

Environmental Management Strategy

Limondale Solar Farm

Prepared for RWE Pty Ltd

August 2024

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RWE Pty Ltd

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August 2024

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23 August 2024

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1 Introduction

1.1 Project background

The Limondale Solar Farm is a large-scale solar photovoltaic (PV) generation facility in south-western New South Wales (NSW). The Limondale Solar Farm has been developed on a site within the Balranald Shire local government area (LGA), approximately 14 kilometres (km) south of the township of Balranald, as shown in Figure 1.1.

The Limondale Solar Farm is a State significant development (SSD) under the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP). Development consent (SSD 8025) under Section 89E of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act) was granted on 31 August 2017. That consent currently has two modifications approved.

MOD 1 (SSD-8025-Mod-1) was approved on 27 July 2018 to modify the development consent including landscape changes, relocation of substation and other minor administrative changes.

MOD 2 (SSD-8025-Mod-2) was approved on 7 October 2022 to modify the development consent for the construction of a battery energy storage system (BESS) (the project) that does not exceed a total delivery capacity of 200 MW.

Following the Planning Secretary's approval of the EMS, RWE will implement the EMS for the project.

1.2 Approved Project

Limondale Solar Farm consists of the following:

- Approximately 872,000 solar panels mounted on single axis-tracker frames, with a height of 4 metres (m)
- Up to 114 inverter stations (up to 2.3m in height), each containing an inverter and a 22 or 33 kilovolt (kV) transformer, and an onsite switchyard containing a transformer and associated switchgear
- Internal access tracks, staff amenities, offices, car parking, laydown areas, security fencing
- A 220 kV underground power line connecting to the existing Balranald Substation that is situated 500 m to the east of the Project.

The Limondale Solar Farm BESS, as Modification 2 of the Project, consists of the following:

- A lithium ion battery storage facility, with a 50MW battery discharging over two hours
- Overhead and underground lines (as per approved Option 1) connecting the new onsite substation to the Limondale Substation.

The BESS will be constructed on the eastern side of the solar farm, as shown in Appendix A of the Development Consent, with cabling via overhead lines. No vegetation clearing is required. The layout of the Project is shown in Figure 1.2.

The solar farm has been constructed and full commercial operation began in 2021. The BESS will be constructed as a stand-alone project. No staging is proposed.

1.3 Scope and objectives

The purpose of this Environmental Management Strategy (EMS) is to outline the framework for implementation of environmental management for construction and operation of the project. It documents the environmental

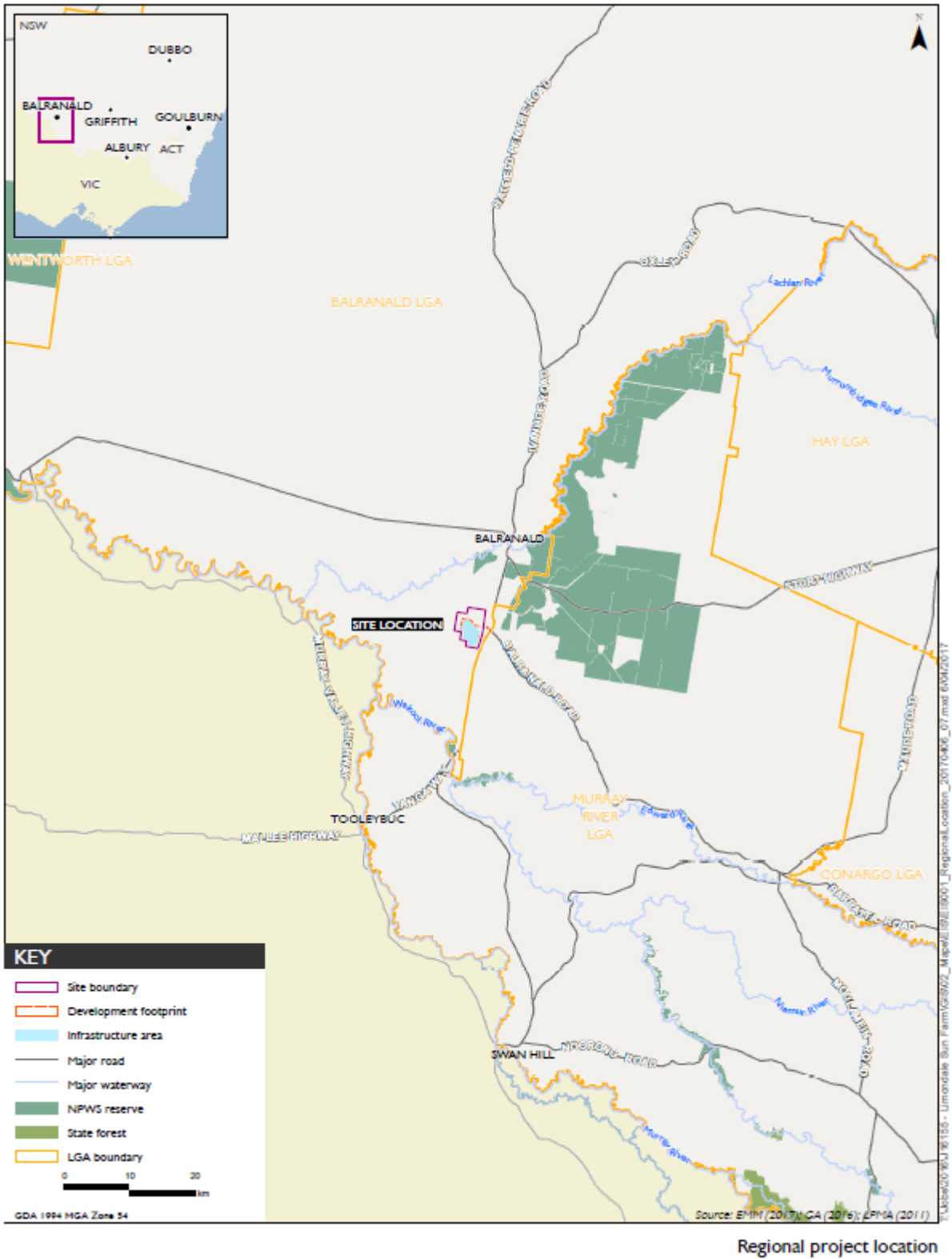
management measures, roles and responsibilities required to comply with the relevant legislative requirements and other applicable licences, approvals and permits.

The EMS has been prepared in accordance with the requirements of Schedule 4, Condition 1 of the conditions of consent (CoC) issued for the project as summarised in Table 1.1 below.

Table 1.1 Conditions of consent

Condition of consent	Report section
1. Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must:	
a) provide the strategic framework for environmental management of the development;	Section 1.4
b) identify the statutory approvals that apply to the development;	Section 2
c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 3
d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to and record complaints; • resolve any disputes that may arise; • respond to any non-compliance; • respond to emergencies; and 	Section 5.1 Section 5.1.2 Sections 5.1 Section 6.3 Emergency Response Plan
e) include: <ul style="list-style-type: none"> • incident notification and reporting requirements • copies of any plans approved under the conditions of this consent; and • a clear plan depicting all the monitoring to be carried out in relation to the development. 	Appendices A to G Section 4

Figure 1.1 Project location



Regional project location

Figure 1.2 Project layout



Source: DPHI CoA 8025 Appendix 1

1.4 Strategic framework

The EMS provides the strategic framework for the Limondale Solar Farm. The purpose of the strategic framework is to provide effective environmental management for the Limondale Solar Farm. This includes the maintenance and improvement of the environmental performance through consistent policy and planning.

Environmental management will be in accordance with a suite of documents and approvals which detail the environmental performance criteria and site-specific management measures and procedures to be implemented during construction and during operation.

This EMS details the performance criteria (where relevant), mitigation and management and environmental performance monitoring (where relevant). Figure 1.3 provides an overview of the relationship between the EMS, management plans and RWE policies and procedures governing the project. The EMS is supported by detailed management plans that have been developed to mitigate potential environmental impacts associated with the construction and operation of the project, shown in Figure 1.3.

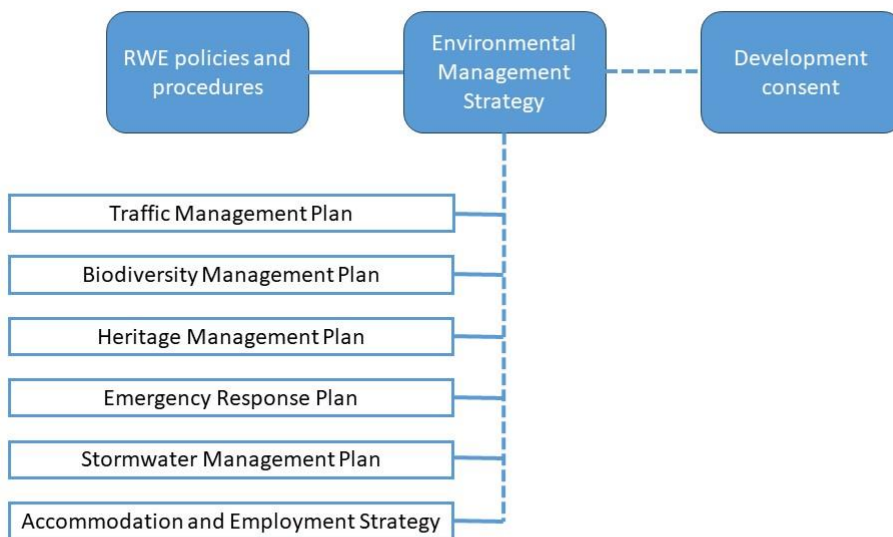


Figure 1.3 EMS strategic framework

1.4.1 RWE policies and procedures

RWE operates under an existing Environmental and Sustainability Policy and Safety Management Plan and prepared in accordance with Australian Standard AS/NZS ISO 45001:2018 Occupational Health & Safety. Through the delivery of the Environment and Sustainability Policy, RWE is committed to:

- conducting environmental risk assessments on any activities which could have an environmental impact
- incorporating environmental factors into the RWE Safety Management System, monitor and review process so as to identify areas of concern or areas to improve
- encouraging effective waste management with recycling and reusing requirements
- monitor current processes through inspections and audits to identify ways of reducing pollution and waste

- effective leadership and commitment by management in the area of environmental sustainability
- promoting and encouraging the reporting of environmental incidents, hazards, or non-compliance by personnel
- acting on any environmental incidents, hazards or non-compliance reports promptly
- fostering a positive and supportive approach to environmental sustainability within the business and encouraging personnel to actively participate in conserving the environment at work, at home and in the community.

2 Statutory requirements

2.1 Development consent

Development consent was issued for the project on 31 August 2017 (SSD 8025) by the Minister for Planning.

MOD 1 (SSD-8025-Mod-1) was approved on 27 July 2018 by the minister for Planning.

MOD 2 (SSD-8025-Mod-2) was approved on 7 October 2022 by the Planning Secretary.

The associated CoCs as relevant to preparation of this EMS are outlined in Table 1.1.

2.2 State and local legislation

The following legislation and environmental planning instruments are relevant to the project:

- *Environmental Planning and Assessment Act 1979*
- Environmental Planning and Assessment Regulation 2000
- State Environmental Planning Policy (State and Regional Development) 2011 [SRD SEPP]
- State Environmental Planning Policy (Transport & Infrastructure) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Rural Lands) 2008
- *Roads Act 1993*
- *Crown Lands Act 1989*
- *Local Land Services Act 2013*
- Balranald Local Environmental Plan 2010.

The statutory approvals / licences that are required for the project are outlined in Table 2.1.

Table 2.1 Other approvals / licenses

Legislation	Authorisation / Action	Consent or approval authority
<i>Roads Act 1993</i>	Section 138 permits for road and intersection improvements for site access road intersection with Yanga Way	NSW Roads and Maritime Service [RMS]
<i>Crown Lands Act 1989</i>	Licence / easement for ongoing access/use of TSR	NSW Department of Industry – Lands [Dol Land]
<i>Biodiversity Conservation Act 2016</i>	Residual impacts to native vegetation will require retirement of 158 biodiversity credits/	Office of Environment and Heritage [OEH]
<i>Local Land Services Act 2013</i>	There may be existing uses in the travelling stock reserves [TSR] which require consideration	Occupation of access road within TSR

3 Roles and responsibilities

Environmental management is the responsibility of all employees and contractors at Limondale. The key personnel and their relevant environmental and community management roles and responsibilities are outlined in Table 3.1.

Limondale Solar Farm Pty Ltd is ultimately responsible to regulatory authorities for all aspects of environmental compliance and is to facilitate the implementation of this EMS. This includes the provision of adequate resources such as:

- qualified personnel
- adequate financial resources
- additional training as required for all employees and contractors.

Table 3.1 Roles and responsibilities

Role	Responsibility	Relevant Project Phase
Site Manager	<ul style="list-style-type: none"> • maintain a working knowledge of this EMS and be aware of all environmental legislative requirements associates with their respective operation • provide sufficient resources for the implementation of this plan and associated plans • Internal and External reporting of incidents and non-compliances 	<ul style="list-style-type: none"> • Solar Farm Operation • BESS Construction • BESS Operation • Decommissioning
Environmental and Community Manager (ECM)	<ul style="list-style-type: none"> • implement and maintain the EMS • facilitate a process of managing overall compliance with regulatory requirements and undertake external reporting for legislative non-compliances as required • coordinate complaints recording and investigation processes including associated reporting requirements • coordinate the implementation of corrective actions and evaluate their effectiveness associated with community complaints; liaise with relevant government authorities and affected landholders in relation to regulatory conditions and compliance issues • coordinate training to communicate requirements of the EMS to relevant personnel 	<ul style="list-style-type: none"> • Solar Farm Operation • BESS Construction • BESS Operation • Decommissioning
Environment and Community Coordinators and Officers (ECC/ECO)	<ul style="list-style-type: none"> • conduct monthly environmental inspections to determine compliance with legislation, standards, codes and other external requirements (ECC) • coordinate monitoring as per environmental management strategy • review all environmental monitoring data to confirm compliance with the relevant criteria • assist with the development and delivery of environmental training packages 	<ul style="list-style-type: none"> • Solar Farm Operation • BESS Construction • BESS Operation • Decommissioning

Table 3.1 Roles and responsibilities

Role	Responsibility	Relevant Project Phase
	<ul style="list-style-type: none"> • conduct environmental inspections as per the EMS • provide ongoing environmental advice as required • Advise Site Manager of incidents and non-compliances, co-ordinate investigations and assist with reporting requirements. 	
Operational Managers / Supervisors	<ul style="list-style-type: none"> • facilitate activities under their control so that they are completed in accordance with this EMS and associated management plans and site procedures • ensure environmental controls within their jurisdiction are operated and maintained in a proper and efficient manner • investigate and report all environmental incidents and non-compliances • report all community complaints 	<ul style="list-style-type: none"> • Solar Farm Operation • BESS Operation
Employees and Contractors	<ul style="list-style-type: none"> • conduct all activities in accordance with this EMS, and associated management plans and procedures, in an environmentally responsible manner • immediately report all environmental incidents and community complaints to their immediate supervisor • participate in relevant environmental training • participate in incident and non-compliance investigations as directed by supervisors 	<ul style="list-style-type: none"> • Solar Farm Operation • BESS Construction • BESS Operation • Decommissioning

4 Inspections and monitoring

The following inspections and monitoring will be the responsibility of the project manager:

- monthly environmental inspections to determine compliance with legislation, standards, codes and other external requirements
- coordination of monitoring as described in this EMS and associated sub-plans
- review all environmental monitoring data to confirm compliance with the relevant criteria.

A monthly environmental inspection checklist will be developed by the project manager prior to commencement of construction activities. Monthly environmental inspection records will be documented and retained onsite for the duration of the project.

The project manager will also be responsible for development of a daily inspection checklist for use by site supervisors / managers as a means to:

- ensure that adequate environmental controls are in place and operating effectively
- identify deficiencies in controls in place, or required corrective actions/improvements, including identification of timing and responsibilities for implementation/action
- identify and report environmental incidents.

The monthly and daily checklists will be developed in consideration of the requirements of the CoC and this EMS and the issue specific inspection and monitoring requirements summarised in Table 4.1.

4.1 Independent Environmental Audit

Independent Audits of the development will be conducted and carried out at the frequency and in accordance with the Independent Audit Post Approval Requirements (IPAR 2020 guideline). And as required by SSD 8025 Mod 1 Schedule 4 condition 5 and 5A-5E.

Proposed independent auditors will be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit. RWE will obtain written agreements of engagement of independent auditors prior to the audit taking place.

The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 5 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.

RWE will (unless otherwise agreed):

- review and respond to each Independent Audit findings
- submit response to the Planning Secretary via the Planning Portal within two months of undertaking the audit
- publicly display the response to the audit within 60 days on the project website.

Table 4.1 **Monitoring plan summary**

Key Issue/Timing	Risk to be managed	Monitoring requirement	Timing / frequency	Responsibility
Biodiversity				
Biodiversity protection Pre-construction of the BESS	<ul style="list-style-type: none"> Native vegetation removal, retention and disturbance. Direct impacts on flora, fauna and ecological communities as a result of clearing activities. Indirect impacts on biodiversity values outside the development site. 	Visual inspection of vegetation clearance activities.	Daily inspections during clearing activities.	Site Supervisor with the Environmental Advisor – report to Project Manager.
	<ul style="list-style-type: none"> Native vegetation removal, retention and disturbance. Direct impacts on flora, fauna and ecological communities as a result of clearing activities. 	Inspection of exclusion fencing.	Daily inspections during clearing activities.	Site Supervisor with the Environmental Advisor – report to Project Manager.
	<ul style="list-style-type: none"> Native vegetation removal, retention and disturbance. Direct impacts on flora, fauna and ecological communities as a result of clearing activities. 	Maintain a record/photo log of any issues and actions taken to remedy breaches of exclusion areas.	As required.	Site Supervisor report Project Manager.
Biodiversity protection Construction of the BESS	<ul style="list-style-type: none"> Native vegetation removal, retention and disturbance. Direct impacts on flora, fauna and ecological communities as a result of clearing activities. Indirect impacts on biodiversity values outside the development site. 	Visual inspection of vegetation clearance activities.	Daily inspections during clearing activities.	Site Supervisor with the Environmental Advisor – report to Project Manager.
	<ul style="list-style-type: none"> Direct impacts on flora, fauna and ecological communities as a result of clearing activities. 	Maintain a log of salvaged animals and actions taken to relocate them.	As required prior to and during vegetation clearance and construction.	Environmental Advisor / Wildlife Handler.

Table 4.1 **Monitoring plan summary**

Key Issue/Timing	Risk to be managed	Monitoring requirement	Timing / frequency	Responsibility
	<ul style="list-style-type: none"> Direct impacts on flora, fauna and ecological communities as a result of clearing activities. 	Inspections for fauna. Where footings have been left open overnight.	Every morning where left open overnight and prior to recommencing or back filling.	Environmental Advisor / Wildlife Handler.
	<ul style="list-style-type: none"> Indirect impacts on biodiversity values outside the development site. 	Inspections of stockpiles and storage areas to ensure no impact outside development site.	Daily inspections required at construction area mark out and during construction.	Site Supervisor with the Environmental Advisor – report to Project Manager.
	<ul style="list-style-type: none"> Weeds, feral pests and soil pathogens. 	Inspections to detect weed germination and signs of soil pathogen infection.	Weekly during construction.	Site Supervisor with the Environmental Advisor – report to Project Manager.
Biodiversity protection	<ul style="list-style-type: none"> Weeds, feral pests and soil pathogens. 	Inspections to detect weed germination and signs of soil pathogen infection.	Monthly for 1 year following construction completion.	Site Supervisor with the Environmental Advisor – report to Project Manager.
Operation of the Solar Farm and BESS	<ul style="list-style-type: none"> Weeds, feral pests and soil pathogens. 	On-going inspections to detect presence of feral pests.	Monthly for 1 year following construction completion.	Site Supervisor with the Environmental Advisor – report to Project Manager.
Soils and erosion				
Erosion and sedimentation	<ul style="list-style-type: none"> Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas. 	Inspect all sediment and erosion control measures implemented prior to works.	Prior to earthworks and clearing activities commencing.	Site Supervisor with the Environmental Advisor – report to Project Manager.
Construction of the BESS and decommissioning	<ul style="list-style-type: none"> Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas. 	Inspections of stockpiles and storage areas to ensure no impact outside development site.	Daily inspections required at construction area mark out and during construction.	Site Supervisor to undertake inspections and report to Project Manager.
	<ul style="list-style-type: none"> Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas. 	Sediment control measures and rehabilitation areas will be checked and maintained at weekly intervals.	Daily during construction and as required.	Site Supervisor to undertake inspections and report to Project Manager.

Table 4.1 **Monitoring plan summary**

Key Issue/Timing	Risk to be managed	Monitoring requirement	Timing / frequency	Responsibility
Construction of the BESS and decommissioning	<ul style="list-style-type: none"> Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas. 	Visual inspections of rehabilitation works during construction to assess the success of soil and vegetation stabilisation.	Weekly inspections.	Site Supervisor to undertake inspections and report to Project Manager.
Operation of the Solar Farm and BESS	<ul style="list-style-type: none"> Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas. 	Inspections of rehabilitated areas and implement appropriate responses if rehabilitation fails.	Quarterly for two years following construction.	Site Supervisor to undertake inspections and report to Project Manager.
	<ul style="list-style-type: none"> minimise the fire risks of the development, including managing vegetation fuel loads on-site. 	Visual inspections of vegetation on site.	Weekly inspections	Site Supervisor with the Environmental Advisor – report to Project Manager.
Traffic and Transport				
Traffic Control Plans Construction of the BESS and decommissioning Operation of the Solar Farm and BESS	<ul style="list-style-type: none"> Traffic and pedestrian safety 	Check signage installed for the project in accordance with the TCP.	Weekly	Site Supervisor
Heavy Vehicles Construction of the BESS and decommissioning Operation of the Solar Farm and BESS	<ul style="list-style-type: none"> Heavy Vehicle numbers 	Number of heavy vehicles accessing the site	Daily	Site Supervisor
Intersection with Yanga Way Construction of the BESS and decommissioning Operation of the Solar Farm and BESS	<ul style="list-style-type: none"> Intersection condition and mud tracking 	Inspection of the intersection with Yanga Way	Daily	Site Supervisor

Table 4.1 **Monitoring plan summary**

Key Issue/Timing	Risk to be managed	Monitoring requirement	Timing / frequency	Responsibility
Site access Construction of the BESS and decommissioning Operation of the Solar Farm and BESS	<ul style="list-style-type: none"> Changes in weather conditions 	Monitor weather forecasts	Daily	Site Supervisor
Accommodation and Employment				
Local Accommodation Construction of the BESS and decommissioning	<ul style="list-style-type: none"> Accommodation use in accordance with AES 	Review accommodation in use	Six monthly	Environmental Advisor, Community manager
Local Employment Construction of the BESS and decommissioning	<ul style="list-style-type: none"> Local employment prioritised in accordance with AES 	Review local employment numbers	Six monthly	Environmental Advisor, Community manager
Cultural Heritage				
Protection of known areas Construction of the BESS and decommissioning Operation of the Solar Farm and BESS	<ul style="list-style-type: none"> Cultural heritage protection 	Ensure protection of known sites outside of the development disturbance area is in place	Weekly during construction or decommissioning Monthly during operation of the Solar Farm and BESS	Site Supervisor

5 Stakeholder consultation and communication

5.1 External communication

All communication on the project will be in accordance with the RWE Renewables Australia Community and Stakeholder Engagement Framework. Procedures specific to the Limondale Solar Farm are presented in the following sections.

5.1.1 Community and agencies

The local community and relevant agencies will be informed and kept up to date with the operation and environmental performance of the Project through planned meetings as relevant, and via website updates.

Information will be made available via the project website(s) in accordance with Schedule 4 Condition 6 of the CoC:

<https://au.rwe.com/projects/limondale-solar-farm/>

<https://au.rwe.com/projects/limondale-bess/>

The project website(s) will include up to date information on:

- the Environmental Impact Statements and other documents relating to the approval
- the final layout plans for the BESS development
- current statutory approvals for the development
- the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged
- how complaints about the development can be made
- a complaints register
- any other matter required by the Planning Secretary.

Contact details, and link to a community feedback / complaint form will also be made available via the project website. The Limondale project contact number 1800 844 007 has been setup for the construction, operation and decommissioning phases.

5.1.2 Community complaints

Limondale will respond to community complaints relating to environmental incidents or as outlined below.

All complaints received will be documented in a Complaints Register which will record the nature of the complaint, any corrective / mitigative actions undertaken in response, and response times. All complaints will be responded to within 24 hours of receipt on weekdays or on the next working day.

The following details will be recorded for each complaint:

- date and time of the complaint
- method by which the complaint was made

- personal details of the complainant (if provided)
- nature of the complaint
- action taken in relation to the complaint
- follow-up actions required.

All complaints will be investigated by the Environment and Community Manager (ECM), who will also be responsible for:

- ensuring adequate mitigative actions are implemented to prevent reoccurrence
- liaising and following-up with complaints
- review of the complaints register to monitor the effectiveness of mitigation measures and identify any recurring themes of complaints that indicate a need to amend management approach.

The complaints procedure and contact details for the public to make complaints will be included on the project website and provided to Balranald Shire Council for information. Contact methods will include a phone number and email address.

5.1.3 Dispute resolution

In the event a complaint is unable to be resolved between the complainant and the relevant Project personnel, a third-party mediator may be used to assist with the resolution of the dispute.

The dispute resolution process is as follows:

- Third party mediator reviews complaint and responses provided.
- Third party mediator determines that the response is either satisfactory or mediation is required.
- In either case, third-party mediator must contact the complainant to advise if they are closing the complaint or if they will initiate the mediation process.
- Mediation will occur at a time and date agreed between the third-party mediator and the complainant (preferably in-person). The third-party mediator and RWE must attend to meeting. Any other relevant Project personnel required to attend the meeting will be at the discretion of RWE.
- Following the mediation meeting, the third-party mediator will advise of any additional actions required or whether the Third-party mediator is satisfied that the matter has been resolved.
- Any additional information must be recorded in the Complaints Register and closed out.

5.2 Internal communication

5.2.1 Site inductions

Prior to commencement of work onsite, all project personnel will attend a site induction covering general and site specific environmental awareness, minimum requirements/standards and controls.

Site induction material will be developed and delivered by the Environment and Community team or alternate suitably qualified personnel. Site induction material will be tailored commensurate with the personnel's role and responsibilities, specific work tasks and associated environmental risks and potential impacts. As a minimum, site inductions will include:

- requirements for compliance with relevant environmental policies and procedures, and individual's responsibilities in implementing these
- environmental risks and mitigation and control measures, including specific measures required by this EMS
- incident reporting requirements
- emergency procedures
- environmental reporting requirements.

5.2.2 Pre-start meetings

Pre-start meetings will be conducted by the Site Supervisor / Manager prior to commencement of activities each day, and will incorporate an environmental issues component to identify specific environmental risks and mitigation measures of relevance to the planned activities for the day.

Pre-start meetings will also be used as a forum for communication of complaints, or incidents as an 'environmental alert' as described below.

5.2.3 Environmental alerts

In the event of an environmental incident, incident learnings and preventative and corrective actions to be implemented to prevent reoccurrence will be communicated to project personnel as soon as practical. This will include issue of an 'environmental alert' via email and pre-start meetings, or some other means as appropriate.

6 Incident investigation and reporting

6.1 Incident notification

A written incident notification must be prepared in accordance with SSD 8025 Schedule 4 condition 3 and Appendix 3 Conditions 1 to 4, (see Appendix A of the EMS) and be submitted to the Planning Secretary via the Major Projects website immediately after becoming aware of the incident. Subsequent notifications are required to be undertaken in accordance with SSD 8025 Appendix 3.

An incident is defined in SSD 8025 Schedule 1 Definitions as:

A set of circumstances that:

- causes or threatens to cause material harm to the environment; and/or
- breaches or exceeds the limits or performance measures/criteria in this consent

Material Harm is defined in SSD 8025 as:

- Actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial

In the event of any incidents, appropriate investigation will be undertaken by the Environmental and Community Manager. Potential incidents that may be relevant to the site include:

- pollution incidents
- bushfire originating from the site
- incidents as a result of extreme weather conditions including flooding
- non-compliance with consent conditions resulting in environmental impacts including (but not limited to):
 - Disturbance of archaeological material in protected areas
 - Clearing of vegetation outside of approved limits
 - Accessing the site from non-approved entry points
 - Construction of approved elements outside of approved areas.

A pollution incident is defined in the *Protection of the Environment Operations Act 1997* (POEO Act) as:

- an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

- harm to the environment is material if:
- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

- it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Pollution incidents must be reported immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW, DPHI and Balranald Shire Council.

6.2 Duty to notify

Under Section 148 of the POEO Act, there is a duty to notify pollution incidents such as spills, leaks or other incidents. The Environmental and Community Manager will notify the appropriate regulatory authority of the pollution incident. If the incident presents an immediate threat to human health or property, the emergency services will be contacted first for assistance. Other agencies will be contacted afterwards to satisfy notification obligations.

The contact details for relevant authorities that may be relevant in the event of an incident or emergency are listed in Table 6.1.

Table 6.1 Relevant authorities contact details

Organisation	Contact
Emergency services	000
Fire and Rescue NSW	02 9265 2999
Balranald fire service (123 Market Street, Balranald)	03 5020 1577
Environment Protection Authority (EPA)	131 555
WorkCover NSW	13 10 50
Balranald Shire Council	03 5020 1300

6.3 Non-compliance

Non-compliances will be identified by a range of mechanisms including:

- review of monitoring results
- complaints
- site inspections
- audits
- incident reports.

Any non-compliance with COC or any other licence / approval will be investigated as described above and reported internally and externally in accordance with the COC or other applicable licence / approval.

The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance as required under Schedule 4 Condition 4.

A non-compliance 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 non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

As part of incident investigation or complaints resolution, corrective and preventative actions will be identified, assigned to an appropriate person and closed out according to set timeframes. Corrective actions will include reference to the relevant incident report or complaint to track compliance.

6.4 Incident investigation

All incidents and near misses will be investigated and documented to:

- establish root cause and identify contributing factors
- identify preventative and corrective actions to be implemented to prevent reoccurrence
- share learnings amongst the project team and other stakeholders as appropriate.

In accordance with Schedule 4, Condition 3 of the SSD 8025, Limondale will:

- immediately notify the Secretary and any other relevant agencies of any incident on site
- within 7 days of the date of the incident, provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.

6.5 Emergency response

The Emergency Response Plan (Appendix G) details the procedures that apply in an emergency.

In summary, in the event of an emergency:

1. Activate the emergency warning system including alarms and implement the evacuation plan.
2. Dial 000 and request relevant services (i.e. Fire Brigade, Police, Ambulance).
 - a) Provide:
 - i) nature of incident
 - ii) name of company, site address, nearest cross street, prominent landmarks
 - iii) any other relevant information (e.g. persons injured).
 - b) A representative is to direct emergency services from the site access intersection on Yanga Way.
3. Undertake any other actions to remove personnel from harm.

6.6 Site personnel contact details

The contact details of personnel responsible in the event of an emergency are provided in Table 6.2 (includes 24-hour contact details).

Table 6.2 **Personnel responsible**

Site	Position	Contact details
Limondale Solar Farm/BESS	Site Supervisor	1800 844 007
Limondale Solar Farm/BESS	Environment and Community Manager	1800 844 007

7 Review and improvement

Ongoing monitoring and review of the performance and implementation of the EMS will be undertaken as required. The EMS review will include:

- outcomes of investigations from incidents and/or complaints
- the continuing suitability of the EMS in relation to changing conditions and information
- feedback from external stakeholders, including regulators and landholders.

In accordance with Schedule 4 Condition 2 of the CoC, Limondale Solar Farm will review and update the EMS and other strategies and plans required under the consent prior to carry out any upgrading or decommissioning activities on site. The EMS and supporting plans are also to be reviewed and if necessary revised within one month of the submission of an incident report under Schedule 4 Condition 3 or any modification to the CoC.

Regular review of the EMS will allow opportunities for improvement to be identified and implemented, achieving the overall aim of continual improvement in environmental management performance. The EMS will be resubmitted for approval where material changes are required. Stakeholders will be consulted before submission is made (where required), and approval will be obtained before making material changes.

Appendix A

Incident notification and reporting requirements

INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS

WRITTEN INCIDENT NOTIFICATION REQUIREMENTS

1. A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 5 of Schedule 4 or, having given such notification, subsequently forms the view that an incident has not occurred.
2. Written notification of an incident must:
 - a. identify the development and application number;
 - b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
 - c. identify how the incident was detected;
 - d. identify when the applicant became aware of the incident;
 - e. identify any actual or potential non-compliance with conditions of consent;
 - f. describe what immediate steps were taken in relation to the incident;
 - g. identify further action(s) that will be taken in relation to the incident; and
 - h. identify a project contact for further communication regarding the incident.
3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.
4. The Incident Report must include:
 - a. a summary of the incident;
 - b. outcomes of an incident investigation, including identification of the cause of the incident;
 - c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
 - d. details of any communication with other stakeholders regarding the incident.

Appendix B

Traffic management plan

Appendix C

Biodiversity management plan

Appendix D

Heritage management plan

Appendix E

Accommodation and employment strategy

Appendix F

Stormwater management

Appendix G

Emergency response plan

Australia

SYDNEY

Ground floor 20 Chandos Street
St Leonards NSW 2065
T 02 9493 9500

NEWCASTLE

Level 3 175 Scott Street
Newcastle NSW 2300
T 02 4907 4800

BRISBANE

Level 1 87 Wickham Terrace
Spring Hill QLD 4000
T 07 3648 1200

CANBERRA

Suite 2.04 Level 2
15 London Circuit
Canberra City ACT 2601

ADELAIDE

Level 4 74 Pirie Street
Adelaide SA 5000
T 08 8232 2253

MELBOURNE

Suite 8.03 Level 8
454 Collins Street
Melbourne VIC 3000
T 03 9993 1900

PERTH

Suite 9.02 Level 9
109 St Georges Terrace
Perth WA 6000
T 08 6430 4800

Canada

TORONTO

2345 Yonge Street Suite 300
Toronto ON M4P 2E5
T 647 467 1605

VANCOUVER

60 W 6th Ave
Vancouver BC V5Y 1K1
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