 9717 – MOD 1 being met (note items identified in **Appendix 4** as not triggered are not included in this assessment summary).

The systems and processes that have been put in place are largely considered appropriate to manage compliance and are considered to have been implemented well, however this audit has identified a number of recommended actions that are provided to address the non-compliances and improve



environmental management and performance. The majority of the non-compliances identified are not deemed to have resulted in material environmental harm.

It is considered that if the actions proposed in **Section 6.0** are adopted then there is no reason the Project cannot demonstrate full compliance.

## 4.2 EPBC Approval

During the audit period construction activities undertaken have been conducted under EPBC 2018/8363. The EPBC Approval as issued under the *Environment Protection and Biodiversity Conservation Act 1999* outline Transgrid's responsibilities and the environmental performance standards it is required to meet.

The Project reports its performance against the above responsibilities and environmental performance status via the submission of its Annual Compliance Report. Generally, the Project has demonstrated compliance with the conditions of its EPBC, however, some non-compliances have been identified. The non-compliances identified with EPBC 2018/8363 are detailed in **Table 4.2** below with further detail provided in **Appendix 4**.

**Table 4.2 Non-Compliance with EPBC 2018/8363**

Condition	Non-Compliance
3	<b>NC- 05:</b> Non-Compliance was triggered in relation to not all management measures were implemented as per the requirements of the BMP in particular partial clearing. Refer to Condition B21 in <b>Table 4.1</b> for further detail.
6	<b>NC- 06:</b> Non-Compliance was triggered in relation to not all management measures were implemented as per the requirements of the BMP in particular partial clearing. Refer to Condition B21 in <b>Table 4.1</b> for further detail.

## 4.3 Amendment Report Mitigation Measures

Generally, the Project has demonstrated compliance with the mitigation measures of its amendment report, however, three (3) non-compliance was identified. The non-compliance identified with amendment report is detailed in below with further detail provided in **Table 4.3**.

**Table 4.3 Non-Compliance with Amendment Report Mitigation Measures**

Condition	Non-Compliance
B3	<b>NC-07:</b> The Rehabilitation Management Plan TARP does not include notification to NPWS and BCS in the event if remedial actions have been triggered.
B5	<b>NC-08:</b> The absence of adequate delineation between No-Go Zone, Hazard Tree Zone, Partial Clearing Zone, and Total Clearing Zone led to unauthorised clearing incident.
B17	<b>NC-09:</b> Clearing of the Easement Clearing Zone assessed as non-compliant under BMP Biodiversity Management Measure BMP12 (unauthorised clearing incident).

## 4.4 Environmental Management Plans

Transgrid and UGL have developed a number of Environmental Management Plans and post approvals compliance documentation for the Project in accordance with relevant requirements of the Infrastructure Approval. These documents address specific impacts associated with the Project, such as heritage, biodiversity and sediment and erosion control, and reflect the requirements detailed in the Infrastructure Approval.

An overview of the compliance status of the Environmental Management Plans and post approvals documentation, including an overview of the compliance with the requirements of the Infrastructure Approval and implementation status of the plans, is included in **Table 4.4** with further details provided in **Appendix 4**. Recommendations and opportunities for improvement, as relevant, are included in **Section 6.0**.

**Table 4.4 Environmental Management Plans**

Condition	Management Plan	Status of Plan
<b>B3</b>	<b>Out-of-Hours Work Protocol (OOHWP)</b>	An OOHWP has been prepared and approved for the Project as confirmed during the Initial Construction Audit. The OOHWP was revised during Construction Audit 2. The OOHWP was not revised during this audit period.
<b>B8</b>	<b>Spoil Management Plan</b>	A Spoil Management Plan has been prepared and approved for the Project as confirmed during the Initial Construction Audit. The Spoil Management Plan has been combined with the SMWP. During Construction Audit 3, the Spoil Management Plan was updated to reflect Stage 2 Works.  In Construction Audit 3 it was noted the Spoil Management Plan 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 (refer to <b>Appendix 4</b> for further details of compliance review).
<b>B16</b>	<b>Soil and Water Management Plan (SWMP)</b>	The Water Management Plan referred to as the SWMP as confirmed during the Initial Construction Audit has been prepared for the Project and approved by the Planning Secretary. During Construction Audit 3, the SWMP was updated to reflect Stage 2 Works.  In Construction Audit 3 it was noted the SWMP 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 (refer to <b>Appendix 4</b> for further details of compliance review).
<b>B18</b>	<b>Biodiversity Offset Package (BOP)</b>	Confirmed during the Initial Construction Audit, a BOP has been prepared and approved for the development. The BOP addresses all requirements of this condition. The BOP is required to be delivered by September 2025 (date revised from 1 September 2024 by MOD 1).

Condition	Management Plan	Status of Plan
		<p>The Department has confirmed receipt of the final BOP, and Snowy Hydro has provided notification that the offset obligations required under Condition B18 of the SSI-9717 Infrastructure Approval have been delivered prior to the 1 September 2025 deadline.</p> <p>At the time of the audit, the Department was progressing its review of the final BOP.</p>
<b>B21</b>	<b>Biodiversity Management Plan (BMP)</b>	<p>A BMP has been prepared and approved for the Project as confirmed during the Initial Construction Audit.</p> <p>During Construction Audit 3, the BMP was updated to reflect Stage 2 Works. During this audit the BMP was updated to reflect extension timeframes of the Operation Vegetation Management Plan. This revision was pending approval at the time of the audit. It should be noted changes to the BMP to reflect recommendations in previous audits is still subject to ongoing consultation.</p> <p>A detailed review and compliance assessment against the BMP biodiversity management measures has also been completed and is also provided in <b>Appendix 4</b> with a summary of the non-compliances identified included in <b>Section 4.4.1</b>.</p>
<b>B24</b>	<b>Heritage Management Plan (HMP)</b>	<p>A HMP has been prepared and approved for the Project as confirmed during the Initial Construction Audit. During Construction Audit 3, the HMP has been updated to reflect Stage 2 Works.</p> <p>A review of the HMP has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to <b>Appendix 4</b> for further details of compliance review). The HMP has not been revised during the audit period.</p>
<b>B27</b>	<b>Transport Strategy</b>	<p>A staged Transport Strategy has been approved for the Project as confirmed during the Initial Construction Audit. A review of the Transport Strategy Stage 1 against the requirements of SSI 9717 – MOD 1 has confirmed that it contains the required information as per the conditions of the approval (refer to <b>Appendix 4</b> for further details of compliance review).</p> <p>The Transport Strategy Stage 2 has been subject to consultation at the time of the audit.</p>
<b>B32</b>	<b>Traffic and Transport Management Plan (TTMP)</b>	<p>The Stage 2 TTMP was prepared in consultation with TfNSW and SVC during the audit period. The TTMP (Rev 0.22) was conditionally approved by the Planning Secretary on 4 April 2025 and is subject to further revision with TfNSW to address Oversize Overmass analysis requirements.</p> <p>A review of the TTMP has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to <b>Appendix 4</b> for further details of compliance review).</p>
<b>B33</b>	<b>Long-Term Road Strategy</b>	<p>The Long-Term Road Strategy was not required to be prepared at the time of the audit. The Long-Term Road Strategy is required to</p>

Condition	Management Plan	Status of Plan
		be prepared within 2 years following commencement of construction.
<b>B36</b>	<b>Visual Impact Management Plan</b>	<p>A Visual Impact Management Plan has been prepared and approved for the Project as confirmed during the Initial Construction Audit.</p> <p>A review of the Visual Impact Management Plan has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to <b>Appendix 4</b> for further details of compliance review). The Visual Impact Management Plan has not been revised during the audit period.</p>
<b>B38</b>	<b>Additional Easement Rehabilitation Strategy</b> (11 kV Line Rehabilitation Strategy)	<p>A 11 KV Line Rehabilitation Strategy has been prepared to the satisfaction of NPWS within six months from the commencement of construction as confirmed during Construction Audit 2.</p> <p>A review of the 11 KV Line Rehabilitation Strategy confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to <b>Appendix 4</b> for further details of compliance review). The 11 KV Line Rehabilitation Strategy has not been revised during the audit period.</p>
<b>B42</b>	<b>Emergency Plan</b>	<p>An Emergency Plan been prepared and approved for the Project as confirmed during the Initial Construction Audit.</p> <p>A review of the revised Emergency Plan has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to <b>Appendix 4</b> for further details of compliance review). The Emergency Plan has not been revised during the audit period</p>
<b>B48</b>	<b>Rehabilitation Management Plan</b> (RMP)	<p>A RMP has been prepared and approved by the Planning Secretary for the Project during the audit period.</p> <p>A review of the RMP confirmed that it contains most of the required information as per the requirements of SSI 9717 – MOD 1 (refer to <b>Appendix 4</b> for further details of compliance review).</p>
<b>C1</b>	<b>Environmental Management Strategy</b> (EMS)	<p>An EMS has been prepared and approved for the Project as confirmed during the Initial Construction Audit. During Construction Audit 3, the EMS was updated to reflect Stage 2 Works.</p> <p>A review of the EMS confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to <b>Appendix 4</b> for further details of compliance review).</p>

#### 4.4.1 BMP Biodiversity Management Measures

The non-compliances identified with the BMP Management Measures are detailed in **Table 4.5** below with further detail provided in **Section 5.4** and **Appendix 4**.

**Table 4.5 Non-Compliance with BMP Management Measures**

Management Measure	Non-Compliance
<b>BMP2</b>	An unauthorised clearing incident was reported on 24 March 2025 involving approximately 507 m <sup>2</sup> of vegetation, comprising 158 m <sup>2</sup> within the Hazard Tree Zone and 349 m <sup>2</sup> within the adjoining no-go zone near Access Track 2 and Tower Pad 11.
<b>BMP11 &amp; BMP 12</b>	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 Zones.
<b>BMP22</b>	Non-compliance related to the implementation of staged clearing requirements was identified. Refer to BMP 11 & 12.
<b>BMP46</b>	Records of <i>Caladenia montana</i> 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.

## 5.0 Environmental Performance

### 5.1 Management Commitment and Resourcing

Throughout the audit, Transgrid and UGL staff were co-operative and forthcoming with information and this allowed the audit team to gain an understanding of the culture of the organisation and project team working on the Project. It was noted during the audit that the Project staff had good record keeping in relation to environmental approvals and compliance. Regarding resourcing for environmental personnel, Jason Snape, Senior Environmental Advisor from Transgrid is responsible for overall compliance associated with the delivery of the Project and coordinates regularly with UGL personnel. Jason is supported by a team of resources including Chris Johnston and Bradley Parker who are Transgrid's Environmental Business Partners for the Project.

Camille Palmer is the Senior Environmental Advisor for UGL and is supported by a team of environmental professionals that is spread across the Project alignment which is split into two distinct Project areas including Lobs Hole (Project East) and Maragle (Project West). On the eastern alignment, Camille is supported by Lauren Logue, Environmental Advisor, and on the western alignment Camille is supported by Vivian Lee Yu, Environmental Advisor.

To meet the commitments outlined by the Infrastructure Approval third party environmental contractors are also used to support the environment team as needed. In respect to this audit period the Project has continued to engage SLR Consulting to assist in fulfilling biodiversity monitoring and management requirements. Furthermore, Navin Heritage Consultants have also been engaged to support in providing assistance for Aboriginal Cultural Heritage management.

Given the scale and complexity of the Project, interface meetings with neighbouring Projects are conducted weekly. Participants include representatives from Snowy Hydro, Transgrid, Future Generation Joint Venture, and UGL. The purpose of these meetings is to provide all stakeholders with insight into work scope activities, facilitate the development of optimal solutions, and prevent work stoppages for all involved parties.

### 5.2 Compliance Management

Transgrid alongside UGL utilise compliance tracking systems to ensure they meet the specific performance measures and criteria set out by this approval. The compliance trackers that have been developed for the Project outline responsible parties, evidence of compliance and associated comments from Transgrid or UGL and relevant links to associated files.

Additionally, Transgrid manages a Notification Tracker for regulators and stakeholders related to the relevant approvals and agreements. Alongside this Notification Tracker, a Management Plan Tracker is also maintained to monitor updates and revisions of management plans required by the Infrastructure Approval while tracking all stakeholder consultations. This workbook has been updated during this audit period in response to previous audit recommendations, to ensure the workbook is able to track revisions even when no updates are required.

It was evident during the audit that Transgrid and UGL communicate and operate concurrently. To track these communications across teams, they continue to utilise a software called TeamBinder.

This platform centralises all documentation and streamlines the review and approval process for controlled documents.

Consistent with the previous construction audit, when documents are uploaded into the system, TeamBinder automatically distributes them to the relevant users via email notifications with all transactions and revisions are recorded within the system. Correspondence is also auto numbered, filed and maintained securely throughout the Project. Any outstanding communications can be identified and accessed in real time.

## 5.3 Reportable Environmental Incidents and Complaints

The reportable environmental incidents, Penalty Infringement Notices, regulatory orders and community complaints that occurred during the audit period are discussed in the following sections.

### 5.3.1 Community Complaints

Two complaints were received during the audit period; however, neither was attributed to the Project's construction activities or environmental performance.

The complaints related specifically to a project vehicle parking in designated disabled space and to an instance of inappropriate behaviour by a contractor engaged by UGL. Both complaints were considered isolated events and were resolved promptly in accordance with Section 4.2 of the EMS.

### 5.3.2 Penalty Infringement Notices / Orders

No penalty infringement notices were received during this audit period.

### 5.3.3 Reportable Incidents

The reportable environmental incidents which have occurred during the audit period as advised by Transgrid are detailed below with further details provided in **Appendix 4**. Upon review it is considered that Transgrid and UGL have appropriately followed the required incident reporting processes as required under SSI 9717.

- *Track 4 Unauthorised Clearing in Project Area*: Unauthorised hand clearing of a total area of 507 m<sup>2</sup> comprised of Hazard Tree Zone (158 m<sup>2</sup>) and no-go zone (349 m<sup>2</sup>) adjoining Access Track 2 and Tower Pad 11. Event occurred on 24 March 2024. Transgrid became aware of the incident on 27 March 2025. Notification was sent to the Department, NPWS, CPHR and AG DCCEEW on 27 March 2025 with a detailed incident report submitted on 14 April 2025.
- *Maragle Turbid Water Discharge June 2025*: Approximately 58 mm of rain was recorded within Project Area West on 24 June 2025 causing a discharge of turbid water into an unnamed creek on the western boundary of the Project area and from a box culvert north of Elliott Way into a vegetated swale. Incident occurred on 24 June 2025. Further heavy snowfall was recorded within Project Area West between 25–26 June 2025 which caused overtopping of the sediment basin adjoining the Maragle 330 kV Switchyard via the basin spillway. Notification was sent to the Department, NPWS, FCNSW, CPHR, EPA and AG DCCEEW on 24 and 26 June 2025, with a detailed incident report submitted on 3 July 2025.



- *Maragle Substation Discharge July 2025 Event 1:* Approximately 13.6 mm of rain recorded within Project Area West between 12:10pm on 6 July 2025 to 09:00am on 7 July 2025 turbid water had discharged from the Maragle 500 kV 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. Transgrid become aware of the incident on 7 July 2025. Notification was sent to the Department, NPWS, FCNSW, CPHR, EPA and AG DCCEEW on 8 July 2025, with a detailed incident report submitted on 16 July 2025.
- *Maragle Substation Discharge July 2025 Event 2:* Approximately 30.6 mm of rain was recorded within Project Area West on 23 July causing turbid water to discharge from the Maragle 500 kV Substation towards the unnamed creek on the western boundary of the Project area. Transgrid become aware of the incident on 23 July 2025. Notification was sent to the Department, NPWS, FCNSW, CPHR, EPA and AG DCCEEW on 24 July 2025, with a detailed incident report submitted on 31 July 2025.
- *Maragle Switchyard Basin Overtop:* Approximately 116.7 mm of rain was recorded within Project Area West between 22–28 July 2025 of which 67.5 mm fell between 26–27 July 2025 causing water to overtop the sediment basin adjoining the Maragle 330 kV Switchyard via the basin spillway. Transgrid become aware of the incident on 28 July 2025. Notification was sent to the Department, NPWS, FCNSW, CPHR, EPA and AG DCCEEW on 28 July 2025, with a detailed incident report submitted on 1 August 2025.
- *Maragle Substation Discharge August 2025:* Approximately 68.5 mm of rainfall was recorded at the Maragle 500 kV substation between 16 August 2025 and 29 August 2025. Discharge commenced on 28 August 2025 and continued throughout the rain event. Water was observed leaving via a sediment trap (the ‘Duck Pond’) and discharged to an unnamed creek via the culvert under the Snowy 2.0 site access road. Transgrid became aware of the incident on 28 August 2025. Notification was sent to the Department, NPWS, FCNSW, CPHR, EPA and AG DCCEEW on 29 August 2025, with a detailed incident report submitted on 4 September 2025.

## 5.4 Biodiversity Management

As required and endorsed by DPHI, Adam Cavallaro, Principal Ecologist and Accredited BAM Assessor undertook the auditing of the Project Biodiversity Management requirements and obligations.

The key focus of biodiversity management for the Project is to ensure that all avoidance, mitigation and management measures relevant to biodiversity and referred to in the environmental assessment documents and relevant permits and approvals are addressed.

Implementation of the BMP was verified through site inspection and review of supporting documentation. Measures required under the BMP were generally in place; however, some inconsistencies remain, particularly in relation to delineation between clearing zones and vegetation management in partial clearing areas.

Vegetation clearing was completed during the audit period, with hazard tree assessments and clearing of these trees ongoing. An unauthorised clearing incident occurred on 24 March 2025 near Access Track 4, resulting in approximately 507 m<sup>2</sup> of vegetation being cleared outside approved delineations 158 m<sup>2</sup> within the Hazard Tree Zone (HTZ) and 349 m<sup>2</sup> within the adjoining No-Go Zone. The investigation found that delineation materials, such as ropes and peg caps, were missing at the time, which led to a misinterpretation of clearing boundaries and represents a departure from BMP 11 and BMP 12.



A review of *24hr Pre-clearance Checklists* provided to Umwelt as part of the audit, indicate there were instances (E05) where ropes used to delineate clearing and no-go zones were absent. The absences of ropes demarcating the edges of clearing zones was raised during Construction Audit 3. There has been some level of corrective actions implemented, including toolbox talks and the supply of additional delineation materials; however, a central register documenting delineation measures has not yet been established. To strengthen traceability and compliance monitoring, all delineation measures should be recorded in a central register prior to any future disturbance works. A formal response from agencies regarding the incident remains outstanding.

Observations of partial clearing areas remain consistent with Construction Audit 3. In Project East, shrubs and groundcover were effectively retained and, in some instances, showing signs of new growth (refer to Plate 1, Plate 2 and Plate 3, **Appendix 5**), while in Project West, impacts from excessive mechanical clearing methods and application of excessive mulch cover continues to inhibit native recruit and regrowth along approximately 1.5 km west of Track 1 (refer to Plate 4, Plate 5 and Plate 6, Plate 7, Plate 8 **Appendix 5**). There are some small instances where natural regeneration has commenced in discrete areas where the mulch cover was obviously thinner and at times provided opportunity to allow for native plant species to regenerate through the thinner mulch layer and exposed soils. It should be recognised that mulch in some areas is of a thickness that will continually suppress native recruitment opportunities, in addition, the coarse nature of the mulch in these areas will need a significant amount of time to breakdown and provide any benefit to the support regenerating native vegetation. Actions to address these matters were provided in Construction Audit 3 and are contained in **Table 3.1** of this report.

The draft Post-Clearing Vegetation Integrity Monitoring Report (LENECO, April 2025) was reviewed, and CPHR provided comments on 12 August 2025 requesting clarification of methodology and correction of data errors affecting Vegetation Integrity (VI) scores. A meeting between Transgrid and CPHR is planned for the next audit period to address these matters. Until this report has been accepted by CPHR, the audit team are not in a position to provide any further feedback until a final version of the report is accepted by CPHR. Any finding of a future review of the report should inform updates to the RMP to ensure where restoration activities are required within partial clearing zones, they are developed to inform and improve vegetation integrity (VI) scores in accordance with the proposed VI score in the Biodiversity Development Assessment Report (BDAR).

During Construction Audit 3, clearing of *Caladenia montana* was identified outside the mapped species polygons defined in the BDAR. An investigation by EMM Consulting (Advice in response to Independent Environmental Audit Findings with respect to *Caladenia montana*, dated 20 June 2025) found that based on the quantum of *Caladenia montana* habitat already cleared, being 10.77 ha within the procedural clearing layer or 12.31 ha within the disturbance zone layer (assuming an updated species polygon using a 30 m buffer from all records, as per the BDAR), the level of clearing permitted under the Infrastructure Approval has already been exceeded.

Consistent with EMM's findings, it remains unclear which of these figures (10.77 ha or 12.31 ha) represents the actual area cleared. However, it is noted that both values exceed the 9.35 ha limit on approved *Caladenia montana* clearing under the consent conditions. Furthermore, the areas of additional *Caladenia montana* that have been identified beyond the previous known occurrences/ extents mapped in the BDAR have not been reported as an Unexpected Find, contrary to recommendations made in Construction Audit 3 and advice provided by EMM. EMM concluded that records of *Caladenia montana* occurring outside the BDAR-defined species polygons constitute an Unexpected Find.

To ensure compliance with Appendix D of the BMP, the Unexpected Threatened Species Finds Procedure should be implemented to formally notify relevant agencies of the occurrence of *Caladenia montana*, acknowledging that the opportunity to halt works has now passed.

Separately, consultation with NPWS on 4 September 2025 addressed herbicide application practices in partial clearing zones. NPWS advised that vehicle-mounted spraying may be acceptable with proper calibration and consideration of spray drift, but recommended use of an indicator dye to ensure accuracy. Transgrid has confirmed that the Pest and Predator Monitoring Program is being revised to reflect this advice and will be subject to subsequent approval. Continued consultation with NPWS should ensure that weed control methods align with best-practice ecological management standards.

UGL has revised the Weed Spraying Register to include details of methodology, weather conditions, and photographic evidence. Pathogen controls, including vehicle wash-down stations and containment measures for *Phytophthora lucustis* were observed to be in place and functioning effectively.

The RMP was approved on 27 June 2025. As the Plan was recently approved and the site remains in the construction phase, opportunities for implementation have been limited. Integration of outcomes from the post-clearing vegetation monitoring should be prioritised in the next audit period to ensure rehabilitation actions are aligned with verified field data.

## 5.5 Aboriginal Cultural Heritage Management

As required and endorsed by DPHI the auditing of the Projects Cultural Heritage Management requirements and obligations was undertaken by Luke Wolfe, Principal Archaeologist.

The key focus of the Aboriginal cultural heritage management for the Project is to ensure that unauthorised harm is prevented to all Aboriginal cultural heritage (both tangible and intangible), and that Aboriginal objects are managed in accordance with the provisions of the Aboriginal Heritage Management Plan (AHMP).

During the audit period, cultural heritage management for the Project continued to be implemented in accordance with the approved AHMP and associated permit conditions. Site personnel demonstrated awareness of cultural heritage requirements, and toolbox talks incorporating cultural heritage considerations were reported to have been undertaken as part of site inductions and ongoing workforce training.

During the site inspection, colour-specific rope demarcation remained in place around areas previously confirmed as not being heritage sites, as identified in the previous audit (refer to Plate 9, **Appendix 5**). Consistent with the recommendation made in Construction Audit 3, it is recommended that the development update its digital mapping and remove the colour-specific rope demarcation around areas confirmed not to contain heritage items.

While undertaking the site audit inspection a suspected Aboriginal object was identified on 10 September 2025 on the road verge near the new Wallaces Creek Bridge within the Snowy Hydro Main Works Project Area. Transgrid personnel reported the find to the Snowy Hydro Main Works team, which was later confirmed by Snowy Hydro's heritage consultant to be a lithic Aboriginal object.. Although the find occurred outside the Project Area, the prompt identification and reporting of the object demonstrated Transgrid's ongoing commitment to cultural heritage management, cooperation with the Snowy Hydro Main Works Project and understanding of reporting procedures.

No other unexpected heritage finds were reported during the audit period. Stop-work and notification procedures, as outlined in the AHMP, remain active should additional items or features of potential archaeological significance be encountered. Ongoing consultation with Registered Aboriginal Parties and relevant stakeholders continues.

## 5.6 Erosion and Sediment Control and Water Management

As required and endorsed by DPHI the auditing of the Project's Erosion and Sediment Control and Water Management requirements and obligations was undertaken by Melissa Swan, Principal Environmental Engineer (CPEng, NER) and Certified Professional in Erosion and Sediment Control (CPESC #8954). The audit of erosion and sediment control and water management for the Project included a site inspection of all the areas identified in **Section 2.3.4**.

During the audit period it was noted that the SWMP was under review, however it has not yet been approved. Reference during the audit was therefore made to Version 0.10 (dated 24/10/2024). The SWMP includes a Spill Response Procedure (Appendix B) and the following Trigger Action Response Plans (TARPs):

- Receiving Waters Exceedance TARP
- Basin Overtopping Event TARP
- Spoil Non-Conformances TARPs.

The Spill Response Plan and TARPs (with the exception of the Spoil Non-Conformance TARP) include the requirement to notify the EPA and other relevant agencies as required at appropriate times.

There were five incidents which occurred during the audit period which had the potential to cause water pollution (refer to **Section 5.3.3** for further detail).

Based on a review of the incident reports, the immediate response to the incidents and ongoing follow up actions are considered appropriate. It is noted that correspondence from the EPA in relation to prior incidents and dated 5 November 2024 indicated that *“with particular reference to the discharge to New Zealand Gully, the licensee did not carry out the appropriate comprehensive sampling to assess potential impact to waters. The EPA reminds Transgrid that a thorough approach must be taken when investigating all instances of discharge to waters. This includes implementing a comprehensive sampling strategy which includes source, confluence/mixing zone, upstream and downstream locations.”* This correspondence was further highlighted in correspondence from the EPA dated 13 August 2025 in response to four of the five incidents and reiterated the need to undertake *“a thorough approach...when investigating all instances of discharge to waters.”* These 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 water quality monitoring was undertaken as part of the monitoring response. For some incidents monitoring included in-situ monitoring with a probe and supplied results were for turbidity only, while some included turbidity and pH. It is unclear if laboratory samples were also taken and analysed. 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.

During the site inspection the sediment basin installed at the base of Track 8 was inspected as was the newly installed sediment basin and clean water basin for the 500 kV substation works (refer to Plate 10, Plate 11 and Plate 12, **Appendix 5**). This brings the total number of operational sediment basins onsite to three and one operational clean water storage basin. These basins form a critical part of the site's sediment control strategy and reflect the project's commitment to containing sediment-laden runoff before it can leave disturbed areas. Several discharges from the 330 kV substation and 500 kV substation sediment basins have occurred during this reporting period. These discharges resulted from a period of significant and prolonged rain and snowfall events. Transgrid faced challenges to reduce the volume of the basins between the consecutive events which was restricted by the limited capacity of local wastewater treatment plants combined with the inability to reuse water onsite due to saturation, resulting in two overtopping incidents occurring during under-design rainfall events. Incident reports for these two overtopping events were prepared and provided to the EPA. The EPA reviewed the incident reports and the provided sampling results and concluded that the incidents resulted in negligible harm to the environment.

The Project's SWMP includes a Primary Erosion and Sediment Control Plan (ESCP) which sets the standards for the project's erosion and sediment controls (ESCs). The Primary ESCP is supported by progressive ESCPs which are updated regularly as site conditions change or prior to new works commencing. The Primary and Progressive ESCPs are informed by best-available practices, including key learnings from the Snowy 2.0 Main Works Project. These insights have informed the implementation of "better than Blue Book" controls, including the increased sizing of diversion bunds, the prioritisation of early rehabilitation, and the use of upslope catch drains to divert clean water early in the flow path, thereby reducing reliance on sediment basins. The PESCPs also include the use of sediment basins which have been constructed larger than the design specifications of the PESCPs. During the audit period Progressive ESCPs were supplied and reviewed for the entirety of the site.

Review of the supplied PESCPs showed that some of the PESCPs did not have dates or version numbers written (or correctly updated) on the actual drawings (some had versioning listed only in the file name). It is recommended that a review of PESCPs 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.

During the audit, water access and licensing requirements was also reviewed. In response to an issue identified with WAL 44782 during Construction Audit 2, UGL initially sought to amend the licence to include a water allocation. An application for this water allocation was prepared and submitted however following consultation with the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) UGL withdrew the amendment application on 25 August 2025 (sighted). This decision was supported by the availability of sufficient onsite water, removing the need to source water from alternative allocations.

During the current audit period, groundwater was unexpectedly intercepted during excavation works, requiring temporary dewatering. As per the correspondence from the NSW DCCEEW Water Group during the audit period (11 July 2025), a WSWA remains a statutory requirement for any pump used to extract groundwater, including portable or temporary dewatering pumps. At the time of the audit, dewatering activities were being undertaken without a valid WSWA, as confirmed by DCCEEW to be required under the *Water Management Act 2000*. It is recommended that the Proponent obtain a WSWA for the dewatering pump to ensure full compliance with the *Water Management Act 2000* and associated regulatory requirements.

During the site audit inspection, ESC measures were found to be well installed and maintained across the entirety of the site (refer to Plate 13, Plate 14, Plate 15 and Plate 16 **Appendix 5**). There was a notable improvement in the quality of installed controls on the eastern section at Lobs Hole when compared to Audit 3. Controls observed included (but were not limited to) mulch cover, soil binders, and rock lining applied across exposed surfaces, rock and sandbag checks within drains, woah-boys installed on steep sections of tracks, three sediment basins and one clean water basin. All controls were implemented to a high standard with minimal erosion observed within drains or on batters. Only two areas for improvement in installed ESCs were identified during the site inspection:

- A fallen sediment fence was observed on Track 8. It is likely this sediment fence 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) (refer to Plate 17, **Appendix 5**).
- The geofabric installed as ground cover on some of the batters on Track 8 was seen to be degrading (likely due to age) and requires replacement (refer to Plate 18, **Appendix 5**).

The audit also noted the implementation of erosion and sediment controls around the temporary Sheep Station Creek Bridge were installed appropriately and the deck of the bridge was clear of sediment (refer to Plate 19, Plate 20 and Plate 21 **Appendix 5**).

The audit confirmed that the Project continues to follow a staged clearing approach to reduce the size of open catchments and associated volumes of dirty water runoff. Clean water diversion catch drains are being prioritised during site establishment works. As bulk earthworks progress, catchment shaping is being applied to further subdivide areas and refine the sizing and placement of erosion controls.

Water reuse practices remain consistent with the SWMP, and no new reuse opportunities were identified during this reporting period. Captured water within sediment controls is being reused for dust suppression via watercarts and through controlled irrigation. A water irrigation and disposal permit system (sighted) is in place to manage the reuse process and ensure irrigation is restricted to fully cleared zones only, in accordance with environmental requirements (J. Snape, pers. comm).

During the audit a review of the water quality monitoring results was undertaken. Water quality monitoring results have been posted on the Project's website up to April 2025. No water quality monitoring results were sighted for the period of July 2025. 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. It is recommended that, if available, the water quality monitoring results for May 2025 to present be published on the Project's website as soon as possible.

Review of the monthly water quality monitoring reports indicates exceedances of various parameters at various locations and at various timeframes across the project site. To date the water quality monitoring reports have not indicated that exceedances are likely to be a result of the construction activities of the Project.



## 5.7 Site Audit Inspection

A comprehensive site inspection of active construction areas across the Project alignment was undertaken as part of this audit, covering all locations specified in **Section 2.3.4** to ensure thorough coverage of key operational areas.

At the Maragle Project Construction Compound, site management standards were generally high. Housekeeping practices were effective, with areas free of litter and waste appropriately sorted into designated bins (refer to Plate 22, **Appendix 5**). Chemical storage facilities were compliant, with all chemicals securely contained within bunded areas to mitigate spill risk. Fire safety provisions were in place, with firefighting equipment readily available, signage clear, and the fire tank full and correctly signposted (refer to Plate 23, **Appendix 5**). Erosion and sediment controls, including rock checks and diversion drains, were observed to be well maintained and effective (refer to Plate 24, **Appendix 5**). Spill kits were strategically located and fully stocked adjacent to the Maragle Substation Project Area.

Significant progress in civil works was observed at the Maragle Switchyard Project Area, including the installation of perimeter fencing and continued construction of the switchyard and auxiliary building. (refer to Plate 25 and Plate 26, **Appendix 5**). Materials were observed to be systematically stockpiled with clear signage, and construction equipment appeared to be well maintained and in good condition. Wheel wash stations were in operation at both Project East and Project West, supported by rumble grids at exit points into Elliot Way and Track 10.

Biosecurity signage for areas affected by *Phytophthora sp.* was in place, (refer to Plate 27, **Appendix 5**). QR codes continued to be used to inform personnel of required procedures, and portable pump packs were available for disinfecting footwear and equipment.

The Lobs Hole Project Compound was also well maintained. Chemical and hydrocarbon storage areas were organised and in good condition, with recycling programs implemented and waste segregation measures in place. While considered an isolated incident, canisters were observed to have been placed in the contaminated waste bin, indicating the importance of maintaining oversight of waste segregation procedures. (refer to Plate 28, **Appendix 5**). Firefighting equipment was available, and the water supply tank was full and signposted (refer to Plates 29, **Appendix 5**).

At Project West, Wallaces Creek was inspected to assess erosion and sediment control effectiveness. While controls appeared to be maintained, as observed in Construction Audit 3 issues were identified along the creek edge. Sediment fences were still not adequately trenched, creating gaps that could allow sediment to enter the creek (refer to Plate 30 and Plate 31, **Appendix 5**).

Track 8 remained a focal point due to the number of incidents recorded in previous audits. During the inspection a silt separator was observed located at the outlet of the Track 8 sediment basin, providing an additional treatment measure for basin overflow and runoff from sections of Track 8. A progressive rollout of permanent erosion and sediment controls was also observed, which appeared effective and well maintained (refer to Plates 10 and Plate 13, **Appendix 5**). Regeneration along Track 8 appeared to be progressing well, with native species establishing across partially cleared areas.

Overall, the site inspection confirmed that construction activities were being undertaken in general accordance with the development consent and relevant environmental management plans. Proactive site management was evident, with environmental controls in place and continued improvements being implemented in response to audit findings.

## 6.0 Recommendations and Opportunities for Improvement

A summary of recommendations and opportunities for improvement identified as an outcome of the audit process is provided in **Table 6.1**.

**Table 6.1 Recommendations**

Condition / Issue	Recommendation
<b>SSI 9717 – MOD 1 Infrastructure Approval</b>	
<b>B5</b>	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.
<b>B10</b>	It is recommended that a date/revision number is incorporated on all versions of each Progressive ESCP.
	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.
<b>B11</b>	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.
<b>B16</b>	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.
<b>B17</b>	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.
<b>B21</b>	It is recommended the revised Biodiversity Management Plan Rev (0.14) is provided to FCNSW for comment.
	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.
	It is recommended that Transgrid continue consultation and prioritise the reinstatement of erosion and sediment control devices along Wallace Creek to prevent further sedimentation impacts.
	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.

Condition / Issue	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 <i>Caladenia montana</i> , acknowledging that the opportunity to halt works has now passed.
<b>B38</b>	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.
<b>B42</b>	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 and attendance retained to demonstrate compliance with Section 6.3 of the Emergency Plan.
<b>B48</b>	<p>It is recommended that the Rehabilitation Management Plan be revised to include details of consultation undertaken with the EPA.</p> <p>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>
<b>C2</b>	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.
<b>Amendment Report Commitments</b>	
<b>B3</b>	It is recommended the TARP in the Rehabilitation Management Plan be revised to include notification to NPWS and CPHR in the event if remedial actions have been triggered.
<b>B11</b>	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.



## Appendix 1

# Independent Audit Declaration Form

## Appendix 1 - Independent Audit Report Declaration Form

Independent Audit Report Declaration Form

**Project Name:** Snowy 2.0 Transmission Connection Project

**Consent Number:** SSI 9717

**Description of Project:** Construction and operation of new 330 kilovolt (kV) transmission lines and associated infrastructure connecting the Snowy 2.0 Main Works Project to the existing electricity grid.

**Project Address:** Elliot Way Maragle NSW 2653 (Snowy Mountains)

**Proponent:** Transgrid

**Title of Audit:** IEA of Snowy 2.0 Transmission Connection Project Construction Audit 4

**Date:** 24 November 2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

**Name of Auditor:** Daniel Sullivan

**Signature:**



**Qualification:** BEnvSc, Exemplar Global Internationally Certified Lead Auditor (No. 113202)

**Company Address:** 75 York Street Teralba NSW 2284

**Company:** Umwelt (Australia) Pty Limited

## Appendix 2

# **DPHI Correspondence Approving the Auditor**

Department of Planning and Environment

Mr Andrew Buttigieg  
180 THOMAS STREET  
HAYMARKET NSW 2000  
27/04/2023

Dear Mr Buttigieg

**Snowy 2.0 - Transmission Connection - (SSI-9717)  
Independent Environmental Audit Team approval**

Reference is made to the post approval documents regarding the Independent Environmental Audit (IEA) timing schedule and the suitability of the Audit team's qualifications, experience and independence, to undertake the IEA and prepare the IEA report, submitted to the Department of Planning and Environment (the department) for the Snowy 2.0 - Transmission Connection on 22 March 2023 as required Condition C10 of SSI 9717 (the approval).

Having considered the qualifications and experience of the audit team from Umwelt Australia Pty Ltd the Planning Secretary endorses the appointment of the audit team listed below, to undertake the IEA and prepare the IEA report in accordance with Condition C10 of the approval.

Mr Daniel Sullivan - Lead Auditor;  
Mr Chris Bonomini - Principal Engineer – Water Process and Risk;  
Mr James Garnham - Senior Ecologist; and  
Mr Luke Wolfe - Principal Archaeologist.

In respect to the request of relief from the counting of three (3) winter shutdown months in the IEA audit frequency of every year of the construction phase, the department is of the opinion that the snowmelts are one of the major potential impact times for erosion/sediment issues associated with the site and hence this 3 months-time period is to be included in the 26 weeks.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements (May 2020). Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits. Notwithstanding the agreement for the above listed auditor for this Project, each respective project approval requires a request for the agreement to the auditor be submitted to the Department, for the consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor will be considered.

If you wish to discuss the matter further, please contact me on 0429400261 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Katrina O'Reilly  
Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

NSW Planning ref: SSI-9717-PA-38

Mr Andrew Buttigieg

Project Manager - Snowy 2.0 Transmission Connection

The Trustee for the NSW Electricity Networks Operations Trust

ABORIGINAL COUNTRY

180 THOMAS STREET

HAYMARKET New South Wales 2000

05/02/2024

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Sent via the Major Projects Portal only

**Subject: Snowy 2.0 - Transmission Connection – Independent Environmental Audit - Auditor replacement approval request 2 February 2024**

Dear Mr Buttigieg

Reference is made to your post approval matter, SSI-9717-PA-38, requesting the Planning Secretary's approval of an alternate suitably qualified, experienced, and independent person to assist in the Independent Audit of the Snowy 2.0 - Transmission Connection - submitted as required by C10 of SSI 9717 (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 2 February 2024.

NSW Planning notes that Mr Chris Bonomini has moved on to a role outside of Umwelt Australia Pty Ltd and is no longer available for the endorsed audit team. NSW Planning has reviewed the replacement auditor nomination and based on the information you have provided is satisfied that Ms Melissa Swan is suitably qualified, experienced, and independent. Consequently, as nominee of the Planning Secretary, I approve the appointment of Ms Swan as part of the IEA team.

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

Should you wish to discuss the matter further, please contact me on 0429400261 on 0429400261 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Katrina O'Reilly

Team Leader - Compliance

Compliance

As nominee of the Planning Secretary



NSW Planning ref: SSI-9717-PA-42  
Mr Andrew Buttigieg  
Project Manager - Snowy 2.0 Transmission Connection  
The Trustee for the NSW Electricity Networks Operations Trust  
180 THOMAS STREET  
HAYMARKET New South Wales 2000  
15/02/2024

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**Subject: Snowy 2.0 - Transmission Connection – Independent Environmental Audit -  
alternate auditors approval**

Dear Mr Buttigieg

Reference is made to your post approval matter, SSI-9717-PA-42, requesting the Planning Secretary's approval of an additional and an alternate suitably qualified, experienced, and independent persons to assist in the Independent Environmental Audit (IEA) of the Snowy 2.0 - Transmission Connection - submitted as required by C10 of SSI 9717 (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 14 February 2024.

NSW Planning notes that Mr James Graham is unable to participate in the IEA due to personal reasons.

NSW Planning has reviewed Mr Graham's replacement auditor nomination and based on the information you have provided is satisfied that Mr Jacob Manners (Principal Ecologist and Accredited BAM Assessor) is suitably qualified, experienced, and independent. In addition, NSW Planning have reviewed Mr Joshua Wheatley (Environmental Consultant) information, as assistant auditor to Mr Daniel Sullivan and is satisfied he is suitably qualified, experienced, and independent. Consequently, as nominee of the Planning Secretary, I approve the appointment of Mr Manners and Mr Wheatley as part of the IEA team.

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

Should you wish to discuss the matter further, please contact me on 0429400261 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Katrina O'Reilly  
Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

NSW Planning ref: SSI-9717-PA-131

Mr Andrew Buttigieg  
Project Manager - Snowy 2.0 Transmission Connection  
NSW Electricity Networks Operations Pty Limited  
180 THOMAS STREET  
HAYMARKET New South Wales 2000  
13/08/2025

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Sent via the Major Projects Portal only

**Subject: Snowy 2.0 - Transmission Connection - Independent Environmental Audit -  
Alternate Biodiversity expert endorsement**

Dear Mr Buttigieg

Reference is made to your post approval matter, SSI-9717-PA-131, request for the Planning Secretary's approval of a replacement Ecologist Expert to be part of the Independent Environmental Audit (IEA) team for the upcoming IEA of the Snowy 2.0 - Transmission Connection, submitted as required by Condition C10 of SSI-9717 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 12 August 2025.

NSW Planning has reviewed the request and notes that the previously endorsed Ecologist Expert, Mr Jacob Manners, has departed Umwelt Australia Pty Ltd and will no longer be available for future audits.

NSW Planning has reviewed the replacement Ecologist Expert auditor nomination and based on the information you have provided is satisfied that the proposed person is suitably qualified, experienced, and independent. In accordance with Condition C10 of the approval and *Independent Audit Post Approval Requirements*, as nominee of the Planning Secretary, I approve the appointment of Mr Adam Cavallaro of Umwelt Australia Pty Ltd as the Principal Ecologist.

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

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of approval and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

Mr Cavallaro must attend site (unless otherwise agreed by the Secretary) and the IEA report must include specific sections (and/or an appended report) prepared by Mr Cavallaro which addresses their assessment of compliance (and recommendations for improvements) in respect to the conditions, management plans and any other matters considered relevant for their areas of expertise.



NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Should you wish to discuss the matter further, please contact me on 0429400261 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly".

Katrina O'Reilly  
Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

## Appendix 3

# Audit Plan and Itinerary





## Transgrid

### Snowy 2.0 Transmission Connection Project SSI 9717 Independent Construction Audit 4

#### Audit Plan

<b>To</b>	Jason Snape (Transgrid)
<b>From</b>	Umwelt (Australia) Pty Limited
<b>Author</b>	Daniel Sullivan (Umwelt)
<b>Date</b>	18 August 2025
<b>Subject</b>	Snowy Hydro 2.0 Connection Project – Independent Construction Audit 4

**Audit Period:** 14 March 2025 – 11 September 2025

**Site Audit Date:** 09 – 11 September 2025

**Audit Team:**

<b>Name</b>	<b>Role</b>
Daniel Sullivan	Lead Auditor
Joshua Wheatley	Assistant Auditor
Adam Cavallaro	Biodiversity Specialist
Luke Wolfe	Aboriginal Archaeology Specialist
Melissa Swan	Sediment & Erosion / Water Specialist

This plan and any files transmitted with it are confidential and are intended to provide information for use in discussions between Umwelt and the named recipient(s) only.

## 1.0 Audit Scope and Objectives

In accordance with the Development Consent for SSI 9717 and the NSW Department of Planning, Industry & Environment's (DPIE) *Independent Audit – Post Approval Requirements* dated May 2020 (Independent Audit Requirements) an Initial Independent Audit is required to be completed for Snowy Hydro 2.0 Connection Project (the Project).

The scope and objectives of the Initial Independent Audit are to assess Transgrid's compliance with:

- All conditions of the Development Consent for SSI 9717 (dated 2 September 2022) that are applicable to the construction phase
- All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans and
- All environmental licences and approvals applicable to the development excluding environment protection licences issued under the *Protection of the Environment Operations Act 1997*.

The audit will also include:

- A review of the environmental performance of the development (including a comparison with the predicted impacts contained in the EIS, review of complaints and incidents registers and consideration of any feedback provided during agency consultation)
- A high-level assessment of whether Environmental Management Plans and sub-plans are adequate and
- Any other matters considered relevant by the auditor or the Department.

## 2.0 Audit Criteria

Reporting of compliance will be based on the compliance status descriptors as defined in the Independent Audit Requirements as shown in **Table 1**. No other terms may be used to describe the compliance status.

**Table 1: Compliance Status Descriptors**

Status	Description
Compliant (C)	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant (NC)	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered (NT)	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

### 3.0 Audit Process

**Document Review:** The documents listed in Part 1 of **Table 2** below will be reviewed prior to and during the audit to enable compilation of audit checklists and allow the auditor to gain an understanding of the site.

**Agency Consultation:** Consultation will be undertaken with Department of Planning, Housing and Infrastructure (DPHI) (formerly Department of Planning and Environment) with regard to the scope of the audit. During this consultation the Department may request that further consultation be undertaken with other parties including other agencies.

**Site Inspection/Audit:** Three days has been allowed for the on-site component of the audit. During the site inspection access is requested to all development areas and environmental aspects that form part of the Project. To maximise the time on site, documentation as discussed below will be reviewed prior to the site inspection.

An indicative itinerary for the site inspection is provided in **Table 3**. This will be revised and reissued as final prior to the site audit date.

During the audit, the following people are proposed to be interviewed (if available):

- Project Manager / Site Manager
- Senior Environmental Advisor;
- Site Environmental Leads;
- Relevant supervisors / personnel from key construction areas visited during the site inspections including those with responsibility for environmental management; and
- Other persons identified during the course of the audit (as relevant).

For the Opening and Closing Meetings, it is suggested that as a minimum these should be attended by the Project Manager/ Site Manager, Senior Environmental Advisor, relevant area supervisors and any other personnel nominated by Transgrid.

**Table 2: Pre-Audit Documentation Requirements**

Issue	Document	Status
<b>Documentation Required Prior to Audit</b>		
<b>Environmental Documentation</b>	Confirmation if any other Approvals or Licences have been required and obtained since the last audit (and copies if yes).	Required
	Copies of any notifications (including any written requirements or directions) given by Secretary under the approval since the last audit	Required
	Management Plans / Strategies- If any changes / amendments to management plans have occurred please provide copies of updated approved plans and details of what the changes were.	Required
	Copies of correspondence to relevant agencies for consultation, submission and approval of any revised plans	Required
	Details of any PINs received, and incidents reported within the audit period including reports	Required
	Complaints register from 14 March 2025 to date (audit period)	Required
	Aboriginal Heritage Salvage Report(s) relevant to the audit period (i.e. since last audit)	Required
	Update on status of addressing actions from previous audit.	Required

**Table 2: Indicative Itinerary for Site Inspection/Audit**

Day/Time	Description	Personnel
<b>Audit Day 1 (Tuesday 09 September 2025)</b>		
<b>9:00am – 9:30am</b>	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>• Introductions</li> <li>• Purpose of Audit</li> <li>• Confidentiality Arrangements</li> <li>• Audit Process and Timing</li> </ul>	Manager/supervisor, environmental personnel and site personnel as invited by Transgrid
<b>9:30am – 10:00am</b>	<b>Presentation on Snowy 2.0 Transmission Connection Project and construction activities in Audit Period</b> Transgrid personnel to present an overview of the progress of construction across the site, including outline of environmental management system and controls	Manager/supervisor and environmental personnel
<b>10:00am – 12:00pm</b>	<b>Documentation Compliance Review</b> <ul style="list-style-type: none"> <li>• Review of SSI 9717 consent</li> </ul>	Environmental personnel and appropriate site personnel as required
<b>12:00pm – 12:30pm</b>	<b>Lunch</b>	
<b>12:30pm – 4:00pm</b>	<b>Documentation Compliance Review (Cont.)</b> <ul style="list-style-type: none"> <li>• Review of SSI 9717 consent (cont.)</li> <li>• Close out of previous audit actions</li> <li>• Review key EIS commitments</li> <li>• Review activities against EIS</li> <li>• Regulator consult issues and audit feedback</li> <li>• Reportable incidents and complaints</li> <li>• Management plans commitments review</li> <li>• Training and communication</li> </ul>	Environmental personnel and appropriate site personnel as required
<b>4:00pm – 4:30pm</b>	<b>Auditors Revision and End of Day 1</b>	Umwelt Auditor Only
<b>Audit Day 2 (Wednesday 10 September 2025)</b>		
<b>8:30am – 9:00am</b>	<b>Day 2 Morning Catchup</b> <ul style="list-style-type: none"> <li>• Recap of Day 1 as needed</li> <li>• Plans for Day 2 and inspections</li> </ul>	Environmental personnel and appropriate site personnel as required
<b>9:00am – 12:00pm</b>	<b>Specialist Auditors Documentation Compliance Review – Biodiversity, Aboriginal Archaeology and Water / SEC</b> <ul style="list-style-type: none"> <li>• Review key EIS commitments</li> <li>• Review activities against EIS</li> <li>• Regulator consult issues and audit feedback</li> <li>• Reportable incidents and complaints</li> <li>• Management plans commitments review</li> </ul>	Environmental personnel and appropriate site personnel as required
<b>12:00pm – 12:30pm</b>	<b>Lunch</b>	

Day/Time	Description	Personnel
12:30pm – 2:30pm	<b>Field Inspection (incl. Biodiversity, Aboriginal Archaeology &amp; Water Specialist) - Lobbs Hole Site (Eastern Alignment)</b> <ul style="list-style-type: none"> <li>All Cleared Areas</li> <li>Any areas where pre-clearing works are planned / commenced</li> <li>Sensitive sites where mitigation / management is required</li> <li>Water management infrastructure and areas</li> </ul>	Environmental personnel and appropriate site personnel as required
2:30pm – 4:30pm	<b>Field Inspection (incl. Biodiversity, Aboriginal Archaeology &amp; Water Specialist) - Maragle Site (Western Alignment)</b> <ul style="list-style-type: none"> <li>All Cleared Areas</li> <li>Any areas where pre-clearing works are planned / commenced</li> <li>Sensitive sites where mitigation / management is required</li> <li>Water management infrastructure and areas</li> </ul>	Environmental personnel and appropriate site personnel as required
4:30pm – 5:00pm	<b>Biodiversity, Aboriginal Archaeology &amp; Water Specialist Wrap Up</b> Brief close out to confirm any initial findings and outstanding RFI approach, etc	Environmental personnel and appropriate site personnel as required
<b>Audit Day 3 (Thursday 11 September 2025)</b>		
9:00am – 9:30am	<b>Day 3 Morning Catchup</b> <ul style="list-style-type: none"> <li>Recap of Day 2 as needed</li> <li>Plans for Day 3</li> </ul>	Environmental personnel and appropriate site personnel as required
9:30am – 12:00pm	<b>Documentation Review</b> Time to review any additional documentation requested on Day 1 & 2 or during site inspections	Environmental personnel and appropriate site personnel as required
12:00pm – 12:30pm	<b>Lunch</b>	
12:30pm – 2:00 pm	<b>Auditor Revision and Preparation for Closeout Meeting</b>	Umwelt Auditor Only
2:00pm – 2:30 pm	<b>Close Out Meeting</b> <ul style="list-style-type: none"> <li>Overview of findings</li> <li>Confirmation of outstanding items or documents required</li> <li>Confirm audit review and completion process</li> </ul>	Manager/supervisor, Environmental personnel and site personnel as invited by Transgrid



## Appendix 4

# Compliance Tables



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
SCHEDULE 2					
PART A ADMINISTRATIVE CONDITIONS					
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
A1.	In meeting the specific performance measures and criteria of this approval, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation, upgrading or decommissioning of the development.	Environmental Management Strategy (Rev 0.08) dated 5/08/2024	Compliant	<p>Confirmed during the Initial Construction Audit, the Maragle 330kV Switching Station and 330kV Transmission Line Connections Environmental Management Strategy (EMS) document (sighted) provides the framework for environmental management for the Snowy Hydro 2.0 Transmission Connection Project. It also generally addresses the requirements of this Infrastructure Approval.</p> <p>Findings and observations made during Construction Audit 4 and the site inspection confirmed that Transgrid are continuing to implement and maintain appropriate measures required under respective management plans aimed at preventing / minimising material harm to the environment.</p> <p>As confirmed during the Initial Construction Audit, Transgrid and its Principal Contractor, UGL, continue to utilise compliance tracking systems (sighted) to ensure the specific performance measures and criteria of this approval are met. During Construction Audit 4, it was noted that Transgrid continues to utilise CAMS as its primary compliance tracking system. Similarly, UGL continues to use Synergy as its compliance tracking system, supporting document control and the monitoring of compliance against approval conditions.</p> <p>There were some reportable incidents during this audit period as described below in these compliance tables; however no material harm was shown to occur to the environment.</p>	
TERMS OF APPROVAL					
A2.	<p>The development must be carried out:</p> <ul style="list-style-type: none"> <li>(a) in compliance with the conditions of this approval;</li> <li>(b) in accordance with all written directions of the Planning Secretary;</li> <li>(c) generally in accordance with the EIS; and</li> <li>(d) generally in accordance with the Development Layout in Appendix 2.</li> </ul>		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><b>Non-Compliances against conditions have been identified during the audit period and are recorded in this table and in the main Audit Report</b></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
A3.	<p>The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:</p> <ul style="list-style-type: none"> <li>(a) any strategies, plans or correspondence that are submitted in accordance with this approval;</li> <li>(b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and</li> <li>(c) the implementation of any actions or measures contained in these documents.</li> </ul>		Not triggered	This condition has not been triggered during the audit period (J. Snape pers. comm).	
A4.	The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Noted		

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																									
A5.	Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition C7.	DPHI Condition A5 Clarification Letter dated 29/08/2025  Biodiversity Management Plan Rev 0.14 Post Approval Form dated 30/04/2025  Biodiversity Management Plan Rev 0.14 Post Approval Form dated 30/07/2025  Rehabilitation Management Plan Notification Letter dated 01/09/2025	Compliant	During the audit period, Transgrid submitted the Biodiversity Management Plan (BMP) to the Planning Portal on two occasions, both involving minor amendments to extending the submission timeframe for the Operational Vegetation Management Plan (OVMP). On 30 April 2025, a submission form was lodged to revise the OVMP submission timeframe from 16 to 20 months. A subsequent submission was made on 30 July 2025 to further extend the timeframe from 16 to 22 months. At the time of the audit, the approval from the Planning Secretary was pending.  An additional extension request was also submitted for the Rehabilitation Management Plan (RMP) on the 1 September 2025. Transgrid sought to extend the timeframe for the provision of the next revision of the RMP by an additional eight (8) weeks from the 31 August to ensure sufficient time for stakeholder review. It was stated the revised timeframe for provision of the revised RMP will be no later than 27 October 2025. At the time of the audit, the approval from the Planning Secretary was pending.  In response to an Opportunity for Improvement raised in Construction Audit 3, Transgrid submitted a Clarification Letter to the Department on 29 August 2025 regarding the notification process and revised submission dates for the OVMP. The letter sought to confirm that the Department and Planning Secretary were formally notified of the revised timeframes, in accordance with Condition A2(c) and commitments outlined in the EIS. No response has been received from the Planning Secretary; however, the submission of the clarification is considered to have addressed the intent of the previous recommendation, and the matter is regarded as closed.																										
LIMITS ON APPROVAL																														
Restrictions on Disturbance Area and Native Vegetation Clearing																														
A6	The Proponent must comply with the restrictions in Table 1 below.  Table 1 Restrictions on Approval  Table 1 Restrictions on Approval <table><tr><th>Matter</th><th>Kosciuszko National Park</th><th>Bago State Forest</th><th>Total</th></tr><tr><td>Maximum Disturbance Area</td><td>81 ha</td><td>44 ha</td><td>125 ha</td></tr><tr><td>Maximum Native Vegetation Full Clearing</td><td>37 ha</td><td>34 ha</td><td>71 ha</td></tr><tr><td>Maximum Native Vegetation Partial Clearing</td><td>38 ha</td><td>9.2 ha</td><td>47.2 ha</td></tr></table> <i>The areas in Table 1 relate to direct disturbance and clearing and do not include the indirect impacts of this disturbance and clearing.</i>	Matter	Kosciuszko National Park	Bago State Forest	Total	Maximum Disturbance Area	81 ha	44 ha	125 ha	Maximum Native Vegetation Full Clearing	37 ha	34 ha	71 ha	Maximum Native Vegetation Partial Clearing	38 ha	9.2 ha	47.2 ha	Clearing Progress Spreadsheet dated 11/09/2025  Unauthorised Track 4 Clearing Detailed Incident Report dated 14/04/2025	Compliant	During the Initial Construction Audit, it was confirmed that clearing activities commenced on 8 March 2024. Clearing was completed during the audit period, with the exception of the Hazard Tree Zone, which is currently subject to further assessment (J. Snape pers. comm).  The extent of vegetation clearing under the Approval at the time of this audit period has been summarised in <b>Table A1</b> below, as reported by the Transgrid.  Table A1. Extent of Clearing <table><tr><th>Matter</th><th>Kosciuszko National Park</th><th>Bago State Forest</th></tr><tr><td>Maximum Native Vegetation (Full Clearance)</td><td>31.3 ha*</td><td>31.8 ha*</td></tr><tr><td>Maximum Native Vegetation (Partial Clearance)</td><td>28.4 ha*</td><td>7.9 ha*</td></tr></table> <i>Note: * Full clearing extent cleared also includes areas where the current condition is only partially cleared (i.e. trees removed but low vegetation left intact), however may be totally cleared in the future as necessary as per the plan.</i>  During the audit period, an unauthorised hand-clearing incident occurred on 24 March 2025 involving approximately 507 m² of vegetation. This has been reported as an incident and recorded as a non-compliance against Condition B17. The clearing incident included 158 m² within the Hazard Tree Zone and 349 m² within a no-go zone adjoining Access Track 2 and Tower Pad 11, within the approved Project boundary. The incident arose during Stage 1 clearing activities involving non-habitat-bearing vegetation.  The clearing incident did not exceed approved disturbance limits under SSI-9717.	Matter	Kosciuszko National Park	Bago State Forest	Maximum Native Vegetation (Full Clearance)	31.3 ha*	31.8 ha*	Maximum Native Vegetation (Partial Clearance)	28.4 ha*	7.9 ha*	
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LAPSE OF APPROVAL																														
A7.	This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.		Compliant	Confirmed during the Initial Construction Audit the development commenced construction on the 4 December 2023 which coincides within 5 years of the date on which the development was granted approval.																										
EVIDENCE OF CONSULTATION																														
A8.	Where conditions of this approval require consultation with an identified party, the Proponent must:  (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and  (b) provide details of the consultation undertaken including:	Management Plan Summary Document Control Register (Summary_DCR_All_Plans) received 19/09/2025	Compliant	(a) Confirmed during the previous Construction Audits, all management plans as detailed in the sections below have been consulted with relevant parties prior to submission to the Planning Secretary. Details of additional consultation that has been undertaken during this audit period have been outlined in the conditions below.  (b) Transgrid utilise multiple compliance tracking systems to ensure the details of consultation records are maintained. These tracking systems include a number of excel registers. As confirmed in previous Construction																										

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
	i) the outcome of that consultation, matters resolved and unresolved; and  ii) details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.			Audits, Transgrid continue to utilise and revise the Management Plan Summary Document Control Register (sighted). This register summarises and contains details of stakeholder consultation across all management plans for the development. This register also includes the outcome of the consultation, matters resolved and unresolved, status and details of any disagreement remaining between stakeholders and how the matters were addressed.	
PROTECTION OF PUBLIC INFRASTRUCTURE					
A9.	Unless the Proponent and the applicable authority agree otherwise, the Proponent must: <ul style="list-style-type: none"> <li>(a) undertake any works on or in the vicinity of public infrastructure in consultation with the applicable public authority or service provider responsible for the public infrastructure;</li> <li>(b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</li> <li>(c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</li> <li>(d) This condition does not apply to any damage to roads caused as a result of general road usage which is expressly provided for in the conditions of this approval.</li> </ul>		Compliant	(a) No works were undertaken during this audit period on or in the vicinity of public infrastructure (J. Snape and C. Palmer pers. comm).  (b) Not triggered during this audit period (J. Snape and C. Palmer pers. comm).  (c) Not triggered during this audit period.  (d) Noted	
DEMOLITION					
A10.	The Proponent must ensure that all demolition work on site is carried out in accordance with AS 2601-2001: <i>The Demolition of Structures</i> (Standards Australia, 2001), or its latest version.		Not triggered	No demolition works have been undertaken during this audit period (J. Snape pers. comm).	
STRUCTURAL ADEQUACY					
A11.	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA; and where the BCA is not applicable, to the relevant Australian Standard.  <i>Notes:</i> <ul style="list-style-type: none"> <li>• Under Part 6 of the EP&amp;A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.</li> <li>• The EP&amp;A Regulation sets out the requirements for the certification of the development.</li> </ul>		Compliant	During the audit period, the Auxiliary Switch Room remained under construction and had not yet been commissioned. The S2 tower was erected during this period, and no other buildings or permanent structures forming part of the approved development were constructed (J. Snape pers. comm).	
COMPLIANCE					
A12.	The Proponent must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this approval relevant to activities they carry out in respect of the development.	Maragle Training Matrix Induction Register received 19/09/2025  Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction Presentation dated 19/08/2025  Site Environmental Plan (3200-0645-PLN-012-CEMP-SEP) dated 21/02/2025  Environmental Toolbox – Noise and Vibration received on the 19/09/2025	Compliant	Identified in previous Construction Audits, Transgrid continue to ensure all employees and contractors inducted on site review the UGL Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction (sighted). The induction (revised during this audit period) covers Environmental Information and Compliance relevant to the conditions of this approval and is highlighted in Part 2 of the presentation.  A copy of the Maragle Training Matrix Induction Register was sighted on 30 September 2025.  Consistent with previous Construction Audits, relevant mitigation measures are continued to be included in Environmental Plans (sighted), with toolboxes (sighted) also being held to increase environmental awareness for employees to ensure individuals are aware of their obligations related to their activities and the development.	

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
OPERATION OF PLANT AND EQUIPMENT					
A13.	<p>All plant and equipment used on site, or in connection with the development must be:</p> <ul style="list-style-type: none"> <li>(a) maintained in a proper and efficient condition;</li> <li>(b) operated in a proper and efficient manner; and</li> <li>(c) kept free of weeds, seeds and pathogens when entering or leaving the site.</li> </ul>	<p>OCON Service Register Updated dated 03/09/2025</p> <p>Heavy Vehicle Prestart Checklist Register dated 27/08/2025</p> <p>Light Vehicle Pre-start Checklist Register dated 01/09/2025</p> <p>Weed and Pathogen Declaration Record – Caterpillar 314F Excavator dated 19/08/2025</p> <p>Weed and Pathogen Declaration Record – Toyota Hilux dated 20/08/2025</p> <p>Maragle 330 kV Environmental Reset Environmental Toolbox received 19/09/2025</p> <p>Environmental Training – Hygiene Declarations Session 1 – Attendance Record dated 13/08/2025</p>	Compliant	<p>(a)/(b) All plant and equipment observed onsite appear to be well maintained and operated in a proper and efficient manner. A sample of services records (OCON Service Register) and vehicle histories were sighted during the audit.</p> <p>(c) All plant onsite is accompanied by a Weed And Pathogen Hygiene Declaration Record providing evidence that plant has been cleaned and inspected, ensuring it has been kept free of weeds, seeds and pathogens. Between 14 March 2025 and 11 September 2025 a total of 82 declarations have been received (C. Palmer pers. comm). A Weed and Pathogen Declaration Record for an Excavator and Hilux was sighted.</p> <p>During the site audit inspection wheel wash stations were observed within the Project Area East and West to ensure vehicles and plant were kept free of weeds, seeds and pathogens when entering and leaving the site. Additionally, rubber mats were also observed located at various access points and rumble grids were in use at entry/exit points at the Maragle Construction Compound and various access tracks.</p> <p>During the site audit inspection where areas of <i>Phytophthora</i> sp. were identified, QR codes were observed to be in use ensuring personnel were aware of the relevant procedures and actions to be undertaken.</p> <p>In response to an Opportunity for Improvement, UGL included reminders in toolbox talks regarding vehicle hygiene, emphasising the need to use site wheel wash facilities where available and to ensure vehicles arrive and depart the site clean and free of soil, weeds, seeds, and pathogens (Environmental Reset Toolbox sighted).</p>	
APPLICABILITY OF GUIDELINES					
A14.	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.		Noted		
A15.	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may, when issuing directions under this approval in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.		Not triggered	No requests or directions from the Planning Secretary were received in respect of ongoing monitoring and management obligations during this audit period (J. Snape pers. comm).	
PART B ENVIRONMENTAL CONDITIONS – GENERAL					
NOISE AND VIBRATION					
Construction Hours					
B1.	Unless the Planning Secretary agrees otherwise, road upgrades, construction, upgrading and decommissioning activities may only be undertaken between 6 am to 6 pm.	<p>Lobs Hole to Maragle 330kV Transmission Line &amp; Switching Station Induction Presentation dated 19/08/2025</p> <p>DPHI OOHW Notification Acceptance Letter dated 22/07/2025</p> <p>DPHI OOHW Notification Acceptance Letter dated 09/09/2025</p>	Compliant	<p>Construction activities were undertaken only during the nominated construction hours, with the exception of concrete finishing works and point-to-point and insulation resistance testing of field cabling (C. Palmer pers. comm).</p> <p>Planning Secretary approval for the concrete finishing works was granted on 23 March 2025 (sighted).</p> <p>Approval for point-to-point and insulation resistance testing of field cabling was initially granted for the period 23 July to 20 August 2025; however, an extension was subsequently requested, and an additional Planning Secretary approval (sighted) was issued for the works to occur between 9 September and 6 October 2025.</p> <p>Nominated hours for road upgrades, construction, upgrading and decommissioning activities are detailed in the UGL induction on slide 86.</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	Unique ID on NC
		DPHI OOHW Notification Acceptance Letter dated 19/03/2025			
<b>B2.</b>	<p>The following construction, upgrading and decommissioning activities may be carried out outside the hours specified in condition B1 above:</p> <ul style="list-style-type: none"> <li>(a) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or</li> <li>(b) emergency work to avoid the loss of life, property or to prevent material harm to the environment; or</li> <li>(c) activities that are inaudible at sensitive receivers that do not require traffic movements on local roads; or</li> <li>(d) road upgrades required by the relevant roads authority/manager to be undertaken outside the construction hours specified in condition B1; or</li> <li>(e) works carried out in accordance with an Out-of-Hours Work Protocol approved in accordance with condition B3.</li> </ul>	<p>OOHW Notification dated 19/03/2025</p> <p>DPHI Email Correspondence OOHW Notification Approval dated 23/03/2025</p> <p>NPWS and SVC Email Correspondence OOHW Notification Approval dated 19/03/2025</p> <p>OOHW Notification dated 16/07/2025</p> <p>DPHI OOHW Notification Acceptance Letter dated 22/07/2025</p> <p>OOHW Notification dated 08/09/2025</p> <p>DPHI OOHW Notification Acceptance Letter dated 09/09/2025</p> <p>UGL General Correspondence - OOHW 002 Request - Switchyard Commissioning dated 07/09/2025</p> <p>DPHI Email Correspondence OOHW Notification Portal Difficulties dated 07/09/2025</p> <p>SVC and NPWS Revised Notification – OOHW Point to Point Installation Email Correspondence dated 15/07/2025</p> <p>SVC and NPWS Revised Notification – OOHW Point to Point Installation Email Correspondence dated 08/09/2025</p>	Compliant	<p>During the audit period, the only activities undertaken outside of standard construction hours included concrete finishing works and point-to-point and insulation resistance testing of field cabling. As the works were located more than 500 metres from the nearest sensitive receiver, no further assessments were required.</p> <p>An Out of Hours Work (OOHW) notification for the concrete finishing was submitted on 19 March 2025 to the DPHI, SVC and NPWS. The works were approved by the Planning Secretary on 23 March 2025. A second OOHW notification for the cable testing was submitted on 16 July 2025 and approved on 22 July 2025; SVC and NPWS were notified by email on 15 July 2025. An extension for 9 September–6 October 2025 was then sought, but Planning Portal access issues delayed submission. The revised notification was submitted within 24 hours of works commencing on 9 September 2025, and DPHI was informed. SVC and NPWS were re-notified on 8 September 2025.</p>	
<b>B3.</b>	<p>An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of works which are outside the hours defined in condition B1. The Protocol must be approved by the Planning Secretary before commencing these works. The Protocol must:</p> <ul style="list-style-type: none"> <li>(a) be prepared in consultation with Council;</li> <li>(b) provide a process for the consideration of out-of-hours works against the relevant construction noise, traffic noise and vibration criteria, including the determination of low and high risk activities;</li> </ul>	<p>Noise and Vibration Management Plan (Rev 0.07) dated 24/10/24 Appendix A: Out of Hours Work Protocol</p> <p>OOHW Approval Flowchart</p>	Compliant	Confirmed during previous Construction Audits, an OOHW Protocol has been prepared by Transgrid for the development. The Out of Work Protocol addresses the requirements of Condition B3.	



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
	(c) identify an approval process that considers the risk of activities, proposed mitigation, management, and coordination,  (d) identify Department and Council arrangements for approved out of hours work.				
Construction and Decommissioning					
B4.	The Proponent must take all reasonable and feasible steps to minimise the construction, upgrading or decommissioning noise of the development in the locations where the noise is audible to sensitive receivers, including any associated traffic noise.	Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.22) dated 18/03/2025  Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024  Complaints Register received 19/09/2025	Compliant	All works undertaken during this audit period related to construction activities, including clearing, civil and commissioning works. Most construction activities were restricted to nominated construction hours, however where works occurred outside these hours, they were undertaken more than 500 m from the nearest sensitive receiver (J. Snape pers. comm).  No complaints have been received in relation to noise during this audit period (J. Snape pers. comm).  Noise mitigation measures are addressed in the NVMP (Rev 0.07) and Traffic and Transport Management Plan (Rev 0.22) (TTMP). Mitigation measures undertaken onsite include limiting machine/vehicle idling and maintenance of equipment.	
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	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).  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. <b>It is noted that this Code of Conduct is based on the Hume Link Joint Venture Project.</b>  <b>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.</b>	
AIR QUALITY					
B6.	In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to: (a) minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and (b) minimise the surface disturbance of the site.	Soil and Water Management Plan (Rev 0.10) Appendix H Contaminated Land Management Plan (Rev 0.09) dated 05/08/2024	Compliant	Consistent with previous Construction Audits, the development continues to implement a range of mitigation measures aimed at reducing offsite pollutants and minimising surface disturbance. Relevant mitigation measures are all outlined in respective management plans including the Contaminated Land Management Plan (rev.09) and Soil and Water Management Plan (rev 0.10) (SWMP).  (a) Mitigation measures to reduce off-site dust and air pollutants include using water carts across the development area and applying mulch in inactive areas where ground disturbance has occurred. During the site audit inspection, water carts were observed in operation across Project East and West.  (b) The UGL Clearing Tracking Methodology statement was reviewed which provides an overview of how UGL limit disturbance within the approved footprint. Management measures include reviewing clearing tracking data capture through use of a surveyor and georeferenced drone imagery. Evidence of survey pegs was observed during the site audit inspection.  (b) Consistent with previous Construction Audits, the development continues to implement the UGL Clearing Tracking Methodology Statement, which outlines how UGL minimises disturbance within the approved disturbance footprint.	
SOIL AND WATER					
Permanent Spoil Emplacement Areas					
B7.	Apart from the spoil that is provided to the NPWS for use in other parts of the Kosciuszko National Park, Forestry Corporation for use in other parts of State Forest, sent off-site, used to construct temporary or permanent infrastructure for the development or Snowy 2.0 Main Works (in accordance with that infrastructure approval, or used to rehabilitate the site or the Snowy 2.0 Main Works site, the Proponent must ensure that any spoil disposed within Kosciuszko National Park are emplaced in the following emplacement areas:  (a) Ravine Bay; or	Spoil Movement and Placement Permit Register dated September 2025  Spoil Movement and Placement Permit SMP-018 dated 09/06/2025	Compliant	During the audit period, a total of 3,708.2 tonnes of spoil originating from Project West (Maragle) has been relocated and 156,000 tonnes of spoil was transported to the Leeds Stockpile on the Project East (Lobs Hole) during the audit period.  All spoil transported during the audit period has been utilised either to support the construction of temporary or permanent infrastructure for the development (Permit SMP-018 sighted) or has been transported to the Main Works Temporary Stockpile (Lobs Hole Emplacement Area) (Permit SMP-013 sighted).	

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
	(b) GF01; or (c) Lobs Hole; or (d) Tantangara for spoil containing naturally occurring asbestos only. <i>Note: The location of these emplacement areas is shown in the figures in Appendix 2.</i>	Spoil Movement and Placement Permit SMP-013 dated 08/03/2025		In response to an Opportunity for Improvement, the Spoil Register is now maintained and updated on a monthly basis to accurately record ongoing spoil movements (C. Palmer pers. comm).	
<b>Spoil Management Plan</b>					
<b>B8.</b>	<p>Prior to the commencement of construction, the Proponent must prepare a Spoil Management Plan to the satisfaction of the Planning Secretary for the development. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, FCNSW, EPA, Water Group, NRAR and DPI;</li> <li>(b) include a description of the measures that would be implemented to:               <ul style="list-style-type: none"> <li>i) minimise the spoil generated by the development;</li> <li>ii) maximise the reuse of non-reactive spoil on site and in other parts of the Kosciuszko National Park, Bago State Forest and/or offsite;</li> <li>iii) minimise the water quality impacts of the temporary spoil stockpiles;</li> </ul> </li> <li>(c) provide an overarching framework for the management of all spoil generated on site, including the testing, classification, handling, temporary storage, chain of custody and disposal of spoil – that complies with the spoil management requirements in condition B7 above;</li> <li>(d) include a detailed plan for managing the temporary spoil stockpiles of the development, which includes suitable triggers for remedial measures (if necessary) and describes the contingency measures that would be implemented to address any water quality risks;</li> <li>(e) investigating, assessing and managing contaminated land and soils in the development area;</li> <li>(f) investigation, assessing and managing the potential for naturally occurring asbestos, potentially acid forming material and other hazardous materials in the development area;</li> <li>(g) include a detailed plan for managing and the disposal of all the reactive or contaminated spoil generated on site, including the contingency measures that would be implemented if the volumes of this spoil are greater than expected and unsuitable for land disposal;</li> <li>(h) include a program to monitor and publicly report on:               <ul style="list-style-type: none"> <li>i) the management of spoil on site;</li> <li>ii) progress against the detailed completion criteria and performance indicators.</li> </ul> </li> </ul> <p>Following the Planning Secretary’s approval, the Proponent must implement the approved Spoil Management Plan.</p>	<p>Soil And Water Management Plan (rev 0.10) dated 24/10/2024</p> <p>Soil And Water Management Plan (Rev 0.10) Appendix A Spoil Management Plan (Rev 0.08) dated 05/11/2024</p> <p>Soil And Water Management Plan (Rev 0.10) Appendix H Contaminated Land Management Plan (rev 0.09) dated 05/11/2024</p> <p>Annual Spoil Report December 2023 – December 2024 dated 14/08/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit, a Spoil Management Plan has been prepared and approved for the development. The Spoil Management Plan addresses all requirements outlined by Condition B8.</p> <p>In Construction Audit 2, it was noted the Spoil Management Plan was undergoing consultation regarding updates in relation to recommendations outlined in the Initial Construction Audit. Consistent with Construction Audit 3, Transgrid has advised consultation is still ongoing and this would be subject to a subsequent approval (J. Snape pers. comm).</p> <p>During the audit period, an Annual Report covering spoil results from December 2023 to December 2024 was published on the Project website. The report outlines spoil movements but does not include an assessment of performance against completion criteria, as the spoil emplacement areas remain active and have not yet reached the stage where completion criteria can be assessed. The report notes that only one emplacement area, the Snowy Temporary Spoil Emplacement (Leeds), was used during the reporting period. It also explains that responsibility for assessing completion criteria for the Snowy 2.0 Main Works emplacement areas lies with the Future Generation Joint Venture (FGJV), which is why these have not been included in the report.</p>	
<b>Water Supply</b>					
<b>B9.</b>	<p>The Proponent must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.</p> <p><i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain the necessary water licences for the development.</i></p>	WAL Withdrawal Email Correspondence dated 25 August 2025	Compliant	<p>Confirmed and consistent with previous Construction Audits, the development holds two water access licences (WAL) which include:</p> <ul style="list-style-type: none"> <li>• WAL44782.</li> <li>• WAL44788.</li> </ul>	



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
				In response to an issue identified with WAL 44782 during Construction Audit 2, UGL initially sought to amend the licence to include a water allocation. Following consultation, the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) advised that the dewatering activities may qualify for an exemption from the requirement to hold a Zero-Share WAL under the Water Management (General) Regulation 2018. Based on this advice, UGL withdrew the amendment application on 25 August 2025 (sighted). This decision was supported by the availability of sufficient onsite water, removing the need to source water from alternative allocations (C. Palmer pers. comm).	
Erosion and Sedimentation					
B10.	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>(a) minimise erosion and control sediment generation;</li> <li>(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"> <li>i) adopt enhanced erosion and sediment controls, taking into consideration the best available information from the Snowy 2.0 Main Works project;</li> <li>ii) minimising the volume of dirty water generated onsite; and</li> <li>iii) exploring and implementing beneficial reuse opportunities such as irrigation and dust suppression.</li> </ul> </li> </ul>	<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 &amp; 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><b>Opportunity for Improvement: It is recommended that a date/revision number is incorporated on all versions of each Progressive ESCP.</b></p> <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><b>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.</b></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, 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</p>	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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				<p>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>	
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"> <li>• <b>Maragle Turbid Water Discharge June 2025:</b> 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 <b>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.</b> Further post-rainfall inspections were undertaken by UGL on 26 June 2025 following heavy snowfall which indicated overtopping of the sediment basin adjoining the Maragle 330kV Switchyard via the basin spillway.</li> <li>• <b>Maragle Substation Discharge July 2025 Event 1:</b> 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 <b>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.</b></li> <li>• <b>Maragle Substation Discharge July 2025 Event 2:</b> 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 <b>turbid water had discharged from the Maragle 500kV Substation towards the unnamed creek on the western boundary of the Project area.</b></li> <li>• <b>Maragle Switchyard Basin Overtop:</b> 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 <b>overtopping of the sediment basin adjoining the Maragle 330kV Switchyard via the basin spillway to New Zealand Gully.</b></li> <li>• <b>Maragle Substation Discharge August 2025:</b> 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 <b>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</b> via the culvert under the Snowy 2.0 site access road approx. 635m from Yorkers Creek.</li> </ul> <p>All incidents were reported to relevant agencies as required with further details 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. <b>For some incidents, monitoring comprised in-situ measurements using a probe, with results reported for turbidity only, while others included both turbidity and pH.</b> It remains unclear whether laboratory samples were also collected and analysed.</p> <p><b>Recommendation:</b> 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>	NC-02

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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B12.	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>(a) ensure that appropriate components of the substation are suitably bundled;</li> <li>(b) ensure that all liquid waste captured by the substation's spill oil containment system is classified, transported, and disposed of at a facility that can lawfully accept the waste; and</li> <li>(c) minimise any spills of hazardous materials or hydrocarbons and clean up any spills as soon as possible after they occur.</li> </ul>	<p>Soil And Water Management Plan (Rev 0.10) Appendix B Spil Response Procedure dated 24/10/2024</p> <p>Synergy Environmental Events dated 14/03/2025 – 11/09/2025</p>	Compliant	<p>(a) The construction of the substation has not commenced during the audit period (J. Snape pers. comm).</p> <p>(b) Not triggered.</p> <p>(c) During the audit period, no hydrocarbon spill incidents were reported other than minor, non-reportable spills. All spills were confined within the Project area and managed internally. Environmental incidents are recorded and reported through Synergy (C. Palmer pers. comm).</p>	
B13.	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.	<p>UGL Water Irrigation and Disposal Permit Register received 19/09/2025</p> <p>Water Irrigation and Disposal Permit – DW-094 dated 28/05/2025</p>	Compliant	During the audit period, groundwater was intercepted during the construction of tower foundations and other excavation activities. The water was pumped into Intermediate Bulk Containers (IBCs) for onsite storage and subsequently reused for dust suppression (C. Palmer pers. comm).	
Riparian Areas					
B14.	<p>The Proponent must ensure:</p> <ul style="list-style-type: none"> <li>(a) all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012), unless DPE Water agrees otherwise; and</li> <li>(b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted.</li> </ul>	UGL Environmental Inspection Weekly Checklist Form dated 19/08/2025	Compliant	<p>(a) Confirmed during Construction Audit 2, the Sheep Station Creek Bridge design is compliant with Condition B14, including complying with relevant requirements of the Guidelines for Controlled Activities on Waterfront Land (2012). During the audit period, construction activities continue to utilise the temporary bridge across Sheep Station Creek for access to undertake construction activities on Project West. The final permanent bridge for Sheep Station Creek is expected to be constructed during the next audit period (J. Snape pers. comm).</p> <p>In response to an Opportunity for Improvement raised in Construction Audit 3, the IEA suggested that sandbags or similar controls (where safe to do so) be installed along the outermost edges of the temporary bridge deck to prevent sediment from being washed into the creek. UGL noted that the installation of sandbags in this location is deemed unsafe and creates a falling hazard of sandbags into the creek. Frequent removal of the sediment from the bridge deck has been deemed a suitable control, including weekly inspection (sighted) of the geofabric blanket under the bridge to remove excess sediment fines which may have fallen through any gaps in the bridge.</p> <p>(b) Confirmed during Construction Audit 2, the SLR Snowy 2.0 Sheep Station Creek Bridge Crossing Report concluded that, provided appropriate erosion and sediment controls are maintained throughout construction works, it is unlikely that the geomorphic condition of Sheep Station Creek will be affected by the construction from either the permanent or temporary bridge.</p> <p>Observations during the site inspection confirmed that appropriate erosion and sediment controls were installed around the temporary Sheep Station Creek Bridge. The bridge incorporates a lip along its edges and geofabric slung beneath the deck to capture sediment. At the time of inspection, the bridge deck was clear of sediment.</p>	
Flooding					
B15.	<p>The Proponent must ensure that the development:</p> <ul style="list-style-type: none"> <li>(a) does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site; and</li> <li>(b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by either FCNSW or NPWS.</li> </ul>		Compliant	<p>Confirmed during Construction Audit 2, the proposed bridges (temporary and permanent) will not significantly impact flood conditions within Sheep Station Creek for a 1% AEP Flood Event.</p> <p>Works occurring during this audit period located within potentially flood affected areas included works relating to the construction of the permanent Sheep Station Creek Bridge.</p> <p>In response to an Opportunity for Improvement raised in Construction Audit 3, UGL undertook a review of flood modelling prepared by SLR. The modelling assessed predicted flows at a 1% AEP event, which represents a larger flood than the 2-year ARI, and indicated that the installed ESCs would generally lie outside the extent of a 2-year ARI flood (C. Palmer pers. comm). During the review, it was identified that the permanent and temporary bridge locations had been accidentally reversed in the modelling outputs (C. Palmer pers. comm). Ongoing consultation with SLR is continuing to address this issue and will remain in place until the permanent bridge is constructed in September 2025.</p> <p>An addendum report is currently being prepared by SLR to document and finalise these updates (J. Snape pers. comm). This report will be reviewed as part of the next audit period.</p>	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)																	
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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>(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>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> <p>Pre-rainfall Inspection Checklist – Project West dated 18/07/2025</p> <p>Pre-rainfall Inspection Checklist – Project West dated 26/08/2025</p> <p>During/Post Rainfall Inspection Checklist – Project West dated 12/07/2025</p> <p>During/Post Rainfall Inspection Checklist – Project East dated 18/08/2025</p> <p>Water Quality Monitoring Field Sheets dated 26/07/2025</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 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"><li>Installation of appropriate ESC controls as per the PESCPs across the development (sighted).</li><li>ESCP register updated regularly.</li><li>Presence of spill kits at various locations across the site (sighted).</li><li>Installation of appropriate bunds for plant and vehicle washdown (sighted).</li><li>Bunded chemical storage containers (sighted).</li><li>Evidence of site training including posters and notes displayed in Crib Sheds relating to ESC measures (sighted).</li><li>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. 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 construction activities associated with the development. 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.</li></ul> <p><b>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.</b></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>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>	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, <b>an unauthorised clearing event was recorded during the audit period on the 24 March 2025</b>. Extent of clearing by the Project to date has been provided by Transgrid as presented in the table below</p> <p><b>Table 2 Habitat Clearing Extent</b></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></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	NC-03
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															



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	
	i)	the impacts of the development on hollow-bearing trees;	EMM - Snowy 2.0 Transmission Connection Project: Advice in response to Independent Environmental Audit Findings with respect to Caladenia montana dated 20/06/2025		Pygmy-possum	98.58	117.29		
	ii)	the impacts of the development on threatened species; and			Yellow-bellied Glider	54.19	59.03		
	iii)	the clearing of native vegetation and key habitat.			Booroolong Frog	0.93	1.67		
<p><i>Notes: * The orange numbers as provided by Transgrid do not reflect or align with the findings of the investigation completed by EMM Consulting:</i></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. <b>The investigation completed by EMM Consulting (<i>Advice in response to Independent Environmental Audit Findings with respect to 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.</b></p> <p><b>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.</b></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. <b>Based on the outcomes of the EMM Consulting Investigation, it would 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>.</b></p> <p><b>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.</b></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 Offset Package									
B18.	Prior to carrying out any development that would impact on biodiversity values outside Kosciuszko National Park, the Proponent must prepare a Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT, to the satisfaction of the Planning Secretary in writing. The Package must include, but not necessarily be limited to:  (a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS;  (b) the cost for each specific biodiversity offset measures, which would be required to be paid into the Biodiversity Conservation Fund if the relevant measures is not implemented and delivered (as calculated in accordance with Division 6 of the Biodiversity Conservation Act 2016 (NSW)) and the offset payment calculator that was established as of 9 August 2021;		Team Binder Re: Biodiversity offsets package - SSI-9717 dated 28/08/2025	Compliant	Confirmed during the Initial Construction Audit, a Biodiversity Offset Package (BOP) has been prepared and approved for the development. The BOP addresses all requirements of this condition. The BOP is required to be delivered by September 2025 (date revised from 1 September 2024 by MOD 1).  The Department has confirmed receipt of the final BOP, and Snowy Hydro has provided notification that the offset obligations required under Condition B18 of the SSI-9717 Infrastructure Approval have been delivered prior to the 1 September 2025 deadline.  At the time of the audit, the Department was progressing its review of the final BOP. This review includes consideration of the recommendation from the Initial Construction Audit that requested additional detail be provided on the cost calculations for each biodiversity offset measure.				

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
	<p>(c) the timing and responsibilities for the implementation and delivery of measures required in the Package; and</p> <p>(d) confirmation that the biodiversity offset measures will have been implemented and delivered by no later than 1 September <del>2024</del> 2025.</p> <p>Following approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p>				
B19.	<p>Prior to carrying out any development outside of the Kosciuszko National Park that could impact the biodiversity values requiring offset, the Proponent or its nominee must lodge a bank guarantee with a total value of \$24,869,236, in accordance with the Deed of Agreement with the Planning Secretary executed on 1 September 2022. The Proponent must comply with the terms of the Deed.</p> <p><i>Note: this condition provides security to the Minister for the performance of the Proponent’s obligations under this approval in relation to biodiversity offsets and release funds for payment into the Biodiversity Conservation Trust in the event that the biodiversity offsets (either in whole or part) are not delivered in accordance with the Package by the Proponent.</i></p>		Compliant	Confirmed during the Initial Construction Audit a bank guarantee in the amount of \$24,869,236.00 relating to biodiversity offsets had been paid.	
Biodiversity Offset Package (Kosciuszko National Park)					
B20.	<p>Prior to carrying out any development that could impact the biodiversity values inside Kosciuszko National Park, the Proponent or its nominee must pay \$10,586,027 to the NPWS to offset the residual biodiversity impacts.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>The NPWS will use these funds and any interest generated by these funds to enhance the biodiversity values of the Kosciuszko National Park. However, in limited circumstances where it is not possible to address all of the residual impacts of the development within Kosciuszko National Park, the NPWS may use some of these funds to ensure suitable conservation actions are carried outside the park.</li> <li>To ensure accountability, the NPWS will: <ul style="list-style-type: none"> <li>develop and implement a detailed program for the allocation of these funds to specific projects, focusing on the ecosystems and species affected by the development; and</li> <li>monitor, evaluate and publicly report on the progress of the implementation of the detailed program and the effectiveness of the specific projects;</li> </ul> </li> <li>The NPWS will develop and implement a specific program in consultation with DCCEW and BCS to carry out conservation actions to address the residual biodiversity impacts of the development on the following Commonwealth listed species and communities: <ul style="list-style-type: none"> <li>Booroolong Frog.</li> </ul> </li> </ul>		Compliant	Confirmed during the Initial Construction Audit a payment of \$10,586,027.00 to NPWS had been paid.	
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> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s in consultation with NPWS, BCS, FCNSW and DCCEW;</p> <p>(b) be prepared in accordance with the Biodiversity Development Assessment Report (Revision 7, dated 22 August 2022);</p> <p>(c) include a description of the measures that would be implemented to:</p>	<p>Biodiversity Management Plan (Rev 0.13) dated 30/10/2024</p> <p>NPWS and CHPR 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>	NC-04

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
	<p>i) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> <p>ii) minimise the clearing of native vegetation and habitat within the disturbance area;</p> <p>iii) minimise the impacts of the development on threatened flora and fauna species within the disturbance area and its surrounds, including the:</p> <ul style="list-style-type: none"> <li>• <i>Caladenia montana</i>;</li> <li>• Gang-gang Cockatoo;</li> <li>• Masked Owl;</li> <li>• Eastern Pygmy-possum;</li> <li>• Yellow-bellied Glider; and</li> <li>• Booroolong Frog</li> </ul> <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 habitat on site, including native vegetative material, hollow logs, ground timber, and topsoil containing vegetative matter and native seed bank;</p> <p>x) collect seeds within the approved disturbance area for use in the ecological rehabilitation of the site;</p> <p>xi) minimise the spread of weeds, pathogens and feral pests on site, and import or export of these matters to or from the site;</p> <p>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;</p> <p>xiii) minimise the light spill from night works, including using directional and LED lighting; and</p> <p>xiv) minimise bushfire risk.</p> <p>(d) include construction clearing and operation vegetation management protocols</p> <p>(e) include a strategy to address:</p> <p>i) management of activities within the 50 m exclusion zone of the Yarrangobilly River and its tributaries;</p> <p>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</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. Both extensions were discussed with CPHR and NPWS, who supported the revised submission dates (sighted). <b>There is no verifiable evidence to support the extension was consulted with FCNSW.</b> 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><b>Recommendation: It is recommended the revised Biodiversity Management Plan Rev (0.14) is provided to FCNSW for comment.</b></p> <p><b>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).</b></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	Unique ID on NC
	<p>(f) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary’s approval, the Proponent must implement the Biodiversity Management Plan.</p>				
HERITAGE					
Protection of Heritage Items					
B22.	<p>The Proponent must ensure the development does not cause any direct or indirect impacts on:</p> <p>(a) any Aboriginal heritage items located outside the approved construction envelope (see Appendix 3); and</p> <p>(b) any of the historic heritage items outside the construction envelope (see Appendix 3).</p>		Compliant	<p>It was evident during the site audit inspection the development continues to maintain boundary fencing around specific heritage items/Aboriginal sites which have been demarcated by colour-specific rope and appropriate signage.</p> <p>During this audit period no Aboriginal objects or historic heritage items outside of the approved construction envelope had been impacted (C. Palmer pers. comm).</p> <p>It was previously recommended in Construction Audit 3 that the development update relevant digital mapping and remove colour-specific rope demarcation around areas confirmed not to be heritage items, this recommendation remains outstanding at the time of the audit.</p>	
B23.	<p>Prior to carrying out any activity that could harm heritage items, the Proponent must:</p> <p>(a) salvage and relocate all heritage items identified for salvage and relocation to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010);</p> <p>(b) undertake archival recording, test excavation and/or salvage of the historic items listed in Table 5 and Table 7 of Appendix 3 if these items are to be affected by the development.</p>		Compliant	<p>(a) No known heritage clearance activities were undertaken during this audit period.</p> <p>(b) Confirmed in the Initial Construction Audit archival recordings were only required to be undertaken at sites R56 and R120. Archival records are included in Appendix 3 of the Post Approvals Historic Management Actions Report.</p>	
Heritage Management Plan					
B24.	<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 3, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared in consultation with Heritage Council, Heritage NSW, NPWS and Aboriginal Stakeholders;</p> <p>(b) include a description of the measures that would be implemented for:</p> <p>i) protecting the heritage items identified in Table 1 of Appendix 3, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved construction envelope;</p> <p>ii) salvaging and relocating the heritage items identified in condition B23;</p> <p>iii) where impacts cannot be avoided to R56 and R120, details of the proposed archaeological research design and excavation methodology, and findings of the Final Archaeological Excavation Report, in accordance with the relevant Heritage Council guidelines;</p> <p>iv) minimising and managing the impacts of the development on heritage items within the construction envelope, including a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works;</p> <p>v) a contingency plan and reporting procedure if:</p> <ul style="list-style-type: none"> <li>heritage items outside the approved construction envelope are damaged;</li> </ul>	<p>Heritage Management Plan (Rev 0.08) dated 24/10/2024</p> <p>Snowy Hydro Main Works 2.0 Heritage Find Email Correspondence dated 13/09/2025</p> <p>Summary Notes – BTLALC Email Correspondence dated 08/09/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit, a Heritage Management Plan had been prepared and approved for the development. The Heritage Management Plan (HMP) addresses all requirements outlined by Condition B24.</p> <p>During this audit period, no unexpected finds were identified however:</p> <ul style="list-style-type: none"> <li>On 10 September 2025, during the site audit inspection, a suspected Aboriginal object was identified by a member of the Audit team, on the road verge near the new Wallace Creek Bridge within the Snowy Hydro Main Works Project Area. Transgrid promptly reported the find to the Snowy Hydro Main Works team, which was later confirmed by Snowy Hydro’s heritage consultant to be a lithic Aboriginal object. The Aboriginal object was located within a survey area previously identified as containing Aboriginal objects, where impacts to such items are permissible under the Project Approval. A Heritage Clearance Certificate had also been issued for Aboriginal objects in this area. Although the find was not within the Development area, Transgrid’s prompt reporting and coordination with the Snowy Hydro Main Works team demonstrates their commitment to protecting Aboriginal cultural values, maintaining effective cooperation with adjacent stakeholders and understanding of relevant reporting procedures.</li> </ul> <p>In response to Opportunities for Improvement raised in Construction Audit 3, Transgrid has commenced a review of the HMP, including verification of the contact details for the twenty-one (21) Registered Aboriginal Parties (RAPs) listed in Section 3.2 of the Plan. Upon completion of this review, Transgrid intends to arrange a workshop with all RAPs to discuss the ongoing management of Aboriginal cultural heritage within the Project. However, the Weekly Environmental Checklist template has not yet been updated to include inspection of sensitive areas identified in the Aboriginal Heritage Management Plan, and this action remains outstanding.</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	Unique ID on NC
	<ul style="list-style-type: none"> <li>previously unidentified heritage items are found; or</li> <li>Aboriginal skeletal material is discovered;</li> </ul> vi) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and vii) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and (c) include a program to monitor and publicly report on the effectiveness of these measures and any heritage impacts of the development; and (d) include a program to publish; i) any detailed archival records required under the conditions of this approval; and ii) the findings of any excavations and salvage works. Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan.				
TRAFFIC AND TRANSPORT					
Designated Heavy and Heavy Vehicles Requiring Escort Routes					
B25.	<p>All heavy vehicles requiring escort associated with the development must only travel to and from the site via the Primary Access Routes described in the EIS, as identified in the figure in Appendix 4, unless the Planning Secretary agrees otherwise.</p> <p>Note: The Proponent is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.</p>	<p>Utilities Transmission Line Traffic And Transport Management Plan dated (Rev 0.22) dated 18/03/2025</p> <p>Convoy Access Request (Drill Rig- Atlas D65) Email Correspondence dated 25/07/2025</p> <p>Convoy Access Request (Drill Rig) Email Correspondence dated 03/09/2025</p> <p>Convoy Access Request (Moxy Watercart) Email Correspondence dated 18/06/2025</p> <p>Convoy Access Request (Excavator) Email Correspondence dated 20/08/2025</p> <p>Convoy Access Request (Moxy Watercart) Email Correspondence dated 10/06/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit, details of heavy vehicles requiring escort and haulage routes are detailed in the TTMP. All heavy vehicles escorted during the audit period only used approved haulage routes (C. Palmer pers. comm).</p> <p>Convoy Access Requests and associated email correspondence were reviewed for the movement of heavy vehicles, including drill rigs, Moxy watercarts, and an excavator. Relevant permits and licences were sighted as attachments to these requests.</p>	
B26.	<p>All heavy and light vehicles associated with the development:</p> <p>(a) must travel to and from the site via the Primary Access Route described in the EIS, as identified in the figure in Appendix 4; and</p> <p>(b) may travel to and from the site via the Secondary Access Routes and Water Supply Routes, subject to the requirements in condition B31, to the satisfaction of the relevant roads authority/manager.</p> <p>unless the Planning Secretary agrees otherwise.</p>	<p>Utilities Transmission Line Traffic And Transport Management Plan dated (Rev 0.22) dated 18/03/2025</p> <p>Lobs Hole to Maragle 330kV Transmission Line &amp; Switching Station Induction</p>	Compliant	<p>Confirmed during the Initial Construction Audit, approved routes are shown in Figure 4 in Appendix A of the TTMP. Direction to only travel only approved roads is outlined in the UGL Site Induction on Slide 15 and is also included in the Pre-Arrival Safety Flyer.</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	Unique ID on NC
		Presentation dated 19/08/2025			
Transport Strategy					
B27.	<p>Prior to commencing construction in Project Area West, the Proponent must prepare a Transport Strategy, in consultation with the relevant roads authority/manager, to the satisfaction of the Planning Secretary, which:</p> <ul style="list-style-type: none"> <li>(a) identifies the location and type of any necessary road upgrades (including roads, intersections, crossing points, bridges and access points), including consideration of relevant amenity impacts;</li> <li>(b) ensures that any road upgrades comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), unless the relevant road authority agrees otherwise;</li> <li>(c) includes a detailed assessment of potential impacts of any necessary road upgrades (such as heritage and biodiversity impacts), including consideration of appropriate mitigation measures;</li> <li>(d) identifies whether intersections, crossing points and access points would be permanent or temporary; and</li> <li>(e) includes measures or notifying, seeking feedback from and addressing the concerns of impacted residents along the route;</li> </ul>	DPHI Traffic and Transport Management Plan Conditional Approval Letter dated 04/04/2025	Compliant	<p>Confirmed during the Initial Construction Audit, the Transport Strategy is intended to be prepared in two stages (approved). The Transport Strategy (Stage 1) was reviewed and confirmed during the Initial Construction Audit, addressing all requirements outlined by Condition B27.</p> <p>The Transport Strategy for Stage 2 is required to be completed prior to construction and operation of infrastructure related to the 500 kV component of the substation. At the time of the audit, the Transport Strategy for Stage 2 had not been approved (J. Snape pers. comm).</p>	
B28.	Prior to commencing construction in Project Area West, the proponent must implement the road upgrades and the mitigation measures identified in the Transport Strategy in condition B27, to the satisfaction of the relevant roads authority/manager.		Compliant	Confirmed during the Construction Audit 2, road upgrades have been completed to the satisfaction of SVC.	
Road Maintenance					
B29.	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>(a) undertake an independent dilapidation survey to assess the: <ul style="list-style-type: none"> <li>i) existing condition of all local roads on the transport route shown in the figure in Appendix 4 (including local road crossings) prior to construction, upgrading or decommissioning works; and</li> <li>ii) condition of all local roads on the transport route (including local road crossing): <ul style="list-style-type: none"> <li>• within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority/manager;</li> <li>• on an annual basis during construction, or within a timeframe agreed to by the relevant roads authority/manager;</li> </ul> </li> </ul> </li> <li>(b) repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings):</li> <li>(c) rehabilitate and/or make good any development related damage: <ul style="list-style-type: none"> <li>i) identified during the construction and/or decommissioning works if it could endanger road safety, as soon as possible after it is identified but within 7 days at the latest, unless the relevant road authority/manager agrees otherwise; and</li> <li>ii) identified in any dilapidation survey completed after the construction, upgrading or decommissioning works within 2 months of the completion of the survey</li> </ul> </li> </ul> <p>to the satisfaction of the relevant roads authority/manager.</p>	<p>SVC Email Correspondence Transgrid Delap report for Tumbarumba to the Old Quarry Rd Elliott Way April 2025 dated 25/06/2025</p> <p>Maragle Project, Tumbarumba To Old Quarry (Elliott Way), New South Wales Dilapidation Survey Report prepared by Streetscape dated April 2025</p>	Compliant	<p>(a) Confirmed during previous Construction Audits, Dilapidation Reports have been prepared to document the pre-construction condition of Tooma Road and Elliot Way between Tumbarumba and O'Hares Campground, New South Wales. Reports were completed in November 2023 and June 2024, with an additional Dilapidation Report prepared in April 2025 (sighted) during this audit period.</p> <p>In response to a recommendation raised in Construction Audit 3, Transgrid sought clarification from SVC regarding the frequency of dilapidation reporting required under the Road Maintenance Agreement. SVC has agreed that annual dilapidation reporting, rather than six-monthly reporting, is sufficient to meet project requirements (sighted).</p> <p>(b) No damage to local roads have been caused during the audit period. For details relating to the status of the repairs raised in Construction Audit 2 refer to Condition A9 (b).</p> <p>(c) No rehabilitation of roads has been undertaken during the audit period (J. Snape pers. comm).</p>	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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B30.	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>(a) restrict development-related vehicle speeds on Lobs Hole Ravine Road, Mine Trail Road and within the site to 30 km/h between sunset and sunrise, unless the Planning Secretary agrees otherwise;</li> <li>(b) restrict the use of Elliott Way inside KNP to no more than 8 heavy vehicles per day, for water cartage purposes only from the Snowy Hydro T2 Tailbay site;</li> <li>(c) restrict development-related vessel speeds on Talbingo Reservoir to current TfNSW speed limits.</li> </ul>	Utilities Transmission Line Traffic And Transport Management Plan dated (Rev 0.22) dated 18/03/2025	Compliant	<p>Confirmed during the Initial Construction Audit the requirements outlined by Condition B30 are outlined in the TTMP.</p> <p>(a) During this audit inspection speed signs were observed enforcing the 30km/h speed limit.</p> <p>(b) Condition has not been triggered (J. Snape and C. Palmer pers. comm)</p> <p>(c) No vessels have been purchased by the development therefore condition has not triggered (C. Palmer pers. comm).</p>	
Bridge Crossing – Sheep Station Creek					
B31.	<p>The Proponent must ensure that any temporary and the permanent bridge over Sheep Station Creek is designed and constructed to comply with the relevant requirements of the:</p> <ul style="list-style-type: none"> <li>(a) Relevant Austroads Standards (such as elevating them above the 1% AEP flood level);</li> <li>(b) Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018); and</li> <li>(c) Policy and Guidelines for Fish Habitat Conservation (DPI, 2013) and Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (NSW Fisheries, 2003).</li> </ul>		Compliant	Confirmed during Construction Audit 2, the temporary and permanent design of Sheep Station Creek Bridge complies with all guidelines outlined by Condition B31.	
Traffic and Transport Management Plan					
B32.	<p>Prior to commencing construction or road upgrades identified in condition B27 (whichever comes first), the Proponent must prepare a Traffic Management Plan for the development in consultation with FCNSW, NPWS, TfNSW, Snowy Valleys Council, Snowy Monaro Regional Council and NSW Police, and to the satisfaction of the Planning Secretary. This plan must include:</p> <ul style="list-style-type: none"> <li>(a) details of the transport route to be used for all development-related traffic;</li> <li>(b) details of the road upgrade works required by condition B27 of this approval;</li> <li>(c) details of the measures that would be implemented to comply with the transport management requirements in conditions B25 to B30 above;</li> <li>(d) details of the measures that would be implemented to: <ul style="list-style-type: none"> <li>i) minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including: <ul style="list-style-type: none"> <li>• a description of the proposed dilapidation surveys required by condition B29 of this approval;</li> <li>• a description of the proposed measures for managing traffic flow around the work sites, construction compounds and accommodation camp;</li> <li>• scheduling heavy vehicle movements to avoid peak periods;</li> <li>• minimising convoy lengths;</li> <li>• reducing the speeds of development-related traffic at key intersections along the Snowy Mountains Highway, including the Link Road intersection;</li> <li>• temporary traffic controls, including detours and signage;</li> <li>• procedures for stringing cables and transmission lines across roads and Talbingo Reservoir;</li> </ul> </li> </ul> </li> </ul>	<p>Utilities Transmission Line Traffic And Transport Management Plan dated (Rev 0.22) dated 18/03/2025</p> <p>DPHI Traffic and Transport Management Plan Conditional Approval Letter dated 04/04/2025</p> <p>Monthly Project Access Route Inspection Checklist – Tooma Rd to Elliot Way Intersection dated 15/07/2025</p> <p>Monthly Project Access Route Inspection Checklist – Adaminaby to Lobs Hole Gate House dated 08/08/2025</p> <p>Monthly Project Access Route Inspection Checklist – Maragle Site to Lobs Hole Gate House dated 07/09/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit, a staged approach for the TTMP has been adopted. Stage 1 of the TTMP has been prepared and approved, addressing all requirements outlined in Condition B32.</p> <p>During the audit period, the Stage 2 TTMP was prepared in consultation with Transport for NSW (TfNSW) and SVC. The TTMP was conditionally approved by the Planning Secretary on 4 April 2025 (sighted) and is subject to further revision with TfNSW to address Oversize Overmass (OSOM) analysis requirements.</p> <p>Evidence of implementation of the TTMP (rev.0.22) was observed during the site audit inspection. Management measures included:</p> <ul style="list-style-type: none"> <li>• Enforcement of speed limit signs, along with additional warning signs when approaching the development.</li> <li>• No observed use of mobile phones in moving vehicles.</li> <li>• Mandatory breath testing for all personnel upon entry to both Project sites, requiring a 0.00 Blood Alcohol Concentration.</li> <li>• All cars when not in use were reversed parked in designated carparking areas.</li> <li>• Availability of drip trays on-site.</li> </ul> <p>In response to a Recommendation raised in Construction Audit 3, UGL has commenced and now undertakes monthly inspections of transport routes, as required under Section 8.5 of the TTMP ensuring compliance, safety, and effective traffic management.</p> <p>In response to an Opportunity for Improvement, UGL has incorporated traffic monitoring into the monthly inspection checklist rather than the weekly environmental checklist. This approach aims to better capture traffic-related issues such as interactions with local traffic, including school bus routes, and to prevent queuing on public roads. It was noted that the weekly checklist remains focused on onsite management and environmental aspects.</p> <p>In response to an Opportunity for Improvement all relevant personnel, contractors and delivery drivers are aware of the requirements under the TTMP for loaded vehicles travelling to site to be covered and contained. This has been addressed via regular pre-start discussions (J. Snape pers. comm).</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	Unique ID on NC
	<ul style="list-style-type: none"> <li>notifying the local community about development-related traffic impacts;</li> <li>procedures for receiving and addressing complaints from the community about development-related traffic;</li> <li>minimising potential cumulative traffic impacts with other projects in the area;</li> <li>minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queueing on the public road network;</li> <li>minimising impacts to the public using Talbingo Reservoir and any water related infrastructure such as the O'Hares campground boat ramp;</li> <li>implementing measures to minimise development-related traffic on the public road network outside standard construction hours;</li> <li>minimising dirt and debris tracked on to the public road network from development related-traffic;</li> <li>details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service;</li> <li>encouraging car-pooling or ride sharing by employees;</li> <li>scheduling the haulage vehicle movements to minimise convoy lengths or platoons;</li> <li>responding to local climate conditions that may affect road safety, such as snow, ice, fog, dust, wet weather and flooding;</li> <li>ensuring loaded vehicles entering or leaving the site have their loads covered or contained and leave site in a forward direction;</li> <li>responding to any emergency repair or maintenance requirements;</li> <li>provisions for maintaining access to the site for FCNWS, NPWS and emergency vehicle access to the site at all times;</li> <li>a traffic management system for managing over-dimensional vehicles; and</li> <li>fatigue management;</li> </ul> <p>ii) minimise the impacts of the road and intersection upgrades of the development;</p> <p>iii) provide sufficient parking on site for all vehicles and ensure vehicles associated with the development do not park on the public road network;</p> <p>iv) maintain all roads and water-related infrastructure on site in a safe and serviceable condition;</p> <p>iii) minimise the traffic noise impacts of the development;</p> <p>(e) details of the haulage of spoil to be disposed within Kosciuszko National Park in accordance with condition B7;</p> <p>(f) ensure any vessel or structure occupying waters must display appropriate shapes and lights in accordance with the Marine Safety (Domestic Commercial Vessel) National Law 2012;</p> <p>(g) include a detailed:</p> <p>i) Heavy Vehicle Salvage Plan;</p> <p>ii) Driver's Code of Conduct;</p>				

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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	iii) Marine Transport Management Plan; iv) Snow & Ice Traffic Management Plan; v) Communication Strategy to keep the public informed about the impacts of the development; (h) include a program to: i) ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan; ii) record and track vehicle movements; and iii) monitor and publicly report on the effectiveness of these measures. Following the Planning Secretary’s approval, the Proponent must implement the Traffic Management Plan.				
<b>Long-Term Road Strategy – Kosciuszko National Park</b>					
<b>B33.</b>	Within 2 years of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Long-Term Road Strategy for the development to the satisfaction of NPWS. This strategy must: (a) identify the road network within the Kosciuszko National Park required for the development during operations, including the detailed specifications for this road network; (b) identify which roads within the Kosciuszko National Park can be narrowed or closed following construction and then rehabilitated; (c) include a detailed program for the rehabilitation of these roads, which can be incorporated into the Rehabilitation Management Plan for the development; and (d) identify future road maintenance and funding responsibilities for the long-term road network following construction. Following NPWS’s approval, the Proponent must implement the Long-Term Road Strategy.		Not triggered	The Long-Term strategy is not required to be prepared during this audit period.	
<b>VISUAL AMENITY</b>					
<b>Visual Appearance</b>					
<b>B34.</b>	The Proponent must: (a) take reasonable steps to minimise the visual impacts of the development; (b) ensure all transmission towers blend into the surrounding landscape as far as possible and minimises the potential for glare and reflection by either: i) painting towers with a colour that; and/or ii) pre-dulling towers with a finish that; (c) ensure the visual appearance of ancillary facilities (including paint colours), blends in as far as possible with the surrounding landscape; and (d) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Visual Impact Management Plan (Rev 14) dated 27/07/2024	Compliant	(a) Transgrid continues to commit to taking all reasonable steps to minimise the visual impacts of the development. As confirmed during the Initial Construction Audit, mitigation measures addressing visual impacts are outlined in Section 5.2–5.8 of the Visual Impact Management Plan (Rev 14). These measures include, among others, painting perimeter security fencing to blend with the surrounding environment. During the site inspection, the fencing was observed to be painted a pale eucalyptus colour, consistent with NPWS requirements. (b) One tower (S2) was constructed during the audit period and has been pre-dulled (J. Snape pers. comm). (c) No ancillary infrastructure has been built during the audit period (J. Snape pers. comm). (d) As outlined in Section 5.7 of the Visual Impact Management Plan, only mandatory safety, identifying or directional signs may be placed on ancillary buildings. No additional signage for other purposes including advertising may be placed on buildings. No additional signage was observed during the site audit inspection.	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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Lighting					
B35.	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>(a) take all reasonable steps to minimise the off-site visual impacts of the development; and</li> <li>(b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> <li>i) is installed as low intensity lighting (except where required for safety or emergency purposes);</li> <li>ii) does not shine above the horizontal; and</li> <li>iii) complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting.</li> </ul> </li> </ul>	Visual Impact Management Plan (Rev 14) dated 27/07/2024	Compliant	<p>Lighting associated with the development has been installed in compliance with Australian/New Zealand Standard AS/NZS 4282:2019 - Control of Obtrusive Effects of Outdoor Lighting.</p> <p>During the site audit inspection lighting was observed to be installed as low intensity lighting which was also confirmed by J. Snape pers. comm.</p> <p>No permanent lighting has been installed during the audit period; however, during the site inspection although not operational, lighting structures appeared to have been constructed facing downward ensuring light does not shine above the horizontal line.</p>	
Visual Impact Management Plan					
B36.	<p>Prior to the commencement of construction, the Proponent must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared in consultation with FCNSW and the NPWS;</li> <li>(b) describe the measures that would be implemented to comply with condition B34 above; and</li> <li>(c) include detailed plans for minimising the visual impacts of the following permanent infrastructure: <ul style="list-style-type: none"> <li>i) Maragle switchyard and substation;</li> <li>ii) transmission line, towers and easement.</li> </ul> </li> </ul> <p>Following the Planning Secretary's approval, the Proponent must implement the Visual Impact Management Plan for the development.</p>	Visual Impact Management Plan (Rev 14) dated 27/07/2024	Compliant	Confirmed during the Initial Construction Audit, a Visual Impact Management Plan has been prepared and approved for the development. The Visual Impact Management Plan addresses all requirements outlined by Condition B36.	
PARK VALUES					
B37.	<p>The Proponent must make the following payments to NPWS for residual impacts of the development on park values:</p> <ul style="list-style-type: none"> <li>(a) \$1 million prior to carrying out any development;</li> <li>(b) \$1 million within 1 year of commencing construction;</li> <li>(c) \$1 million within 2 years of commencing construction;</li> <li>(d) \$1 million within 3 years of commencing construction;</li> <li>(e) \$1 million within 4 years of commencing construction;</li> </ul> <p>unless the Planning Secretary agrees otherwise.</p> <p>Note: The NPWS will use these funds and any interest generated by these funds to enhance the park values of the Kosciuszko National Park. The NPWS will:</p> <ul style="list-style-type: none"> <li>• develop a detailed program for the allocation of these funds to specific projects;</li> <li>• monitor, evaluate and publicly report on the spending of these funds and the effectiveness of these projects.</li> </ul>		Compliant	Confirmed during the Initial Construction Audit Snowy Hydro Limited on behalf of Transgrid have submitted 2 payments of \$1,000,0000 to the Department of Planning and Environment Finance Shared Services required to be paid prior to carrying out any development and within 1 year of commencing construction.	
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> <ul style="list-style-type: none"> <li>(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;</li> </ul>	<p>11 kv Line Rehabilitation Strategy dated 11/05/2024</p> <p>Snowy 2.0 Transmission Connection - Additional Easement Rehabilitation Strategy Status Email</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</p>	



Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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	(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  (c) timing for each program of works.  Following approval, the Proponent must implement the Additional Easement Rehabilitation Strategy.	Correspondence dated 13/08/2025		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.  (c) The timing of program works is included in Section 11 which outlines: <ul style="list-style-type: none"> <li>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 2025 and concluded in mid-April 2025 (sighted).</li> <li>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).</li> </ul> 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, <b>it remains unclear how these activities are being tracked or monitored for implementation.</b> 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.  <b>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.</b>	
HAZARD AND RISK					
Dangerous Goods					
B39.	The Proponent must ensure that the storage, handling, and transport of dangerous goods is undertaken in accordance with the relevant Australian Standards and guidelines, particularly AS1940 The storage and handling of flammable and combustible liquids and AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code, and the EPA’s Storing and Handling of Liquids: Environmental Protection – Participants Manual.	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit mitigation measures addressing the storage, handling and transport of dangerous goods is included in the SWMP (rev 0.10).  During the site inspection chemicals were generally well organised / kept in bunded areas / areas appeared to meet site volume requirements for chemical and hydrocarbons. Hydrocarbon and chemical storage areas were observed to be well maintained.	
Electric and Magnetic Fields					
B40.	The Proponent must ensure that the design, construction and operation of the development is managed to comply with the applicable electric and magnetic fields (EMF) limits in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz – 100 kHz) (ICNIRP, 2010).	Electric and Magnetic Fields Design Report dated 05/04/2025	Compliant	The Electric and Magnetic Fields Design Report, prepared by UGL, indicates that the development’s design was developed in accordance with the ICNIRP (2010) guidelines.	
Operating Conditions					
B41.	The Proponent must: <ul style="list-style-type: none"> <li>(a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;</li> <li>(b) ensure that the development;               <ul style="list-style-type: none"> <li>i) complies with the relevant asset protection requirements in the RFS’s Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones;</li> <li>ii) is suitably equipped to respond to any fire on site, including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds;</li> <li>iii) incorporates the recommendations of a fire risk assessment as per Transgrid’s design standards;</li> </ul> </li> <li>(c) ensures that buildings within the compounds comply with Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS’s Planning for Bushfire Protection 2019;</li> </ul>	Bushfire Plan (Rev 0.06) dated 30/08/2023  Emergency Plan (Rev 0.07) dated 25/06/2024	Compliant	(a) Confirmed during the Initial Construction Audit, Bushfire mitigation measures for the development are included in Section 5 of the Bushfire Plan  (b) <ul style="list-style-type: none"> <li>i) Confirmed during the Initial Construction Audit, APZ works undertaken during construction will be in accordance with Appendix 4 of Planning for Bush Fire Protection (NSW RFS, 2019).</li> <li>ii) A minimum 20,000L dedicated fire water supply tank is available at three assembly areas including UGL Switchyard, UGL Lobs Hole Compound, and FGJV Lobs Hole Accommodation Camp.</li> <li>iii) As per previous Construction Audits, the development is still subject to detailed design (J. Snape pers. comm).</li> </ul> (c) Consistent with the Initial Construction Audit Transgrid and UGL have considered and are ensuring buildings comply with the Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS’s Planning for Bushfire Protection 2019 as part of final IFC design (J. Snape pers. comm)	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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	<p>(d) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area;</p> <p>(e) develop procedures to manage potential fires on site, in consultation with the RFS, FRNSW, FCNSW and NPWS;</p> <p>(f) assist the RFS, FRNSW, FCNSW, NPWS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(g) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.</p>			<p>(d) Consistent with the Initial Construction Audit, the final IFC design of Project has not been completed for the Project during this audit period. Transgrid and UGL have assured access tracks and APZs associated with the development are wholly contained within the approved disturbance area (J. Snape pers. comm).</p> <p>(e) Confirmed during the Initial Construction Audit, the Bushfire Plan which is included as an appendix in the Emergency Plan has undergone consultation with RFS, FRNSW, FCNSW and NPWS. See Condition 42.</p> <p>(f) Noted</p> <p>(g) Not triggered during the audit period.</p>	
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>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 landslide 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 (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 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. <b>No verifiable evidence was provided to demonstrate that these stakeholders were invited to attend the emergency evacuation drill held on 16 March 2025.</b></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><b>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 and attendance retained to demonstrate compliance with Section 6.3 of the Emergency Plan.</b></p>	



Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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WASTE					
B43.	<p>Excluding the spoil generated by the development from within KNP, waste generated during construction, operation, upgrading and decommissioning must be dealt with in accordance with the following priorities:</p> <ul style="list-style-type: none"> <li>(a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;</li> <li>(b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and</li> <li>(c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.</li> </ul>	<p>Waste Management Strategy (Rev 0.08) dated 01/11/2023</p> <p>Environmental Inspection Weekly Checklist template dated 19/08/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit a Waste Management Strategy has been prepared for the development and addresses the requirements outlined by Condition B43.</p> <p>During the site inspection for the Construction Audit 4 it was evident recycling programs were continued to be implemented and maintained including recycling bottles and cans. While considered an isolated incident, canisters were observed to have been placed in the contaminated waste bin, indicating the importance of maintaining oversight of waste segregation procedures.</p> <p>In response to an Opportunity for Improvement in Construction Audit 3, UGL revised its Environmental Inspection Weekly Checklist to include verification of whether waste is being segregated according to waste streams.</p>	
B44.	The importation of waste and storage, treatment, processing, reprocessing or disposal of such waste must comply with the Protection of the Environment Operations Act 1997, the Protection of the Environment Operations (Waste) Regulation 2014, and orders or exemptions under the regulation.	UGL Imported Material Tracking Register received 19/09/2025	Compliant	<p>During this audit period only road base concrete and rock has been imported to site (Import Material Tracking Register sighted).</p> <p>No waste has been imported to site during the audit period (J. Snape pers. comm).</p>	
B45.	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.		Compliant	<p>Confirmed during the Initial Construction Audit, waste from the development is exported to a site licensed by the EPA. Waste originating from the east development alignment is exported to Bellettes Landfill (EPA Licenced Facility) and waste from the from the west development alignment is exported to Forest Hill Liquid Waste Storage and Transfer Station which is operated by JJ Richards and Sons.</p> <p>During the audit, it was noted that Bellettes had not been used in the two weeks prior to the site audit inspection. Waste removal for the entire development is expected to be managed by JJ Richards (C. Palmer pers. comm).</p>	
B46.	All waste that is removed from site must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	<p>Bellettes Bulk Bins Tax Invoice dated 31/05/2025</p> <p>Bellettes Bulk Bins Tax Invoice dated 30/04/2025</p> <p>Bellettes Bulk Bins Tax Invoice dated 31/08/2025</p> <p>Christies Waste Disposal Tax Invoice dated 14/07/2025</p> <p>Maragle 330kv Switching Station And 330kv Transmission Line Connections Project Status Report dated June 2025, July 2025 and August 2025</p> <p>JJ Richards Waste Docket dated 16/04/2025</p>	Compliant	<p>Consistent with previous Construction Audits, waste removed from site is tracked by UGL and is reported monthly within UGL Monthly Status Reports. Waste reported in these documents are also further broken down in accordance with the EPA's Waste Classification Guidelines.</p> <p>In response to a recommendation from previous Construction Audits, Transgrid has obtained appropriate records and waste dockets from JJ Richards and Bellettes for all waste removed from Project Site East and West during the audit period.</p>	
REHABILITATION					
B47.	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>(a) rehabilitate all parts of the site within the Kosciuszko National Park to comply with the rehabilitation objectives in Table 2 and the ecological rehabilitation objectives in Table 3;</li> <li>(b) rehabilitate the Bago State Forest site to comply with the rehabilitation objectives in Table 2;</li> <li>(c) complete the rehabilitation of the site, including the removal of all temporary infrastructure, creation of landforms, narrowing of roads within 3 years of completing construction;</li> </ul>		Not triggered	Construction has not been completed. Initial rehabilitation works are required within three years of completion of construction. Therefore, this condition has not been triggered.	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1																											
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	<div>(d) complete the ecological rehabilitation of the site, apart from areas used for operations, within 20 years of completing construction;</div> <div>(e) complete the final rehabilitation of the site, including the removal of all remaining infrastructure within 3 years of decommissioning the development; and</div> <div>(f) complete the ecological rehabilitation of the areas used for operations within 20 years of decommissioning the development.</div> <div>Table 2 Rehabilitation Objectives</div> <table><caption>Table 2 Rehabilitation Objectives</caption><tr><th>Feature</th><th>Objective</th></tr><tr><td>Land Use</td><td>Return the site to its previous use in consultation with NPWS and FCNSW</td></tr><tr><td>Land</td><td>Safe, stable and non-polluting;  Progressively rehabilitate the site as soon as possible following disturbance;  Employ interim rehabilitation strategies to areas that can't be permanently rehabilitated yet to minimise dust generation, erosion, uncontrolled discharges of sediment, and the spread of weeds to other parts of the Kosciuszko National Park;</td></tr><tr><td>Infrastructure</td><td>Decommission and remove infrastructure, unless NPWS and/or FCNSW agrees otherwise;</td></tr><tr><td>Community</td><td>Ensure public safety</td></tr></table> <div>Table 3   Ecological rehabilitation objectives, including indicative completion criteria and performance indicators</div> <table><caption>Table 3   Ecological rehabilitation objectives, including indicative completion criteria and performance indicators</caption><tr><th>Ecological rehabilitation objective</th><th>Completion criteria</th><th>Performance indicators</th></tr><tr><td><b>Objective 1:</b> The vegetation composition of the rehabilitation is recognisable as a plant community type (PCT) contained within the Broken Vegetation Classification and which was present on site prior to the project's temporary disturbance.</td><td>(a) Native plant species composition is characteristic of the target PCT based on suitable analysis against a reference data set using the PCT Assignment Tool. (b) The target PCT BAM composition score is within or greater than the inter-quartile range of local reference site values for the assigned PCT.</td><td>All native vascular plant species are monitored to species level from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method, and/or other method approved by the Planning Secretary. 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All priority attributes of nutrient cycling, soil processes and both subsoil and topsoil properties should be within or greater than the interquartile range of local reference site values for the assigned PCT.  Rehabilitation vegetation communities are maturing, and natural recruitment is occurring for species within each growth form at rates within or greater than the interquartile range of local reference site values for the assigned PCT.  The number and ground cover of weed species is comparable to, or less than, the interquartile range of local reference site values for the assigned PCT.  Fauna habitat features and resources (food and shelter characteristics) within the rehabilitation vegetation communities are present and within or greater than the interquartile range of local reference site values for the assigned PCT.</td><td>Growth medium, covering both subsoil and topsoil properties, and soil processes are monitored using methods approved by the Planning Secretary.  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B48.	<div>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:</div> <div>(a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, FCNSW, BCS, EPA, NSW DPI and TfNSW;</div> <div>(b) be consistent with the Spoil Management Plan, Long-Term Road Strategy and Visual Mitigation Management Plan;</div> <div>(c) include a conceptual plan for the rehabilitation of the whole site;</div> <div>(d) include the detailed program for the rehabilitation of roads in the Kosciuszko National Park in accordance with the approved Long-Term Road Strategy;</div> <div>(e) include a topsoil balance for the site, which includes a strategy for:<div>i) maximising the reuse of topsoil on site (provided it is suitable for reuse);</div><div>ii) using other suitable growth media; and</div><div>iii) importing additional topsoil to the site (if necessary);</div></div> <div>(f) include a native seed collection and propagation program in accordance with Florabank (<a href="http://www.florabank.org.au">www.florabank.org.au</a>) and/or NPWS guidelines for the site, which includes a strategy for:</div>	<div>Rehabilitation Management Plan Rev 0.06 dated 06/06/2025</div> <div>Rehabilitation Management Plan Notification Letter dated 01/09/2025</div> <div>CHPR and NPWS Endorsement Email Correspondence dated 18/06/2025</div> <div>DPHI Rehabilitation Management Plan Post Approval Review dated 02/04/2025</div> <div>DPHI Rehabilitation Management Plan Approval Letter dated 27/06/2025</div>	Compliant	<div>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.</div> <div>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.</div> <div>(a) As outlined in Section 1.5 of the RMP, the plan was prepared in consultation with NPWS, CPHR, FCNSW, NSW DPI and TfNSW. However, Section 1.5 does not include any details indicating that the RMP was prepared in consultation with the EPA, as required under the relevant approval condition.</div> <div>Review of consultation records, including screenshots of submission correspondence, confirms that the RMP was provided to the EPA for consultation. This indicates that consultation with the EPA did occur, but it has not been reflected or documented within the RMP.</div>																							

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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	<p>i) maximising the collection and use of native seed resources from the site prior to disturbance;</p> <p>ii) collecting seed from the surrounding area, including other parts of the Kosciuszko 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"> <li>plant community types to be established; and</li> <li>area of land to be established for each plant community type;</li> </ul> <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>Following the Planning Secretary's approval, the Proponent must implement the Rehabilitation Management Plan.</p>	<p>Rehabilitation Management Plan Portal Consultation Submission Screenshot</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>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 <b>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.</b></p> <p><b>Opportunity for Improvement: It is recommended that the Rehabilitation Management Plan be revised to include details of consultation undertaken with the EPA.</b></p> <p><b>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.</b></p>	
PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING					
ENVIRONMENTAL MANAGEMENT STRATEGY					
C1.	<p>Prior to commencing development, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <p>(a) provide the strategic framework for environmental management of the development;</p> <p>(b) identify the statutory approvals that apply to the development;</p> <p>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p> <p>(d) set out the procedures that would be implemented to:</p> <p>i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</p> <p>ii) receive, handle, respond to, and record complaints;</p>	<p>Environmental Management Strategy (Rev 0.08) dated 05/08/2024</p> <p>Complaints Register received 19/09/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit the EMS was approved by the Planning Secretary on the 03 August 2023 prior to commencement.</p> <p>(a) Included in Appendix C TransGrid Environmental Framework.</p> <p>(b) Included in Section 2.</p> <p>(c) Included in Section 3.10.</p> <p>(d)</p> <p>i) Included in Section 4.5.</p> <p>ii) Included in Section 4.2. Two community complaints were received during the audit period. Complaints were managed in accordance with Section 4.2.</p> <p>iii) Included in Section 4.2.</p>	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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	iii) resolve any disputes that may arise; iv) respond to any non-compliance; v) respond to emergencies; and (e) include: i) references to any strategies, plans and programs approved under the conditions of this approval; and ii) a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this approval.  Following the Planning Secretary's approval, the Proponent must implement the Environmental Management Strategy.			iv) Included in Section 3.12.  v) Response to emergencies is mentioned in Section 3.7, with further detailed provided in the Emergency Plan.  (e)  i) Included in Appendix D Document Map.  ii) Included in Section 3.8 Table 3.2.	
REVISION OF STRATEGIES, PLANS AND PROGRAMS					
C2.	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:  (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	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.  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.  <b>It is noted that the Visual Impact Management Plan and Emergency Plan are not yet included in the register;</b> however, Transgrid has advised that both plans have been reviewed, with no amendments deemed necessary (J. Snape pers. comm).  <b>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.</b>	
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS					
C3.	With the approval of the Planning Secretary, the Proponent may:  (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); (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 (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).  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.  If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	DPHI Traffic and Transport Management Plan Conditional Approval Letter dated 04/04/2025  NPWS and CHPR BMP Endorsement Email Correspondence dated 28/07/2025  DPHI Rehabilitation Management Plan Approval Letter dated 27/06/2025  NPWS and CHPR RMP Endorsement Email Correspondence dated 18/06/2025	Compliant	(a) Confirmed during the Initial Construction Audit the Planning Secretary approved a staging request to prepare management plans on a staged basis on the 27 March 2023 allowing the development scope to be delivered in two stages: <ul style="list-style-type: none"> <li>Stage 1 – All activities associated with the construction and operation of infrastructure related to the 330 kV grid connection.</li> <li>Stage 2 – All activities associated with the construction and operation of infrastructure related to the 500 kV component of the substation.</li> </ul> (b) Confirmed during the initial Construction Audit request was sought from TransGrid to combine the Spoil Management Plan and Water Management Plan. The Planning Sectary approved the request on the 18 November 2022.  (c) During the audit period some management plans have been revised. The current status of approved management plans required by this approval is provided below: <ul style="list-style-type: none"> <li>EMS – Revision 0.08 was not revised during the audit period.</li> <li>BMP – Revision 0.13 is the current approved version. Rev 0.14 underwent consultation with BCS and NPWS. It has not been provided to FCNSW for comment. BMP is pending approval from the Planning Secretary.</li> <li>SWMP – Revision 0.10 was not revised during the audit period.</li> <li>NVMP – Revision 0.06 was not revised during the audit period.</li> </ul>	



Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage.			<ul style="list-style-type: none"> <li>TTMP – Revision 0.22 was prepared in consultation with TfNSW and NPWS. The Planning Secretary conditionally approved Revision 0.22 on the 04 April 2025.</li> <li>RMP – Revision 0.06 was prepared in consultation with NPWS, CPHR, FCNSW, NSW DPI, EPA and TfNSW and was approved by the Planning Secretary on the 27 June 2025.</li> <li>Heritage Management Plan – Revision 8 was not revised during the audit period.</li> <li>Emergency Plan – Revision 0.07 was not revised during the audit period..</li> <li>Visual Impact Management Plan – Revision 14 was not revised during the audit period.</li> </ul>	
NOTIFICATIONS					
Notification of Department					
C4.	<p>Prior to commencing development, construction, operations, upgrading or decommissioning of the development, the Proponent must notify the Department in writing via the Major Projects website portal and NPWS and FCNSW of the date of commencing the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	<p>DPHI Stage 2 Notification Letter dated 24/04/2025</p> <p>NPWS and FCNSW – Stage 2 Commencement Email Correspondence dated 24/04/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit prior to commencing construction Transgrid submitted a notification in writing to Major Projects website portal, FCNSW, NPWS and DCCEEW. The development is currently in Stage 1 of its construction.</p> <p>During the audit period Transgrid submitted a notification in writing to Major Projects website portal and emailed FCNSW and NPWS notifying of its intention to commence construction activities associated with Stage 2 of the Development, excluding OSOM deliveries associated with 500kV componentry of the substation and associated upgrades of roads and bridges, on 28 April 2025</p>	
Final Layout Plans					
C5.	<p>Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including:</p> <ul style="list-style-type: none"> <li>(a) details on siting of transmission towers and ancillary facilities; and</li> <li>(b) showing comparison to the approved layout and approved vegetation clearing.</li> </ul> <p>The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans. Works as Executed Plans.</p>		Compliant	Confirmed during the Initial Construction Audit detailed designs of the development were issued to the Department via the Major Projects website prior to the commencement of construction.	
C6.	Prior to commencing operations, the Proponent must submit plans that confirm the constructed layout of the development and showing comparison to the final layout plans to the Planning Secretary, via the Major Projects website.		Not triggered	The development is currently undertaking construction. Operations have not commenced (J. Snape pers. comm).	
Incident Notification					
C7.	The Department and the NPWS must be notified via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.	<p>Major Projects Notification - Track 4 Unauthorised Clearing in Project Area dated 27/03/2025</p> <p>Major Projects Notification - Maragle Turbid Water Discharge June 2025 Rev 1 dated 24/06/2025</p> <p>Major Projects Notification - Maragle Turbid Water Discharge June 2025 Rev 2 dated 26/06/2025</p> <p>Major Projects Notification - Maragle Substation Discharge July 2025 Event 1 dated 08/07/2025</p> <p>Major Projects Notification - Maragle Substation</p>	Compliant	<p>There were 6 recorded incidents that occurred within this Audit Period. Events were reported immediately to the Department and NPWS after Transgrid were aware of the non-compliance. Details are below:</p> <ul style="list-style-type: none"> <li><i>Track 4 Unauthorised Clearing in Project Area:</i> Unauthorised hand clearing of a total area of 507m<sup>2</sup> comprised of Hazard Tree Zone (158m<sup>2</sup>) and no-go zone (349m<sup>2</sup>) adjoining Access Track 2 and Tower Pad 11. Event occurred on the 24 March 2024. Transgrid become aware of the incident on the 27 March 2025. Notification was sent to the Department, NPWS, CPHR and AG DCCEEW on the 27 March 2025 with a detailed incident report submitted on 14 April 2025.</li> <li><i>Maragle Turbid Water Discharge June 2025:</i> Approximately 58 mm of rain was recorded within Project Area West on 24 June 2025 causing a discharge of turbid water into an unnamed creek on the western boundary of the Project area and from a box culvert north of Elliott Way into a vegetated swale. Incident occurred on the 24 June 2025. Further heavy snowfall was recorded within Project Area West between 25-26 June 2025 which caused overtopping of the sediment basin adjoining the Maragle 330kV Switchyard via the basin spillway. Notification was sent to the Department, NPWS, FCNSW, CPHR, EPA and AG DCCEEW on the 24 and 26 June 2025, with a detailed incident report submitted on 03 July 2025.</li> <li><i>Maragle Substation Discharge July 2025 Event 1:</i> Approximately 13.6 mm of rain recorded within Project Area West between 12:10pm on 6 July 2025 to 09:00am on 7 July 2025 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. Transgrid become aware of the incident on the 07 July 2025. Notification was sent to the Department, NPWS, FCNSW,</li> </ul>	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
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		<p>Discharge July 2025 Event 2 dated 24/07/2025</p> <p>Major Projects Notification - Maragle Switchyard Basin Overtop dated 28/07/2025</p> <p>Major Projects Notification - Maragle Substation Discharge August 2025 dated 29/08/2025</p>		<p>CPHR, EPA and AG DCCEEW on the 8 July 2025, with a detailed incident report submitted on 16 July 2025.</p> <ul style="list-style-type: none"> <li><i>Maragle Substation Discharge July 2025 Event 2:</i> Approximately 30.6mm of rain was recorded within Project Area West on the 23 July causing turbid water to discharge from the Maragle 500kV Substation towards the unnamed creek on the western boundary of the Project area. Transgrid become aware of the incident on the 23 July 2025. Notification was sent to the Department, NPWS, FCNSW, CPHR, EPA and AG DCCEEW on the 24 July 2025, with a detailed incident report submitted on 31 July 2025.</li> <li><i>Maragle Switchyard Basin Overtop:</i> Approximately 116.7 mm of rain was recorded within Project Area West between 22-28 July 2025 of which 67.5 mm fell between 26-27 July 2025 causing water to overtop the sediment basin adjoining the Maragle 330kV Switchyard via the basin spillway. Transgrid become aware of the incident on the 28 July 2025. Notification was sent to the Department, NPWS, FCNSW, CPHR, EPA and AG DCCEEW on the 28 July 2025, with a detailed incident report submitted on 01 August 2025.</li> <li><i>Maragle Substation Discharge August 2025:</i> Approximately 68.5 mm of rainfall was recorded at the Maragle 500 kV substation between the 16 August 2025 and 29 August 2025. Discharge commenced on 28 August 2025 and continued throughout the rain event. Water was observed leaving via a sediment trap (the 'Duck Pond') and discharged to an unnamed creek via the culvert under the Snowy 2.0 site access road. Transgrid became aware of the incident on 28 August 2025. Notification was sent to the Department, NPWS, FCNSW, CPHR, EPA and AG DCCEEW on 29 August 2025, with a detailed incident report submitted on 04 September 2025.</li> </ul>	
Non-Compliance Notification					
C8.	The Planning Secretary and the NPWS must be notified in writing via the Major Projects website portal within seven days after the Proponent becomes aware of any non-compliance.		Compliant	See Condition C7.	
C9.	<p>A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</p> <p>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>		Compliant	Non-compliance notifications within this audit period addressed all details as outlined in this condition and are shown in the notifications submitted via the Major Projects Portal.	
INDEPENDENT ENVIRONMENTAL AUDIT					
C10.	Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.		Compliant	The Initial Construction Audit was undertaken 15 week post the commencement of construction as approved by the Planning Secretary on the 31 January 2024. The Second Construction Audit was undertaken within 6 months of the Initial Construction Audit. The Third Construction Audit was undertaken within 6 months of the Second Construction Audit. The Fourth Construction Audit was undertaken within 6 months of the Third Construction Audit which is in accordance with the requirements of the Independent Audit Post Approval Requirements (2020).	
ACCESS TO INFORMATION					
C11.	<p>The Proponent must:</p> <p>(a) make the following information and documents publicly available on its website as relevant to the stage of the development:</p> <p>i) the EIS;</p> <p>ii) the final layout plans for the development;</p> <p>iii) current statutory approvals for the development;</p> <p>iv) approved strategies, plans or programs required under the conditions of this approval;</p> <p>v) the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged;</p>	<p>Project website (sighted 05/09/2025)</p> <p>Monthly Construction Water Quality Monitoring Report dated April 2025</p>	Compliant	<p>Transgrid provides the information required under this condition on its website: <a href="https://www.TransGrid.com.au/projects/snowy-2-0-transmission-connection-project/">https://www.TransGrid.com.au/projects/snowy-2-0-transmission-connection-project/</a>.</p> <p>All relevant documents including the previous independent environmental audit is provided on the website.</p> <p>Consistent with the previous Construction Audit, there continues to be a lag in publishing water quality monitoring reports, with the most recent report available being from April 2025. As identified previously, an opportunity for improvement remains, with a recommendation that the Project website be updated in a timely and regular manner to ensure monitoring results are made publicly available.</p> <p>In response to an Opportunity for Improvement outlined in Construction Audit 3 the Additional Easement Strategy has also uploaded to the project website.</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	Unique ID on NC
	vi)	a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;				
	vii)	how complaints about the development can be made;				
	viii)	any independent environmental audit, and the Proponent’s response to the recommendations in any audit; and				
	ix)	any other matter required by the Planning Secretary; and				
	(b)	keep such information up to date.				

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
General				
BMP1	Training will be provided to all Project personnel, including relevant sub-contractors on the requirements from this plan through inductions, toolboxes and targeted training. The training will outline key environmental features and threatened species to be protected and measures to be implemented. Site inductions must inform all personnel working in the Project area what the limit of works and Exclusion Zones are and where they occur.	Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction Presentation dated 19/08/2025  Training Matrix Induction Register received 19/09/2025	Compliant	Identified in previous Construction Audits, Transgrid continue to ensure all employees and contractors inducted on site review the UGL Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction (sighted). The induction (revised during this audit period) covers Environmental Information and Compliance relevant to the conditions of this approval and is highlighted in Part 2 of the presentation.
BMP2	No clearing will occur outside the approved project footprint / disturbance area without prior approval from DPE, in consultation with BCD and NPWS.	NPWS and CPHR Track 4 Unauthorised Clearing Email Correspondence dated 27/03/2025  WSP Consistency Assessment Report Snowy 2.0 Transmission Connection Project dated 5/02/2025  Major Projects Notification - Track 4 Unauthorised Clearing in Project Area dated 27/03/2025	Non-compliant	During the audit period, vegetation clearing for the development was completed, with only hazard tree removal remaining subject to further assessment.  <b>An unauthorised clearing incident</b> was reported on 24 March 2025 involving <b>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</b> . 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.  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 credit requirements identified in the Biodiversity Development Assessment Report (BDAR).  <b>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.</b>
BMP3	If clearing of vegetation is required outside the Project area these areas would need further assessment, approval and recalculation of offset requirements in accordance with the CEMP (UGL, 2023a).	WSP Consistency Assessment Report Snowy 2.0 Transmission Connection Project dated 5/02/2025	Compliant	Refer to the findings and recommendations above for BMP2.
Design				
BMP4	Detailed design will focus on the retention of managed shrub and groundcover vegetation zones, within the ECZ, HCZ and HTZ to avoid and minimise the loss of vegetation and habitat and movements of fauna across the landscape and to minimise the impact of predation on displaced fauna. This will be undertaken by UGL applying the clearing methodology and clearing zones presented in Appendix K of the Project BDAR (Jacobs, Rev 7, Aug 2022) to their detailed design.	LENECO Post-clearing Vegetation Integrity Monitoring Report in Partial Clearing Zones dated 13/04/25  CPHR Snowy 2.0 Transmission Connection – Draft Post-Clearing Vegetation Integrity (VI) Monitoring Report Letter dated 12/08/2025  NPWS Meeting Minutes - Weed and Pathogen Control Monitoring Program dated 04/09/2025	Compliant	<b>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.</b>  Works within the Hazard Tree Zone (HTZ) have generally not commenced (J. Snape pers. comm).  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.  During the audit period, the draft Post-Clearing Vegetation Integrity Monitoring Report (LENECO, 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.  No further review of this document has occurred and will be postponed until agreement has been reached between Transgrid, and CPHR.



Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
				<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 LENECO 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><b>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.</b></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 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>
<b>BMP5</b>	Final design for permanent creek crossing structures on access roads will implement a design option to ensure stream flow is unaffected (e.g., single span to minimise stream disturbance and flow). These designs will be endorsed by NPWS, prior to the commencement of work.		Compliant	Confirmed during Construction Audit 2, the temporary and permanent designs for the Sheep Station Creek Bridge comply with the requirements of Condition B31 of the Infrastructure Approval. As noted in Construction Audit 3, the bridge designs were approved by NPWS. The final bridge is expected to be constructed and operational by Construction Audit 5 (J. Snape pers. comm).
<b>BMP6</b>	Design and micro-siting of access tracks will avoid and minimise impacts to rock outcrops, large boulders, piled rock, and rock features that provide potential sheltering and breeding habitat for fauna including threatened species and avoid mapped habitat trees. Access track corridors will be established with consideration to terrain (e.g., utilisation of the ridgelines to navigate to the higher elevations) to minimise cut / fill and vegetation clearing.		Compliant	Consistent with previous Construction Audits, micro-siting continues to be primarily influenced by topographical constraints associated with the steep terrain. Some retained habitat trees were observed within the partial clearing zones with lopped crowns. These trees are proposed to be retained but remain subject to further hazard assessment (J. Snape pers. comm).
<b>BMP7</b>	Directional lighting will be used for any permanent lighting required (i.e., substation) to minimise light spill. Ensure lighting is not directed into vegetation and shields are used.		Compliant	No permanent lighting has been installed during the audit period. (J. Snape pers. comm).
<b>Pre-construction</b>				
<b>BMP8</b>	A Project Ecologist/s will be appointed prior to the commencement of construction.	Richard Floyd SLR CV  Michael Youdale SLR CV  John Keep SLR CV	Compliant	During the audit period Peter Monsted from LENECO has been replaced by Richard Floyd (Principal Consultant), Michael Youdale (Technical Director and QLD & NT Team Lead), and John Keep (Senior Project Consultant) from SLR as the appointed project ecologists.
<b>BMP9</b>	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	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	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</p>

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
	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>Pre-rainfall Inspection Checklist – Project West dated 18/07/2025</p> <p>Pre-rainfall Inspection Checklist – Project West dated 26/08/2025</p> <p>During/Post Rainfall Inspection Checklist – Project West dated 12/07/2025</p> <p>During/Post Rainfall Inspection Checklist – Project East dated 18/08/2025</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>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, <b>erosion and sediment controls located downstream of Track 8 along Wallace Creek have not yet been repaired and remain non-functional</b>. 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><b>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.</b></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>
<b>BMP10</b>	A seed collection methodology will be developed and implemented to assist with rehabilitation post construction. The methodology will include early collection of seeds onsite prior to clearing and other appropriate areas.	BMP (Rev. 13)	Compliant	A Seed Collection Method is contained in Appendix E of the BMP (Rev. 13).
<b>Vegetation Clearing, Protection and Management</b>				
<b>BMP11</b>	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	<b>Non-compliant</b>	<p>During the audit period, <b>an unauthorised clearing incident occurred adjoining Access Track 4</b>. The incident investigation identified that some <b>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</b>. 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, <b>a central register documenting delineation measures has not yet been established</b>.</p> <p><b>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.</b></p>
<b>BMP12</b>	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	<b>Non-compliant</b>	Refer to findings and recommendations for BMP11 for details.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
<b>BMP13</b>	A 50 metre Exclusion Zone for the Booroolong Frog will be marked and clearly delineated from other survey markers with signage placed around the tributaries that flow downhill into the Yarrangobilly River, 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.	Visual observation	Compliant	Rope fencing and signage was observed during site audit inspection.
<b>BMP14</b>	The 50 metre Exclusion Zone adopted for the Main Works Project for the Booroolong Frog on Yarrangobilly River, will be retained for construction of the transmission line.	Visual observation	Compliant	Rope fencing and signage were observed during site audit inspection.
<b>BMP15</b>	Hazard trees identified from the LiDAR 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, in accordance with the Clearing Procedure, and included in SEPs.	Visual observation	Compliant – subject to ongoing assessment	Consistent with Construction Audit 3, assessment of all hazard trees is still ongoing (J. Snape pers. comm). No clearing was undertaken within the Hazard Tree Zone during the audit period (J. Snape pers. comm).
<b>BMP16</b>	Implement clearing in accordance with the clearing protocol provided in Appendix B.	<p>Maragle Form 09 - 24hr Pre-clearing Checklist – E08 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E05, East ▶ West of Sheep Station Creek ▶ T11 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E19, East ▶ West of Sheep Station Creek ▶ Access Track 5 from T9 to T10 dated 18/09/2025</p>	Compliant	<p>The evidence collected during the Construction Audit 3 satisfies the requirements of this management measure.</p> <p>In response to a recommendation from Construction Audit 3, Transgrid acknowledged that prior approval should be sought for any variations to staged clearing requirements from the relevant agencies, including CPHR, NPWS, FCNSW, and the Department of Climate Change, Energy, the Environment and Water (DCCEEW). UGL is consulting with the Project Ecologist (SLR) to update the Pre-Clearing Checklist and Clearing Permit to reflect this requirement. However, no verifiable evidence has been provided to demonstrate that these updates have been implemented, and the matter remains outstanding.</p>
<b>BMP17</b>	<p>A qualified Project Ecologist will undertake the following at least 28 days prior to clearing:</p> <ul style="list-style-type: none"> <li>Assessment of HBTS for Owls including: <ul style="list-style-type: none"> <li>Songmeters will be placed underneath a tree within the centre of an identified cluster of potential Masked Owl nest trees for a period of four weeks before planned clearing. The songmeters will be placed a maximum of 200 m apart within the Masked Owl threatened species habitat of the Project area.</li> <li>Within the last two weeks of the songmeters monitoring, stagwatching will be undertaken targeting potential nest trees based on the results of the first two weeks of songmeters. Stagwatching will be undertaken an hour before dawn and an hour before and after dusk.</li> </ul> </li> </ul> <p>If nesting owls are present, the tree is to be clearly marked as an Environmental Protection: No Go Zone (Exclusion Zone) and removal of the tree must be delayed until the chicks have fledged (10-12 weeks). There is to be no disturbance within 50 m of the tree, and fencing/ flagging will be established to demarcate this buffer. Disturbance between 50 –</p>		Compliant	Confirmed during Construction Audit 3 surveys were completed at least 28 days prior to clearing to ensure compliance with environmental requirements.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
	<p>100 m is to be minimised as far as reasonably practicable also.</p> <ul style="list-style-type: none"> <li>Assessment of HBTS for Gang-gang Cockatoo including: <ul style="list-style-type: none"> <li>Songmeters will be placed underneath a tree within the centre of an identified cluster of potential Gang-gang Cockatoo nest trees for a period of four weeks before planned clearing. The songmeters will be placed a maximum of 200m apart within the Gang-gang Cockatoo threatened species habitat of the Project area - Within the last two weeks of the songmeters monitoring, stagwatching will be undertaken targeting potential nest trees based on the results of the first two weeks of songmeters. Stagwatching will be undertaken during the day for cockatoo activity.</li> <li>If nesting birds are present, the tree is to be clearly marked an Exclusion Zone (buffer 100m of the tree) will be established, using high visibility fencing/ flagging removal of the tree must be delayed until the chicks have fledged (1012 weeks). Disturbance up to 200m from the tree is to be minimised as far as reasonably practicable.</li> </ul> </li> </ul>			
<b>BMP18</b>	<p>A qualified Ecologist will undertake the following at least 14 days prior to clearing:</p> <ul style="list-style-type: none"> <li>Delineation of clearing zones and Exclusion Zones.</li> <li>Ensure any trees from the Transmission Structure Zone clearing area authorised for removal, that occur within proximity to the clearing limit boundary, are felled so they fall into the cleared zone. No vegetation felling or associated damage to vegetation from felling activities is to occur within Exclusion Zones.</li> <li>Place Exclusion Zone high visibility fencing outside tree protection zones (see below "14 days before clearing" section for more detail). If the tree protection zone cannot be avoided during works, the Structural Root Zones (SRZ) of trees will be retained. Installation of Booroolong Frog Buffer</li> <li>Delineation of Rocky Outcrop Avoidance Zones</li> <li>The SEA and Project ecologist will commence the clearing permit process.</li> </ul>		Compliant	The evidence collected during the Construction Audit 3 satisfies the requirements of this management measure.
<b>BMP19</b>	<p>A qualified Ecologist will undertake a pre-clearing inspection of the Project area at least 14 days prior to clearing. The ecologist will:</p> <ul style="list-style-type: none"> <li>Physically mark any important habitat features with flagging/non-permanent spray paint suspected to be utilised by significant species in the area and record GPS coordinates of each biodiversity feature. Important habitat features include: <ul style="list-style-type: none"> <li>Large active stick nests</li> <li>Hollow-bearing trees</li> </ul> </li> <li>HBTs with a diameter at breast height (DBH1) of &gt;130cm that also contain dead wood / old branch stubs in the canopy shall be marked for 'limb by limb' (spray-painted 'LxL' or similar) removal treatment</li> <li>HBTs that are smaller (trunk &lt;130cm DBH, and / or do not contain dead wood / old branch stubs / or</li> </ul>		Compliant	The evidence collected during the Construction Audit 3 satisfies the requirements of this management measure.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
	<p>inaccessible by EWP in the canopy) shall be marked as 'Hollow Bearing' (spray-painted 'HBT' or similar)</p> <ul style="list-style-type: none"> <li>• If hollows are active at the time of inspection</li> <li>- Yellow-bellied Glider den trees and sap trees (i.e. presence of a v-notch)</li> <li>- Active nesting/breeding sites (dens, drays, nests etc.)</li> <li>- Threatened species habitat (as evidenced by scratchings, scats etc)</li> <li>- Unexpected threatened flora (in accordance with the Unexpected Threatened Species Finds Procedure).</li> <li>• Targeted searches will also be undertaken for weed species, to ground truth the extent of weed occurrences within the Project area.</li> <li>• Identify suitable fauna release locations outside the Project area.</li> <li>• Identify and surround trees for protection with exclusion fencing. This consists of flagging, bunting, nightline or other similarly robust and durable material with reflective strips periodically along its length, designated as "Environmental Protection Area" zones.</li> <li>• Contact will be made with the local vet and/or wildlife carer (contact details outlined in Appendix C) prior to the commencement of clearing works to ensure they are available in case fauna is found.</li> </ul> <p>Within Booroolong Frog habitat:</p> <ul style="list-style-type: none"> <li>• Any aquatic habitat features (rocks, logs) that are required to be removed will be salvaged for rehabilitation within riparian areas.</li> </ul> <p>Within Yellow-bellied Glider habitat:</p> <ul style="list-style-type: none"> <li>• Inspect den/sap trees to determine if live gliders are present</li> <li>- If gliders are present or likely to be present, the tree is to be clearly marked as an exclusion/ no-go zone and demarcated with fencing/ flagging. The removal of the tree must allow time for fauna to vacate of its own accord (as outlined in more detail below, i.e., a two staged process, clearing non-habitat vegetation first).</li> </ul>			
<b>BMP20</b>	<p>No more than 24 hours before clearing using the checklist attached as Appendix B, the following will occur:</p> <ul style="list-style-type: none"> <li>• Boundaries for construction, clearing and Exclusion Zones will be confirmed.</li> <li>• The Ecologist will check marked habitat trees and features within the works area are correctly marked.</li> <li>• Fauna relocation will take place, refer to Appendix C.</li> <li>• Booroolong Frog: o Any aquatic habitat features (rocks, logs) that are required to be removed will be salvaged for rehabilitation within riparian areas.</li> <li>• Yellow-bellied Glider habitat: o Inspect den/sap tress to determine if live gliders are present</li> <li>• If gliders are present or likely to be present, the tree is to be clearly marked as an exclusion/no-go zone and demarcated with fencing/flagging. The removal of the tree must allow time for fauna to vacate of its own accord (as outlined in more detail below, i.e., a two staged process, clearing nonhabitat vegetation first).</li> </ul>	<p>Maragle Form 09 - 24hr Pre-clearing Checklist – E08 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E05, East ▶ West of Sheep Station Creek ▶ T11 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E19, East ▶ West of Sheep Station Creek ▶ Access Track 5 from T9 to T10 dated 18/09/2025</p>	Compliant	<p>Consistent with previous Construction Audits, NPWS and CPHR received pre-clearing reports, with the final reports provided in Construction Audit 3. As confirmed in Construction Audit 3, these reports contained detailed information regarding the effort and observations recorded during pre-clearing surveys. No reports were prepared during the audit period as clearing was completed shortly after Construction Audit 3.</p> <p>During the audit, pre-clearing checklist forms and a sample of records were reviewed. In response to an Opportunity for Improvement raised in Construction Audit 3, UGL are consulting with the Project ecologist (SLR) to update the Pre-Clearing Checklist and Clearing Permit to improve alignment and traceability across reporting documentation.</p>



Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
BMP21	At the completion of the pre-clearing surveys a report will be compiled of all the data and activities completed during the pre-clearance surveys. The outcomes of the pre-clearing inspections will be reported to BCD, NPWS, FCNSW and DCCEW prior to the commencement of vegetation clearing. The report will include any recorded habitat features (including GPS data), fauna relocated or euthanised, including name of qualified/licensed handler, species, location notes, and release location and method.		Compliant	No new pre-clearing reports were prepared during the audit period. Pre-clearing report applicable to Track 5 and Track 4 were provided to relevant stakeholders in Construction Audit 3 (J. Snape pers. comm).
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.
BMP23	<p>Clearing will be undertaken as part of a single or two stage process:</p> <ul style="list-style-type: none"> <li>• Stage 1 clearing of non-habitat vegetation e.g., shrubs, regrowth, ground cover and non-habitat trees). Allow at least 24 hours for fauna to vacate habitat before removing habitat trees.</li> <li>• Stage 2 clearing of habitat vegetation (hollow-bearing trees, habitat trees, and bushrock) supervised by a qualified ecologist.</li> </ul> <ul style="list-style-type: none"> <li>- Habitat features marked as “HBT” will be mechanically shaken or ‘nudged’ prior to felling to encourage any remaining animals to either leave, or at least attempt to leave and therefore become visible, at which point observed by the Project Ecologist/a suitably qualified ecologist and safely captured and released elsewhere in accordance with the Fauna Rescue and Relocation Procedure (Appendix C).</li> <li>- Subsequent to felling, habitat trees marked as “HBT” will be systematically checked for any remaining fauna. If fauna is encountered, the Project Ecologist/a suitably qualified ecologist with experience in fauna handling should capture any animal that emerges, inspect for injuries and, if uninjured, relocate to predetermined fauna release area or if injured, referred to a vet or wildlife carer for treatment in accordance with the Rescue and Release Procedure (Appendix C of the BMP).</li> <li>- Trees marked as ‘LxL,’ to demarcate those trees which have multiple hollows and potential hollows in limbs, would be inspected by the Project Ecologist/ a suitably qualified ecologist via an elevated work platform (EWP) where possible.</li> <li>- Soft felling techniques are to be used for the sectional removal of habitat trees &gt;130cm DBH. A range of measures can be applied, including the use of a mulching head and/or shears on an excavator to remove non-habitat limbs on standing trees. Such activity will be mindful that hollows and resident fauna will not be directly impacted by the operation. This will help minimise tracking in partially cleared areas, aide a safe clearing methodology, and create room for EWP access to hollow limbs for subsequent fauna detection and removal</li> </ul>	<p>Maragle Form 09 - 24hr Pre-clearing Checklist – E08 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E05, East ▶ West of Sheep Station Creek ▶ T11 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E19, East ▶ West of Sheep Station Creek ▶ Access Track 5 from T9 to T10 dated 18/09/2025</p>	Compliant	The evidence collected during Construction Audit 3 and this audit satisfies the requirements of this management measure.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
	<ul style="list-style-type: none"> <li>Felled habitat trees will be left for a short time (1 – 2 hours) to allow any undetected fauna further opportunity to escape</li> <li>Nests and on-ground logs will be carefully inspected by the Project Ecologist or a suitably qualified ecologist. Logs should be carefully rolled and inspected beneath the log. Any fauna species are to be relocated to habitat identified during the preclearing process or, if injured, transported to a veterinarian or wildlife carer. If nest boxes are deemed an appropriate mitigation measure by the Project Ecologist to utilise during fauna relocations, these will be established in consultation with Transgrid and BCD.</li> </ul>			
<b>BMP24</b>	<p>As far as possible, clearing will be planned to avoid times when hollow-dependent fauna is breeding, including:</p> <ul style="list-style-type: none"> <li>Gang-gang Cockatoo – October to January</li> <li>Masked Owl – May to August</li> <li>Eastern Pygmy-possum – Spring to Autumn</li> <li>Yellow-bellied Glider – November to May</li> </ul>		Compliant	No threatened species were recorded during the audit period. However, it is generally not feasible to schedule clearing activities to avoid these periods due to significant seasonal overlap, except when works are paused.
<b>BMP25</b>	Hand clearing only will be used in <i>Caladenia montana</i> habitat.	Visual Observation	Compliant	Hand clearing zones were observed during the audit site inspection.
<b>BMP26</b>	A qualified ecologist or will be present during all clearing operations to record any tree hollows not identified during the pre-clearing survey, and to rescue any animals disturbed by clearing.	Maragle Form 00 - Daily Site Report - East ▶ West of Sheep Station Creek ▶ T11 Clearing Supervision dated 24/03/2025		The evidence collected during the audit period satisfies the requirements of this management measure.
<b>BMP27</b>	Records are to be kept of all fauna rescue events including locations to where fauna have been relocated. Provide GPS coordinates for such events.	Fauna Rescue & Event Record ( <i>Vespadelus regulus</i> - E-19) dated 26/03/2025	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
<b>BMP28</b>	Hollows logs and limbs encountered during clearing will be retained (not piled) for placement within adjacent vegetation or on the maintained easement within shrub retention areas.	<p>Visual Observation</p> <p>Timber License LIC000203</p>	Compliant	During the site inspection, stockpiles of timber were observed across both Project East and Project West areas. Transgrid advised that any timber located within Kosciuszko National Park land cannot be removed from the site. In areas located within the Bago State Forest, the Project has received approval from FCNSW to remove up to 2,000 tonnes of residual logs and 220 tonnes of residual mulch.
<b>BMP29</b>	Any felled timber within Bago State Forest that FCNSW determine can be repurposed will be removed off-site by FCNSW.		Compliant	It was advised by UGL that FCNSW have salvaged some timber from the Bago State Forest. It was noted that some stockpiles of timber remain in Project Area West.
<b>BMP30</b>	Post clearing report will be prepared outlining the process of habitat removal, records of fauna that had to be handled or relocated, final clearing extent using GPS.	Post-construction ecological report Maragle 330kV Switching Station and 330kV Transmission Line Connection dated October 2025	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
<b>BMP31</b>	<p>No stockpiling or storage of equipment and machinery will occur:</p> <ul style="list-style-type: none"> <li>Within dripline of any mature trees</li> <li>Within 50m of riparian buffers or vegetation</li> <li>Outside of the total clearing zone</li> </ul>	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
<b>BMP32</b>	Pruning of mature trees is to be in accordance with Part 5 of the Australian Standard 4373-2007 Pruning of amenity trees.	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
<b>BMP33</b>	Use existing tracks where possible and previously cleared and disturbed areas for access purposes.	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
<b>BMP34</b>	All machinery will be free from any fuel and other pollutant residues, with connections and hoses inspected regularly.	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
<b>Wildlife Protection</b>				
<b>BMP35</b>	Where fauna is encountered that requires handling or rescue, follow the Fauna Rescue and Release Procedure in Appendix C.	Fauna Rescue & Event Record ( <i>Vespadelus</i>	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.



Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
		<i>regulus</i> - E-19) dated 26/03/2025		
BMP36	Clearance of construction areas prior to commencement of daily clearing activities will occur to ensure there is no wildlife present. This will involve an on-foot pre-clearing survey by a suitably qualified ecologist.	Maragle Form 00 - Daily Site Report - East ▶ West of Sheep Station Creek ▶ T11 Clearing Supervision dated 24/03/2025		Pre-clearing surveys are conducted prior to the commencement of daily clearing activities (C. Palmer pers. comm).
BMP37	A daily drive through sweep of areas planned for construction, by the contractors' environmental representatives, will occur during general construction activities. If an animal is located within the construction area during works, the Delivery Manager and Project Management Site Representative are to be notified immediately. All work must immediately cease within the immediate area of the find and a local wildlife rescue, or an ecologist will be required for assistance where necessary.	Daily Site Diary Entries dated 14/03/2025, 07/05/2025 and 14/08/2025	Compliant	Daily site diary entries identify the completion of inspections of active construction areas for fauna.
BMP38	Vehicle movements on newly formed access tracks will be limited to a 20 km/h speed limit implemented to reduce the risk of vehicle strike to fauna.	Visual Observation	Compliant	During the site audit inspection speed signs were observed during the site audit inspection.
BMP39	Artificial lighting required during construction in the early morning and late afternoon in winter will be limited to within approved construction hours.	Correspondence OOHW Notification Approval dated 23/03/2025  DPHI OOHW Notification Acceptance Letter dated 22/07/2025  DPHI OOHW Revised Notification Acceptance Letter dated 09/09/2025	Compliant	No OOHW requiring artificial lighting was undertaken during winter period (further details refer to Condition B2 of the Infrastructure Approval).
BMP40	Fauna strike space – when towers are standing, monitoring in the form of weekly inspections will occur via walked tower to tower transects to identify collision issues and identify any collision occurrences. Where collisions are identified, this would trigger installation of additional control measures including increased monitoring and installation of additional reflectors.		Not-triggered	Construction of towers is ongoing. Only one tower (S2) was erected during the audit period (J. Snape pers. comm).
<b>Aquatic Habitats</b>				
BMP41	Watercourse crossings will be designed to minimise impacts on hydrology, aquatic habitat and fauna by: <ul style="list-style-type: none"> <li>• Maintaining low-flow conditions and not blocking fish passage</li> <li>• Being designed with consideration of the potential for flooding during construction</li> <li>• Be removed and the area rehabilitated following completion of construction.</li> </ul>		Compliant	Confirmed during Construction Audit 2, the temporary and permanent design of Sheep Station Creek Bridge complies with all guidelines outlined by Condition B31 of the Infrastructure Approval including Policy and Guidelines for Fish Habitat Conservation (DPI, 2013) and Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (NSW Fisheries, 2003).
BMP42	Retain stumps in riparian zones and aquatic habitats where practicable to reduce the potential for bank erosion. Even dead stumps and root systems may act to reduce erosion during construction and operation periods. If stump treatment with poison is required, appropriate treatment will be determined in consultation with NPWS or FCNSW (dependent on location).	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this condition.
BMP43	Activities in aquatic habitats and riparian zones will be avoided, excluding approved works at Sheep Station Creek.	Visual Observation	Compliant	No construction activities have been undertaken within riparian zones during the audit period excluding approved works at Sheep Station Creek (J. Snape pers. comm)
BMP44	Keeping vehicles and machinery away from the banks of a waterway where possible. Where machinery must enter the	Visual Observation	Compliant	No vehicles or machinery were observed near any banks of water during the site audit inspection. .

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
	waterway ensure that they are cleaned, degreased and serviced prior to entering.			
BMP45	Removal of all temporary works, flow diversion barriers and sediment control barriers within aquatic habitats as soon as practicable and in a manner that does not promote future channel erosion.		Not-triggered	
Unexpected Threatened Species				
BMP46	Where threatened species are unexpectedly identified during pre-construction, or construction, follow the Unexpected Threatened Species Procedure in Appendix D.	<p>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</p>	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. <b>The investigation completed by EMM Consulting (<i>Advice in response to Independent Environmental Audit Findings with respect to 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.</b></p> <p><b>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.</b></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). <b>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.</b></p> <p><b>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 <i>Caladenia montana</i>, acknowledging that the opportunity to halt works has now passed.</b></p>
Weeds, Pathogens And Pests				
BMP47	Follow the Weed and Pathogen Control and Monitoring Procedure in Appendix H to prevent or minimise spread of weeds and pathogens	<p>UGL Notification of New Weed Species – Maragle &amp; Lobs Hole dated 16/08/2025</p> <p>UGL Weed Transect Locations dated 18/09/2025</p> <p>UGL Weed Spraying Register received 19/09/2025</p> <p>Visual observation of washdown stations and restricted areas.</p> <p>UGL Pathogen Testing Register dated 09/07/2025</p> <p>Annual Pathogen Monitoring Program</p>	Compliant	<p><u>Weed Control</u></p> <p>Weed mapping is required to be undertaken during initial pre-clearance surveys and updated bi-annually within and adjacent to the Project area, including a 50-metre buffer, in accordance with Section 6.2 of the Weed and Pathogen Control Monitoring Program (WPCMP). This process involves revising the mapping after each monitoring period to capture newly affected areas and assess the effectiveness of implemented management measures.</p> <p>Field surveys for weed transects completed in May 2025 identified six new weed species within the transects and as incidental findings. In line with the TARP (Appendix E of the WPCMP), UGL will continue to monitor and implement targeted weed treatment measures under ecological supervision.</p> <p>Consistent with Construction Audit 3, areas within Project West containing deep mulch cover from previous works were observed to support emerging weed growth. Targeted weed control in these areas remains necessary to prevent further colonisation and spread.</p> <p>In response to an Opportunity for Improvement raised during the previous audit, UGL has updated the Weed Spraying Register to include details of spraying methodologies, observations of surrounding vegetation, justification for weather-related decisions, and photographic evidence where practicable.</p> <p><u>Pathogen Control</u></p>

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	Requirement	Evidence Collected	Compliance Status	Findings and Recommendations
		Report December 2023 to December 2024 dated 08/07/2025		<p>The Annual Pathogen Monitoring Program Report for 2024 was prepared during the audit period. it noted In late March 2024, <i>Phytophthora lucustis</i> was positively identified near Tower 15 within Maragle. Following the positive identification of <i>Phytophthora</i> within the Project area, UGL enacted the TARP objectives for pathogens and implemented containment mitigation measures. <i>Pythium sp.</i> was also detected at Tower 16, however, as this species is an agricultural-based pathogen, existing mitigation measures including weed and pathogen hygiene protocols were identified as sufficient to mitigate risk.</p> <p>During the site audit inspection, evidence of pathogen hygiene protocols was observed to be in place and effectively implemented.</p> <p>In response to a recommendation raised during Construction Audit 3 pathogen testing was undertaken in the areas experiencing <i>Banksia canei</i> dieback observed in Audit 3 between 21-22 March 2025. No pathogens were detected and as such additional hygiene measures beyond those detailed in the approved BMP are not required. Areas will continue to be monitored and sampling as part of annual pathogen testing (J. Snape pers. comm).</p>
<b>BMP48</b>	All plant and equipment arriving to site will be clean of weed and seed material and be accompanied by a Weed Hygiene Declaration as included in Appendix H.	<p>Weed and Pathogen Declaration Record – Caterpillar 314F Excavator dated 19/08/2025</p> <p>Weed and Pathogen Declaration Record – Toyota Hilux dated 20/08/2025</p>	Compliant	All plant onsite is accompanied by a Weed And Pathogen Hygiene Declaration Record providing evidence that the plant has been cleaned and inspected ensuring it has been kept free of weeds, seeds and pathogens. Between 14 March 2025 and 11 September 2025 a total of 82 declarations have been received (C. Palmer pers. comm). A Weed and Pathogen Declaration Record for an Excavator and Hilux was sighted.
<b>BMP49</b>	Implement Pest and Predator Monitoring Program in Appendix I.	SLR Pest and Predator Data and Monitoring Report – Quarter 2 dated 22/07/2025	Compliant	Pest monitoring was undertaken throughout the audit period. The Quarter 2 2025 Pest Monitoring Report was reviewed and indicated frequent detections of feral horses and deer across the Project West site. In contrast, at Lobs Hole (East), the primary pest species recorded was the fox.
<b>BMP50</b>	Personal waste / refuse generated during construction will be stored appropriately in inaccessible bins and disposed at appropriate waste disposal facilities off-site.	Visual Observation	Compliant	During the inspection, the Maragle Project Construction Compound and Lobs Hole were observed to be well maintained, with general housekeeping practices effectively implemented, keeping the area free of litter.
<b>Rehabilitation</b>				
<b>BMP51</b>	Disturbed areas are to be progressively stabilised to prevent erosion and weed establishment	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	Compliant	Refer to mitigation measure W3 in the Amendment Report Mitigation Measures for findings and recommendation details.
<b>BMP52</b>	Implement Rehabilitation Plan	DPHI Rehabilitation Management Plan Approval Letter dated 27/06/2025	Compliant	The Rehabilitation Management Plan was approved on 27 June 2025. As the approval occurred late in the audit period and updates to incorporate post-clearing monitoring results for the partial clearing zones are still pending, opportunities to implement the plan during this period have been limited.

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						
Part A – Conditions Specific to Action											
1	To minimise the impacts of the action on protected matters, the approval holder must: <div><div>a. not clear more than:<div><div>(i) 1.67 ha of habitat for Booroolong Frog; and</div><div>(ii) 118.34 ha of habitat for Spot-tailed Quoll; and</div></div></div><div>b. minimise the impacts of the Action on hollow-bearing trees.</div></div>	<div>Biodiversity Management Plan (rev 0.13) dated 30/10/2024</div> <div>UGL Clearing Progress Summary dated 11/09/2025</div>	Compliant	<div>a. Clearing commenced on the 08 March 2024 which occurred outside the audit period however clearing activities were undertaken during this audit period. Extent of clearing of Spotted Quoll and Booroolong frog habitat is summarised in the table below.</div> <div>Table 1: Extent of Clearing</div> <table><tr><th>Species</th><th>Extent of Clearing</th></tr><tr><td>Booroolong Frog</td><td>0.93 ha</td></tr><tr><td>Spot-tailed Quoll</td><td>99.45 ha</td></tr></table> <div>Clearing is within approved limits.</div> <div>b. Implementation of impact minimisation for hollow bearing trees was discussed and observed during the audit inspection.</div>	Species	Extent of Clearing	Booroolong Frog	0.93 ha	Spot-tailed Quoll	99.45 ha	
Species	Extent of Clearing										
Booroolong Frog	0.93 ha										
Spot-tailed Quoll	99.45 ha										
2	The approval holder must not clear outside the project area.		Compliant	No clearing outside the clearing areas was detected or notified to the Transgrid during this audit period (J. Snape pers. comm).							
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.	<div>Biodiversity Management Plan (rev 0.13) dated 30/10/2024</div> <div>Environmental Management Strategy (rev 0.08) dated 5/08/2024</div>	Non-compliant	<div>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</div> <div>Condition B41 is compliant.</div> <div>Condition C1 is compliant.</div>	NC-05						
4	The Biodiversity Management Plan required under condition B21 of the State Infrastructure Approval must: <div><div>a. be consistent with relevant statutory documents;</div><div>b. demonstrate how the approval holder will minimise erosion and control sediment generation;</div><div>c. demonstrate how the approval holder will take all reasonable and feasible measures to prevent any discharge to waters;</div><div>d. in respect of all watercourses which contain habitat for Booroolong Frog, as indicated by the areas within the yellow polygons designated ‘Booroolong Frog’ within the designated ‘Study area’ in the map at Attachment B, specify:<div><div>(i) what and how detailed baseline data on surface water flows and quality will be collected prior to the commencement of the Action; and</div><div>(ii) a program to augment data regarding surface water flows and quality data over time;</div></div></div><div>e. specify detailed criteria for determining surface water impacts (in respect of flows, quality and flooding) of the Action on the Booroolong Frog, including criteria for triggering remedial action (if necessary);</div><div>f. specify a monitoring program capable of detecting any specified criteria for triggering remedial action, if they occur; and</div><div>g. include a description of the measures that will be implemented to minimise the surface water impacts of the Action on the Booroolong Frog.</div></div>	<div>Biodiversity Management Plan (rev 0.13) dated 30/10/2024</div>	Compliant	<div>a. BMP has been prepared in accordance with</div> <div>b. Included in Section 5.8 of the BMP</div> <div>c. Included in Section 5.8 of the BMP</div> <div>d.<div><div>(i) Methodology provided in BMP Appendix G - Table 4-2</div><div>(ii) BMP refers to SWMP</div></div></div> <div>e. Detailed criteria for determining surface water impacts (in respect of flows, quality and flooding) of the Action on Booroolong Frog is to be included in the revised BMP (pending consultation and approval).</div> <div>f. A monitoring program capable of detecting any specified criteria for triggering remedial action is to be included in the revised BMP which is subject to further consultation and subsequent approval (J. Snape pers. comm).</div> <div>g. Mitigation measures specific to the Booroolong Frog contained in BMP Appendix G Table 4-1.</div> <div>Changes to the BMP to reflect recommendations in previous audits is still subject to ongoing consultation and subsequent approval (J. Snape pers. comm).</div>							
5	The approval holder must submit the Biodiversity Management Plan and Environmental Management Strategy required by conditions B21 and C1 of the State Infrastructure Approval to the department for the Minister’s approval before they are approved by the NSW Planning Secretary.		Not applicable								
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.	<div>Biodiversity Management Plan (rev 0.13) dated 30/10/2024</div>	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						

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
7	To offset the impacts of the Action on protected matters, the approval holder must implement conditions B18, B19 and B20 of the State Infrastructure Approval.		Not applicable	Compliant with Condition B18, B19 and B20 of the State Infrastructure approval.	
8	The approval holder must notify the department in writing within 10 business days of making a biodiversity offset payment to the NSW National Parks and Wildlife Service. Each notification must state the date of payment, the amount paid, and the component of the biodiversity offset obligations in respect of which the payment is made.		Compliant	Confirmed during the Initial Construction Audit payment was made by Snowy Hydro Limited on behalf of Transgrid to NPWS on the 31 August 2023.	
Submission and Publication of Plans					
9	The approval holder must submit all plans required by these conditions electronically to the department.		Compliant	Confirmed during the Initial Construction Audit the EMS and BMP were sent and approved by the Department.	
10	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: <ul style="list-style-type: none"> <li>a. the plan is approved by Secretary of the NSW Department of Planning and Environment as required under a state/territory government condition which must be complied with in accordance with these EPBC Act conditions.</li> </ul>	Project Webpage (sighted 6/03/2025)	Compliant	Consistent with previous Construction Audits management plans are available and accessible on the project website (sighted). <a href="https://www.lumea.com.au/projects/snowy-2-0-transmission-connection-project/#environmental-documentation">https://www.lumea.com.au/projects/snowy-2-0-transmission-connection-project/#environmental-documentation</a>	
11	The approval holder must keep all published plans required by these conditions on the website until the expiry date of this approval.	Project Webpage (sighted 6/03/2025)	Compliant	Refer to Condition 10.	
12	The approval holder is required to exclude or redact sensitive ecological data from plans published on the website or otherwise provided to a member of the public.		Not applicable	Confirmed during the Initial Construction Audit data has already been made publicly available by the NSW Government on the Major Projects webpage.	
13	If sensitive ecological data is excluded or redacted from a plan in accordance with condition 12, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.		Not applicable		
Part B – Administrative Conditions					
Notification of Date of Commencement of Action					
14	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days of commencement of the Action.		Not applicable	Confirmed during the Initial Construction Audit AG DCCEEW were notified of the commencement of construction within 5 business days.	
15	If the commencement of the Action does not occur within 5 years from the date of this approval, then the approval holder must not commence the Action without the prior written agreement of the Minister.		Not applicable	Action has commenced within 5 years of this approval	
Compliance Records					
16	The approval holder must maintain accurate and complete compliance records.	Summary_DCR_All_Plans Register	Compliant	Transgrid utilise compliance tracking systems and excel registers/spreadsheets (sighted) to ensure they meet the specific performance measures and criteria set out by this approval.	
17	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.  <i>Note: Compliance records may be subject to audit by the department, or by an independent auditor in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the department's website or through the general media.</i>		Not triggered	No requests were received during the audit period (J. Snape pers. comm).	
18	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guidelines for biological survey and mapped data (2018), or any subsequent official version or as otherwise specified by the Minister in writing.		Compliant	All plans prepared in accordance with the department's Guidelines for biological survey and mapped data (2018) and Guide to providing maps and boundary data for EPBC Act projects (2021).	



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
19	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guide to providing maps and boundary data for EPBC Act projects (2021), or any subsequent official version or as otherwise specified by the Minister in writing.		Compliant	All plans are generally prepared in accordance with the department's Guidelines for biological survey and mapped data (2018) and Guide to providing maps and boundary data for EPBC Act projects (2021).	
20	The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 12 months of the commencement of the Action.		Not triggered		
Annual Compliance Reporting					
21	The approval holder must prepare a compliance report for each 12-month period following the date of this approval, or as otherwise agreed to in writing by the Minister.		Not triggered	No Compliance Report was required to be submitted during this audit period.	
22	Each compliance report must be consistent with the department's Annual Compliance Report Guidelines (2014), or any subsequent official version.		Not triggered	No Compliance Report was required to be submitted during this audit period.	
23	Each compliance report must include: <ul style="list-style-type: none"> <li>a. Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.</li> <li>b. One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.</li> <li>c. A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.</li> </ul>		Not triggered	No Compliance Report was required to be submitted during this audit period.	
24	The approval holder must: <ul style="list-style-type: none"> <li>a. Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required.</li> <li>b. Notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website.</li> <li>c. Provide the weblink for the compliance report in the notification to the department.</li> <li>d. Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.</li> <li>e. Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.</li> <li>f. If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.</li> </ul> <i>Note: Compliance reports may be published on the department's website.</i>		Not triggered	No Compliance Report was required to be submitted during this audit period.	
Reporting Non-compliance					
25	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.	Track 4 Unauthorised Clearing Email Correspondence dated 27/03/2025  Maragle Turbid Water Discharge June 2025 Email Correspondence dated 24/06/2025	Compliant	During the audit period, one unauthorised clearing event and five rainfall events resulted in sediment-laden water discharges. All six incidents were reported to the department within two days of becoming aware. For further detail refer to Condition C7 of the Infrastructure Approval Tables.	

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
		<p>Maragle Substation Discharge July 2025 Event 1 Email Correspondence dated 08/07/2025</p> <p>Maragle Substation Discharge July 2025 Event 2 Email Correspondence dated 24/07/2025</p> <p>Maragle Switchyard Basin Overtop Email Correspondence dated 28/07/2025</p> <p>Maragle Substation Discharge August 2025 Email Correspondence dated 29/08/2025</p>			
26	<p>The approval holder must specify in the notification:</p> <ol style="list-style-type: none"> <li>Any condition or commitment made in a plan which has been or may have been breached.</li> <li>A short description of the incident and/or potential non-compliance and/or actual noncompliance.</li> <li>The location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance.</li> </ol> <p><i>Note: If the exact information cannot be provided, the approval holder must provide the best information available.</i></p>		Compliant	All notifications included the requirements of condition 26.	
27	<p>The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify:</p> <ol style="list-style-type: none"> <li>Any corrective action or investigation which the approval holder has already taken.</li> <li>The potential impacts of the incident and/or non-compliance and/or non-compliance.</li> <li>The method and timing of any corrective action that will be undertaken by the approval holder.</li> </ol>		Compliant	All six incidents during the audit period were followed by the submission of detailed reports to the department within the required 12 business days. For further detail refer to Condition C7 of the Infrastructure Approval Tables.	
Independent Audit					
28	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every five-year period following the commencement of the Action until this approval expires, unless otherwise specified in writing by the Minister.		Not triggered	An independent audit of compliance was not triggered during the audit period.	



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
29	For each independent audit, the approval holder must: <ol style="list-style-type: none"> <li>Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit.</li> <li>Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department.</li> <li>Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department.</li> <li>Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report.</li> <li>Keep every audit report published on the website until this approval expires.</li> </ol>		Not triggered	Refer to Condition 29.	
30	Each audit report must report for the five-year period preceding that audit report.		Not triggered	Refer to Condition 29.	
31	Each audit report must be completed to the satisfaction of the Minister and be consistent with the department's Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019), or any subsequent official version.		Not triggered	Refer to Condition 29.	
Completion of an Action					
32	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.		Not triggered		
33	Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data.		Not triggered	Construction activities were ongoing throughout the audit period.	
Change to State Infrastructure Development					
34	The approval holder must notify the department in writing of any proposed change to the State Infrastructure Approval that may relate to protected matters within 2 business days of formally proposing a change and within 5 business days of becoming aware of any proposed change.		Not triggered	No proposed changes to the State Infrastructure Approval occurred during this audit period.	
35	The approval holder must notify the department in writing of any change to the State Infrastructure Approval conditions that may relate to protected matters, within 10 business days of a change to conditions being finalised.		Not triggered	See Condition 34 for details.	
Revision of Management Plans					
36	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.		Not triggered	No management plans have been approved by the department during the audit period.	
37	The approval holder may choose to revise an action management plan approved by the Minister under condition 5 or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the Action in accordance with the RAMP would not be likely to have a new or increased impact.	Revised BMP Rev 0.14 Submission Correspondence dated 30/04/2025 Revised BMP Rev0.14 Email Correspondence dated 05/08/2025	Compliant	During the audit period, Transgrid submitted a revised version of the BMP to the Minister in accordance with Section 143A of the EPBC Act. These revised documents relate to minor amendments to the submission timeframe for the OVMP and were submitted on the basis that the proposed changes would not result in a new or increased impact.  During the audit period, Transgrid revised the BMP on two occasions. On 30 April 2025, a submission form was lodged to revise the OVMP submission timeframe from 16 to 20 months (sighted). A subsequent revision was made on 30 July 2025 to further extend the timeframe from 16 to 22 months (sighted).	

**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
38	<p>If the approval holder makes the choice under condition 37 to revise an action management plan without submitting it for approval, the approval holder must:</p> <p>a. Notify the department electronically that the approved action management plan has been revised and provide the department with:</p> <p>(i) an electronic copy of the RAMP;</p> <p>(ii) an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP;</p> <p>(iii) an explanation of the differences between the approved Action management plan and the RAMP;</p> <p>(iv) the reasons the approval holder considers that taking the Action in accordance with the RAMP would not be likely to have a new or increased impact; and</p> <p>(v) written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the department.</p> <p>b. Subject to condition 40, implement the RAMP from the RAMP implementation date.</p>	<p>Revised BMP Rev 0.14 Submission Correspondence dated 30/04/2025</p> <p>Revised BMP Rev.014 Department Correspondence dated 5/08/2025</p>	Compliant	<p>The BMP (Rev 0.14) was submitted to the Department on 30 April 2025, addressing requirements (i) to (v) of Condition 38. A revised version of the BMP (Rev 0.14) was subsequently provided in August 2025.</p> <p>A revised BMP (Rev 0.14) was subsequently submitted in August 2025 to address minor updates. In email correspondence dated 5 August 2025, the Department acknowledged receipt of the EPBC Business Portal submission and notification relating to the revised Biodiversity Management Plan (Rev 0.14) under Conditions 37 and 38.</p>	
39	<p>The approval holder may revoke its choice to implement a RAMP under condition 37 at any time by giving written notice to the department. If the approval holder revokes the choice under condition 37, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 37.</p>		Not triggered		
40	<p>If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the Action in accordance with the RAMP would be likely to have a new or increased impact, then:</p> <p>a. Condition 37 does not apply, or ceases to apply, in relation to the RAMP.</p> <p>b. The approval holder must implement the action management plan specified by the Minister in the notice.</p>		Not triggered		
41	<p>At the time of giving the notice under condition 40, the Minister may also notify that for a specified period of time, condition 37 does not apply for one or more specified Action management plans.</p> <p>Note: Conditions 37, 38, 39 and 40 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised Action management plan, at any time, to the Minister for approval.</p>		Not triggered		

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
Construction Environmental Management					
	The management of environmental impacts during construction would be documented in the CEMP. The CEMP would provide a centralised mechanism through which all potential construction-related environmental impacts will be managed. It would also provide the overall framework for the system and procedures to ensure that environmental impacts are minimised, and that legislative and approval requirements are fulfilled.		Compliant	Confirmed during the Initial Construction Audit, management of environmental impacts during construction are documented within the ‘Aspects and impacts register’ included as Appendix G of the Construction Environmental Management Plan (CEMP).	
	<p>The CEMP would include:</p> <ul style="list-style-type: none"> <li>• TransGrid's and the Contractor's environmental policy, objectives, and performance targets for construction</li> <li>• Reference to all relevant statutory and other obligations, including consents, licenses and approvals</li> <li>• Management policies, procedures, and review processes to assess the implementation of mitigation measures and the environmental performance of the project against the objective and targets <ul style="list-style-type: none"> <li>○ Requirements and guidelines for management in accordance with</li> <li>○ The mitigation measures specified in this EIS</li> </ul> </li> <li>• Requirements in relation to incorporating and implementing mitigation measures and emergency response procedures</li> <li>• Roles and responsibilities of all personnel and contractors to be employed on site</li> <li>• Incident and contingency management procedures</li> <li>• Procedures for complaints handling and ongoing communication with the community</li> <li>• Monitoring and auditing program, as defined by this EIS and the conditions of the approval.</li> </ul>		Compliant	Confirmed during the Initial Construction Audit, a CEMP has been prepared for the development.	
	<p>The CEMP would comprise a main CEMP document, issue-specific sub-plans, activity-specific procedures and strategies, and site-based control maps as relevant. These include:</p> <ul style="list-style-type: none"> <li>• Rehabilitation plan</li> <li>• Spoil management plan</li> <li>• Construction traffic management plan (CTMP)</li> <li>• Biodiversity management plan</li> <li>• Soil and water management plan (SWMP)</li> <li>• Cultural heritage management plan (CHMP)</li> <li>• Historic and natural heritage management plan</li> <li>• Flood management plan (FMP)</li> <li>• Contaminated land management plan (CLMP) and associated NOA management plan (if required)</li> <li>• Prepare-Act-Survive bushfire response plan</li> <li>• Construction waste management plan (CWMP)</li> <li>• Worker accommodation strategy.</li> </ul>		Compliant	<p>Confirmed during the Initial Construction Audit, the CEMP includes relevant sub-plans, activity-specific procedures and strategies, and site-based control maps as relevant for the development.</p> <p>The Rehabilitation Management Plan (RMP) will be included in the revised CEMP pending the provision of the Post-clearing Vegetation Integrity Monitoring Report in Partial Clearing Zones (C. Palmer and J. Snape pers. comm).</p>	
Biodiversity					
B1	<p>Detailed design of the project will focus on the retention of managed shrub and groundcover vegetation zones, within the ECZ, H CZ 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.</p> <p>Final design for permanent creek crossing structures on access roads will implement a design option to ensure stream flow is unaffected (e.g. single span to minimise stream disturbance and flow).</p> <p>Design and micro-siting of access tracks will avoid and minimise impacts to rock outcrops, large boulders, piled rock, and rock features that provide potential sheltering and breeding habitat for fauna including threatened species and avoid mapped habitat trees. Access track corridors will be established with consideration to terrain (e.g., utilisation of the ridgelines to navigate to the higher elevations) to minimise cut/fill and vegetation clearing.</p>	<p>Visual observation during Site Audit</p> <p>Bridge design requirements confirmed during Audit 2.</p>	Compliant	It is considered that the detailed design requirements have been met in relation to the clearing zones, permanent creek crossing structures and micro siting of access tracks.	

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
B2	<p>A BMP will be prepared and approved prior to construction. The BMP will be prepared by a qualified ecologist in consultation with BCS and NPWS, and include a plan for implementing, evaluating and reporting on the effectiveness of all mitigation measures outlined in the revised BDAR (Appendix C), but not be limited to these measures. The BMP will be based on SMART principals (Specific, Measurable, Achievable, Realistic, Timebound) and will focus on monitoring the performance of proposed measures and informing an adaptive management approach based on performance triggers for remedial action or additional offsets where further impacts are identified.</p> <p>The BMP will include a program to monitor, evaluate and publicly report on the outcomes of a biodiversity monitoring program (refer Section 11.2 of the revised BDAR). The BMP must stipulate objectives for monitoring, and how baseline data will be captured and represented.</p>	<p>Biodiversity Management Plan (rev 0.13) dated 30/10/2024</p>	Compliant	<p>Confirmed during the Initial Construction Audit a Biodiversity Management Plan (BMP) has been prepared prior to the commencement of construction.</p> <p>Implementation of the BMP is assessed in BMP Management Measures Compliance Table (refer <b>Table 2</b> in <b>Appendix 4</b>).</p>	
B3	<p>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.</p> <ul style="list-style-type: none"> <li>The plan will focus on the implementation of soil erosion prevention, re-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</li> <li>Restoration of riparian vegetation (i.e. weed control) will be implemented to protect and improve key habitat areas of the Booroolong Frog</li> <li>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</li> <li>Revegetation of slopes will be undertaken in accordance with the rehabilitation plan</li> <li>Landscaping of pervious surfaces using native indigenous species only</li> <li>Soil loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder)</li> <li>Ongoing maintenance of the rehabilitation work will be required, including management of weeds and pathogens</li> <li>Topsoil and subsoil generated during construction will be stockpiled separately on-site to be used for rehabilitation. Stockpiles will be managed according to best management practices (Managing Urban Stormwater: Soils and Construction).</li> </ul>	<p>Rehabilitation Management Plan Rev 0.06 dated 06/06/2025</p> <p>DPHI Rehabilitation Management Plan Approval Letter dated 27/06/2025</p>	Non-compliant	<p>The RMP has been prepared in consultation with CPHR and FCNSW and was approved on the 26 June 2025 by the Planning Secretary.</p> <ul style="list-style-type: none"> <li>Implementation of the RMP is detailed in Section 5 and rehabilitation measures to be undertaken are detailed Table 5-6</li> <li>Riparian vegetation is detailed in Section 5.1.7.3</li> <li><b>The Trigger Action Response Plan (TARP) does not include notification to NPWS or CPHR in the event that remedial actions are triggered.</b> It is 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. <b>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..</b></li> <li>Provided in Appendix B: Trigger Action Response Plan</li> <li>Revegetation of batters is included in Table 5-2 with performance indicators included in Table 6-1</li> <li>Planting is detailed in Section 5.1.7</li> <li>Soil stabilisation is detailed in Section 5.</li> <li>Ongoing maintenance of rehabilitation works is detailed in Table 5-6 and Appendix B: Trigger Action Response Plan</li> <li>Managing soils is detailed in Section 5.1.3.</li> </ul> <p><b>Recommendation: It is recommended the TARP in the Rehabilitation Management Plan be revised to include notification to NPWS and CPHR in the event if remedial actions have been triggered.</b></p>	NC-07
B4	<p>Pre-clearing Process: the pre-clearing process will include two stages. Stage 1 will include survey and translocation of any fauna from the disturbance area into areas of retained vegetation prior to the development of the project. This may include detailed markup of threatened species locations and their translocation such as <i>Caladenia montana</i>. All work must be carried out by qualified ecologist. The next pre-clearing stage will include final inspections of the disturbance area immediately before the construction activity commences to check and physically mark any important habitat features that need to be considered when identifying exclusion zones and conducting the staged habitat removal process within the total and partial clearing zones. Document, mark and record the location of:</p> <ul style="list-style-type: none"> <li>Large stick nests</li> <li>Any rock features</li> <li>Habitat/hollow-bearing trees</li> <li>Threatened flora.</li> </ul> <p>The outcomes of the pre-clearing inspections will be reported to BCS/NPWS prior to the commencement of vegetation clearing. The report will include any fauna relocated or euthanised, including name of qualified/licensed handler, species, location notes, and release location and method.</p>	<p>Maragle Form 09 - 24hr Pre-clearing Checklist – E08 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E05, East ► West of Sheep Station Creek ► T11 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E19, East ► West of Sheep Station Creek ► Access Track 5 from T9 to T10 dated 18/09/2025</p>	Compliant	<p>Consistent with previous Construction Audits, NPWS and CPHR received pre-clearing reports, with the final reports provided in Construction Audit 3. As confirmed in Construction Audit 3, these reports contained detailed information regarding the effort and observations recorded during pre-clearing surveys. No reports were prepared during the audit period as clearing was completed shortly after Construction Audit 3.</p> <p>During the audit, pre-clearing checklist forms and a sample of records were reviewed.</p> <p>In response to an Opportunity for Improvement raised in Construction Audit 3, UGL are consulting with the Project ecologist (SLR) to update the Pre-Clearing Checklist and Clearing Permit to improve alignment and traceability across reporting documentation.</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
B5	<ul style="list-style-type: none"> <li>The boundary of the clearing limits for each disturbance zone will be clearly marked on site by a surveyor before vegetation clearing commences.</li> <li>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</li> <li>Exclusion zones and the edge of the clearing boundary will be marked with high visibility fencing and signage</li> <li>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</li> <li>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</li> <li>Hazard trees identified from the LiDAR 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.</li> </ul>	Major Projects Notification - Track 4 Unauthorised Clearing in Project Area dated 27/03/2025	Non-compliant	<p>During the audit period, <b>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.</b> 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, <b>a central register documenting delineation measures has not yet been established.</b></p> <p><b>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.</b></p>	NC-08
B6	A vegetation clearing methodology has been developed (provided as Appendix K of the revised BDAR), the methods described focus on the removal of vegetation in total and partial clearing zones. These methods will be incorporated as a vegetation clearing plan within the BMP designed to document the methods of vegetation and habitat clearing within each zone, including soil protection measures, mechanical and non-mechanical approaches, removal of habitat, protection of retained vegetation, and appropriate storage and re-use of mulch and timber to avoid disturbance of retained vegetation. Hollows logs and limbs encountered during clearing will be retained for placement within adjacent vegetation or on the maintained easement within shrub retention areas. The plan will include a requirement to prepare a post clearing report that records the final clearing extent using GPS to demonstrate whether clearing is within the approved disturbance area, and if exceeded, recalculate additional offset obligations.		Compliant	Confirmed during previous Construction Audits the requirements of Condition B6 are addressed in the BMP Appendix B Clearing Procedure.	
B7	The vegetation clearing procedures will include provisions that any felled timber within Bargo State Forest that FCNSW determine can be repurposed will be removed off-site by FCNSW.		Compliant	Requirements of Condition B7 are addressed in the BMP Appendix B Clearing Procedure.	
B8	<p>A staged habitat removal process will be required for removal of habitat (hollow-bearing trees, habitat trees, and bushrock) Staged habitat removal minimises direct impacts on fauna by providing them with an opportunity to vacate hollows and relocate naturally. The process includes:</p> <ul style="list-style-type: none"> <li>If possible, avoid clearing during times when hollow-dependent fauna are breeding</li> <li>Contact vets and wildlife carers before works commence</li> <li>Ensure that licensed wildlife carers and/or ecologists are on site during habitat removal</li> <li>Adopt two staged removal clearing non-habitat first (e.g. shrubs, regrowth, ground cover and nonhabitat trees). Allow at least 24 hours for fauna to vacate habitat before removing habitat</li> <li>Ensure wildlife carers and/or ecologists are present during removal of habitat trees, and that habitat trees are felled carefully, using equipment that allows habitat trees to be lowered to the ground with minimal impact</li> <li>A procedure for the ethical handling of injured or displaced fauna is to be documented in the BMP</li> <li>Record the effort and outcomes of the habitat removal process</li> <li>Save and reuse cleared material for rehab and habitat</li> <li>Preparation of an ‘Unexpected threatened species finds procedure’ to be implemented during construction and operation. Applies to all activities that have potential to impact upon threatened flora and fauna species which have not already been assessed and approved. Any threatened entities found in a location previously unknown during construction or operation must be immediately notified to NPWS</li> </ul>	<p>Maragle Form 09 - 24hr Pre-clearing Checklist – E08 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E05, East ► West of Sheep Station Creek ► T11 dated 18/09/2025</p> <p>Maragle Form 09 - 24hr Pre-clearing Checklist - E19, East ► West of Sheep Station Creek ► Access Track 5 from T9 to T10 dated 18/09/2025</p>	Compliant	<p>Requirements of Condition B8 are addressed in the BMP Appendix B Clearing Procedure, Appendix C Fauna Rescue and Release Procedure and Appendix D Unexpected Threatened Species Procedure.</p> <p>Implementation of staged clearing requirements is assessed under BMP Biodiversity Mitigation Measure BMP16 (Refer to <b>Table 2</b> in <b>Appendix 4</b>).</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
	<ul style="list-style-type: none"> <li>Preparation of a Fauna handling and rescue procedure to be implemented during construction and operation.</li> </ul>				
<b>B9</b>	Clearance of construction areas prior to commencement of daily construction to ensure there is no wildlife present. This will involve drive through sweep of areas planned for construction, by the contractors environmental representatives. If an animal is located within the construction area during works, the Delivery Manager and Project Management Site Representative are to be notified immediately. All work must immediately cease within the immediate area of the find and a local wildlife rescue or an ecologist will be required for assistance where necessary.	Daily Site Diary samples	Compliant	Assessed as compliant against BMP Biodiversity Mitigation Measure BMP 37 (Refer to refer <b>Table 2 in Appendix 4</b> ).	
<b>B10</b>	<p>An operational Vegetation Management Plan (VMP) will be prepared by an experienced ecologist prior to commencement of project operation. The plan will focus on vegetation management within the ECZ and HTZ with the aim of maintaining long-term Vegetation Integrity targets.</p> <p>The VMP will interpret the vegetation integrity scores into feasible actions to maintain vegetation condition, and outline project specific ongoing vegetation clearing requirements and methodology.</p> <p>The VMP will include a strategy for maintaining the expected vegetation outcomes for all partial impact zones assessed in the revised BDAR. The strategy will:</p> <ul style="list-style-type: none"> <li>Translate the vegetation integrity (VI) scores into management actions to be applied during construction and operation of the project</li> <li>Include triggers for corrective actions</li> <li>Include details for review and reporting by a qualified ecologist in consultation with NPWS and BCS</li> <li>The VMP will be guided by Transgrid’s vegetation risk model and operational vegetation clearance requirements, in addition to the principles for Integrated Vegetation Management (IVM) which will aim to preserve future Vegetation Integrity scores within the ECZ</li> <li>Long-term monitoring will be conducted to measure the effectiveness of the VMP. The methods and timing of the monitoring will be documented in the VMP and will include a responsibility to report the results to BCS and NPWS</li> <li>The VMP will detail methods for vegetation maintenance in the ECZ with a focus on retaining plant species diversity and cover of low understorey and groundcover plants &lt;200mm, while tree and shrub regrowth will be suppressed for long-term easement management</li> <li>The VMP will detail methods of maintenance in the HTZ with a focus on retaining all non-hazard trees, as well as shrubs, grasses, and forbs. Ongoing inspection (using Lidar, and follow-up on foot or drone) of hazard trees will occur and document the method of removal for each tree to ensure that non-hazard trees are not impacted during tree felling. Where threatened orchids are mapped (Caladenia montana), hazard trees will be sensitively removed to avoid impacting on the ground layer. This will include removing trees from the top down and cutting into small sections, transferring into the ECZ and mulching</li> <li>The VMP will address measures required to minimise fire risk during operation of the project.</li> </ul>	<p>DPHI Condition A5 Clarification Letter dated 29/08/2025</p> <p>BMP Rev 0.14 Post Approval Form dated 30/04/2025</p> <p>BMP Rev 0.14 Post Approval Form dated 30/07/2025</p>	Compliant	During the audit period, Transgrid submitted the Biodiversity Management Plan (BMP) to the Planning Portal on two occasions, both involving minor amendments to the submission timeframe for the Operational Vegetation Management Plan (OVMP). On 30 April 2025, a submission form was lodged to revise the OVMP submission timeframe from 16 to 20 months. A subsequent submission was made on 30 July 2025 to further extend the timeframe from 16 to 22 months. At the time of the audit approval from the Planning Secretary was pending.	
<b>B11</b>	<p>A Soil and Water Management Plan (SWMP) will be prepared and implemented as part of the CEMP. The plan will include stringent controls to mitigate impacts of runoff and sediment transfer from the project area during construction and operation. Control measures will remain in situ until site stabilisation completion criteria are met. The plan will ensure protection of aquatic habitat in the tributaries crossed by the project, and particularly aimed at protecting the habitat for the Booroolong Frog associated with Yarrangobilly Creek.</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.</p> <p>Sedimentation will be managed through implementation of effective sediment control management plans will be implemented to ensure that sediment does not enter the waterways</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</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
	<p>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"> <li>Erosion and sediment control plans for all stages of construction</li> <li>The implementation of sediment control measures across the project area - sediment control ponds and sediment basins, coir logs and sediment fencing to control sediment run-off, catch drains and perimeter bunds and diversion drains</li> <li>A schedule will be included for cleaning sediment basins with intervals to be informed from the outcomes of monitoring basins from Snowy 2 Main Works construction and catchment modelling. The schedule will include additional checks after rainfall events of &gt;50 mm in 24 hours</li> <li>Additional 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 and Wallaces Creek and at structures sites and access roads on the slopes around Yarrangobilly Creek and associated tributaries</li> <li>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</li> <li>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</li> <li>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</li> <li>Implementation of tannin leachate management controls may be required as determined by the monitoring program</li> <li>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</li> <li>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</li> <li>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)</li> <li>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)</li> <li>An induction protocol will be mandatory for all personnel involved in construction and operation works</li> <li>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.</li> </ul>			<p>drains are being installed as a priority, along with the application of soil binder to exposed surfaces.</p> <p>However, <b>erosion and sediment controls located downstream of Track 8 along Wallace Creek have not yet been repaired and remain non-functional</b>. 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><b>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.</b></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>	
<b>B12</b>	<p>To prevent an increase in weeds and disease pathogens in adjacent vegetation the flowing will be carried out: Weed control and monitoring programs will be developed and documented in the BMP in consultation with BCS and NPWS and any deviation from measures approved by DPE are to be raised and approved. The program will include adaptive management strategies for priority weed species during construction, and early operational phase. The details of the monitoring program will be determined during the preparation of the BMP and follow the principles outlined in Section 11.2 of the revised BDAR (Appendix C)</p> <ul style="list-style-type: none"> <li>Identify all weed species in KNP in consultation with NPWS. Priority weeds species in Bago State Forest are consistent with high threat weeds</li> </ul>		Compliant	Requirements of B12 are addressed in the Biodiversity Management Plan Appendix H Weed and Pathogen Control Monitoring Program.	



Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
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	<ul style="list-style-type: none"> <li>Identify, map, and remove all weeds before clearing for construction, and record location of weed and sprayed area for use in ongoing weed monitoring and management programs.</li> <li>Prepare a vehicle and machinery hygiene strategy and implement during construction and operation. The strategy will include specific locations, timing and methods for removing soil and plant matter from vehicles and machinery. Ensure vehicle and machinery hygiene measures in the strategy are applied during construction and operation</li> <li>During the clearing works, weeds will be disposed and managed appropriately to stop the spread of weed species</li> <li>Wash down stations will be constructed at suitable locations to wash down vehicles and employee shoes to stop the spread of weeds, pathogens (including amphibian chytrid fungus, <i>Phytophthora cinnamomi</i> and exotic rust fungi) and the introduction of new species</li> <li>During construction, any biosecurity issues identified are to be reported to FCNSW and NPWS immediately.</li> </ul>				
<b>B13</b>	<p>To prevent an increase in predatory and pest species the following will be carried out:</p> <ul style="list-style-type: none"> <li>Personal waste / refuse generated during construction will be stored appropriately in inaccessible bins and disposed at appropriate waste disposal facilities off-site. Any personal waste generated during operation will be removed from the site (including substation) and disposed in an appropriate waste facility.</li> <li>A feral animal monitoring program will be developed and implemented as described in Section 11.2 of the revised BDAR (Appendix C)</li> <li>Based on performance triggers for adaptive management. It will be important to share data with NPWs and State Forests. Increased predator activity will trigger the need for predator control based on performance measures to be outlined in the BMP. Control will be done in consultation with NPWS and DPE - State Forests.</li> </ul>	SLR Pest and Predator Data and Monitoring Report – Quarter 2 dated 22/07/2025	Compliant	<p>Inaccessible bins were observed onsite during the site audit inspection. Waste originating from the Eastern Project alignment is exported to Bellettes Landfill (EPA Licenced Facility) and waste from the Project West Is exported to Forest Hill Liquid Waste Storage and Transfer Station which is operated by JJ Richards.</p> <p>During the audit, it was noted that Bellettes had not been used in the two weeks prior to the site audit inspection. Waste removal for the entire development is expected to be managed by JJ Richards (C. Palmer pers. comm).</p> <p>A Pest and monitoring Program has been prepared for the Project and is included as Appendix I in the BMP. Monitoring of feral pests has continued during the audit period.</p>	
<b>B14</b>	<p>The extensive survey data for this project, and the Main Works EIS will be utilised to identify specific bird and bat populations that are at risk of collision and electrocution. E.g. For higher risk species deploy species specific bird divertors, with day/night reflectors within approved buffer distance, along key sections of transmission line. This will be appropriate for diurnal and nocturnal birds The BMP to include adaptive management for high-risk bird and bat species as outlined below with intervals and strategies to be determined in consultation with NPWS:</p> <ul style="list-style-type: none"> <li>Regular monitoring within the transmission line easements for evidence of bird / bat collision with transmission lines (intervals to be determined in consultation with NPWS)</li> <li>Monitoring of taller structures for evidence of raptor nest building</li> <li>Develop target trigger for number of high-risk species incidents</li> <li>Deploy species specific bird / bat divertors / reflectors in areas where a defined number of incidents have occurred.</li> </ul>		Compliant	Requirements of Condition B14 are addressed in the BMP Section 5.13 and Appendix K Bird and Bat Management Plan.	
<b>B15</b>	<p>To reduce light impacts the following will be implemented:</p> <ul style="list-style-type: none"> <li>Directional lighting will be used for any permanent lighting required (i.e. substation) to minimise light spill</li> <li>Artificial lighting required during construction in the early morning and late afternoon in winter will be limited to within approved construction hours.</li> </ul>	Site observation	Compliant	<p>During the site audit inspection lighting was observed to be installed as low intensity lighting which was also confirmed by J. Snape pers. comm.</p> <p>No permanent lighting has been installed during the audit period; however, during the site inspection although not operational, some lighting structures appeared to have been constructed facing downward ensuring light does not shine above the horizontal line.</p>	
<b>B16</b>	The barbed wire/razor wire fencing installed around the substation switchyard will have improved visibility measures installed, such as adding visible objects to the fence, for example tape, plastic flags, and metal tags.	Site observation	Compliant	Barbed wire/razor wire fencing installed around the switchyard were observed to have reflector tags.	
<b>B17</b>	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		<b>Non-compliant</b>	<b>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.</b>	<b>NC-09</b>
<b>B18</b>	Vehicle movements on newly formed access tracks will be limited to 20km/h speed limit implemented to reduce the risk of vehicle strike to fauna.	Site observation	Compliant	Vehicle limits were sighted during the site audit inspection.	

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
B19	All tree pruning operations will be carried out in accordance with the Australian Standard AS4373-2007 Pruning of Amenity Trees.		Compliant	Zero non-compliance’s were reported in relation to tree pruning operations during the audit period. Tree pruning operations are carried out following relevant Environmental Safety work Method Statements (J. Snape pers. comm.). No tree pruning works were carried out during the audit period.	
Aboriginal Heritage					
AH1	Where possible, impacts to identified Aboriginal sites will be avoided.		Noted		
AH2	<p>A CHMP and accompanying unexpected finds procedure will be prepared, to guard against inadvertent impacts to Aboriginal objects during construction. The CHMP will specify that project works will be restricted to the disturbance area. It will include provisions to ensure workers are made aware of cultural heritage places and their value, for example through project inductions. The CHMP will include provisions to guard against indirect impact to AHIMS# 56-6-0477 and provide a method to manage potential heritage constraints and unexpected finds during construction.</p> <p>The long-term storage of any recovered Aboriginal objects will be developed during the completion of the CHMP, in consultation with the RAPs, but is likely to include (in preferential order):</p> <ul style="list-style-type: none"> <li>Re-burial on site, in an appropriate location in the vicinity of the project</li> <li>Lodged with a RAP under a Care and Control Agreement</li> <li>Deposition with the Australian Museum.</li> </ul>	Aboriginal Heritage Management Plan (rev 0.07) dated 24/10/2024	Compliant	<p>Confirmed during the Initial Construction Audit, an Aboriginal Heritage Management Plan (AHMP) has been prepared and forms part of the Heritage Management Plan for the development.</p> <p>The AHMP addresses all requirements outlined in Condition AH2.</p>	
AH3	<p>Salvage collection of surface artefacts, will be carried out prior to construction, at ST PAD 01 and ST PAD 02, ST PAD 03, Str5 AS, AHIMS# 56-6-0540, and AHIMS# 56-6-0048 and AHIMS# 56-6—0477 (if required) with the RAPs. Surface collection will be undertaken using the following method:</p> <ul style="list-style-type: none"> <li>Artefact collection will be undertaken by a team comprising an archaeologist and RAP representatives</li> <li>Artefact locations will be marked on the ground and recorded with a hand-held GPS (or equivalent) prior to collection</li> <li>Collected artefacts will be catalogued on site by the team, with recorded attributes as listed for the test excavation analysis</li> <li>Artefacts will be placed in individual bags, labelled with location information</li> <li>Following the completion of the surface collection program, a brief report will be prepared which outlines the results of the program.</li> </ul>		Compliant	Confirmed during the Initial Construction Audit a program of surface collection was completed for associated Aboriginal sites and reported.	
AH4	In the event that a site or artefact (as defined by the NPW Act or Heritage Act) is identified during construction works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to TransGrid, and the regulator in accordance with legislation. No work will commence in the vicinity of the find until any required approvals have been given by the regulator. In the event that skeletal remains are encountered during the activity, works must stop immediately, the area secured to prevent unauthorised access and TransGrid, NSW Police and Heritage NSW contacted.	Snowy Hydro Main Works 2.0 Heritage Find Email Correspondence dated 13/09/2025	Compliant	<p>During this audit period, no unexpected finds were identified however:</p> <ul style="list-style-type: none"> <li>On 10 September 2025, during the site audit inspection, a potential Aboriginal object was identified on the road verge near the new Wallace Creek Bridge within the Snowy Hydro Main Works Project Area. The find was promptly reported to the Snowy Hydro Main Works team and was later confirmed to be a tuff artefact. The artefact was located within a survey area previously identified as containing Aboriginal objects, where impacts to such items are permissible under the Project Approval. A Heritage Clearance Certificate had also been issued for Aboriginal objects in this area. Although the find was not within the Development area, Transgrid’s prompt reporting and coordination with the Snowy Hydro Main Works team reinforces their commitment to protecting Aboriginal cultural values and maintaining effective cooperation with adjacent stakeholders.</li> </ul>	
AH5	If changes are made to the project to include impacts outside the disturbance area, further archaeological investigation will must be conducted		Not triggered	No changes to the Project to include impacts outside the disturbance area were determined during the audit period (J. Snape pers. comm). Confirm?	
Non-Aboriginal Heritage					
NH1	During detailed design, if the disturbance area changes but is still within the project area, a consistency assessment will be prepared to confirm if impacts are consistent with the EIS.		Compliant	No significant changes to the Project design have occurred from what was assessed in the EIS (J. Snape pers. comm).	
NH2	A historic and natural heritage management plan will be prepared for the project, which clearly outlines the extent of impact to each recorded historic heritage item within the disturbance area and potential impacts to those sites located within the broader project area. The plan should clearly outline measures for their protection (where applicable) and details of further investigation and archaeological archival recording where appropriate.	Historic Heritage Management Plan (rev 0.09) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit, a Historic Heritage Management Plan has been prepared and forms part of the Heritage Management Plan for the Project. The Historic Heritage Management Plan addresses all requirements outlined in Condition NH2.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
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NH3	<p>If archaeological excavations are required:</p> <ul style="list-style-type: none"> <li>Transgrid will nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program. This person must fulfil the Heritage Council’s Excavation Director Criteria 2019 for the excavation of locally significant archaeological sites</li> <li>Archaeological Research Design and Excavation Methodology will be prepared to guide the archaeological program. It will be prepared according to Heritage Council of NSW guidelines. The methodology will be submitted for comments to the Heritage Council of NSW (or its delegate) and approval by DPE prior to the commencement of archaeological excavation</li> <li>A final archaeological excavation report will be prepared within 12 months of the completion of archaeological excavation. It will include details of any significant artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the land owner. Copies of the final excavation report will be provided to DPE, the Heritage Council of NSW and to the local Council’s local studies unit.</li> </ul>		Not triggered	No historical (non-Aboriginal) heritage archaeological excavation activities were required during this audit period (J. Snape pers. comm).	
NH4	All heritage items within the disturbance area that are to be impacted by the project will be subject to archival recording and archaeological excavations prior to the commencement of works. If these sites have been entirely destroyed by the Snowy 2.0, then the mitigation measures relating to archival recording and archaeological excavations will not apply.		Compliant	Confirmed during the Initial Construction Audit, further assessments were undertaken to determine heritage management actions. Archival recordings were only required to be undertaken R56 and R120. Archival records are included in Appendix 3 of the Post Approvals Historic Management Actions Report.	
NH5	If the construction of the project will destroy or directly impact the R45 (Lobs Hole Copper Mine Water Race), archival recording and archaeological excavation must occur prior to the commencement of construction.		Compliant	Confirmed as part of the Initial Construction Audit, archival recordings were only required to be undertaken R56 and R120. Archival records are included in Appendix 3 of the Post Approvals Historic Management Actions Report.	
NH6	In the event that a site or artefact (as defined by the NPW Act or Heritage Act) is identified during construction works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to TransGrid, and the regulator in accordance with legislation. No work will commence in the vicinity of the find until any required approvals have been given by the regulator. In the event that skeletal remains are encountered during the activity, works must stop immediately, the area secured to prevent unauthorised access and TransGrid, NSW Police and DPIE contacted.		Compliant	No unexpected historic heritage finds were encountered during the audit period (J. Snape pers. comm).	
Water					
W1	<p>The waterway crossing over flood impacted waterways such as Sheep Station Creek will be designed and constructed in a way that minimises flood risk and minimises upstream and downstream impacts. The waterway crossing will be designed to ensure flow and drainage is maintained in waterways where construction works are taking place or where the permeant waterway crossing will be. The waterway crossing will be constructed in accordance with minimum design criteria for waterway crossings outlined in Why do fish need to cross the road? Fish passage requirements for waterway crossings (Fairfull and Witheridge, 2003).</p> <p>The design of waterway crossing will also consider the appropriate measures are outlined in:</p> <ul style="list-style-type: none"> <li>Forest Soil and Water Protection – A Guide for Operators (State Forests of NSW, 2000)</li> <li>Fire Trail Design, Construction and Maintenance Manual (RFS, 2017).</li> </ul> <p>All new waterway crossings, construction and rehabilitation of works near or within watercourses be accordance with the requirements of the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).</p>		Compliant	<p>Confirmed during Construction Audit 2, the temporary and permanent design of Sheep Station Creek Bridge complies with all guidelines outlined by Condition B31 of the Infrastructure Approval.</p> <p>Since the bridge clear spans the creek channel, there will also not be any alteration of velocity or flow distribution.</p> <p>During the site audit inspection it was noted that appropriate erosion and sediment controls were installed surrounding the temporary Sheep Station Creek Bridge.</p>	
W2	<ul style="list-style-type: none"> <li>Flood modelling will be undertaken at the detailed design stage to define flood behaviour for the existing conditions due to mainstream and overland flooding. The flood models will be utilised to identify and address potential impacts of the proposed works for construction and operation of the project on flooding</li> <li>Overland flooding impacts will be considered during detailed design, to ensure that the substation’s drainage and stormwater system is adequate, and the substation's platforms are above the required flood immunity</li> <li>Structures within the flood extent will be designed with appropriate foundation to ensure stability against hydrostatic pressure and debris load.</li> </ul>		Compliant	<p>Consistent with Condition W1, flood modelling has been undertaken by SLR to enable identification of any potential impacts from and to Sheep Station Creek Bridge as a result of flooding.</p> <p>During the audit period a review of modelling has been undertaken via desktop review of 1% AEP mapping supplied by SLR consulting. An addendum report is currently in preparation by SLR to close-out associated updates (J. Snape pers. comm).</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
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.</p> <p>The SWMP will include:</p> <ul style="list-style-type: none"><li>Erosion and sediment control plans for all stages of construction that will be submitted for approval prior to its implementation. Initially the principal SWMP will be prepared, and it will be followed by the Progressive SWMP that will be regularly updated during the construction phase to take into consideration changes that may occur that require revised erosion and sediment controls</li><li>Details on the construction and management of sediment basin if determined to be required</li><li>Protection of waterways such as scour protection, stabilisation and revegetation</li><li>Any imported fill will be certified at source locations as pathogen and weed free Excavated Natural Material or Virgin Excavated Natural Material)</li><li>Management of stockpiles and spoil</li><li>Tannin leachate management controls</li><li>Management of accidental spills, response and reporting</li><li>An induction protocol</li><li>Responsibilities for all management measures.</li></ul> <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>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.</p> <p>An ESCP (sighted) has been prepared for the Project and is incorporated within the SWMP. The ESCP documents the planned measures to minimise erosion and control sediment generation. Progressive ESCPs have also been prepared to accompany the Primary ESCP. The Progressive ESCPs are updated regularly based on changes to site conditions and can take the form of “red line” mark ups of drawings. Revisions are documented in a Progressive ESCP register (sighted).</p> <p>No fill has been imported to site during the audit period.</p> <p>During the site inspection the following observations were made with respect to erosion and sediment controls:</p> <ul style="list-style-type: none"><li>The sediment basin located at the base of Track 8 was observed to be in place and operational during the audit period, 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.).</li><li>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.</li><li>Stockpiles were managed appropriately with drainage controls installed upslope and sediment controls installed downslope.</li><li>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.</li><li>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. <b>Only two areas for improvement were identified during the site inspection:</b><ul style="list-style-type: none"><li><b>A fallen sediment fence was observed on Track 8.</b> 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).</li><li><b>The geofabric installed as ground cover on some of the batters on Track 8 was seen to be degrading</b> (likely due to age) and requires replacement.</li></ul></li></ul> <p>- Review of the supplied Progressive ESCPs showed that some of the <b>Progressive ESCPs did not have dates or version numbers written (or correctly updated) on the actual drawings</b> (some had versioning listed only in the file name).</p> <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><b>Opportunity for Improvement:</b> 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><b>Opportunity for Improvement:</b> 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>	

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
				<b>Opportunity for Improvement:</b> It is recommended that a review of PESCPs 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.	
<b>W4</b>	<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> <p>Water Quality Monitoring Field Sheets dated 26/07/2025</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><b>Consistent with previous Construction Audits, there is a lag in preparing and publishing the 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</b></p> <p><b>Opportunity for Improvement:</b> 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>	
<b>W5</b>	<ul style="list-style-type: none"> <li>All chemicals or other hazardous substances will be stored in a bunded area and away from any drainage lines/pits. The capacity of the bunded area will be at least 130% of the largest chemical volume contained within the bunded area</li> <li>No refuelling or bulk herbicide preparation will occur within 40 m of natural drainage lines</li> <li>Environmental spill kits containing spill response materials suitable for the works being undertaken will be kept on site at all times and be used in the event of a spill</li> <li>Any spills will be contained, cleaned up promptly and immediately reported to the relevant site representative.</li> </ul>	<p>Soil And Water Management Plan (rev 0.10) dated 24/10/2024</p>	Compliant	<p>Confirmed during the Initial Construction Audit relevant mitigation measures are considered in the SWMP.</p> <p>It was observed during the site audit inspection chemicals were stored within bunded containers. Evidence of drip trays being implemented during refuelling were also observed.</p>	
<b>W6</b>	<ul style="list-style-type: none"> <li>The SWMP will include arrangements for managing wet weather events, including monitoring of potential high risk events (such as storms) and specific controls and follow-up measures to be applied in the event of wet weather</li> <li>Where required, adequate sediment controls (including the consideration of sediment basins) will be included in the access track design to manage erosion and sedimentation and associated impacts on receiving waters.</li> </ul>		Compliant	<p>Confirmed during the Initial Construction Audit relevant mitigation measures for wet weather events are considered in Section 5 of the SWMP and Section 5 of the ESCP. It was also confirmed ESCs for access tracks are documented within the Progressive ESCPs for the Project and observed to be installed during the site inspection. Installation of permanent ESC and drainage measures was being undertaken for some access tracks during the site inspection.</p>	
<b>W7</b>	<p>For the Snowy 2.0 T2 Tailbay site and Paddys River water uptake site:</p> <ul style="list-style-type: none"> <li>A water extraction licence will be sought prior to the extraction of any water from Talbingo Reservoir and the Paddy’s River</li> <li>Prior to extraction of water near Paddy’s River Flat Campground, rubber mats will be placed on the ground under the water trucks to prevent erosion and sediments entering the waterway</li> </ul>	<p>WAL Withdrawal Email Correspondence dated 25 August 2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit the Project only holds two water access licences which include:</p> <ul style="list-style-type: none"> <li>WAL44782</li> <li>WAL44788.</li> </ul> <p>In response to an issue identified with WAL 44782 during Construction Audit 2, the development initially sought to amend the licence to include a water allocation. During the</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
	<ul style="list-style-type: none"> <li>During water extraction from Talbingo Reservoir and Paddy’s River, slow velocities of water pumping and screens on the hoses will be used to minimise small aquatic fauna been inadvertently picked up.</li> </ul>			current audit period, the Department advised that the dewatering activities undertaken at the site may qualify for an exemption from the requirement to hold a Zero Share WAL under the Water Management Act 2000. Accordingly, the application to amend WAL 44782 was withdrawn on 25 August 2025 (sighted).	
<b>W8</b>	<p>Temporary dewatering for construction is not anticipated. In the event that dewatering is required then the following management measures will apply:</p> <ul style="list-style-type: none"> <li>Confirmation of whether or not a licence under the WM Act as defined under the NSW Aquifer Interference Policy (DPI Water, 2012) is required prior to any dewatering activity commencing</li> <li>Should the amount of water extracted be more than 3 ML/year, a water access licence will be obtained</li> <li>If dewatering is required, the management of discharge water will be documented in the SWMP Discharge water will be limited to vegetated, grassed areas, away from waterways, and within the construction footprint. If the discharge water is highly turbid, dewatering through a filter sock (or similar), or via transportable sedimentation tanks will be considered, where appropriate, to minimise sedimentation.</li> </ul>	<p>Soil And Water Management Plan (rev 0.10) dated 24/10/2024</p> <p>Water Irrigation and Disposal Permit Register</p> <p>WAL Withdrawal Email Correspondence dated 25 August 2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit, the management of discharge water is included in the SWMP alongside a Water Irrigation and Disposal Permit which is included as Appendix I.</p> <p>During the audit period groundwater has been intercepted during construction of tower foundations and other excavation activities. Intercepted water has been pumped into Intermediate Bulk Containers (IBCs for storage on site) and used for dust suppression (C. Palmer pers. comm).</p> <p>In response to an issue identified with WAL 44782 during Construction Audit 2, UGL initially sought to amend the licence to include a water allocation. Following consultation, the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) advised that the dewatering activities may qualify for an exemption from the requirement to hold a Zero-Share WAL under the Water Management (General) Regulation 2018. Based on this advice, UGL withdrew the amendment application on 25 August 2025 (sighted). This decision was supported by the availability of sufficient onsite water, removing the need to source water from alternative allocations (C. Palmer pers. comm).</p>	
<b>W9</b>	<p>A flood management plan (FMP) will be prepared for the project and will detail the processes for flood preparedness, materials management, weather monitoring, site management and flood incident management.</p> <p>The FMP will also address procedures and responsibilities for flood response (preparation of site upon receipt of flood warning, evacuation of site personnel) during and recovery following a flood event.</p>		Compliant	Confirmed during the Initial Construction Audit Flood management has been addressed in the Emergency Plan for the Project and addresses all of the requirements outlined by this condition.	
<b>W10</b>	Waterway crossing and access tracks will be inspected as part of the maintenance inspections to ensure all crossings remain in good condition.	<p>Soil And Water Management Plan (rev 0.10) dated 24/10/2024</p> <p>Pre-rainfall Inspection Checklist – Project West dated 18/07/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit monitoring requirements for soil and water management including waterway crossings and access tracks is included in Table 6-1 of the SWMP.</p> <p>During the audit period it was observed that waterway crossings have been considered within the pre-rainfall inspection checklists (sighted).</p>	
<b>Land</b>					
<b>L1</b>	Targeted geological investigations will be undertaken in areas of surface disturbance using a risk-based approach. Results from these investigations will determine the level of management to be implemented for soils and contamination (including NOA).	ADE Consulting Group - NOA and AFR Results Email Correspondence dated 11/06/2025	Compliant	During the audit period NOA testing was undertaken at the tower foundations across the project area. No asbestos was identified in any samples from either the source area or stockpiled material (C. Palmer pers. comm).	
<b>L2</b>	<p>A contaminated land management plan will be prepared prior to construction works commencing. It will include management measures to</p> <ul style="list-style-type: none"> <li>Manage areas of known or potential contamination that will be impacted during construction</li> <li>Manage unexpected finds in the event that unexpected contamination sources are identified (including NOA). This will include guidance on identifying potential contaminated land characteristics (visual, odours, etc), steps to cease works in the affected area, further investigation to assess the extent, magnitude and type of contaminants and appropriate remedial actions.</li> </ul>		Compliant	Confirmed during the Initial Construction Audit, a Contaminated Land Management Plan has been included in the Soil and Water Management Plan and is listed as Appendix H. The Contaminated Lanad Management addresses the requirement outlined in Condition L2.	
<b>L3</b>	<ul style="list-style-type: none"> <li>Further assessment will be carried out during the geotechnical investigation for the project to verify the presence/absence of NOA within the NOA risk zones. Should NOA be detected, a NOA management plan will be prepared and implemented to guide the handling, transport and disposal of the material</li> <li>NOA awareness training will be provided to all staff and contractors working in areas with NOA risk</li> </ul>	ADE Consulting Group - NOA and AFR Results Email Correspondence dated 11/06/2025	Compliant	During the audit period NOA testing was undertaken at the tower foundations across the project area. No asbestos was identified in any samples from either the source area or stockpiled material (C. Palmer pers. comm).	



Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
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	<ul style="list-style-type: none"> <li>If asbestiform and/or indicator minerals and/or textures are encountered or suspected during excavation works, work is to stop in the area and management be alerted. The area will be isolated with a 10 metre exclusion zone and sign posted, access will be restricted and specialist geological and occupational hygiene advice will be sought prior to further progressing work in that area.</li> </ul>				
L4	<p>A spoil management strategy will be prepared for the project. The spoil management plan will outline appropriate management procedures for the generation, management and importation (if required) of spoil. It will include, but not be limited to:</p> <ul style="list-style-type: none"> <li>Confirming spoil quantities</li> <li>Carrying out appropriate assessments, including geotechnical investigations</li> <li>Procedures for classification of spoil</li> <li>Identification of spoil reuse measures, including segregation of soils as subsoils and topsoils</li> <li>Spoil stockpile management procedures including minimising the number of stockpiles, area and time they are exposed, and locating stockpiles away from drainage lines and natural waterways and from where they will be susceptible to erosion</li> <li>Spoil haulage routes</li> <li>Spoil disposal and reuse locations</li> <li>Imported spoil sources and volumes.</li> </ul>		Compliant	Confirmed during the Initial Construction Audit, a Spoil Management Plan has prepared for the Project and addresses all of the requirements outlined in Condition L4.	
L5	<p>Management of topsoil stockpiles and other excavated material stockpiles to minimise dust and sediment in runoff will include:</p> <ul style="list-style-type: none"> <li>Minimising the number of stockpiles, area and time they are exposed</li> <li>Locating stockpiles away from drainage lines and natural waterways and from where they will be susceptible to erosion</li> <li>Stockpiles will be bunded in accordance with the Blue Book (Landcom, 2004) Managing Urban Stormwater – Soils and Construction, Volume 1, 4th Edition)</li> </ul> <p>Stabilise stockpiles, establish sediment controls and suppress dust as required.</p>		Compliant	Confirmed during the Initial Construction Audit, Stockpile management requirements are included in Section 5.2 of the Primary Erosion and Sediment Control Plan.	
L6	<p>Excavated material will be managed in accordance with the spoil management strategy.</p> <ul style="list-style-type: none"> <li>Where applicable, excess spoil will be re-used for other elements of the project such as access track construction. Where spoil cannot be reused it will be managed as per the SWMP. Alternatively, excess material will be disposed of at other suitable locations (including at Ravine Bay, GF01, Main Yard or other Snowy 2.0 approved emplacement areas) as agreed to with NPWS, FCNSW.</li> <li>Material which has been assessed as not suitable for reuse on land or for subaqueous disposal at the Ravine Bay, GF01, Main Yard or other Snowy 2.0 approved emplacement areas (as part of the Snowy 2.0 management procedure) or cannot be reused will be classified in accordance with the Waste Classification Guidelines (EPA, 2014). Excavated material will be transported to an appropriate excavated material disposal area. Approval will be obtained prior to transport and will require an estimate of the likely volume of excavated material to be disposed</li> </ul>		Compliant	Confirmed as part of the Initial Construction Audit, the Spoil Management Plan addresses all of the requirements outlined in this condition.	
L7	Excavated material to be disposed in the spoil emplacement locations (including Ravine Bay, GF01, Main Yard or other Snowy 2.0 approved emplacement areas will be transported to the emplacement area by TransGrid and/or contractor and then managed by Snowy Hydro in accordance with the relevant approved Snowy 2.0 Rehabilitation Plan prepared by Snowy Hydro.	<p>Spoil Movement and Placement Permit Register dated September 2025</p> <p>Spoil Movement and Placement Permit SMP-018 dated 09/06/2025</p> <p>Spoil Movement and Placement Permit SMP-013 dated 08/03/2025</p>	Compliant	All spoil transported during the audit period has been utilised either to support the construction of temporary or permanent infrastructure for the development (Permit SMP-018 sighted) or has been transported to the Main Works Temporary Stockpile (Lobs Hole Emplacement Area) (Permit SMP-013 sighted).	
L8	The CEMP will include measures to identify and report any newly identified geodiversity sites. It will also include measures to minimise impacts to known geodiversity sites		Compliant	Confirmed during the Initial Construction Audit measures considering geodiversity sites have been included in relevant sub-plans.	



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
L9	<p>A Rehabilitation Plan will be prepared in consultation with NPWS and FCNSW to guide the long term rehabilitation of the project. The rehabilitation plan will be based on the rehabilitation strategy outlined in Section 5.4.10 and will:</p> <ul style="list-style-type: none"> <li>• Include a detailed plan for rehabilitation of the site</li> <li>• Characterise the soil types within the disturbance area</li> <li>• Include details of soil management measures, including</li> <li>• Topsoil stripping and stockpiling procedure</li> <li>• Subsoil management measures</li> <li>• Soil reinstatement methodology which includes a topsoil application procedure</li> <li>• Include measures to minimise:</li> <li>• Loss of soil</li> <li>• Loss of organic matter, nutrient and soil decline</li> <li>• Compaction</li> <li>• Consideration of how rehabilitation will be carried out where soils are unable be recovered, or soils are poor/unfit for re-use</li> <li>• Include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the sites, and triggering any remedial action (if necessary)</li> <li>• Describe the measures that would be implemented to:</li> <li>• Comply with the rehabilitation objectives and associated performance and completion criteria</li> <li>• Progressively rehabilitate the site</li> <li>• Include a program to monitor and report the effectiveness of these measures.</li> </ul>	<p>Rehabilitation Management Plan Rev 0.06 dated 06/06/2025</p> <p>DPHI Rehabilitation Management Plan Approval Letter dated 27/06/2025</p>	Compliant	<p>The RMP has been prepared in consultation with CPHR and FCNSW and was approved on the 26 June 2025 by the Planning Secretary. The RMP includes all requirements outlined in mitigation measure L9</p>	
Transport					
T1	<p>A CTMP will be prepared and implemented and will include</p> <ul style="list-style-type: none"> <li>• Confirmation of haulage routes</li> <li>• Measures to maintain access to local roads, and maintain the capacity of existing roads where possible</li> <li>• Site specific traffic control measures (including signage) to manage and regulate traffic movement</li> <li>• Requirements and methods to consult and inform the local community of impacts on the local road network due to the development-related activities</li> <li>• Consultation with TfNSW, and Snowy Valleys Council, NPWS, FCNSW and Snowy Hydro’s contractors</li> <li>• The investigation of alternative routes to avoid transport through Batlow through the use of roads owned by FCNSW</li> <li>• Consultation with the emergency services to ensure that procedures are in place to maintain safe, priority access for emergency vehicles and emergency management activities</li> <li>• Access to construction sites including entry and exit locations and measures to prevent construction vehicles queuing on Elliott Way</li> <li>• A response plan for any construction related traffic incident</li> <li>• Monitoring, review and amendment mechanisms</li> <li>• Individual traffic management requirements at each phase of construction</li> <li>• Measures to minimise the number of workers using private vehicles travelling to and from project area west</li> </ul>	<p>Utilities Transmission Line Traffic And Transport Management Plan dated (Rev 0.22) dated 18/03/2025</p>	Compliant	<p>Confirmed during the Initial Construction Audit, a Transport and Traffic Management Plan (TTMP) has prepared for the Project and addresses all of the requirements outlined in Condition T1.</p> <p>The TTMP has been revised during the audit period. Please see Condition B32 in the Infrastructure Approval Tables for further detail.</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
	<ul style="list-style-type: none"> <li>Employment of standard traffic management measures to minimise short-term traffic impacts expected during construction</li> <li>Management of oversized vehicles</li> <li>Relevant traffic safety measures, including appropriate signage, driver conduct and safety protocols</li> <li>Identify requirements for, and placement of, traffic barriers.</li> <li>A fatigue and weather condition management plan for both light and heavy vehicles that details driver protocols for both driver fatigue and adverse weather</li> <li>Bridge load assessments will be carried out in conjunction with the OSOM permit application process.</li> </ul> <p>The CTMP will also consider the following strategies to maintain access for regular and emergency management activities:</p> <ul style="list-style-type: none"> <li>Staging of construction works to avoid the need for roads to be fully closed for any extended period of time</li> <li>Development of alternative access routes in consultation with NPWS and emergency services if any closures are required</li> <li>Provision of sufficient shoulder width or regular stopping bays to allow regular and emergency vehicles to pass or stop.</li> </ul>				
<b>T2</b>	Should the construction planning require that heavy vehicles to use the route via Elliot Way, Link Road and Goat Ridge Road between the project area east and project area west, the details will be included in the CTMP and a road safety audit and risk assessment will be carried out.		Not triggered	Not triggered during the audit period (J. Snape pers. comm).	
<b>T3</b>	If works will affect the free flow of traffic a Traffic Control Plan will be prepared, and a Road Occupancy Licence will be obtained from TfNSW.		Compliant	Works during this audit period have not affected the free flow of traffic on state roads during this audit period (J. Snape pers. comm).	
<b>T4</b>	<p>Road maintenance will be managed through the following measures:</p> <ul style="list-style-type: none"> <li>A road dilapidation survey of Elliott Way and other potential local roads utilised by the project will be carried out prior to commencing construction as agreed to with Snowy Valleys Council and NPWS. Any impacts identified as caused by the project will be rectified as specified with any road maintenance agreements</li> <li>Routine defect identification and rectification of the access roads and tracks will be managed as part of the project maintenance procedure</li> <li>Access roads and tracks will be designed in accordance with the relevant vehicle loading requirements.</li> </ul>	Maragle Project, Tumbarumba To Old Quarry (Elliot Way), New South Wales Dilapidation Survey Report prepared by Streetscape dated April 2025	Compliant	<p>Confirmed during previous Construction Audits, Dilapidation Reports have been prepared to document the pre-construction condition of Tooma Road and Elliot Way between Tumbarumba and O’Hares Campground, New South Wales. Reports were completed in November 2023 and June 2024, with an additional Dilapidation Report prepared in April 2025 (sighted) during this audit period.</p> <p>In response to a recommendation raised in Construction Audit 3, Transgrid sought clarification from SVC regarding the frequency of dilapidation reporting required under the Road Maintenance Agreement. SVC has agreed that annual dilapidation reporting, rather than six-monthly reporting, is sufficient to meet project requirements (sighted).</p>	
<b>T5</b>	Affected communities, visitors, FCNSW, NPWS and emergency services will be notified in advance of any disruptions to traffic and restriction of access impacted by project activities.		Compliant	Consistent with previous Construction Audits, Transgrid continue to operate in accordance with the Stakeholder and Community Engagement Plan.	
<b>T6</b>	Access protocols within KNP will be undertaken in accordance with the MOU between TransGrid and NPWS for the Procedure for the Undertaking of Inspection, Maintenance and Emergency Works of TransGrid Network Assets and Associated Infrastructure.		Noted		
<b>T7</b>	<p>For the access track to structures 12 and 13 (first two structures on the western side of Talbingo Reservoir), measures will be incorporated into the final design under consultation with NPWS to enable vehicles to safely stop for personnel to open and close the access track gate. Such measures may include:</p> <ul style="list-style-type: none"> <li>The placement of the gate at a suitable distance along the track as to avoid vehicles parking on/adjacent to Elliott Way</li> <li>Incorporation of a pull over bay alongside the existing Elliott Way road surface.</li> <li>Appropriate safety measures including the use of guard rails will be incorporated into the design where required.</li> </ul>		Compliant	<p>Access tracks to structures 12 and 13 are still subject to detailed design (J. Snape pers. comm).</p> <p>During the audit period guard rails on track 10 have been installed in April.</p> <p>Gates would be installed in consultation with NPWS however Transgrid are still awaiting from designs from NPWS (J. Snape pers. comm).</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
Landscape Character and Visual Impact					
VIA1	Detailed design will consider the retention of existing vegetation to the greatest extent practicable south of Elliott Way and around the substation to ensure that potential visual impacts from Elliott Way are minimised.		Compliant	Confirmed during the Initial Construction Audit, the Visual Impacts Management Plan ensures the detailed design considers the retention of existing vegetation. It is noted the revised Visual Impact Management Plan was approved by the Planning Secretary during the audit period. The revised Visual Impact Management Plan was approved on the 25 October 2024.	
VIA2	<ul style="list-style-type: none"> <li>All construction plant, equipment, waste and excess materials will be contained within the designated boundaries of the work site and will be removed from the site following the completion of construction</li> <li>Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality</li> <li>On completion of the work disturbed areas will be stabilised and returned to as close to original condition.</li> </ul>	Soil And Water Management Plan (rev 0.10) dated 24/10/2024  Rehabilitation Management Plan Rev 0.06 dated 06/06/2025	Compliant	Confirmed during the Initial Construction Audit some details outlined in this condition are included in the Soil And Water Management Plan.  During the audit period the RMP was prepared. Relevant requirements are included in Section 5.	
VIA3	<ul style="list-style-type: none"> <li>The new structures will undergo accelerated ageing of the zinc galvanised coatings prior to erection to help reduced the visual impacts of the project</li> <li>To assist with reducing the visual obviousness of the structures through Lobs Hole Ravine, five structure pairs (Structure pairs 1, 2, 3, 7 and 8) will be painted olive green.</li> </ul>	Visual Impact Management Plan (Rev 14) dated 27/07/2024	Compliant	Mitigation measures outlined I Condition VIA 3 are addressed in Section 5.2. of the Visual Impact Management Plan.	
Noise and Vibration					
NV1	The standard techniques for controlling noise impacts during construction are presented in the ICNG. During construction relevant standard measures as outlined in Section 6 of the ICNG will be implemented.	Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit noise mitigation measures are included in Section 7 of the Noise and Vibration Management Plan (NVMP).	
NV2	Do not conduct vibration intensive works within the recommended safe setback distances. Avoid the use of vibration intensive plant within the nominated human comfort distances.	Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit relevant management measures considering vibration outlined by Condition NV2 are included in Section 7 (Table 7.1) of the NVMP.	
NV3	Care will be taken when carrying out vibration-intensive activities (e.g. use of hydraulic rock breakers and vibratory rollers, and blasting) within distances approaching the recommended safe setback distances around heritage items R45 and R49. Where maintaining of these setback distances is not possible a suitably qualified person will be present or monitoring will be undertaken during the works to suspend activities in the instance of any issues.	Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit relevant management measures considering vibration outlined by Condition NV3 are included in Section 4.2 of the NVMP.	
NV4	A detailed blast plan will be prepared by the blasting contractor prior to each blast to mitigate the potential for the recommended safe setback distances being encroached.	Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024	Not triggered	No blasts have occurred during this audit period (J. Snape pers. comm).	
Air Quality					
AQ1	Air quality mitigation measures will include, but not be limited to: <ul style="list-style-type: none"> <li>Identifying potential sources of air pollution</li> <li>Dust mitigation and suppression measures to be implemented</li> <li>Plant and equipment will be switched off when not in use</li> <li>Vehicles, plant and construction equipment will be appropriately sized for the task and properly maintained so as to achieve optimum fuel efficiency</li> <li>Materials will be delivered with full loads and will come from local suppliers, where possible</li> <li>Methods to manage work during strong winds or other adverse weather conditions</li> <li>A progressive rehabilitation of disturbed areas.</li> </ul>	Soil And Water Management Plan (Rev 0.10) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit air quality mitigation measures are addressed in Section 5.8 of the SWMP.  During the site inspection, water carts were observed in operation to ensure dust was effectively mitigated. Equipment plant and construction equipment were also observed to be well maintained.	
Hazards and Risks					
HAZ1	All designs will be in accordance with the ICNIRP Guidelines for limiting exposure to time varying Electric and Magnetic Fields (1Hz – 100Hz) (ARPANSA, 2010) with consideration to the public and on-site workers.	Electric and Magnetic Fields Design Report dated 05/04/2025	Compliant	The Electric and Magnetic Fields Design Report, prepared by UGL, indicates that the development’s design was developed in accordance with the ICNIRP (2010) guidelines.	
HAZ2	The following lightning protection measures will be included in the detailed design:		Compliant		

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
	<ul style="list-style-type: none"> <li>Each structure will be equipped with earthing fixtures</li> <li>Each transmission line will have two earthing lines at the top of each structure to provide protection to the conductors from lightning strike</li> <li>Lightning masts will be installed at the substation.</li> </ul>	<p>Maragle 330kV Transmission Line Connection and TL64 Cut-in Earthing Design Report - IFC Revised for ACCR Conductor dated 17/05/2024</p> <p>TL-902730.H.IFC Drawing</p> <p>TL-902733.G.IFC Drawing</p>		The detailed design has taken into account the required lightning protection measures (J. Snape pers. comm). Supporting documentation, including the earthing design report and drawings, demonstrates that appropriate earthing and lightning protection provisions have been incorporated into the design.	
<b>HAZ3</b>	<p>A Prepare-Act-Survive bushfire response plan will be prepared for the project. The plan will be prepared according to Planning for Bush Fire Protection (RFS, 2019) and in consultation with NPWS, FCNSW and Snowy Valleys Bush Fire Management Committee.</p> <p>The fire prevention/mitigation strategies within Bago State Forest will be generally in accordance with Forest Practices Codes including the Standard Operating Procedure -Plantation Harvesting, Haulage and Site Preparation Fire Restrictions (Fire Prevention 19/51).</p> <p>The plan will include responsibilities associated with and details of</p> <ul style="list-style-type: none"> <li>Site specific hazards and risks for the project area</li> <li>Procedures to maintain bushfire awareness</li> <li>Bushfire mitigation measures</li> <li>Fire preparedness actions including:</li> <li>Evacuation triggers</li> <li>Evacuation routes</li> <li>Mustering points</li> <li>Neighbourhood safer places and refuges of last resort</li> <li>Instructions for sheltering in-vehicle if there are no other options.</li> </ul>	<p>Emergency Plan (rev 0.07) dated 25/06/2024</p> <p>Bushfire Plan (rev 0.06) dated 30/08/2023</p>	Compliant	Confirmed during the Initial Construction Audit, bushfire risks and response are addressed in the Emergency Plan. The Bushfire Plan listed as Appendix H of the Emergency Plan addresses the requirements set out by Condition HAZ3.	
<b>HAZ4</b>	<ul style="list-style-type: none"> <li>For the main construction compounds, a minimum of 40 metres clearance is required between fuel/chemical storage points and woody vegetation. The construction compound buildings will have at least 20 metres clearance to the vegetation.</li> <li>Firefighting equipment will be maintained at and/or accessible to all active construction sites during the declared bushfire danger season, and site personnel trained in its use. Equipment will be appropriate to the activities being conducted and the fire danger at the time of works, but as a minimum must include: <ul style="list-style-type: none"> <li>4WD Striker with slip-on water unit, equipped with diesel pump and hoses</li> <li>Extinguishers</li> <li>Knap sacks</li> <li>Hand tools (e.g. fire rakes).</li> </ul> </li> <li>Any vegetation cleared as part of these works will be removed from site (as much as reasonably practicable), or otherwise processed to avoid excessive bushfire fuel accumulation as agreed with FCNSW and NPWS.</li> </ul>		Compliant	<p>It was observed during the site inspection fire equipment was maintained and accessible. Equipment included fire extinguishers and furphy's.</p> <p>Water supply tanks were observed to be full and signposted (sighted).</p>	
<b>HAZ5</b>	<ul style="list-style-type: none"> <li>All chemicals or other hazardous substances will be stored in a bunded area and away from any natural drainage lines. The capacity of the bunded area will be at least 130% of the largest chemical volume contained within the bunded area. The location of the bunded enclosure/s will be shown on Site Plans.</li> <li>The storage, handling and use of dangerous goods and hazardous substances will be carried out in accordance with the WHS Act and Regulations, the Storage and Handling of Dangerous Goods Code of Practice (WorkCover NSW, 2005) and relevant Australian Standards</li> </ul>		Compliant	During the site audit inspection, it was observed that chemicals and other hazardous substances were stored in a bunded area and away from any natural drainage lines.	
<b>HAZ6</b>	<ul style="list-style-type: none"> <li>Routine condition monitoring and risk-based maintenance of project elements to minimise the incidence of ignitions from asset failures</li> </ul>		Not triggered	Conditions relate to the operational phase of the Project.	

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
	<ul style="list-style-type: none"> <li>Ongoing vegetation management will be in accordance with TransGrid’s operational vegetation monitoring and management procedures. This will include regular inspection and maintenance of trees and woody vegetation within the transmission corridor to provide safe clearance distance to the overhead conductors, and maintenance of the substation APZ</li> <li>The APZ surrounding the substation will be completely cleared with vegetation managed to approximately 100 mm in height</li> <li>Ongoing risk management of trees located outside the easement that have potential to strike the conductor if they were to fall</li> <li>Access tracks will be maintained to facilitate ongoing access to transmission structures for maintenance. It is recommended that these tracks are to be maintained to the standards of a Category 9 fire trail (RFS, 2016) to allow fire response in the area.</li> </ul>				
HAZ7	Hot work (activities involving high temperatures) and fire risk work (activities involving heat or with the potential to generate sparks) will be managed under TransGrid procedures.	Bushfire Plan Appendix C – Hot Work And Fire Risk Work Procedure dated 13/03/2023	Compliant	<p>During the Initial Construction Audit, it was confirmed that the procedure for Hot Work and Fire Risk Work is included as Appendix C of the Bushfire Plan. This procedure addresses the requirements of Condition HAZ7.</p> <p>In response to a recommendation raised in Construction Audit 3, the Hot Work and Fire Risk procedure has been reviewed with no proposed material change from the previous version. This procedure will be circulated for wider consultation within specific business units and published prior to the commencement of the statutory bushfire danger period (1 October to 31 March) (J. Snape pers. comm).</p>	
Social and Economic					
SE1	<p>A CSEP will be prepared and implemented to help provide timely and accurate information to the community during construction. The plan will include (as a minimum):</p> <ul style="list-style-type: none"> <li>Mechanisms to provide details and timing of proposed activities to key stakeholders including residents, business owners, NPWS, FCNSW, emergency service, health and medical facilities, visitors, accommodation providers and annual event organisers, recreational users and motorists including changed traffic and access conditions and amenity impacts</li> <li>Process for receiving and responding to queries and complaints regarding the project’s construction.</li> </ul>	Complaints Register received 19/09/2025	Compliant	<p>Confirmed during the Initial Construction Audit requirements included in Condition SE1 are addressed in the Stakeholder and Community Engagement Plan.</p> <p>Two community complaints were received during the audit period. Complaints were managed in accordance with Section 4.2 of the EMS.</p>	
SE2	<ul style="list-style-type: none"> <li>A worker accommodation strategy will be prepared for the project to manage demand for tourist accommodation from the construction workforce during the construction phase and postconstruction</li> <li>Maximise the use of the Snowy 2.0 works accommodation where possible to minimise demand for local accommodation</li> <li>Consider local business opportunities in project procurement practices, including encouraging contractors to source local goods and services, where possible</li> <li>Identify and communicate to local communities (prior to and during construction) opportunities and requirements for work on the project.</li> </ul>		Compliant	Confirmed during the Initial Construction Audit a Workers Accommodation Strategy has been prepared for the Project.	
SE3	<ul style="list-style-type: none"> <li>Development, monitoring and review of project incident response plans, including ongoing consultation with emergency service providers about changes to local access and potential delays and disruptions</li> <li>Preparation of a workforce health and safety plan that includes measures for responding to health, medical and safety incidents during construction.</li> </ul>		Compliant	Confirmed during the Initial Construction Audit a Health and Safety Management Plan has been prepared for the Project whilst the development, monitoring and review of project incident response plans is included in the Stakeholder and Community Engagement Plan.	
SE4	The operation and maintenance of the portion of the project in KNP will be carried out in accordance with any access and operational protocols established between TransGrid and NPWS.		Noted		
Waste					
WR1	Further consultation with local waste facilities will be carried out during detailed design to further determine potential disposal locations		Compliant	Confirmed during the Initial Construction Audit consultation has been undertaken with local EPA licenced waste facilities.	

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
<b>WR2</b>	<ul style="list-style-type: none"> <li>A construction waste management plan (CWMP) will be prepared for the project and outline appropriate management procedures. It will include, but not be limited to:</li> <li>Identification of the waste types and volumes that are likely to be generated by the project</li> <li>Adherence to the waste minimisation hierarchy principles of avoid/reduce/reuse/recycle/dispose</li> </ul> <p>Waste management procedures to manage the handling and disposal of waste, including vegetation, spoil, unsuitable material or unexpected waste volumes</p> <ul style="list-style-type: none"> <li>Identification of reporting requirements and procedures for tracking of waste types and quantities</li> </ul> <p>A resource management strategy detailing the process to identify reuse options for surplus materials.</p>	Waste Management Strategy (rev 0.09) dated 05/11/2024	Compliant	Confirmed during the Initial Construction Audit a Waste Management Strategy which is included as Appendix C of the Contaminated Land Management Plan has been prepared for the Project and addresses the requirements of this condition.	
<b>WR3</b>	Excess spoil generated in project area east will be transported by truck to Lobs Hole where it will be managed and disposed of by Snowy Hydro (in accordance with the methods described in the Snowy 2.0 Major Works EIS and any conditions of their approval).	Soil And Water Management Plan (rev 0.10) Appendix A Spoil Management Plan (rev 0.08) dated 05/11/2024	Compliant	Confirmed during the Initial Construction Audit excess spoil management is outlined in Section 3.4 of the Spoil Management Plan.	
<b>WR4</b>	All waste, including surplus soils, which cannot be reused will be classified in accordance with the Waste Classification Guidelines (EPA, 2014), removed from the site and disposed of at a facility that can lawfully accept the waste in accordance with the POEO Act and POEO Waste Regulation.	Waste Management Strategy (rev 0.09) dated 05/11/2024	Compliant	Confirmed during the Initial Construction Audit requirements of this condition are included in the Waste Management Strategy.	
<b>WR5</b>	Operational waste will be managed in accordance with TransGrid Waste Management Procedures and associated Work Instructions.		Not triggered	Conditions relate to the Operational phase of the Project.	
Cumulative Impacts					
<b>CI1</b>	<ul style="list-style-type: none"> <li>Regular consultation will be carried out with nearby/adjoining projects and key stakeholders during the detailed design and construction phase to review potential cumulative impacts and timing of activities that have potential cumulative impacts</li> <li>As far as practical construction activities will be coordinated and staggered with Snowy Hydro to minimise cumulative impacts in the project area west</li> <li>Engagement with Snowy Valleys Council and Snowy Monaro Regional Council will be ongoing regarding impacts on local infrastructure (including accommodation, services)</li> </ul>		Compliant	<p>Confirmed during the Initial Construction Audit, consultation responsibilities are outlined in the Stakeholder and Community Engagement Plan.</p> <p>Consistent with the Construction Audit 3, the Interface Management Plan continues to be implemented during the audit period with Interface meetings held weekly for the construction team and fortnightly for the environmental team to discuss work scope activities and plan strategies to develop best solutions and prevent stoppages of work for all parties. Looking to review frequency of environmental meetings outside the audit period (J. Snape pers. comm).</p>	

## Appendix 5

# Photographic Plates







**Plate 1: Partial clearing area Hand clearing - Project East below Pad 11**  
(Inspection date 10/09/2025)



**Plate 2: Post partial clearing vegetation response - Project East near Pad 2**  
(Inspection date 10/09/2025)





**Plate 3: Edge of total clearing area and partial (hand) clearing - Project East Pad 10**  
(Inspection date 10/09/2025)



**Plate 4: Heavy mulch layer with minor regeneration response – Project West below Pad 18**  
(Inspection date 10/09/2025)





**Plate 5: Partial clearing (mechanical) exposed soils and patchy heavy mulch – Project West Pad 18 (Inspection date 10/09/2025)**



**Plate 6: Partial clearing (mechanical) heavy mulch and grazed ground layer – Project West Pad 19 (Inspection date 10/09/2025)**





**Plate 7: Bracken fern with a scattered shrub and groundcover layer (Partial clearing) – Project West northeast of Pad 18 (Inspection date 10/09/2025)**



**Plate 8: Dense mulch cover lacking native groundcover. South east of Pad 19 – Project West (Inspection date 10/09/2025)**





**Plate 9: Non- historical heritage items still demarcated by colour specific rope. Near Track 8 – Project West (Inspection date 10/09/2025)**



**Plate 10: Track 8 Sediment Basin (Inspection date 10/09/2025)**





**Plate 11: 500 kV Substation Clean Water Basin – Substation Project Area**  
(Inspection date 10/09/2025)



**Plate 12: Installed erosion and sediment controls around the “Duck Pond” looking towards the 500 kV substation sediment basin** (Inspection date 10/09/2025)





**Plate 13: Erosion and sediment controls leading to sediment basin along Track 8 – Project East (Inspection date 10/09/2025)**



**Plate 14: Erosion and sediment controls and soil binder installed along Track 5 (as viewed from Pad 10) – Project East (Inspection date 10/09/2025)**





**Plate 15: Installed erosion and sediment controls on Track 2 (Inspection date 10/09/2025)**



**Plate 16: Erosion and sediment controls installed to address water seepage issues and prevent soil loss at Maragle Switchyard – Project West (Inspection date 10/09/2025)**





**Plate 17: Fallen sediment fence on Track 8 – Project East (Inspection date 10/09/2025)**



**Plate 18: Degraded geofabric on some of the batters along Track 8 – Project East (Inspection date 10/09/2025)**





**Plate 19: Implementation of erosion and sediment controls around the temporary Sheep Station Creek Bridge – Project East (Inspection date 10/09/2025)**



**Plate 20: Effectiveness of sediment fences around the temporary Sheep Station Creek Bridge – Project East (Inspection date 10/09/2025)**





**Plate 21: Temporary Sheep Station Creek Bridge deck clear of sediment - Project East (Inspection date 10/09/2025)**



**Plate 22: Areas free of litter and waste appropriately sorted into designated bins- Maragle Project Construction Compound (Inspection date 09/09/2025)**



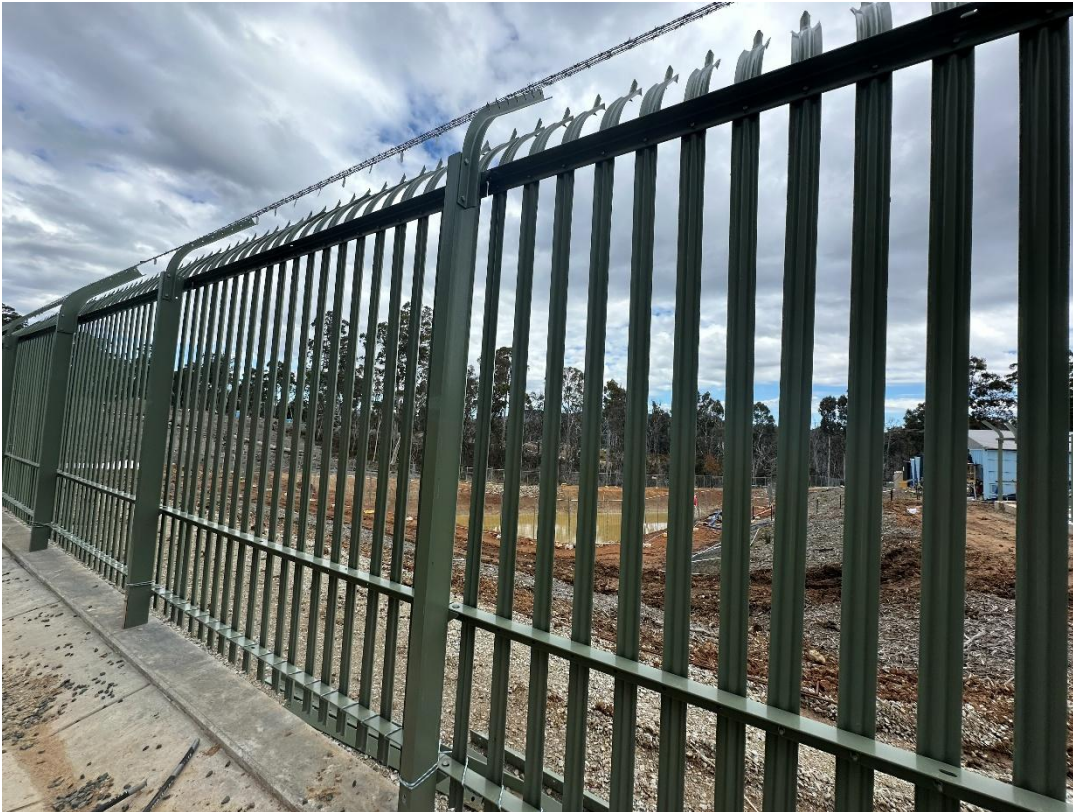


**Plate 23: Fire tank full and correctly signposted - Maragle Project Construction Compound**  
(Inspection date 09/09/2025)



**Plate 24: Erosion and sediment controls well maintained and effective - Maragle Switchyard**  
(Inspection date 09/09/2025)





**Plate 25: Perimeter fencing - Maragle Switchyard (Inspection date 09/09/2025)**

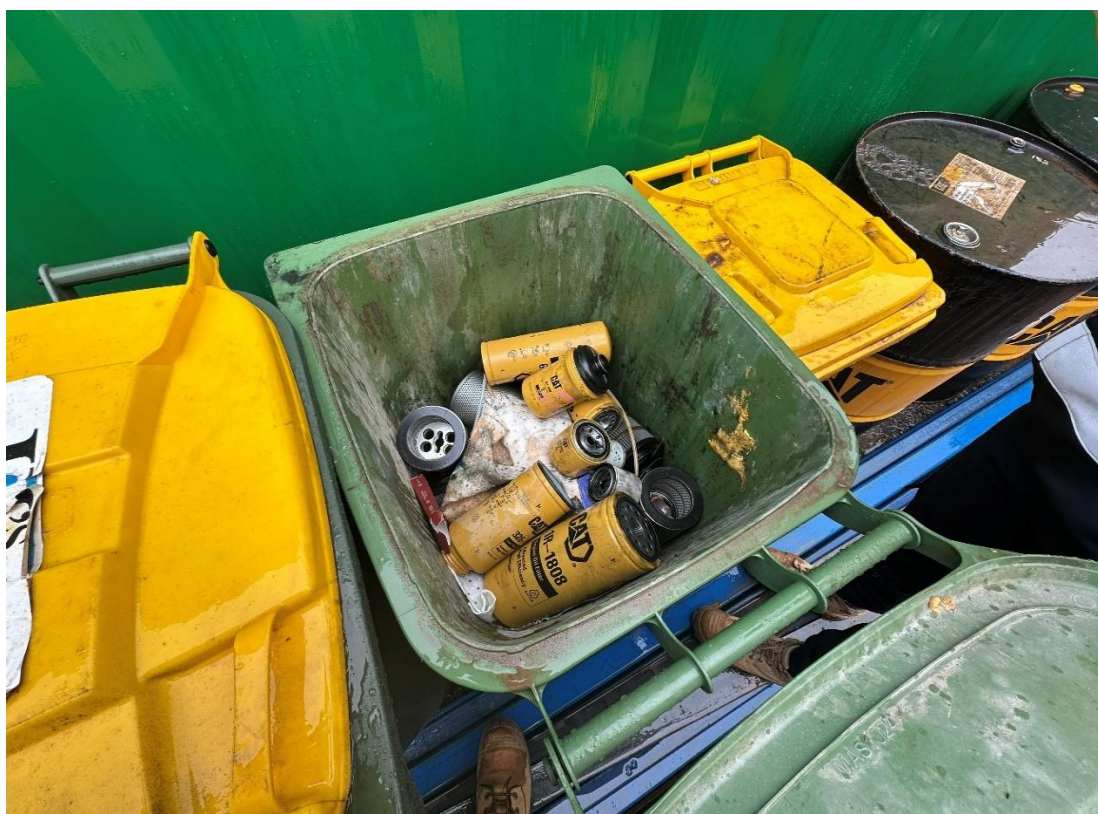


**Plate 26: Overview of Maragle Switchyard (Inspection date 09/09/2025)**





**Plate 27: Biosecurity signage for areas under active management for *Phytophthora* sp. Risk - Project West (Inspection date 10/09/2025)**



**Plate 28: Canisters were observed to have been placed in the contaminated waste bin – Lobs Hole Construction Compound (Inspection date 10/09/2025)**





**Plate 29: Firefighting equipment was available – Lobs Hole Construction Compound (Inspection date 10/09/2025)**



**Plate 30: Ineffective erosion and sediment controls located on edge of Wallace Creek - Project East (Inspection date 10/09/2025)**





**Plate 31: Erosion and sediment controls located on edge of Wallace Creek. Sediment fences were observed not embedded – Project East (Inspection date 10/09/2025)**



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