

Wollar Solar Farm (SSD-9254): Response to Independent Environmental Audit Report in accordance with Condition 9 of Schedule 4

IEA Ref	Category	Reference	Requirement	Description	Recommendation	Response	Target Timeline
NC1	Non-Compliance	CoC 13	Prior to commencing development under this consent, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below, to the satisfaction of BCD, unless the Planning Secretary agrees otherwise in writing.	<p>WSD formally notified the Department that a non-compliance with Condition 13 has occurred by way of a letter dated 10 January 2022. The non-conformance related to the biodiversity credits required by Condition 13 were not able to be retired by the Condition 13 Timeframe. A letter of response from the Department acknowledged the non-conformance and proposed actions to resolve the matter. During the audit interviews it was reported that WSD continued to pursue establishment of a stewardship site, though as Biodiversity Conservation Trust will not accept a grazing tenancy on the site, WSD has reverted to purchasing the credits.</p> <p>WSD has sourced the majority of the required credits privately and has submitted the credit transfer request. The balance of the credits (34 for Koala and 50 for Large-eared Pied Bat) will be acquired from the offset fund. WSD reported that this purchase is in progress.</p>	That WSD finalise its purchase of outstanding credits as a matter of priority.	WSD is continuing to progress retiring the required credits. During finalisation of this Audit Report, WSD has completed payment to the Biodiversity Conservation Fund for the Koala, Large-eared Pied Bat Species Offset Credits and White Box Black Cypress Pine Ecosystem Credits. In June 2023, WSD has also received approval from the DPE for the transfer of the remaining outstanding Ecosystem and Species Offset Credits. WSD is currently in the process of applying to retire these remaining outstanding Credits to complete its obligations to Biodiversity Credits under Consent Condition 13 of Schedule 3.	By end 2023

IEA Ref	Category	Reference	Requirement	Description	Recommendation	Response	Target Timeline
NC2	Non-Compliance	CoC 26	<p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <ul style="list-style-type: none"> - The requirements of all relevant Australian Standards; and - The NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. 	<p>AS3780 The storage and handling of corrosive substances require that safety data sheets are kept up to date.</p> <p>The NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook includes checklists that includes "Make sure MSDS for all chemicals are up-to-date and accessible at any time" and also references the WorkCover NSW Code of Practice for the Storage and Handling of Dangerous Goods which requires "that a register of hazardous chemicals at the workplace is prepared and kept up to date The register is a list of the product names of all hazardous chemicals used, handled or stored at the workplace accompanied by the current SDS for each hazardous chemical listed."</p> <p>While a hazardous chemicals register was sighted during the site visit and all chemicals that were 'spot-checked' were on the register, it was noted that many of the accompanying safety data sheets were out of date, including some relating to hazardous chemicals.</p> <p>Recommendation: It was also noted that the safety data sheets did not appear to be ordered. It is recommended that they are sorted (perhaps alphabetically or numbered on the reference sheets) to allow prompt identification during an incident.</p>	That the site SDS register and folder be updated with the current safety data sheets.	<p>In June 2023 upon identification of several of the Safety Data Sheets (SDS) having dates beyond the 5 year limit, the EPC subcontractor has obtained the most up to date copies of the outdated SDS and updated the SDS Register. This has been checked and confirmed during a third party WHS audit in June 2023.</p>	Completed June 2023

IEA Ref	Category	Reference	Requirement	Description	Recommendation	Response	Target Timeline
NC3	Non-Compliance	CHMP Section 6	The design must avoid the modified tree (Wollar SF ST 1) and possible modified tree (Wollar SF ST 2). A minimum 15 m buffer must be in place around these trees to prevent any inadvertent impacts to the trees canopy and root systems.	During the site visit it was observed that ST 2 is within the fenced construction area and has fencing established around it. However, it was observed that the fencing around ST 2 appeared to be less than 15m from the tree. While it appeared there had not been any disruption to the area within 15m of ST 2, inadequate protection is considered a non-compliance.	That the fencing around ST 2 is relocated ASAP. Prior to relocating the fencing it is recommended that the advice of the heritage consultant be sought to clarify whether fencing is to be 15m from the trunk of the tree or also the fallen limb that lies next to the tree.	Advice was sought from the specialist heritage consultant, who clarified the requirement for a 15m demarcation from the trunk of the tree of the possible modified tree ST2 where existing fencing around the possible modified tree was identified to be less than 15m on site. Fencing was extended in June 2023 and WSD was able to confirm with the Contractor that no construction work was carried out within 15m of the the possible modified tree.	Completed June 2023

IEA Ref	Category	Area	Recommendation / Opportunity for Improvement	Response to Audit Findings	Target Timeline
IA1	Recommendation / Opportunity	Biodiversity	The BMP appears to be in draft, it is recommended that this document be finalised.	The Draft Bushfire Management Plan (BFMP) was issued to the Rural Fire Service for consultation in May 2023. The Draft BFMP has also been reviewed by the Owners Engineer and comments provided to the Consultant for updating and to finalise the Plan.	By end August 2023

IEA Ref	Category	Area	Recommendation / Opportunity for Improvement	Response to Audit Findings	Target Timeline
IA2	Recommendation / Opportunity	Biodiversity	That the spatial data collected from machinery undertaking ground clearance is periodically overlaid on the vegetation mapping to compare the clearance areas and compare the progressive clearance total.	Vegetation mapping is now being updated fortnightly during ground disturbance works to compare progressive clearance total against the total approved area.	Ongoing
IA3	Recommendation / Opportunity	Biodiversity	It is recommended that the spatial data captured during the tree clearance surveys is compared with the BDAR data, to check that removal has been consistent with the BDAR.	Ecologist advice is currently being sought regarding the comparison of tree clearance surveys with BDAR data to check that removal has been consistent with the BDAR.	To be confirmed pending advice.
IA4	Recommendation / Opportunity	Biodiversity	Seek ecologist advice on the placement of hollow bearing limbs is sought.	Following the audit site inspection, coarse woody debris (CWD) was removed from within the development footprint and placed on areas outside the development footprint but within the project boundary. Ecologist advice is currently being sought regarding placement of hollow bearing tree limbs.	Majority by end August 2023 but some ongoing throughout construction
IA5	Recommendation / Opportunity	Biodiversity	Seek ecologist recommendations for the placement of CWD (greater than 200 mm and less than 600mm in diameter).	Following the audit site inspection, coarse woody debris (CWD) was removed from within the development footprint and placed on areas outside the development footprint but within the project boundary. Ecologist advice sought regarding placement of CWD (200mm-600mm diameter) states that CWD stacked in piles should be spaced out as discrete logs.	Majority by end August 2023 but some ongoing throughout construction

IEA Ref	Category	Area	Recommendation / Opportunity for Improvement	Response to Audit Findings	Target Timeline
IA6	Recommendation / Opportunity	Biodiversity	Seek ecologist recommendations for the placement of CWD (greater than 600 mm in diameter).	Following the audit site inspection, coarse woody debris (CWD) was removed from within the development footprint and placed on areas outside the development footprint but within the project boundary. Ecologist advice is currently being sought regarding placement of CWD (greater than 600mm).	Majority by end August 2023 but some ongoing throughout construction
IA7	Recommendation / Opportunity	Biodiversity	That the weed surveys are documented, to allow tracking of weed distribution and proliferation, over time (as above).	Ecologist advice is currently being sought regarding the documentation of weed surveys to allow tracking of weed distribution and proliferation over time.	By end 2023
IA8	Recommendation / Opportunity	Biodiversity	Organise an independent pest assessment for later in the project as a verification of these inspections.	An independent pest assessment will be organised as verification for observations made during site inspections.	By end 2023
IA9	Recommendation / Opportunity	Biodiversity	That the gaps under the construction perimeter fence (e.g. under gates) are rectified to make it more difficult for kangaroos and other wildlife to enter the construction area.	Gaps under construction perimeter fencing are currently being rectified and ongoing monitoring during construction for any new gaps created.	By mid 2024
IA10	Recommendation / Opportunity	Biodiversity	That all vehicles that have been checked and cleared to work on-site are included on the Vehicle Hygiene Register.	A Vehicle Hygiene Register has been set up and all vehicles on site have been checked and cleared to work on site, and documented in the register.	Completed July 2023

IEA Ref	Category	Area	Recommendation / Opportunity for Improvement	Response to Audit Findings	Target Timeline
IA11	Recommendation / Opportunity	Chemical Storage	That the safety data sheets did not appear to be ordered. It is recommended that they are sorted (perhaps alphabetically or numbered on the reference sheets) to allow prompt identification during an incident.	Safety Data Sheets (SDS) are managed by subcontractors working on site. Site SDS sheets and register have been reviewed and updated, including the sorting of SDS alphabetically.	Completed June 2023
IA12	Recommendation / Opportunity	Waste Management	That the disposal destinations are added to the waste register for each disposal event.	Waste register has been updated to include disposal destinations for each disposal event.	Completed July 2023
IA13	Recommendation / Opportunity	Monitoring/ Administration	While the Monthly Management Site Review includes a category for "Access", it does not specifically include local roads, it is recommended that this be added to make sure these inspections are documented.	Monthly Management Site Review (MMSR) checklist to be updated to include inspection of local roads.	By end August 2023
IA14	Recommendation / Opportunity	Monitoring/ Administration	That the requirement for drivers to only drive on purpose made, public and site roads be added to the next revision of the Site Induction	Site Induction to be updated to include a requirement for drivers to only drive on purpose made, public and site roads.	By end August 2023
IA15	Recommendation / Opportunity	Monitoring/ Administration	It is recommended that a prompt for a periodic check of heritage sites be included in the monthly reporting requirements.	Monthly report template to be updated to include a prompt for heritage site inspections.	By end August 2023

IEA Ref	Category	Area	Recommendation / Opportunity for Improvement	Response to Audit Findings	Target Timeline
IA16	Recommendation / Opportunity	Monitoring/ Administration	While the condition of consent states that the Work as Executed Plans are not required until the commencement of operations, the letter from DPIE approving the staging of development requires that "Work as Executed Plans are submitted prior to commencing the operation of the relevant stage of the development." Accordingly, it is recommended that the Work as Executed Plans are submitted for the Upgrade of Barigan Road and Northern Access Road.	WSD has submitted the Work as Executed Plans to DPE relating to Stage 1 Upgrade of Barigan Road and Stage 2 Northern Access Road works in July 2023 during finalisation of this Audit Report.	Completed July 2023