

## INDEPENDENT ENVIRONMENTAL AUDIT REPORT: SUNTOP SOLAR FARM (SSD 8696)

July 2021

**Auditee:** Bouygues Construction Australia Pty Ltd (contractor) on behalf of Suntop SF Pty Ltd as trustee for Suntop Asset Trust (proponent)

**Auditor:** Vantage Environmental Management Pty Ltd

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This Independent Environmental Audit report has been certified by Toby Hobbs, Principal Auditor (Exemplar Global) and Director of Vantage Environmental Management Pty Ltd.

Report Revision	Date	Comments	Prepared by	Approved for issue by
Draft	07 Jul 2021	Draft for review	T. Hobbs S. Price	T. Hobbs
1	08 Jul 2021	Additional information provided by construction contractor	T. Hobbs S. Price	T. Hobbs
2	22 Jul 2021	Finalised report for distribution	T. Hobbs S. Price	T. Hobbs

## LIMITATIONS

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## 1 EXECUTIVE SUMMARY

This report presents the findings of an Independent Environmental Audit (IEA) that was undertaken to assess the environmental performance and compliance status of the Suntop Solar Farm (NSW Department of Planning, Industry and Environment [DPIE]: Application Number SSD 8696), herein referred to as the “Project”. The IEA covers the period of commencement of construction (01 October 2020) to the date of the site visit on 22 June 2021.

The Audit was undertaken by Vantage Environmental Management Pty Ltd in accordance with the requirements of Schedule 4, Condition 6 of the Project’s Development Consent (Modification 1, 11 October 2019) and conducted in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020). The scope of the audit was developed in consultation with DPIE and Dubbo Regional Council.

There were four (4) non-compliances identified with Development consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (STSF-IEA-21-NC1):** Records associated with required monitoring in accordance with the DPIE-approved Biodiversity Management Plan were not available at the time of the audit; as such, it was apparent that not all required monitoring had been undertaken;
- **Non-compliance No. 2 (STSF-IEA-21-NC2):** Dangerous and/or hazardous materials were observed to be stored directly on the ground surface during the audit;
- **Non-compliance No. 3 (STSF-IEA-21-NC3):** Records associated with required monitoring in accordance with the (Construction) Environmental Management Plan were not available at the time of the audit; as such, it could not be confirmed that required monitoring had been undertaken; and
- **Non-compliance No. 4 (STSF-IEA-21-NC4):** Based on review of the project website between 10 June 2021 and 29 June 2021 a complaints register had not been published as per the requirements of Schedule 4, Condition 7 of the Development Consent.

Based on the non-compliances identified during the audit program the following recommendations are made:

- **Recommendation No. 1 (STSF-IEA-21-R1):** In response to Non-compliance No. 1, the monitoring schedule listed within Table 10.3 of the DPIE-approved Biodiversity Management Plan should be reviewed and a suitable monitoring program, inclusive of documentation, instigated as soon as practicable;
- **Recommendation No. 2 (STSF-IEA-21-R2):** In response to Non-compliance No. 2, the storage and handling of all dangerous and/or hazardous materials on site (even those used on a temporary basis) should be reviewed and measures put in place to ensure storage is consistent with the relevant Australian Standard and other legislation/guidelines;
- **Recommendation No. 3 (STSF-IEA-21-R3):** In response to Non-compliance No. 3, the monitoring schedule listed within Section 14.1.1 of the (Construction) Environmental Management Plan should be reviewed and a suitable monitoring program, inclusive of documentation, instigated as soon as practicable; and
- **Recommendation No. 4 (STSF-IEA-21-R4):** In response to Non-compliance No. 4, a redacted complaints register should be uploaded to the project website as soon as practicable.

There were five (5) opportunities for improvement identified with Development consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

- **Opportunity for Improvement No. 1 (STSP-IEA-21-OI1):** The proponent and their construction contractor should formally document an agreement with Council to ensure that the intersection pavement will be returned to Council in a condition that is satisfactory to Council at the end of the construction and commissioning periods for the project;

- **Opportunity for Improvement No. 2 (STSP-IEA-21-OI2):** If the westerly access point (Gate No. 2) is to be used in the future, sight distances should be reviewed with Dubbo Regional Council to ensure they are adequate;
- **Opportunity for Improvement No. 3 (STSP-IEA-21-OI3):** Some minor material tracking / drag-out was noted at the intersection of the project access (Gate No. 1) and Suntop Road. It is recommended that this area is monitored for potential mud/sediment accumulation and, where necessary, required maintenance such as sweeping and/or repairs to the road surface should be completed in a timely manner; and
- **Opportunity for Improvement No. 4 (STSP-IEA-21-OI4):** Evidence of some on-site erosion and sedimentation associated with construction works was observed during the site inspection of 22/06/21. As such, additional temporary soil stabilisation measures such as the application of soil binder at key locations should be implemented prior to the establishment of final landscaping/vegetative cover to further reduce the potential for erosion/sedimentation during construction.
- **Opportunity for Improvement No. 5 (STSP-IEA-21-OI5):** Additional clean-up of construction waste, particular packing materials such as plastic sheeting, cardboard, paper and plastic baling tape that could easily be transported by wind to adjoining farmland areas is recommended in areas of active construction.

The standard of environmental management evident during the completion of the audit was generally acceptable. Construction works and associated management plans, records and monitoring documentation were deemed, in the majority, to be generally consistent with Development consent conditions and associated plans and strategies.

It is considered that the management strategies in place to mitigate potential construction impacts were generally appropriate and the impacts observed on site were consistent with those identified in the EIS.

There were 12 complaints received by the Project during the audit period, two (2) of which were unrelated to the Project. Three (3) environmental incidents were reported by the Project within the audit period.

In accordance with Section 4.3.2 of the *Independent Audit Post Approval Requirements* (DPIE, 2020), the proponent must submit their response to the audit findings to the Department in a separate document to this report within three (3) months of the commencement of the audit, i.e. by 02 September 2021. The proponent must respond to all audit findings, including recommendations and opportunities for improvement.

## 2 INTRODUCTION

### 2.1 Background

This report presents the findings of an Independent Environmental Audit (IEA) that was undertaken by Vantage Environmental Management Pty Ltd (Vantage) to assess the environmental performance and compliance status of the Suntop Solar Farm (NSW Department of Planning, Industry and Environment [DPIE] Application Number: SSD 8696), herein referred to as the “Project”. The IEA is a requirement of Schedule 4, Condition 6 of the Project’s Development Consent (Modification 1, 11 October 2019).

The Project is a 189MW utility scale solar farm located at 909 Suntop Road in Suntop, New South Wales (approximately 60km southeast of Dubbo) within the Dubbo Regional Council local government area. The scope of works includes installation of approximately 440,000 solar panels and 110 inverter stations. In addition, underground 33kV and 132kV transmission cables will connect the solar farm to the Transgrid substation. The Project site covers an area of approximately 513 hectares which is mostly cleared and was previously used for cropping and grazing.

The Project proponent is Suntop SF as trustee for Suntop Assest Trust (Suntop SF) and the contractor responsible for construction of the Project is Bouygues Construction Australia Pty Ltd (BCYA).

### 2.2 Audit Team

The Vantage audit team consisted of Toby Hobbs as the Principal Auditor and Susannah Price as an assistant Auditor. Endorsement of the audit team was provided by DPIE via the correspondence of 04 May 2021, a copy which is included within Appendix A of this report.

Toby Hobbs, MEnvMgmt, is an Exemplar Global-certified Principal Environmental Auditor and has undertaken significant auditor roles in the capacity of the independent Environmental Representative role on many major (\$500M+) infrastructure projects in southern Australia since 2005.

Susannah Price, MSc, is an Exemplar Global-certified Environmental Auditor and has worked as an auditor on many major (\$500M+) infrastructure projects in southern Australia since 2007.

### 2.3 Audit Objectives

The objective of the IEA was to obtain an independent and objective assessment of the environmental performance and compliance status of the Project in accordance with Schedule 4, Condition 6 of the Project’s Development Consent and the *Independent Audit Post Approval Requirements* (DPIE, 2020). The audit scope, discussed below in section 2.4, provides further detail of the audit objectives.

### 2.4 Audit Scope

The audit scope consisted of:

1. An assessment of compliance with:
  - a. Development Consent for SSD 8696 as modified (Modification 1, 11 October 2019);
  - b. Post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of the following plans during the construction phase:
    - Final Layout Plans;
    - Traffic Management Plan;
    - Landscaping Plan;
    - Biodiversity Management Plan;

- Chance Finds Protocol (Appendix 2 of Cultural Heritage Management Plan);
  - Accommodation and Employment Strategy;
  - Environmental Management Strategy; and
  - Environmental Management Plan;
2. An assessment of the environmental performance of the development, including an assessment of:
    - Actual impacts compared to predicted impacts documented in the Environmental Impact Statement and associated amendments;
    - The physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;
    - Incidents, non-compliances and complaints that occurred or were made during the audit period;
    - The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and
    - Any feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period.
  3. The status of implementation of previous Independent Audit findings, recommendations and actions (if any);
  4. A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
  5. Any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

Further information regarding relevant matters raised by the Department are discussed within Section 3.6 of this report and have been addressed during completion of the IEA.

## 2.5 Audit Period

This IEA covers the period of commencement of construction (01 October 2020) to the date of the site visit on 22 June 2021.

## 2.6 Audit Opening and Closing Meetings

As part of the IEA program, Audit Opening and Audit Closing meetings were held as noted in Table 1, below.

**TABLE 1: Audit Meeting Attendance Register**

Meeting Type/ Date of Meeting	Personnel Present
Audit Opening Meeting 02 June 2021	Bjorn Schultz (Suntop SF – Project Director) Etosha Milner (Suntop SF– Project Engineer) Greg Smith (BCYA – HSE Manager) Fabrice Geoffrey (BCYA – Senior Project Manager) Chris Todd (BCYA – Site Superintendent) Awais Imtiaz (BCYA – Planning Manager) Toby Hobbs (Vantage – Principal Auditor)

Meeting Type/ Date of Meeting	Personnel Present
Audit Closing Meeting 30 June 2021	Bjorn Schultz (Suntop SF – Project Director) Etosha Milner (Suntop SF– Project Engineer) Greg Smith (BCYA – HSE Manager) Fabrice Geoffrey (BCYA – Senior Project Manager) Chris Todd (BCYA – Site Superintendent) Awais Imtiaz (BCYA – Planning Manager) Toby Hobbs (Vantage – Principal Auditor) Susannah Price (Vantage – Auditor)

## 3 AUDIT METHODOLOGY

### 3.1 Selection and Endorsement of Audit Team

The audit team was selected by the construction contractor (BYCA) on 17 February 2021 and endorsed by DPIE via their correspondence of 04 May 2021, a copy of which is included within Appendix A of this report.

### 3.2 Independent Audit scope development

Prior to the commencement of the audit, the scope was developed in accordance with Schedule 4, Condition 6 of the Project's Development Consent and the *Independent Audit Post Approval Requirements* (DPIE, 2020). On 10 May 2021, Vantage issued the proposed audit scope to DPIE, Dubbo Regional Council and NSW Environment Protection Authority (EPA) for comment.

Correspondence received from DPIE on 13 and 14 May 2021 confirmed that the Department were generally satisfied with the audit scope and additional feedback was provided, which is listed within Section 3.6 of this report.

The Dubbo Regional Council Manager Building and Development Services advised that Council did not have any comments regarding the proposed scope of the audit. In addition, EPA did not have any specific comments regarding the scope.

Copies of correspondence related to consultation undertaken as part of the audit scope are presented within Appendix B of this report.

### 3.3 Compliance Evaluation

In order to evaluate Project compliance, the following process was followed:

- Desktop audit of the documents provided by the contractor/proponent;
- Collection of further information from the contractor/proponent as required; and
- Assessment of documents for compliance and reporting in this audit report.

### 3.4 Site Personnel Interviews

Interviews were held with the following site personnel on 22 June 2021 as part of the Project site visit for the audit:

- Bjorn Schultz (Suntop SF – Project Director);
- Etosha Milner (Suntop SF– Project Engineer);
- Greg Smith (BCYA – Health, Safety and Environment [HSE] Manager); and
- Fabrice Geoffrey (BCYA – Senior Project Manager).

The site interviews provided the auditor with an opportunity to obtain relevant evidence regarding the compliance status and environmental performance of the Project to support the desk-based audit review process. It is noted that site personnel interviewed were most willing to assist the auditor and provided full and prompt disclosure with respect to the auditor's queries.

### 3.5 Site Inspections

A site inspection was undertaken by the Principal auditor, Toby Hobbs, on 22 June 2021. The purpose of the site visit was to discuss the compliance status of the Project with relevant site personnel, view environmental management records, view the status of on-site environmental controls and observe general environmental performance and Development Consent (and associated management plans and strategies) compliance for the Project.

The site visit also provided the auditor with an opportunity to obtain appropriate evidence regarding the compliance status and environmental performance of the Project to support the desk-based audit review process. It is noted that all areas of the site were accessible to the auditor at the time of the site visit.

### 3.6 Consultation

Consultation associated with completion of this audit involved issue of the proposed audit scope to DPIE, Dubbo Regional Council and NSW Environment Protection Authority (EPA) for comment on 10 May 2021. A request for feedback on the environmental performance of the project was also issued to the above-referenced stakeholders by Vantage on 10 June 2021.

Feedback on the proposed audit scope is discussed within Section 3.2 of this report.

Additional feedback regarding the audit scope was received by DPIE's Team Leader of Compliance and listed within Table 2, below, along with a reference to where each item is discussed in this audit report.

**TABLE 2: Summary of DPIE comments and report reference**

DPIE comment	Section of this report discussing the comment
Traffic management including: <ul style="list-style-type: none"> <li>Vehicle movements during school bus pickup and drop-off periods and times</li> <li>Recording and management of vehicle movements</li> </ul>	Section 4.7: EMP, Sub-plans and Compliance Documents Section 4.11: Actual verses Predicted Environmental Impacts Appendix C: Audit Table
Road upgrades, including monitoring and maintenance	Section 4.11: Actual verses Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table Appendix D: Site Inspection Photographs
Erosion and sediment control management	Section 4.7: EMP, Sub-plans and Compliance Documents Section 4.11: Actual verses Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table Appendix D: Site Inspection Photographs
Water management on-site and off-site	Appendix C: Audit Table Appendix D: Site Inspection Photographs
Vegetation planting and screening	Section 4.7: EMP, Sub-plans and Compliance Documents Appendix C: Audit Table Appendix D: Site Inspection Photographs

DPIE comment	Section of this report discussing the comment
Aboriginal and heritage management	Section 4.7: EMP, Sub-plans and Compliance Documents Section 4.11: Actual versus Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table Appendix D: Site Inspection Photographs
Management of complaints register	Section 4.9: Complaints Appendix C: Audit Table Appendix D: Site Inspection Photographs
Lighting	Appendix C: Audit Table
Compliance with CEMP	Section 4.7: EMP, Sub-plans and Compliance Documents Appendix C: Audit Table
Management to prevent/minimise tracking of material onto Suntop Road	Section 4.7: EMP, Sub-plans and Compliance Documents Appendix C: Audit Table
Waste management	Section 4.7: EMP, Sub-plans and Compliance Documents Appendix C: Audit Table Appendix D: Site Inspection Photographs

Dubbo Regional Council personnel reported that they did not have any specific concerns regarding the environmental performance of the Project, however they did have some concerns regarding the condition of the road upgrades required by the Development Consent. Further comment is provided within Appendix C (Audit Table of Development Consent Conditions) as part of Schedule 3, Conditions 5 (Road Upgrades) and 6 (Site Access).

EPA did not provide any feedback on the environmental performance of the Project. Correspondence received by EPA on 21 May 2021 determined that the Project did not undertake a scheduled activity in accordance with Schedule 1 of the *Protection of the Environment Operations Act 1997*. As such, the Project did not hold an Environment Protection Licence and Dubbo Regional Council was the appropriate regulatory authority.

DPIE stated that they had received one (1) complaint regarding the Project which was associated with perceived erosion/sedimentation issues on neighbouring lands located down-slope of the western boundary of the Project site.

Copies of correspondence related to consultation undertaken as part of the audit program are presented within Appendix B of this report.

### 3.7 Compliance Status Descriptors

The compliance status of each Development Consent condition presented in the audit table in Appendix C has been determined in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020). The compliance status was recorded as one of the following:

- Compliant – 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 – 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; or

- Not triggered – A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

## 4 AUDIT FINDINGS

### 4.1 Approvals and Documents Audited

The following construction-related approvals and documents were considered as part of this IEA:

- Development Consent for SSD 8696 as modified (Modification 1, 11 October 2019);
- Final Layout Plans;
- Traffic Management Plan;
- Landscaping Plan;
- Biodiversity Management Plan;
- Chance Finds Protocol (Appendix 2 of Cultural Heritage Management Plan);
- Accommodation and Employment Strategy; and
- Environmental Management Strategy; and
- Environmental Management Plan.

### 4.2 Compliance Performance

There are a total of 51 conditions within the Development Consent of the Project as modified (Modification 1, 11 October 2019) and all 51 conditions were assessed for environmental compliance as part of this IEA. 35 conditions were determined to be compliant, four (4) were determined to be non-compliant and 12 were not triggered as part of this IEA. Detailed audit outcomes are presented within Appendix C (Audit Table of Development Consent Conditions). In accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020) the audit table presents the following information:

- Development Consent condition (Approval ID);
- Development Consent requirements;
- Audit evidence collected;
- Audit findings and recommendations; and
- Compliance status.

### 4.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

As far as the auditor of this report is aware, no agency notices, orders, penalty notices or prosecutions have been issued for the Project.

### 4.4 Non-compliances

There were four (4) non-compliances identified with the Development consent conditions and associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (STSF-IEA-21-NC1):** Records associated with required monitoring in accordance with the DPIE-approved Biodiversity Management Plan were not available at the time of the audit; as such, it was apparent that not all required monitoring had been undertaken;

- **Non-compliance No. 2 (STSF-IEA-21-NC2):** Dangerous and/or hazardous materials were observed to be stored directly on the ground surface during the audit;
- **Non-compliance No. 3 (STSF-IEA-21-NC3):** Records associated with required monitoring in accordance with the (Construction) Environmental Management Plan were not available at the time of the audit; as such, it could not be confirmed that required monitoring had been undertaken; and
- **Non-compliance No. 4 (STSF-IEA-21-NC4):** Based on review of the project website between 10 June 2021 and 29 June 2021 a complaints register had not been published as per the requirements of Schedule 4, Condition 7 of the Development Consent.

#### 4.5 Opportunities for Improvement

There were five (5) opportunities for improvement identified with the Development consent conditions and associated management plans and strategies reviewed during the audit program as noted below:

- **Opportunity for Improvement No. 1 (STSP-IEA-21-OI1):** Suntop Solar Farm and their construction contractor should formally document an agreement with Council to ensure that the Renshaw McGirr Way and Suntop Road intersection pavement will be returned to Council in a condition that is satisfactory to Council at the end of the construction and commissioning periods for the project;
- **Opportunity for Improvement No. 2 (STSP-IEA-21-OI2):** If the westerly access point (Gate No. 2) is to be used in the future, sight distances should be reviewed with Dubbo Regional Council to ensure they are adequate;
- **Opportunity for Improvement No. 3 (STSP-IEA-21-OI3):** Some minor material tracking/drag-out was noted at the intersection of the project access (Gate No. 1) and Suntop Road. It is recommended that this area is monitored for potential mud/sediment accumulation and, where necessary, required maintenance such as sweeping and/or repairs to the road surface should be completed in a timely manner;
- **Opportunity for Improvement No. 4 (STSP-IEA-21-OI4):** Evidence of some on-site erosion and sedimentation associated with construction works was observed during the audit site visit of 22/06/21. As such, additional temporary soil stabilisation measures such as the application of soil binder at key locations should be implemented prior to the establishment of final landscaping/vegetative cover to further reduce the potential for erosion/sedimentation during construction; and
- **Opportunity for Improvement No. 5 (STSP-IEA-21-OI5):** Additional clean-up of construction waste, particular packing materials such as plastic sheeting, cardboard, paper and plastic baling tape that could easily be transported by wind to adjoining farmland areas is recommended in areas of active construction.

#### 4.6 Previous Audit Recommendations

As far as the auditor is aware, there have not been any previous environmental audits undertaken for the Project.

#### 4.7 EMP, Sub-plans and Compliance Documents

The Development Consent for the Project required that specific post approval documents be prepared and submitted to the Department prior to the commencement of construction. As part of this audit, the following post approval documents were assessed to determine if they had been developed and implemented in accordance with the conditions of consent and their content is adequate:

- Traffic Management Plan;
- Landscaping Plan;

- Biodiversity Management Plan;
- Chance Finds Protocol (Appendix 2 of Cultural Heritage Management Plan);
- Accommodation and Employment Strategy; and
- Environmental Management Strategy; and
- Environmental Management Plan.

The adequacy of the documents was determined on the basis of whether there were any non-compliances resulting from the implementation of the document or whether there were any opportunities for improvement. A technical review of the documents was not undertaken as part of this audit.

#### **4.7.1 Traffic Management Plan**

The Traffic Management Plan (TMP) was prepared by SECA Solution and the most recent version viewed as part of this audit was Version 10 dated 13 October 2020. This version of the TMP was approved by DPIE on 15 October 2020. A previous version of the TMP (Version 6, dated 22 April 2020) was approved by DPIE on 24 April 2020, prior to commencement of construction.

The TMP was developed in consultation with RMS (now Transport for NSW), Dubbo Regional Council, Ogden Coaches (regarding school bus routes) and Orange City Council (regarding use of Orange Bypass by construction heavy vehicles).

The auditor considers the TMP has been generally developed in accordance with the Development Consent conditions and relevant approvals and that the content is generally adequate and being implemented on site. Further information regarding the TMP is discussed in the Independent Audit Table in Appendix C.

#### **4.7.2 Landscaping Plan**

The Landscaping Plan (LP) was prepared by NGH Environmental and the most recent version viewed as part of this audit was “Final V4.0” dated 04 May 2020. This version of the LP was approved by DPIE on 05 May 2020, prior to commencement of construction.

The LP was developed in consultation with Council and surrounding landowners as discussed in Section 4 of the LP.

The auditor considers the LP has been generally developed in accordance with the Development Consent conditions and relevant approvals and that the content is generally adequate and being implemented on site.

Further information regarding the LP is discussed in the Independent Audit Table in Appendix C.

#### **4.7.3 Biodiversity Management Plan**

The Biodiversity Management Plan (BMP) was prepared by NGH Environmental and the most recent version viewed as part of this audit was “Final V5.0” dated 09 June 2020. The BMP was approved by DPIE on 18 June 2020, prior to commencement of construction.

The BMP was developed in consultation with BCD as discussed in Section 4 of the BMP.

The auditor considers the BMP has been developed in accordance with the Development Consent conditions and relevant approvals and that the content is adequate and generally being implemented on site aside from the compliance matters discussed within Section 5 of this report.

Further information regarding the BMP is discussed in the Independent Audit Table in Appendix C.

#### **4.7.4 Chance Finds Protocol (Appendix 2 of Cultural Heritage Management Plan)**

The Cultural Heritage Management Plan (including the Chance Finds Protocol as Appendix 2) was prepared by BYCA and the most recent version viewed as part of this audit was Revision No. 4 dated 17 June 2020. Correspondence from the Biodiversity and Conservation Division (BCD) dated 26 June 2020, prior to the commencement of construction, determined that BCD was satisfied with the content of the Chance Finds Protocol.

The auditor considers the CHMP has been generally developed in accordance with the Development Consent conditions and relevant approvals and that the content is generally adequate and being implemented on site.

Further information regarding the CHMP is discussed in the Independent Audit Table in Appendix C.

#### **4.7.5 Accommodation and Employment Strategy**

The Accommodation and Employment Strategy (AES) was prepared by BYCA and the most recent version viewed as part of this audit was Revision No. 2 dated 16 April 2020. This version of the AES was approved by DPIE on 24 April 2020, prior to commencement of construction.

The AES was developed in consultation with Council as discussed in Section 1.2 of the AES.

The auditor considers the AES has been generally developed in accordance with the Development Consent conditions and relevant approvals and that the content is generally adequate and being implemented on site.

Further information regarding the AES is discussed in the Independent Audit Table in Appendix C.

#### **4.7.6 Environmental Management Strategy**

The Environmental Management Strategy was prepared by BYCA and the most recent version viewed as part of this audit was Revision "Second Draft" dated 11 March 2020. This version of the EMS was approved by DPIE on 18 March 2020, prior to commencement of construction.

The auditor considers the EMS has been generally developed in accordance with the Development Consent conditions and relevant approvals and that the content is generally adequate. There do, however, appear to be some opportunities for improvement and recommendations to ensure continual environmental management performance and compliance with the Development Consent which are discussed within Section 5 of this report.

Further information regarding the EMS is discussed in the Independent Audit Table in Appendix C.

#### **4.7.7 Environment Management Plan (including Sub-Plans)**

The Environment Management Plan (EMP) was prepared by BYCA and the most recent version viewed as part of this audit was Revision No. 3 dated 21 February 2021. The EMP includes the following sub-plans:

- Flora and Fauna Management Plan;
- Weed and Pest Management Plan;
- Soil and Water Management Plan;
- Air Quality Management Plan;
- Noise and Vibration Management Plan;
- Cultural Heritage Management Plan;
- Waste and Energy Management Plan; and
- Fire Management Plan.

The EMP (and Sub-plans) did not require approval by DPIE.

The auditor considers the EMP (and Sub-plans) has been generally developed in accordance with the EMS, Development Consent conditions and relevant approvals and that the content is generally adequate and being implemented on site, aside from the compliance matters discussed within Section 5 of this report.

#### **4.8 Environmental Performance**

Based on the review of activities undertaken during the current audit program, it is considered that the mitigation measures detailed in the DPIE-approved Environmental Management Strategy, as well as other strategies and plans required within the Development Consent were generally appropriate and effective in minimising impacts associated with construction of the Project. Some compliance-related issues and opportunities for improvement of a generally minor nature were identified during the audit as discussed within Section 5 of this report.

Following completion of the auditor's interviews and site visit of 22 June 2021, it was deemed that a reasonable range of environmental controls were in place to assist in minimising the risk of significant environmental incidents such as damage to heritage items, native vegetation and pollution events. Key environmental protection measures observed during the site visits included:

- Environmental controls such as sediment fencing, rock-armouring, detention ponds, swales and grader-drains to assist in the management of potential erosion and/or sedimentation;
- Posting of speed limits and signage in accordance with the Traffic Management Plan;
- Tracking and documentation of heavy vehicle and over-dimensional movements;
- Tracking and documentation of plant and equipment maintenance;
- Provision of appropriately stocked and secured spill kits at key locations across the Project site;
- Use of watercarts and progressive stabilisation to minimise potential dust generation;
- Signage and exclusion zone fencing for protection of heritage areas; and
- Structured management of waste and recyclable materials.

#### **4.9 Complaints**

As of 30 June 2021, the Project team reported that 12 complaints had been received that related to environmental management matters during construction. Two (2) of these complaints were assessed to be unrelated to the Project as they were associated with operations from other non-Project related properties in the Suntop area.

Nine (9) complaints were received by the Project team regarding the following perceived issues:

- Disruption to stock-water supply;
- Changes to site-access arrangements for a dam on a neighbouring property;
- Consultation process associated with the landscape screening planting program;
- Unsafe conditions on local roads due to heavy vehicle movements, inclusive of periods when school buses were operational;
- Parking of Project vehicles in local business areas of Wellington and Dubbo; and
- Potential erosion and sedimentation to an off-site property down-slope of the Project site.

One (1) complaint was received by DPIE regarding perceived erosion/sedimentation issues on neighbouring lands located down-slope of the western boundary of the Project site.

The auditor considers that the response to complaints was generally satisfactory and evidence of additional mitigation measures in place to minimise potential impacts from construction works was observed at the time of the audit program. In some instances, the need for on-going consultation and management to address complaints was also recognised by the Project team.

It is noted that the Project website (<https://suntopsolarfarm.com.au/>) contains information to allow for members of the community to share their thoughts, concerns or suggestions for the Project via an email enquiry form. As noted within Section 5 of this report, the website did not contain a link to the required Complaints Register at the time of the audit and, as such, this was recorded as a non-compliance with the Development Consent (Schedule 4, Section 7).

#### **4.10 Incidents**

At the time of completion of this audit, three (3) environmental incidents had been recorded during construction of the Project and reported to DPIE in accordance with Schedule 4, Condition 4 of the Development Consent as noted below:

- 06/11/20: Hydraulic oil leak from road-registered tipper on Suntop Road;
- 01/03/21: Minor spill of sewage ablution from a block belly tank; and
- 01/03/21: Minor (less than 1L) hydraulic oil spill from a forklift.

Each of the incidents were reported to DPIE in a timely manner and closed-out appropriately which is commendable.

#### **4.11 Actual versus Predicted Environmental Impacts from Environmental Impact Statement**

A detailed environmental risk assessment was undertaken in the Project Environmental Impact Statement (EIS, Pitt & Sherry, Rev. 01, May 2018) and the following environmental risks were identified:

- Biodiversity;
- Aboriginal heritage;
- Visual amenity;
- Traffic and transport;
- Erosion and sediment control; and
- Bush Fire.

As part of this audit, specific potential impacts listed in the EIS within each of the identified environmental risks were considered and comment provided on the actual impacts during construction (see Table 3, below). Comment is not provided regarding potential operational impacts as the Project was under construction at the time of the audit and, therefore, an assessment of operational phase impact management was beyond the scope of the audit.

It is considered that the management strategies in place to mitigate potential construction impacts were appropriate and the impacts observed on site were generally consistent with those identified in the EIS. Table 3, below, presents a summary of audit observations associated with above-noted environmental risks.

**TABLE 3: Actual verses Predicted Environmental Impacts**

Potential/Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
<b>BIODIVERSITY</b>		
Clearing of native vegetation and removal of dead wood and trees which may negatively affect fauna	Clearing reported to have been completed in accordance with approved designs and flora/fauna protection measures. Pre-clearing ecological inspection completed and documented.	Environmental protection measures in place as per the DPIE-approved Biodiversity Management Plan. Vegetative screen planting program in progress at time of audit. Cleared vegetation retained for habitat enhancement.
Introduction and/or spread of noxious weeds and pathogens	Some areas of typical weeds present in agricultural settings after clearing observed.	Plant/equipment inductions are conducted that incorporate inspections for the presence of biosecurity risks. The site is monitored for presence of weeds.  Weed control to be conducted as part of landscaping and site rehabilitation program prior to the commencement of operation.
Disturbance of fauna during construction due to light, noise and air quality impacts generated by vehicles, equipment and construction activities	Clearing minimised as much as possible. Vegetation fencing and exclusion zones in place. Boundary fencing in place.	Cleared vegetation has been retained for future habitat enhancement (coarse woody debris).
Fauna mortality, injury or entrapment in trenches	No adverse impacts reported.	Proposed mitigation measures implemented as necessary to reduce potential for fauna mortality, injury or entrapment in trenches.
Erosion of disturbed areas leading to sedimentation and dust affecting any downgradient habitat	Some evidence of localised erosion/sedimentation observed.	Site-based civil engineering review of site drainage conducted resulting in installation of additional drainage control measures.
<b>ABORIGINAL HERITAGE</b>		
No impacts predicted	No impacts reported. Agreed heritage protection measures implemented.	Heritage exclusion zone fencing and signage is in place for on-site items and boundary fencing is in place to protect off-site item.
<b>VISUAL AMENITY</b>		
Impact to landscape character of the site and surrounding area	Visual impacts appear consistent with the Development Consent. The Project site is in a rural area and not visible from the closest arterial road (Renshaw McGirr Way).	Vegetation screen planting will be completed as part of the Project to minimise visual impacts, in accordance with the Landscaping Plan.

Potential/Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
Visual impact to the surrounding viewpoints, both public and private	No permanent buildings were complete at the time of the audit. Temporary facilities associated with the site compound were present and set back from Suntop Road to minimise visual impact. Monitoring of noise and light-spill conducted to minimise potential impact to neighbouring properties.	Project designs incorporate a subdued colour palate for permanent infrastructure that is consistent with the surrounding rural setting. Non-reflective materials will be used where possible/practicable to minimise glare and reflections.
<b>TRAFFIC AND TRANSPORT</b>		
Construction noise from earthworks involving trenching for cabling, piling of panel supports and assembly of panels.	Excessive and/or high-noise generating activities were not observed at the time of the audit. Works are not conducted outside of approved construction hours.	Strategies are in place to minimise noise generation and monitoring of equipment is undertaken to ensure it is well maintained and operated to manufacturer's specifications.
Increased collision risks on surrounding roads	No local traffic was observed on Suntop Road at the time of the audit as the Project site is located within sparsely populated rural lands. Agreed improvements have been made to the intersection of Renshaw McGirr Way and Suntop Road. Council consulted regarding site access points. Traffic movements have been modified to minimise road use during times when school buses are in operation following receipt of complaints.	Construction traffic deemed to be managed in accordance with the DPIE-approved Traffic Management Plan. Heavy and over-dimensional vehicle movement registers were reviewed by the auditor and volumes were confirmed to be compliant with Development Consent conditions. Car-pooling and a coach service from Dubbo and Wellington are in use to reduce potential impacts associated with increased traffic during the construction phase.
Damage to road infrastructure	The intersection of Renshaw McGirr Way and Suntop Road has been upgraded in accordance with Development Consent requirements. Following the upgrade some defects have been identified.	Road maintenance associated with the Project will be addressed by the proponent in accordance with Dubbo Regional Council requirements.

Potential/Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
Associated noise and dust which may adversely affect nearby receivers	<p>Reduced speed limits noted to be in place within Project site to assist in minimising potential noise and dust.</p> <p>Excessive and/or high-noise generating activities were not observed at the time of the audit. Works are not conducted outside of approved construction hours.</p> <p>Watercarts observed to be in use to assist with dust suppression at the time of the auditor's site visit.</p>	Strategies are in place to minimise noise and dust generation.
Disruption to existing services (school buses, cyclists, pedestrians)	Approved Traffic Management Plan in place.	Car-pooling and a coach service from Dubbo and Wellington are in use to reduce potential impacts associated with increased traffic during the construction phase.
<b>EROSION AND SEDIMENT CONTROL</b>		
Construction activities impacting upon surface water flow and disturb soils and lead to sediment runoff	Some evidence of localised erosion/sedimentation observed.	Site-based civil engineering review of site drainage conducted resulting in installation of additional drainage control measures.
Erosion of exposed soil and stockpiled materials	Landscaping to be undertaken to ensure exposed soils will be stabilised. Some areas noted to be lacking in vegetative cover at time of audit.	Additional temporary soil stabilisation measures such as the application of soil binder at key locations should be implemented prior to the establishment of final landscaping/vegetative cover to further reduce the potential for erosion/sedimentation during construction.
Dust generation from excavation and vehicle movements over exposed soil	Watercarts observed to be in use to assist with dust suppression at the time of the auditor's site visit.	Evidence of strategies to minimise potential dust generation observed at time of audit.
Contamination of soil due to spillage of hazardous chemicals such as fuels, oil, etc	<p>Main site-based fuelling activities are undertaken from a bunded above-ground storage tank.</p> <p>Un-bunded storage of some chemical / fuel containers observed within maintenance area of site during audit.</p>	Storage and handling of all dangerous and/or hazardous materials on site (even those used on a temporary basis) should be reviewed and measures put in place to ensure storage is consistent with the relevant Australian Standard and other legislation/guidelines.

Potential/Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
<b>BUSH FIRE</b>		
Ignition sources starting a bushfire, i.e. petrol-powered tools, motor vehicles driving over combustible material, storage of fuels and dangerous goods, smoking from site personnel, electrical faults, lighting and cropping equipment	Emergency Management Plan in place to address potential risks inclusive of bushfire. Project personnel attend regional Emergency Services meetings. Tool-boxing regarding bushfire risks completed.	Site personnel demonstrated a clear understanding of the risk of potential bush-fire from construction-based ignition sources.

#### 4.12 Site Inspection

A site inspection was conducted by the Principal auditor, Toby Hobbs, on 22 June 2021. The site was noted to be currently under construction with a range of activities occurring including minor earthworks, piling, panel installation, trenching for cables and installation of other electrical infrastructure. The weather at the time of the inspection was partly cloudy with light winds and a temperature of approximately 12°C. It is noted that there had been approximately 60mm of rainfall in the two (2) weeks prior to the site visit (Wellington Bureau of Meteorology monitoring station). All areas of the site were accessible to the auditor at the time of the site visit.

Evidence for the audit collected during the site inspection is presented within the column titled “Evidence Collected” in the Independent Audit Table (Appendix C). In addition, site inspection photographs are presented within Appendix D.

#### 4.13 Site Interviews

As mentioned previously, interviews were held with the following senior Project personnel on 22 June 2021 as part of the site visit for the audit:

- Bjorn Schultz (Suntop SF – Project Director);
- Etosha Milner (Suntop SF – Project Engineer);
- Greg Smith (Bouygues Construction – HSE Manager);
- Fabrice Geoffrey (Bouygues Construction – Senior Project Manager); and
- Awais Imtiaz (Bouygues Construction – Planning Manager).

Evidence for the audit collected during the site interviews is presented within the column titled “Evidence Collected” in the Independent Audit Table (Appendix C).

#### 4.14 Previous Annual Review or Compliance Report Recommendations

The auditor understands that there have not been any annual reviews associated with the Project up until completion of this audit.

Three (3) non-compliances were identified in the Pre-Construction compliance report (NGH Environmental, 03/07/20) as follows:

- CoA 8 Notification. No evidence was available that written notification had been provided to DPIE, notifying of the intended commencement of construction;

- CoA 6 Construction of site access prior to the commencement of construction. The western access from Suntop Road to the site was only partly constructed and the eastern access had not commenced construction; and
- CoA 12 The retirement of biodiversity credits prior to the commencement of construction. Biodiversity credits had not been retired, nor had an alternative time frame for credit retirement had been made.

It is noted that all three (3) non-compliances had been closed out at the time of this audit.

#### 4.15 Key Strengths

The standard of environmental management evident during completion of the Independent Environmental Audit was considered generally appropriate with several key strengths evident as noted below:

- Project personnel, inclusive of those from the proponent and contractor teams, were well resourced, suitably qualified, dedicated, and experienced;
- There was a strong commitment evident to ensure Development Consent compliance;
- Construction has proceeded on schedule in sometimes difficult and changeable circumstances due to the COVID-19 pandemic;
- Incidents have been reported in a timely manner and closed-out appropriately;
- A range of waste management options were being investigated at the time of the audit to maximise resource recovery and reuse;
- Considerable resources had been deployed to ensure local personnel were employed during the construction of the Project; and
- A successful car-pooling program and coach service from Dubbo and Wellington were in use to reduce potential impacts associated with increased construction-based traffic.

## 5 RECOMMENDATIONS

### 5.1 Non-compliances

There were four (4) non-compliances identified with Development consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (STSF-IEA-21-NC1):** Records associated with required monitoring in accordance with the DPIE-approved Biodiversity Management Plan were not available at the time of the audit; as such, it was apparent that not all required monitoring had been undertaken;
- **Non-compliance No. 2 (STSF-IEA-21-NC2):** Dangerous and/or hazardous materials were observed to be stored directly on the ground surface during the audit;
- **Non-compliance No. 3 (STSF-IEA-21-NC3):** Records associated with required monitoring in accordance with the (Construction) Environmental Management Plan were not available at the time of the audit; as such, it could not be confirmed that required monitoring had been undertaken; and
- **Non-compliance No. 4 (STSF-IEA-21-NC4):** Based on review of the project website between 10 June 2021 and 29 June 2021 a complaints register had not been published as per the requirements of Schedule 4, Condition 7 of the Development Consent.

Based on the non-compliances identified during the audit program the following recommendations are made:

- **Recommendation No. 1 (STSF-IEA-21-R1):** In response to Non-compliance No. 1, the monitoring schedule listed within Table 10.3 of the DPIE-approved Biodiversity Management Plan should be

reviewed and a suitable monitoring program, inclusive of documentation, instigated as soon as practicable;

- **Recommendation No. 2 (STSF-IEA-21-R2):** In response to Non-compliance No. 2, the storage and handling of all dangerous and/or hazardous materials on site (even those used on a temporary basis) should be reviewed and measures put in place to ensure storage is consistent with the relevant Australian Standard and other legislation/guidelines;
- **Recommendation No. 3 (STSF-IEA-21-R3):** In response to Non-compliance No. 3, the monitoring schedule listed within Section 14.1.1 of the (Construction) Environmental Management Plan should be reviewed and a suitable monitoring program, inclusive of documentation, instigated as soon as practicable; and
- **Recommendation No. 4 (STSF-IEA-21-R4):** In response to Non-compliance No. 4, a redacted complaints register should be uploaded to the project website as soon as practicable.

## 5.2 Opportunities for Improvement

There were five (5) opportunities for improvement identified with Development consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

- **Opportunity for Improvement No. 1 (STSP-IEA-21-OI1):** The proponent and their construction contractor should formally document an agreement with Council to ensure that the Renshaw McGirr Way and Suntop Road intersection pavement will be returned to Council in a condition that is satisfactory to Council at the end of the construction and commissioning periods for the project;
- **Opportunity for Improvement No. 2 (STSP-IEA-21-OI2):** If the westerly access point (Gate No. 2) is to be used in the future, sight distances should be reviewed with Dubbo Regional Council to ensure they are adequate;
- **Opportunity for Improvement No. 3 (STSP-IEA-21-OI3):** Some minor material tracking / drag-out was noted at the intersection of the project access (Gate No. 1) and Suntop Road. It is recommended that this area is monitored for potential mud/sediment accumulation and, where necessary, required maintenance such as sweeping and/or repairs to the road surface should be completed in a timely manner;
- **Opportunity for Improvement No. 4 (STSP-IEA-21-OI4):** Evidence of some on-site erosion and sedimentation associated with construction works was observed during the site inspection of 22/06/21. As such, additional temporary soil stabilisation measures such as the application of soil binder at key locations should be implemented prior to the establishment of final landscaping/vegetative cover to further reduce the potential for erosion/sedimentation during construction; and
- **Opportunity for Improvement No. 5 (STSP-IEA-21-OI5):** Additional clean-up of construction waste, particular packing materials such as plastic sheeting, cardboard, paper and plastic baling tape that could easily be transported by wind to adjoining farmland areas is recommended in areas of active construction.

## 6 CONCLUSION

Vantage Environmental Management Pty Ltd has conducted an Independent Environmental Audit (IEA) to assess the environmental performance and compliance status of the Suntop Solar Project (NSW Department of Planning, Industry and Environment Application Number SSD 8696). The IEA was a requirement of Schedule 4, Condition 6 of the Project's Development Consent (Modification 1, 11 October 2019) and conducted in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020).

There were four (4) non-compliances identified with Development Consent conditions and the associated management plans and strategies reviewed during the audit program. Recommendations to address the identified non-compliance have been presented by the auditor. In addition, there were five (5) opportunities for improvement identified.

Overall, the standard of environmental management evident during the completion of the audit was generally acceptable. Construction works and associated management plans, records and monitoring documentation were deemed, in the majority, to be generally consistent with Development consent conditions and associated plans and strategies.

It is considered that the management strategies in place to mitigate potential construction impacts were generally appropriate and the impacts observed on site were consistent with those identified in the EIS.

In accordance with Section 4.3.2 of the *Independent Audit Post Approval Requirements* (DPIE, 2020), the proponent must submit their response to the audit findings to the Department in a separate document to this report within three (3) months of the commencement of the audit, i.e. by 02 September 2021. The proponent must respond to all audit findings, including recommendations and opportunities for improvement.

# Appendix A

DPIE Audit Team Endorsement: 04 May 2021



Mrs Chelsea Milles  
Project Development Manager  
Level 10  
15 GREEN SQUARE CLOSE  
FORTITUDE VALLEY Queensland 4006  
04/05/2021

Dear Mrs Milles

**Suntop Solar - SSD-8696**  
**Independent Environmental Audit Team endorsement 2021**

I refer to your request (SSD-8696-PA-22) for the Secretary's approval of suitably qualified persons from Vantage Environmental Management to prepare the Independent Environmental Audit for Suntop Solar (the project) in accordance with Schedule 4 Condition 6 of SDD-8696 (the consent).

The Department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, in accordance with Schedule 4 Condition 6 of the consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team of Mr Toby Hobbs and Ms Susannah Price Price of Vantage Environmental Management to prepare the Independent Environmental Audit.

:

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

The Independent Environmental Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements, in accordance with conditions of consent and in consultation with relevant agencies. 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 audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

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

Yours sincerely

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

# Appendix B

## Consultation

10 May 2021

**Ms Katrina O'Reilly**  
**Team Leader - Compliance**  
**Department of Planning, Industry & Environment**  
4 Parramatta Square, 12 Darcy Street  
PARRAMATTA NSW 2150  
Sent via email: [katrina.oreilly@planning.nsw.gov.au](mailto:katrina.oreilly@planning.nsw.gov.au)

Dear Ms O'Reilly

**RE: Suntop Solar Farm – SSD 8696**  
**Proposed Independent Environmental Audit Scope**

Vantage Environmental Management Pty Ltd have been engaged by Bouygues Construction Australia Pty Ltd (on behalf of Canadian Solar) to undertake the Independent Environmental Audit for the Suntop Solar Farm project in accordance with Schedule 4, Condition 6 of the Development Consent (SSD 8696, MOD 1 - 11 October 2019). Susannah Price and myself were endorsed by DPIE for this role via the Department's correspondence of 04 May 2021.

In accordance with the *Independent Audit Post Approval Requirements (2020)*, this letter provides a proposed scope for the Independent Environmental Audit for the Department's consideration. In addition, please note that we will be liaising with Dubbo Regional Council and the NSW Environment Protection Authority for input into the scope of this audit. It would be most appreciated if you could advise if the Department has any input on this proposed scope or requires input from any other agencies or stakeholders as part of development of this audit scope.

The proposed audit scope includes:

1. An assessment of compliance with:
  - a. Development Consent for SSD 8696 as modified (Mod 1, July 2020);
  - b. Post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans during the construction phase including:
    - Final Layout Plans;
    - Traffic Management Plan;
    - Landscaping Plan;
    - Biodiversity Management Plan;
    - Chance Finds Protocol;
    - Accommodation and Employment Strategy; and
    - Environmental Management Strategy.

2. An assessment of the environmental performance of the development, including an assessment of:
  - a. Actual impacts compared to predicted impacts documented in the Environmental Impact Statement and associated amendments;
  - b. The physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;
  - c. Incidents, non-compliances and complaints that occurred or were made during the audit period;
  - d. The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and
  - e. Any feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period.
3. The status of implementation of previous Independent Audit findings, recommendations and actions (if any);
4. A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
5. Any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

It is our intention to commence the audit program during the week of 24 May 2021 and, as such, it would be appreciated if you could provide any comment regarding the proposed scope of the audit prior to that time.

Should you require any further information please don't hesitate to contact the undersigned at your convenience either by phone on 0420 922 955 or via email on [thobbs@venv.com.au](mailto:thobbs@venv.com.au).

Yours sincerely



**Toby Hobbs**  
Principal Auditor  
Vantage Environmental Management Pty Ltd

**From:** [Katrina O'Reilly](#)  
**To:** [Toby Hobbs](#)  
**Subject:** Re: Proposed Audit Scope: Suntop Solar Farm (SSD 8696)  
**Date:** Friday, 14 May 2021 9:17:08 AM

---

Toby,

Additional areas to look at;  
mgt to prevent/minimise tracking of material onto suntop road and  
Waste mgt.  
Thanks  
Regards  
Katrina

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**From:** Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>  
**Sent:** Thursday, May 13, 2021 12:54:11 PM  
**To:** Toby Hobbs <thobbs@venv.com.au>  
**Subject:** Re: Proposed Audit Scope: Suntop Solar Farm (SSD 8696)

Toby,

The Department would like areas below looked at;  
Traffic mgt ( including mgt of vehicles during school bus pick and drop times, recording  
and mgt of vehicle movements );  
Road upgrades, monitoring and maintenance;  
Erosion and sediment control mgt;  
Water mgt on site and off site;  
Veg planting and screening;  
Aboriginal/ heritage mgt;  
Complaints register and mgt of;  
Lighting; and  
Compliance with CEMP ( not a specific condition but included in the projects EIS).

Regards  
Katrina

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**From:** Toby Hobbs <thobbs@venv.com.au>  
**Sent:** Monday, May 10, 2021 4:23:26 PM  
**To:** Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>  
**Subject:** Proposed Audit Scope: Suntop Solar Farm (SSD 8696)

Good afternoon Katrina,

Please find attached correspondence related to the forthcoming Independent Environmental  
Audit (IEA) of the Suntop Solar Farm.

Any comments from the Department regarding the proposed scope of work for the IEA would be  
most appreciated.

Regards,

Toby

**TOBY HOBBS**

Principal

Vantage Environmental Management Pty Ltd

PO Box 378 Albury NSW 2640

**T** (02) 6021 8655 **M** 0420 922 955

[www.venv.com.au](http://www.venv.com.au)

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**From:** [Darryll Quigley](#)  
**To:** [Susannah Price](#)  
**Subject:** SSD 8696 Proposed Audit Scope - Suntop Solar Project  
**Date:** Tuesday, 1 June 2021 2:33:41 PM  
**Attachments:** [ATT00001.png](#)  
[ATT00002.png](#)  
[ATT00003.png](#)  
[ATT00004.png](#)  
[ATT00005.png](#)  
[ATT00006.png](#)  
[ATT00007.png](#)

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Susannah,

Dubbo Regional Council has no comments to make at this time with regard to the proposed Audit.

Council would like to be informed of the conclusion of the Audit.

For any further information regarding this matter please contact me on 6801 4656 during business hours or via return email.



**Darryll Quigley**

**Manager Building and Development Services**

**Building & Development Services | Dubbo Regional Council**

P 02 6801 4656

[Darryll.Quigley@dubbo.nsw.gov.au](mailto:Darryll.Quigley@dubbo.nsw.gov.au)

<http://dubbo.nsw.gov.au>

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**From:** Susannah Price <[sprice@venv.com.au](mailto:sprice@venv.com.au)>  
**Sent:** Monday, 10 May 2021 3:45 PM  
**To:** Dubbo Regional Council <[council@dubbo.nsw.gov.au](mailto:council@dubbo.nsw.gov.au)>  
**Subject:** Proposed Audit Scope - Suntop Solar Project

**[EXTERNAL Message: Be cautious of clicking on links or opening attachments.]**

Hi,

Please find attached a proposed audit scope for an Independent Environmental Audit of the Suntop Solar project (located south of Dubbo) for your consideration. We appreciate if you could please forward this email to the relevant department representative.

If you have any questions, please don't hesitate to contact me.

Regards  
Susannah

**SUSANNAH PRICE, MSc**  
Project Manager

Vantage Environmental Management Pty Ltd  
PO Box 378 Albury NSW 2640  
**T** (02) 6021 8655 **M** 0421 871 433  
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DOC21/402021

Mr Toby Hobbs  
Vantage Environmental Management Pty Ltd  
PO Box 378  
Albury NSW 2640

Email: [thobbs@venv.com.au](mailto:thobbs@venv.com.au)

21 May 2021

Dear Mr Hobbs

**NSW Environment Protection Authority – Suntop Solar Farm - SSD 8696**

**Proposed Independent Environmental Audit Scope**

The NSW Environment Protection Authority (the EPA) refers to your letter dated 10 May 2021, seeking comment regarding the Independent Environmental Audit Scope for the Suntop Solar Farm Project (the Premises) in accordance with Schedule 4, Condition 6 of Development Consent SSD 8696, MOD 1-11. The EPA understand Vantage Environmental Management Pty Ltd are endorsed by Department of Planning, Industry and Environment for this audit.

The EPA notes the Premises does not undertake a scheduled activity in accordance with Schedule 1 of the *Protection of the Environment Operations Act 1997*. Therefore, the Premises does not hold an Environment Protection Licence. We understand you are also consulting with Dubbo Regional Council who will be the appropriate regulatory authority for this project.

The EPA has no specific comments regarding the audit scope.

If you have any questions or concerns in relation to this matter, please contact Nina Sheer in the Regulatory Operations Delivery Hub on (02) 9995 5706 or at [EPA.DeliveryHub@epa.nsw.gov.au](mailto:EPA.DeliveryHub@epa.nsw.gov.au).

Yours sincerely

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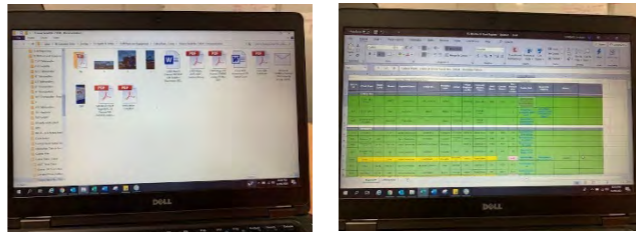
**SHERIDAN LEDGER**  
**Unit Head Regulatory Operations Delivery Team**

# Appendix C



## Independent Audit Table

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>SCHEDULE 2: ADMINISTRATIVE CONDITIONS</b>				
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>				
Schedule 2 Condition 1	In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	<p>- All evidence collected and observations made during this audit (for construction phase of development).</p> <p>Evidence was not collected regarding the operation, upgrading or decommissioning phases of the development as these phases have not yet occurred.</p>	The environmental management and mitigation measures in place for construction of the Project were deemed to be generally suitable and consistent with Consent conditions.	Compliant (Construction phase only)
<b>TERMS OF CONSENT</b>				
Schedule 2 Condition 2	<p>The Applicant must carry out the development:</p> <p>(a) generally in accordance with the EIS; and</p> <p>(b) in accordance with the conditions of this consent.</p> <p><i>Note: The general layout of the development is shown in Appendix 1.</i></p>	- All evidence collected and observations made during this audit (for construction phase of development).	The development is being carried out generally in accordance with the EIS and the conditions of this Development Consent. Some minor adverse impacts associated with construction were identified during the audit but none were deemed to be of high significance.	Compliant
Schedule 2 Condition 3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	N/A	There have been no reported inconsistencies between the plans and documentation referred to in this condition.	Not triggered
Schedule 2 Condition 4	<p>The Applicant must comply with any requirement/s of the Secretary arising from the Department's assessment of:</p> <p>(a) any strategies, plans or correspondence that are submitted in accordance with this consent;</p> <p>(b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and</p> <p>(c) the implementation of any actions or measures contained in these documents.</p>	<p>- All evidence collected and observations made during this audit</p> <p>- Suntop Solar Farm SSD 8696 – COA 5A. Preconstruction Compliance Report (03/07/20)</p> <p>- Correspondence dated 13/07/20 from DPIE acknowledging receipt and satisfaction of preconstruction compliance report</p>	The proponent has complied with requests and requirements from the Secretary.	Compliant
<b>FINAL LAYOUT PLANS</b>				
Schedule 2 Condition 5	Prior to the commencement of construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure.	<p>- Suntop Solar Farm General Layout, Final Design (Rev. F, 07/02/20)</p> <p>- Correspondence dated 10/02/20 from DPIE acknowledging receipt of Final Layout Plan</p> <p>- Correspondence dated 01/01/20 from proponent providing date of Commencement of Construction as 01/10/20</p>	Detailed Final Layout Plans were lodged with DPIE on 07/02/20 which included details on the location of the siting of solar panels and ancillary infrastructure. The plans were lodged prior to commencement of construction.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE</b>				
Schedule 2 Condition 6	Over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.	N/A	Not relevant as upgrade has not occurred	Not triggered
<b>WORK AS EXECUTED PLANS</b>				
Schedule 2 Condition 7	Prior to the commencement of operations, or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department.	N/A	Not relevant as operation phase not yet commenced	Not triggered
<b>NOTIFICATION OF DEPARTMENT</b>				
Schedule 2 Condition 8	Prior to the commencement of the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing of the date of commencement, or cessation, of the relevant phase.	<ul style="list-style-type: none"> <li>- Letter dated 01/10/20 from proponent to DPIE providing date of Commencement of Construction as 01/10/20</li> <li>- DPIE confirmation of upload of Notice of Commencement of Construction letter to Major Projects portal of 01/10/20</li> </ul>	<p>DPIE notified in writing of date of commencement of construction prior to commencement of that phase.</p> <p>Commencement of other phases of development yet to be notified to DPIE.</p>	Compliant (Construction phase only)
<b>STRUCTURAL ADEQUACY</b>				
Schedule 2 Condition 9	<p>The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i>.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>- Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</li> <li>- Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</li> </ul>	<ul style="list-style-type: none"> <li>- Construction Certificate No. 470.3/2020, 22/10/20 (Suntop Solar Farm – Stage 3 – Civil Works and Fencing)</li> <li>- Construction Certificate No. 470.5/2020, 10/12/20 (Suntop Solar Farm – Stage 5 – Installation of Piling, Trackers and Modules)</li> <li>- Construction Certificate No. 470.7/2020, 04/02/21 (Suntop Solar Farm – Stage 7 – Installation of AC and DC electrical networks, earth network and control, security and communications systems)</li> <li>- Construction Certificate No. 470.8/2020, 11/05/20 (Suntop Solar Farm – Stage 8 – Installation of Inverter stations, weather stations and array boxes)</li> <li>- Construction Certificate No. 470.10/2020, 03/06/20 (Suntop Solar Farm – Stage 10 – O&amp;M building)</li> </ul>	Construction Certificates have been obtained for works to date.	Compliant
<b>DEMOLITION</b>				
Schedule 2 Condition 10	The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	- Project personnel advised the auditor on 08/06/21 that no demolition activity has taken place on site	The proponent is not undertaking any demolition work as part of this development.	Not triggered



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<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>				
Schedule 2 Condition 11	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p> <p>This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.</p>	<p>- Project personnel advised the auditor on 08/06/21 that no damage or relocation of relevant public infrastructure had taken place as part of the project</p>	The project has not damaged or relocated any relevant public infrastructure as part of this development.	Not triggered
<b>OPERATION OF PLANT AND EQUIPMENT</b>				
Schedule 2 Condition 12	<p>The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>- Vehicle register/inspections/maintenance records inspected on site. Electronic copies are maintained for all equipment including photographs, risk assessment details, registration certificates, service history and on-site verification checklists.</p>  <p>Daily pre-start checklist viewed contained information to check for excessive smoke, oil leaks, etc. Records were viewed that showed 166 pre-start meetings/checks had been completed and retained on file at the time of the audit.</p>	Completed register/inspections/maintenance records held on site. All relevant information presented within the registers. Information was current to date of audit.	Compliant
<b>SUBDIVISION</b>				
Schedule 2 Condition 13	<p>The Applicant may subdivide the site to create three new allotments, as identified in the figure in Appendix 5 and in accordance with the requirements of the EP&amp;A Act and EP&amp;A Regulation.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision.</li> <li>• Division 4 of Part 8 of the EP&amp;A Regulation sets out the application requirements for subdivision certificate</li> </ul>	<p>- Dubbo Regional Council Subdivision Certificate issued on 22/06/20 under the Environmental Planning &amp; Assessment Act 1979</p> <p>- DP1266474 documentation</p>	A subdivision certificate from Dubbo Regional Council was obtained by the proponent.	Compliant

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<b>SCHEDULE 3: ENVIRONMENTAL CONDITIONS - GENERAL</b>				
<b>BATTERIES</b>				
<b>Battery Storage Restriction</b>				
Schedule 3 Condition 1	Battery storage is not permitted on the project site.  <i>Note: Nothing in this condition prevents the Applicant from seeking to modify the consent to permit battery storage in the future.</i>	- Project personnel advised the auditor on 08/06/21 that battery storage is not proposed for the project	Battery storage is not proposed.	Compliant
<b>TRANSPORT</b>				
<b>Over-Dimensional and Heavy Vehicle Restrictions</b>				
Schedule 3 Condition 2	The Applicant must ensure that the: (a) development does not generate more than: <ul style="list-style-type: none"> <li>45 heavy vehicle movements a day during construction, upgrading or decommissioning;</li> <li>1 over-dimensional vehicle movements a day during construction, upgrading or decommissioning;</li> <li>5 heavy vehicle movements a day during operations; on the public road network; and</li> </ul> (b) length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 19 metres, unless the Secretary agrees otherwise.	- Suntop Solar Farm Traffic Management Plan (Rev 10, 13/10/20)  - DPIE approval letters of Traffic Management Plan dated 10/02/20 (for Rev 6, 22/04/20) and 15/10/20 (for Rev 10, 13/10/20)  - Typical heavy vehicle volumes were reported to range between 12 and 22 movements per day  - At the time of the audit site inspection on 22/06/21 there had only been one (1) over-dimensional (OD) vehicle movement to site which was the main sub-station transformer in late 2020  - No further OD vehicles movements are predicted to be required during construction of the project	Heavy vehicle and over-dimensional vehicle movements appeared consistent with Development Consent conditions for construction.	Compliant
Schedule 3 Condition 3	The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day.	- Heavy Vehicle (HV) and Over-dimensional (OD) Vehicle tracking register viewed on site  - Typical heavy vehicle volumes were reported to range between 12 and 22 movements per day  - At the time of the audit site inspection on 22/06/21 there had only been one (1) over-dimensional (OD) vehicle movement to site which was the main sub-station transformer in late 2020  - No further OD vehicles movements are predicted to be required during construction of the project	Heavy vehicle movements appeared to have been appropriately tracked and consistent with Development Consent conditions.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Designated Over-Dimensional and Heavy Vehicle Access Route</b>				
Schedule 3 Condition 4	<p>All over-dimensional and heavy vehicles associated with the development must travel to and from the site via the Mitchell Highway, Showground Road, Renshaw McGirr Way and Suntop Road, as identified in the figure in Appendix 3.</p> <p><i>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.</i></p>	<p>- Suntop Solar Farm Traffic Management Plan (Rev 10, 13/10/20)</p> <p>- DPIE approval letters of Traffic Management Plan dated 10/02/20 (for Rev 6, 22/04/20) and 15/10/20 (for Rev 10, 13/10/20)</p> <p>- On-going monitoring and training</p> <p>- Traffic signage at intersection of Suntop Road as observed on 22/06/21</p> 	<p>Vehicle movements appeared to have been appropriately tracked and consistent with Development Consent conditions.</p>	Compliant
<b>Road Upgrades</b>				
Schedule 3 Condition 5	<p>Prior to commencement of construction, the Applicant must upgrade the intersection of Renshaw McGirr Way and Suntop Road, to the satisfaction of the relevant roads authority.</p>	<p>- Intersection upgrade noted by Auditor to be complete during visit of 22/06/21 with some pavement defects evident.</p>  <p>- Email correspondence from Dubbo Regional Council on 25/06/21:</p> <ul style="list-style-type: none"> <li>Renshaw McGirr Way and Suntop Road intersection design and layout was to Council's satisfaction</li> <li>Quality of construction and/or of the base course pavement material was subsequently identified as not to Council's satisfaction</li> <li>Council have requested that at the end of the construction and commissioning periods that the pavement will be returned to Council in a condition that is satisfactory to Council</li> </ul>	<p>Information obtained from the relevant road authority, Dubbo Regional Council, indicated that following completion of the intersection upgrade and subsequent use during construction of the project, some quality defects have become evident. Council confirmed that it was their expectation that at the end of the construction and commissioning periods the intersection pavement would be returned in a condition that was satisfactory to Council. It is further noted that Council had liaised with the proponent's construction contractor who had given verbal confirmation that the necessary defect rectification works would be completed.</p> <p><b>Opportunity for Improvement No. 1 (STSP-IEA-21-OI1):</b> The proponent and their construction contractor should formally document an agreement with Council to ensure that the Renshaw McGirr Way and Suntop Road intersection pavement will be returned to Council in a condition that is satisfactory to Council at the end of the construction and commissioning periods for the project.</p>	Compliant


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<b>Site Access</b>				
Schedule 3 Condition 6	Prior to the commencement of construction, the Applicant must construct two site access points off Suntop Road (shown in Appendix 1) with a Rural Property Access type treatment to cater for the largest vehicle accessing the site, including sealing the on-site access roads a minimum of 30 m from their intersection with Suntop Road, in accordance with the Austroads Guide to Road Design (as amended by RMS supplements), to the satisfaction of Council.	<p>- Email correspondence from Dubbo Regional Council on 25/06/21 stating that:</p> <ul style="list-style-type: none"> <li>Both site access points (Gate No.1 and Gate No. 2) had been constructed mostly to Council's satisfaction</li> <li>Some additional vegetation clearing was required to allow for adequate sight distance at the location of the westerly site access point: Gate No. 2</li> </ul> <p>- At the time of the audit site inspection on 22/06/21 only one (1) site access point was in use which was the eastern access referred to as Gate No. 1. It was reported that Gate No. 1 was the only access location necessary for construction at that point in time.</p>	<p>Dubbo Regional Council confirmed that site access points were generally constructed in accordance with their requirements although an opportunity for improvement, as noted below, was identified.</p> <p><b>Opportunity for Improvement No. 2 (STSP-IEA-21-OI2):</b> If the westerly access point (Gate No. 2) is to be used in the future, sight distances should be reviewed with Dubbo Regional Council to ensure they are adequate.</p>	Compliant
<b>Operating Conditions</b>				
Schedule 3 Condition 7	The Applicant must ensure: (a) the internal roads are constructed as all-weather roads; (b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; (c) the capacity of the existing roadside drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) development-related vehicles leaving the site are in a clean condition and do not result in dirt being tracked onto the public road network.	<p>- Suntop Solar Farm Traffic Management Plan (Rev 10, 13/10/20)</p> <p>- DPIE approval letters of Traffic Management Plan dated 10/02/20 (for Rev 6, 22/04/20) and 15/10/20 (for Rev 10, 13/10/20)</p> <p>- Health and Safety reviews and inspection checklists</p> <p>- Signage and tool-box training</p> <p>- Internal access roads constructed with aggregate topping</p> <p>- No off-site parking was observed at the time of the audit site inspection on 22/06/21</p>	<p>A range of relevant environmental protection measures have been implemented as part of the construction phase, inclusive of monitoring of vehicles prior to departure from site. Notwithstanding this, some minor material tracking/drag-out was noted at the location of Gate No. 1 during the audit site visit of 22/06/21.</p> <p><b>Opportunity for Improvement No. 3 (STSP-IEA-21-OI3):</b> Some minor material tracking/drag-out was noted at the intersection of the project access (Gate No. 1) and Suntop Road. It is recommended that this area is monitored for potential mud/sediment accumulation and, where necessary, required maintenance such as sweeping and/or repairs to the road surface should be completed in a timely manner.</p>	Compliant


Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Traffic Management Plan</b>				
Schedule 3 Condition 8	<p>Prior to the commencement of construction, the Applicant must prepare a Traffic Management Plan for the development in consultation with RMS and Council, and to the satisfaction of the Secretary. This plan must include:</p> <p>(a) details of the transport route/s to be used for all development-related traffic, including the location of access points;</p> <p>(b) a protocol for undertaking independent dilapidation surveys to assess the:</p> <ul style="list-style-type: none"> <li>existing condition of Suntop Road, Renshaw McGirr Way and Showground Road on the transport route/s prior to construction, upgrading or decommissioning activities; and</li> <li>condition of Suntop Road, Renshaw McGirr Way and Showground Road on the transport route/s following construction, upgrading or decommissioning activities;</li> </ul> <p>(c) a protocol for the repair of any local roads identified in the dilapidation surveys to have been damaged during construction, upgrading or decommissioning works;</p> <p>(d) details of the road upgrade works required by condition 5 of Schedule 3;</p> <p>(e) details of the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport route/s during construction, upgrading or decommissioning works, including:</p> <ul style="list-style-type: none"> <li>consideration of potential interaction with other State significant development projects in the Dubbo Regional LGA, in consultation with the Applicants of the projects;</li> <li>temporary traffic controls, including detours and signage;</li> <li>notifying the local community about project-related traffic impacts;</li> <li>procedures for receiving and addressing complaints from the community about development-related traffic;</li> <li>minimising potential for conflict with school buses and other motorists as far as practicable;</li> <li>scheduling of haulage vehicle movements to minimise convoy length or platoons;</li> <li>responding to local climate conditions that may affect road safety such as fog, dust and wet weather;</li> <li>responding to any emergency repair or maintenance requirements; and</li> <li>a traffic management system for managing over-dimensional vehicles; and</li> </ul> <p>(f) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> <li>travelling speeds;</li> <li>driver fatigue;</li> <li>procedures to ensure that drivers adhere to the designated transport route/s; and</li> <li>procedures to ensure that drivers implement safe driving practices.</li> </ul> <p>Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Traffic Management Plan (Rev 10, 13/10/20)</li> <li>- DPIE approval letters of Traffic Management Plan dated 10/02/20 (for Rev 6, 22/04/20) and 15/10/20 (for Rev 10, 13/10/20)</li> <li>- Health and Safety reviews and inspection checklists</li> <li>- Contractual conditions</li> <li>- Vehicle tracking registers</li> <li>- Toolbox training records</li> <li>- Induction records</li> <li>- Signage</li> </ul>	<p>The Traffic Management Plan (TMP) was approved by DPIE prior to the commencement of construction.</p> <p>During the Auditor's site visits and interviews of 22/06/21, evidence of implementation of the TMP was confirmed including records of traffic movement, bus use for project personnel, posting and monitoring of speed limits, tool-box records, etc.</p> <p>It is further noted that the Health, Safety and Environment Manager confirmed that the timing of vehicle movements had been modified where practicable to be reduced during local school bus pick-up and drop-off times.</p> <p>Project personnel reported that liaison is on-going with Dubbo Regional Council regarding required upgrades and maintenance of the road network as a result of project-based traffic movements.</p>	Compliant


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<b>LANDSCAPING</b>				
<b>Vegetation Buffer</b>				
Schedule 3 Condition 9	<p>The Applicant must establish and maintain a mature vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1, to the satisfaction of the Secretary. This vegetation buffer must:</p> <p>(a) be planted prior to the commencement of operations;</p> <p>(b) consist of species that facilitate the best possible outcome in terms of visual screening;</p> <p>(c) be effective at screening views of solar panels and ancillary infrastructure on site from residence R1 and R6 within 3 years of commencing construction; and</p> <p>(d) be properly maintained with appropriate weed management.</p>	<p>- Suntop Solar Farm Landscaping Plan (Final ver. 4.0, 04/05/20)</p> <p>- DPIE approval letter dated 05/05/20 of Landscape Plan</p> <p>- Viewing of designated buffer zone plantings by Auditor on 22/06/21</p> <p>- At the time of the audit site inspection the planting works were observed to be near completion with reported finalisation scheduled for mid-July 2021</p> <div>   </div>	<p>Landscaping outcomes observed during the site visit of 22/06/21 included installation of exclusion zone fencing, weed control, deep-ripping, planting, installation of plant guards and watering.</p> <p>The Landscaping Plan presents the perimeter planting specification inclusive of:</p> <ul style="list-style-type: none"> <li>• Species selection and planting areas</li> <li>• Planting methodology</li> <li>• Monitoring</li> <li>• Maintenance</li> </ul>	Compliant
<b>Landscaping Plan</b>				
Schedule 3 Condition 10	<p>Prior to the commencement of construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with Council and surrounding landowners, to the satisfaction of the Secretary. This plan must include:</p> <p>(a) a description of measures that would be implemented to ensure that the vegetated buffer achieves the objectives of condition 9 (a) – (c) of schedule 3 of this consent;</p> <p>(b) include a program to monitor and report on the effectiveness of these measures; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following the Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	<p>- Suntop Solar Farm Landscaping Plan (Final ver. 4.0, 04/05/20)</p> <p>- DPIE approval letter dated 05/05/20 of Landscape Plan</p>	<p>The Landscape Plan was approved by DPIE prior to the commencement of construction.</p> <p>At the time of the site visit of 22/06/21, planting works were observed to be near completion with reported finalisation scheduled for mid-July 2021.</p>	Compliant
<b>Land Management</b>				
Schedule 3 Condition 11	<p>Following any construction or upgrading on the site, the Applicant must:</p> <p>(a) restore the ground cover of the site as soon as practicable;</p> <p>(b) maintain the ground cover with appropriate perennial species; and</p> <p>(c) manage weeds within this ground cover.</p>	<p>- Site visit of 22/06/21</p> <p>- Erosion and sediment control plan (Rev. 0, 19/05/20)</p> <p>- Sediment Fence Inspection Register</p>	<p>Not relevant until after construction (or upgrading) is completed.</p> <p>Some areas of weed infestation and poor ground cover were observed at the time of the Auditor's site visit. Proponent has reported that weed control and ground cover restoration will be undertaken upon completion of construction works.</p>	Not triggered


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BIODIVERSITY										
Biodiversity Offsets										
Schedule 3 Condition 12	<p>Prior to the commencement of construction, unless otherwise agreed by the Secretary, the Applicant must retire biodiversity credits of a number and class specified in Table 1 below to the satisfaction of OEH.</p> <p>The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by:</p> <p>(a) acquiring or retiring ‘biodiversity credits’ within the meaning of the Biodiversity Conservation Act 2016;</p> <p>(b) making payments into an offset fund that has been developed by the NSW Government; or</p> <p>(c) providing supplementary measures.</p> <p><i>Table 1: Ecosystem Credit Requirements</i></p> <table><tr><th><i>Vegetation Community</i></th><th><i>PCT ID</i></th><th><i>Credits Required</i></th></tr><tr><td>White Box – White Cypress Pine – Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion</td><td>PCT267</td><td>47.75</td></tr></table> <p><i>Note: Following repeal of the Threatened Species Conservation Act 1995 on 25 August 2017, credits created under that Act are taken to be “biodiversity credits” under the Biodiversity Conservation Act 2016 by virtue of clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</i></p>	<i>Vegetation Community</i>	<i>PCT ID</i>	<i>Credits Required</i>	White Box – White Cypress Pine – Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion	PCT267	47.75	<p>- Suntop Solar Farm Biodiversity Management Plan (ver. Final 5.0, 09/06/20)</p> <p>- DPIE approval letter dated 18/06/20 of Biodiversity Management Plan</p> <p>- Letter from proponent dated 29/07/20 requesting retirement of biodiversity credits post-commencement of construction</p> <p>- Letter from DPIE dated 14/08/20 approving commencement of construction prior to retirement of biodiversity credits and setting a new date for biodiversity credit retirement of 31/05/21.</p> <p>- Letter from proponent dated 27/05/21 including evidence that 48 biodiversity credits were retired on 25/05/21 (approved by DPIE Biodiversity and Conservation Division). Vegetation class of the credits was “Western Slopes Grass Woodland”.</p>	<p>Biodiversity credits were retired using method (a), i.e. acquiring or retiring ‘biodiversity credits’ within the meaning of the Biodiversity Conservation Act 2016.</p> <p>The number and class of biodiversity credits were retired to the satisfaction of OEH (now DPIE Biodiversity and Conservation Division) and within the adjusted timeframe agreed to by the Secretary.</p>	Compliant
<i>Vegetation Community</i>	<i>PCT ID</i>	<i>Credits Required</i>								
White Box – White Cypress Pine – Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion	PCT267	47.75								


Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Biodiversity Management Plan</b>				
Schedule 3 Condition 13	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with OEH, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> <li>managing the remnant vegetation and fauna habitat on site;</li> <li>minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development;</li> <li>minimising the impacts to fauna on site (including fauna interaction with perimeter fencing) and implementing fauna management protocols;</li> <li>avoiding the removal of hollow-bearing trees during late winter and spring to avoid the main breeding period for hollow-dependent fauna;</li> <li>rehabilitating and revegetating temporary disturbance areas;</li> <li>protecting vegetation and fauna habitat outside the approved disturbance areas;</li> <li>maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and</li> <li>controlling weeds and feral pests; and</li> </ul> <p>(b) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following the Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p><i>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters covered under the Biodiversity Stewardship Agreement.</i></p>	<p>- Suntop Solar Farm Biodiversity Management Plan (ver. Final 5.0, 09/06/20)</p> <p>- DPIE approval letter dated 18/06/20 of Biodiversity Management Plan</p> <p>- Pre-Clearing Survey Report (OzArk Environment and Heritage)</p> <p>- Review of site induction and toolbox records</p> <p>- Viewing of retained vegetation from clearing for future habitat enhancement</p> <p>- Some areas of weed infestation and poor ground cover were observed at the time of the Auditor's site visit of 22/06/21</p> <div data-bbox="1308 959 1632 1203" data-label="Image"> </div> <div data-bbox="1641 959 1961 1203" data-label="Image"> </div>	<p>A pre-clearance survey and associated reporting was undertaken by a suitably qualified and experienced organisation, OzArk Environmental and Heritage of Dubbo, NSW.</p> <p>Clearing was supervised by ecologists and retained limbs and root-balls were retained for site-based habitat enhancement.</p> <p>Site induction contains information regarding flora and fauna management. Additional tool-boxing has been completed.</p> <p>Weed monitoring and management records associated with the requirements of Table 10-3 of the Biodiversity Management Plan (BMP) has not been conducted.</p> <p>In accordance with Section 1.3 of the DPIE-approved Environmental Management Strategy, an Environmental Management Plan (and associated Sub-plans), inclusive of the DPIE-approved BMP, has been developed to ensure appropriate environmental management and Development Consent compliance for the project. Table 10.3 of the BMP presents the monitoring schedule for the project inclusive of conducting environmental inspections to monitor the following items:</p> <ul style="list-style-type: none"> <li>Laydown areas to ensure materials and equipment are within designated boundaries</li> <li>Vegetation clearing, topsoil removal and stockpile sites are appropriately managed</li> <li>Retained hollow-bearing trees are not disturbed during late winter and spring</li> <li>Fauna handling</li> <li>Weed monitoring</li> </ul> <p>At the time of the audit, records to confirm all required monitoring had been conducted in accordance with the BMP were unavailable.</p> <p><b>Non-compliance No. 1 (STSF-IEA-21-NC1)</b> Records associated with required monitoring in accordance with the DPIE-approved Biodiversity Management Plan were not available at the time of the audit; as such, it was apparent that not all required monitoring had been undertaken.</p>	Non-Compliant


Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
			<b>Recommendation No. 1 (STSF-IEA-21-R1):</b> The monitoring schedule listed within Table 10.3 of the DPIE-approved Biodiversity Management Plan should be reviewed and a suitable monitoring program, inclusive of documentation, instigated as soon as practicable.	
<b>AMENITY</b>				
<b>Construction, Upgrading and Decommissioning Hours</b>				
Schedule 3 Condition 14	<p>Unless the Secretary agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between:</p> <p>(a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1 pm Saturdays; and (c) at no time on Sundays and NSW public holidays.</p> <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary:</p> <ul style="list-style-type: none"> <li>the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or</li> <li>emergency work to avoid the loss of life, property and/or material harm to the environment.</li> </ul>	<ul style="list-style-type: none"> <li>- Induction and toolbox records</li> <li>- Interviews with site personnel</li> </ul>	Approved construction hours are monitored by the Construction and HSE Managers. During site interviews of 21/06/21, the Auditor confirmed site personnel were aware of permitted construction hours.	Compliant
<b>Noise</b>				
Schedule 3 Condition 15	The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version.	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20)</li> <li>- DPIE approval letter dated 18/03/20 of Environmental Management Strategy</li> <li>- Site specific noise and vibration management protocols</li> <li>- Site Induction and toolbox content</li> </ul>	Site works were deemed to be consistent with relevant Environmental Management Strategy mitigation measures. No high-noise generating activities noted during site visit of 22/06/21.	Compliant
<b>Dust</b>				
Schedule 3 Condition 16	The Applicant must minimise the dust generated by the development.	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20) and DPIE approval letter dated 18/03/20 of Environmental Management Strategy</li> <li>- Active dust suppression observed during site inspection of 22/06/21</li> <li>- Site Induction and toolbox content</li> </ul> 	Site works were deemed to be consistent with relevant Environmental Management Strategy mitigation measures. No significant dust emissions noted during site visit of 22/06/21. Full time water cart is on site.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Visual</b>				
Schedule 3 Condition 17	The Applicant must: (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection from the solar panels; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20)</li> <li>- DPIE approval letter dated 18/03/20 of Environmental Management Strategy</li> <li>- Proponent confirmed Project designs have incorporated relevant measures to address potential visual impacts.</li> </ul>	Designs for permanent site infrastructure are understood to be consistent with Development Consent conditions.	Not triggered
<b>Lighting</b>				
Schedule 3 Condition 18	The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> <li>• is installed as low intensity lighting (except where required for safety or emergency purposes);</li> <li>• does not shine above the horizontal; and</li> <li>• complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.</li> </ul>	<ul style="list-style-type: none"> <li>- Proponent confirmed project designs have incorporated relevant measures to address potential lighting impacts, although at the time of the audit the lighting design had not been finalised for construction</li> <li>- Toolbox training and inspections to view potential light-spill from temporary construction facilities such as site sheds and amenities are conducted on a periodic basis</li> </ul>	<p>Minimal lighting is proposed and will include down-lights on sensors at the O&amp;M building.</p> <p>HSE Manager reported that construction-based monitoring of potential light-spill has been conducted during construction works and lighting is minimised where possible to reduce the potential for off-site impacts to adjoining properties.</p>	Compliant (for construction phase)
<b>HERITAGE</b>				
<b>Protection of Heritage Items</b>				
Schedule 3 Condition 19	The Applicant must ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items identified in Table 1 in Appendix 4 or located outside the approved development footprint.  <i>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 1.</i>	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Cultural Heritage Management Plan (Rev. No. 4, 17/06/20)</li> <li>- Site fencing around isolated artefacts “Suntop IF 1” and “Suntop IF 2” observed during site visit of 22/06/21</li> </ul>  <ul style="list-style-type: none"> <li>- The “Suntop Culturally Significant Tree” was observed to be beyond the boundary with exclusion zone fencing in place</li> </ul>	Site fencing was observed to be in place around the Aboriginal heritage items and no direct or indirect impacts were identified during the site visit of 22/06/21.	Compliant
<b>Discovery of Human Remains</b>				
Schedule 3 Condition 20	If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Applicant must notify the NSW Police and OEH as soon as possible following the discovery, and work must not recommence in the area until this is authorised by OEH.	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Cultural Heritage Management Plan [CHMP] (Rev. No. 4, 17/06/20)</li> <li>- Letter from DPIE Biodiversity and Conservation Division (formerly OEH) dated 26/06/20 reporting satisfaction with the CHMP, and the Chance Finds Protocol contained within (as Appendix 2)</li> </ul>	<p>Project personnel reported that no discovery of human remains have been made during construction of this development.</p> <p>Appendix 2 of the CHMP (Chance Finds Protocol) refers to procedures to follow if human skeletal remains are encountered.</p>	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Chance Finds Protocol</b>				
Schedule 3 Condition 21	<p>Prior to the commencement of construction, the Applicant must prepare a Chance Finds Protocol for the development in consultation with the Aboriginal stakeholders, and to the satisfaction of OEH.</p> <p>Following OEH's approval, the Applicant must implement the Chance Finds Protocol.</p>	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Cultural Heritage Management Plan [CHMP] (Rev. No. 4, 17/06/20)</li> <li>- Letter from DPIE Biodiversity and Conservation Division (formerly OEH) dated 26/06/20 reporting satisfaction with the CHMP, and the Chance Finds Protocol contained within (as Appendix 2)</li> <li>- Evidence of consultation with the Wellington Local Aboriginal Land Council was presented within the CHMP</li> </ul>	<p>A Chance Finds Protocol was developed in consultation with Aboriginal stakeholders and to the satisfaction of OEH (now DPIE Biodiversity and Conservation Division), prior to commencement of construction.</p> <p>Project personnel reported that no chance finds have been identified during construction of this development.</p>	Compliant
<b>SOIL &amp; WATER</b>				
<b>Water Supply</b>				
Schedule 3 Condition 22	<p>The Applicant 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 Applicant is required to obtain the necessary water licences for the development.</i></p>	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20)</li> <li>- DPIE approval letter dated 18/03/20 of Environmental Management Strategy</li> <li>- Interviews with site personnel</li> <li>- Site visit of 22/06/21 to view on-site conditions</li> </ul> 	<p>Existing on-site infrastructure, inclusive of tanks and dams, are used to harvest and store run-off for use during construction for dust suppression and other non-potable uses. Potable water is trucked to site by a local contractor and held within polyethylene tanks for use by site personnel.</p> <p>Project personnel reported that no water licences were required to be obtained for this project.</p>	Compliant
<b>Water Pollution</b>				
Schedule 3 Condition 23	<p>The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.</p> <p><i>Note: Section 120 of the POEO Act makes it an offence to pollute any waters.</i></p>	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20)</li> <li>- DPIE approval letter dated 18/03/20 of Environmental Management Strategy</li> <li>- Site visit of 22/06/21 to view on-site environmental controls</li> <li>- Incident management and reporting records</li> <li>- General site induction content</li> </ul>	<p>No reported incidents associated with potential water pollution, as defined under Section 120 of the POEO Act, were identified during the audit.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Operating Conditions</b>				
Schedule 3 Condition 24	<p>The Applicant must:</p> <p>(a) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version;</p> <p>(b) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and</p> <p>(c) ensure all works (including watercourse crossings) are undertaken in accordance with the following, unless otherwise agreed by DoI – L &amp; W:</p> <ul style="list-style-type: none"> <li>Guidelines for Controlled Activities on Waterfront Land (2012), or its latest version; and</li> <li>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004), or its latest version.</li> </ul>	<p>- Soil and Water Management Plan (Rev. 2, 20/02/21)</p> <p>- Erosion and Sediment Control Plan (Rev. 0, 19/05/20)</p> <div data-bbox="1311 493 1964 737">  </div>	<p>Soil and Water Management Plan has been developed with reference to relevant guidelines and requirements.</p> <p>Erosion/sedimentation controls were observed to be generally consistent with the Soil and Water Management Plan and Erosion and Sediment Control Plan during site visit of 22/06/21.</p> <p>It is noted that a complaint from a neighbouring landholder was received by DPIE with respect to perceived erosion/sedimentation impacts from the project. The project team reported that a project-based civil engineer had reviewed drainage designs following receipt of the complaint. As a result of the review, some rectification works to provide additional on-site detention of stormwater via construction of retention/sediment dams near the western property boundary were suggested. The rectification works were observed to be in progress at the time of the audit site visit on 22/06/21 which was positive to see.</p> <p><b>Opportunity for Improvement No. 4 (STSP-IEA-21-OI4):</b> Evidence of some on-site erosion and sedimentation associated with construction works was observed during the audit site visit of 22/06/21. As such, additional temporary soil stabilisation measures such as the application of soil binder at key locations should be implemented prior to the establishment of final landscaping/vegetative cover to further reduce the potential for erosion/sedimentation during construction.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>HAZARDS</b>				
<b>Storage and Handling of Dangerous Materials</b>				
Schedule 3 Condition 25	The Applicant must: (a) store and handle all dangerous or hazardous materials on site in accordance with AS1940-2004: <i>The storage and handling of flammable and combustible liquids</i> , or its latest version; (b) ensure the substation is suitably bunded; and (c) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.	<p>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20)</p> <p>- DPIE approval letter dated 18/03/20 of Environmental Management Strategy</p> <p>- Soil and Water Management Plan (Rev. 2, 20/02/21)</p> <p>- Site visit of 22/06/21</p> 	<p>Well stocked spill kits present at key locations across project site.</p> <p>Lockable bunded storage containers present for flammable and combustible liquids.</p> <p>Portable bunds were not present at locations where fuelling occurs and minor quantities of fuel (such as 20L containers), oils and other potential hazardous materials were stored on a temporary basis.</p> <p>Bunding is incorporated within the substation.</p> <p><b>Non-compliance No. 2 (STSF-IEA-21-NC2)</b> Dangerous and/or hazardous materials were observed to be stored directly on the ground surface during the audit.</p> <p><b>Recommendation No. 2 (STSF-IEA-21-R2):</b> Storage and handling of all dangerous and/or hazardous materials on site (even those used on a temporary basis) should be reviewed and measures put in place to ensure storage is consistent with the relevant Australian Standard and other legislation/guidelines.</p>	Non-Compliant
<b>Operating Conditions</b>				
Schedule 3 Condition 26	The Applicant must: (a) minimise the fire risks of the development; (b) ensure that the development: <ul style="list-style-type: none"> <li>includes at least a 10 metre defendable space around the perimeter of the solar panel area that permits unobstructed vehicle access;</li> <li>manages the defendable space and solar panel area as an Asset Protection Zone;</li> <li>complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2006</i> (or equivalent) and <i>Standards for Asset Protection Zones</i>;</li> <li>is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection, located adjacent to the internal access road;</li> </ul> (c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (d) notify the relevant local emergency management committee following construction of the development, and prior to the commencement of operations.	N/A	This condition is titled "Operating Conditions" and is interpreted to only be relevant during operation.	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Fire Management and Emergency Response Plan</b>				
Schedule 3 Condition 27	Prior to the commencement of operations, the Applicant must prepare a Fire Management and Emergency Response Plan for the development in consultation with the RFS and Fire & Rescue NSW. This plan must identify the fire risks and controls of the development, and the procedures that would be implemented if there is a fire on site or in the vicinity of the site. Two copies of the plan must be kept on site in a prominent position adjacent to the site entry point at all times.	N/A	This condition must be complied with prior to commencement of operations and is therefore not relevant to this audit.	Not triggered
<b>WASTE</b>				
Schedule 3 Condition 28	The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version); (c) store and handle all waste on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal.	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20)</li> <li>- DPIE approval letter dated 18/03/20 of Environmental Management Strategy</li> <li>- Suntop Waste and Energy Management Plan (Rev 1 21/02/21)</li> <li>- Site visits and interviews of 22/06/21</li> </ul> 	<p>Evidence of appropriate waste management including segregation, sorting and storage was noted during the site visit. It was commendable to note that a range of options to reuse and recycle wastes were being investigated.</p> <p>Housekeeping was generally of an acceptable to good standard across the project site. In some areas of active construction, uncontained wastes were observed that could become windborne and potentially blown on to adjoining properties or other areas of the project site.</p> <p><b>Opportunity for Improvement No. 5 (STSP-IEA-21-O15):</b> Additional clean-up of construction waste, particular packing materials such as plastic sheeting, cardboard, paper and plastic baling tape that could easily be transported by wind to adjoining farmland areas is recommended in areas of active construction.</p>	Compliant
<b>ACCOMMODATION AND EMPLOYMENT STRATEGY</b>				
Schedule 3 Condition 29	<p>Prior to the commencement of construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Secretary. This strategy must:</p> <p>(a) propose a strategy to facilitate the accommodation of the workforce associated with the development, with consideration of the cumulative impacts associated with other State significant development projects in the Dubbo Regional LGA constructed concurrently;</p> <p>(b) investigate options for prioritising the employment of local workers for the construction and operation of the development where feasible; and</p> <p>(c) include a program to monitor and review the effectiveness of the strategy over the life of the development.</p> <p>Following the Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.</p>	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Accommodation and Employment Strategy (ver. 2, 16/04/20)</li> <li>- DPIE approval letter dated 24/04/20 of Accommodation and Employment Strategy</li> <li>- Interviews with site personnel on 22/06/21</li> <li>- Review of employment/employee registers</li> </ul>	<p>The Accommodation and Employment Strategy (AES) was developed in consultation with Council and DPIE and approved by the Secretary prior to commencement of construction.</p> <p>Project staff and the contractor's employment agency conduct monitoring to confirm the effectiveness of the strategy.</p> <p>Use of car-pooling and coaches to transport workers to the site is commendable.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status										
DECOMMISSIONING AND REHABILITATION														
Schedule 3 Condition 30	<p>Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 2.</p> <p><i>Table 2: Rehabilitation Objectives</i></p> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Project site</td><td><ul style="list-style-type: none"><li>Safe, stable and non-polluting</li><li>Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</li></ul></td></tr><tr><td>Solar farm infrastructure</td><td><ul style="list-style-type: none"><li>To be decommissioned and removed, unless the Secretary agrees otherwise</li></ul></td></tr><tr><td>Land use</td><td><ul style="list-style-type: none"><li>Restore land capability to pre-existing agricultural use</li></ul></td></tr><tr><td>Community</td><td><ul style="list-style-type: none"><li>Ensure public safety</li></ul></td></tr></table>	Feature	Objective	Project site	<ul style="list-style-type: none"><li>Safe, stable and non-polluting</li><li>Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</li></ul>	Solar farm infrastructure	<ul style="list-style-type: none"><li>To be decommissioned and removed, unless the Secretary agrees otherwise</li></ul>	Land use	<ul style="list-style-type: none"><li>Restore land capability to pre-existing agricultural use</li></ul>	Community	<ul style="list-style-type: none"><li>Ensure public safety</li></ul>	N/A	This condition is relevant to a period after cessation of operations and is therefore not relevant to this audit.	Not triggered
Feature	Objective													
Project site	<ul style="list-style-type: none"><li>Safe, stable and non-polluting</li><li>Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</li></ul>													
Solar farm infrastructure	<ul style="list-style-type: none"><li>To be decommissioned and removed, unless the Secretary agrees otherwise</li></ul>													
Land use	<ul style="list-style-type: none"><li>Restore land capability to pre-existing agricultural use</li></ul>													
Community	<ul style="list-style-type: none"><li>Ensure public safety</li></ul>													
SCHEDULE 4 - ENVIRONMENTAL MANAGEMENT AND REPORTING														
ENVIRONMENTAL MANAGEMENT														
Environmental Management Strategy														
Schedule 4 Condition 1	<p>Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the 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) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"><li>keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li><li>receive, handle, respond to, and record complaints;</li><li>resolve any disputes that may arise;</li><li>respond to any non-compliance;</li><li>respond to emergencies; and</li></ul> <p>(e) include:</p> <ul style="list-style-type: none"><li>references to any plans approved under the conditions of this consent; and</li><li>a clear plan depicting all the monitoring to be carried out in relation to the development.</li></ul> <p>Following the Secretary’s approval, the Applicant must implement the Environmental Management Strategy.</p>	<p>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20)</p> <p>- DPIE approval letter dated 18/03/20 of Environmental Management Strategy</p> <p>- Inspection Checklists</p> <p>- Site visit and interviews of 22/06/21</p>	<p>A copy of the approved Environmental Management Strategy (EMS) was held within the project site office. Site personnel were familiar with the content of the strategy and evidence of implementation was observed during the site visit of 22/06/2021.</p> <p>The general site induction for the project included a comprehensive overview of environmental management requirements and priorities.</p> <p>In accordance with Section 1.3 of the DPIE-approved EMS, an (Construction) Environmental Management Plan (EMP) and associated Sub-plans have been developed to ensure appropriate environmental management and Development Consent compliance for the project. Section 14.1.1 of the EMP presents the inspection regime for the project inclusive of conducting weekly environmental inspections via a checklist to monitor the following items:</p> <ul style="list-style-type: none"><li>Site security</li><li>Environmental complaints</li><li>General waste management</li><li>Cleaning operations</li><li>Hazardous/special waste</li><li>Chemicals/oils/solvents/fuels</li><li>Water pollution prevention</li><li>Pollution response</li><li>Dust/air pollution</li></ul>	Non-Compliant										

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
			<ul style="list-style-type: none"> <li>• Light pollution</li> <li>• Noise and Vibration</li> <li>• Permits/licences/consents</li> </ul> <p>Based on the auditor's review of site records and discussions with site personnel it was apparent that this monitoring program was not being conducted in accordance with the EMP. It is, however, noted that monitoring of key risk areas such as the performance of erosion/sedimentation controls was being conducted.</p> <p><b>Non-compliance No. 3 (STSF-IEA-21-NC3):</b> Records associated with required monitoring in accordance with the (Construction) Environmental Management Plan were not available at the time of the audit; as such, it could not be confirmed that required monitoring had been undertaken.</p> <p><b>Recommendation No. 3 (STSF-IEA-21-R3):</b> The monitoring schedule listed within Section 14.1.1 of the (Construction) Environmental Management Plan should be reviewed and a suitable monitoring program, inclusive of documentation, instigated as soon as practicable.</p>	
<b>Revision of Strategies and Plans</b>				
Schedule 4 Condition 2	<p>The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> <li>• submission of an incident report under condition 4 of Schedule 4;</li> <li>• submission of an audit report under condition 6 of Schedule 4; or</li> <li>• any modification to the conditions of this consent.</li> </ul>	N/A	<p>Based on the nature and low significance of the reported incidents up to the time of the audit site visit of 22/06/21, it is considered that no updates or reviews to plans or programs were required.</p> <p>No updates or reviews to plans or programs are deemed required at this stage of construction.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Updating and Staging of Strategies, Plans or Programs</b>				
Schedule 4 Condition 3	<p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>• While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.</li> <li>• If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</li> </ul>	N/A	No strategies, plans or program are currently required by this consent on a progressive basis.	Not triggered
<b>COMPLIANCE</b>				
<b>Incident Notification</b>				
Schedule 4 Condition 4	<p>The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> immediately after the Applicant 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.</p>	<p>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20)</p> <p>- DPIE approval letter dated 18/03/20 of Environmental Management Strategy</p> <p>- Review of records from the project incident reporting and management database</p>	<p>The project uses an electronic tracking database for centralised incident reporting and management.</p> <p>At the time of completion of this audit, three (3) environmental incidents had been recorded during construction of the project and reported to DPIE in accordance with Schedule 4, Condition 4 of the Development Consent as noted below:</p> <ul style="list-style-type: none"> <li>• 06/11/20: Hydraulic oil leak from road-registered tipper on Suntop Road</li> <li>• 01/03/21: Minor spill of sewage ablution from a block belly tank</li> <li>• 01/03/21: Minor (less than 1L) hydraulic oil spill from a forklift</li> </ul> <p>Each of the incidents were reported in a timely manner and closed-out appropriately which is commendable.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Non-Compliance Notification</b>				
Schedule 4 Condition 5	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the noncompliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	<ul style="list-style-type: none"> <li>- Suntop Solar Farm Environmental Management Strategy (ver. 2, 11/03/20)</li> <li>- DPIE approval letter dated 18/03/20 of Environmental Management Strategy</li> <li>- Interviews with project personnel</li> </ul>	It was reported by project personnel that there have not been any non-compliances since the development of this project.	Compliant
<b>Compliance Reporting</b>				
Schedule 4 Condition 5a	Prior to commencing the construction, upgrading and decommissioning of the development, the Applicant must submit a compliance report to the Department in accordance with the relevant <i>Compliance Reporting Post Approval Requirements</i> (DPE 2018), or its latest version.	<ul style="list-style-type: none"> <li>- Suntop Solar Farm SSD 8696 – COA 5A. Preconstruction Compliance Report (03/07/20)</li> <li>- Correspondence dated 13/07/20 from DPIE acknowledging receipt and satisfaction of preconstruction compliance report</li> </ul>	A Pre-Construction Compliance Report, as required by the <i>Compliance Reporting Post Approval Requirements</i> (DPE 2018) was issued prior to commencement of construction.	Compliant
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>				
Schedule 4 Condition 6	<p>Within 6 months of commencing construction, or as directed by the Secretary, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must:</p> <ul style="list-style-type: none"> <li>(a) be prepared in accordance with the relevant <i>Independent Audit Post Approval</i> requirements (DPE 2018);</li> <li>(b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</li> <li>(c) be carried out in consultation with the relevant agencies;</li> <li>(d) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and</li> <li>(e) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.</li> </ul> <p>Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations.</p> <p>The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.</p>	- This Independent Environmental Audit (IEA) report	<p>The date of commencement of construction was 01/10/20.</p> <p>The current IEA program was commissioned by the proponent's construction contractor on 17/02/21 which is within the period of six (6) months from the commencement of construction.</p> <p>Further information is provided within this Independent Environmental Audit (IEA) report.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>ACCESS TO INFORMATION</b>				
Schedule 4 Condition 7	<p>The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> <li>the EIS;</li> <li>the final layout plans for the development;</li> <li>current statutory approvals for the development;</li> <li>approved strategies, plans or programs required under the conditions of this consent;</li> <li>the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</li> <li>how complaints about the development can be made;</li> <li>a complaints register;</li> <li>any independent environmental audit, and the Applicant's response to the recommendations in any audit; and</li> <li>any other matter required by the Secretary; and</li> </ul> <p>(b) keep this information up to date.</p>	<p>Project website review between 10/06/21 and 29/06/21:</p> <p><a href="https://suntopsolarfarm.com.au/">https://suntopsolarfarm.com.au/</a></p>	<p>All reports (latest versions) were located on the Project website with the exception of a complaints register.</p> <p><b>Non-compliance No. 4 (STSF-IEA-21-NC4)</b> Based on review of the project website between 10/06/21 and 29/06/21, a complaints register had not been published as per the requirements of Schedule 4, Condition 7 of the Development Consent</p> <p><b>Recommendation No. 4 (STSF-IEA-21-R4):</b> A redacted complaints register should be uploaded to the project website as soon as practicable.</p>	Non-Compliant

# Appendix D

Site Inspection Photographs (22 June 2021)



**Plate 1:** View of the upgraded intersection of Renshaw McGirr Way and Suntop Road looking towards the north. Signage for project vehicles was noted to be in place in accordance with the approved Traffic Management Plan at this location. In accordance with Dubbo Regional Council requirements, some maintenance to the upgraded intersection will be required once site-based construction is complete.



**Plate 2:** View of the recently installed solar panels and electrical infrastructure on the western portion of the Project site. This area was the most advanced area of construction. Vegetative cover had yet to be established in some areas within this location. The site layout was noted to be consistent with the Development Consent.



**Plate 3:** View of the sediment fencing and water quality basin installed on the western boundary of the site as part of the Project erosion and sedimentation control measures documented within the Soil and Water Management Plan. Some evidence of sedimentation/erosion was noted to the south of this area during the auditor's site visit of 22/06/21 which was being addressed by upgrading drainage and stormwater detention infrastructure.



**Plate 4:** View of sensitive area protection signage and fencing installed in accordance with Development Consent Schedule 3, Condition 19.



**Plate 5:** View of retained vegetation from site clearing activities for future re-use as habitat enhancement during site rehabilitation and landscaping as per Development Consent Schedule 3, Condition 13(a).



**Plate 6:** View of the site-bunded fuelling area at the time of the auditor's site visit on 22/06/21. An appropriately stocked and secured spill kit was noted to be present.



**Plate 7:** View of the on-site hazardous materials storage area on 22/06/21. Lockable bunded storage containers were present for flammable and combustible liquids. Bunds were not present at some locations where fuelling occurs and minor quantities of fuel (such as 20L containers), oils and other potential hazardous materials were stored on a temporary basis.



**Plate 8:** View of the southwest portion of the site where segregated construction wastes and re-usable materials were noted to be stored prior to re-use and/or off-site transport for recycling or disposal.



**Plate 9:** View of a site-based watercart in use as part of the strategy to manage air quality during construction. No significant dust emissions were noted during the site visit of 22/06/21.

# Appendix E

## Independent Audit Declaration Form

## INDEPENDENT AUDIT REPORT DECLARATION FORM

(Template from DPIE Independent Audit Post Approval Requirements, May 2020).


<b>Project Name</b>	Suntop Solar Farm
<b>Consent Number</b>	SSD 8686
<b>Description of Project</b>	Solar farm
<b>Project Address</b>	909 Suntop Road, Suntop NSW
<b>Proponent</b>	Suntop SF Pty Ltd as trustee for Suntop Asset Trust
<b>Title of Audit</b>	Independent Environmental Audit Report: Suntop Solar Farm SSD 8696 (July 2021)
<b>Date</b>	22 July 2021

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:

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

### 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).

<b>Name of Auditor</b>	Toby Hobbs
<b>Signature</b>	
<b>Qualification</b>	MEnvMgmt, Principal Auditor (Exemplar Global)
<b>Company</b>	Vantage Environmental Management Pty Ltd
<b>Company Address</b>	PO Box 378, Albury NSW 2640



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