



Appendix V

Preliminary
Decommissioning
Security Report



Attexó

Decommissioning Security Report

Tully Battery Energy Storage System

Prepared for: RWE Tully Battery Pty Ltd

Date: 4 June 2026



Document information

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Prepared by	Justin Claridge, Principal Environmental Scientist
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Prepared for:

RWE Tully Battery Pty Ltd

Prepared by:

Attexo Group Pty Ltd
attexo.com.au
ABN 75 637 138 008

Attexo Group Pty Ltd 2026

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Abbreviations and Statutory Terms

Term	Meaning
BESS	Battery energy storage system
BSF	Battery storage facility
CCRC	Cassowary Coast Regional Council
CLR	Contaminated land register
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DTMR	Department of Transport and Main Roads
ECDMP	End of Construction Decommissioning Management Plan
EODMP	End of Operation Decommissioning Plan
EP Act	<i>Environmental Protection Act 1994 (Qld)</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
EMR	environmental management register
EP Regulation	Environmental Protection Regulation 2019 (Qld)
MCU	material change of use
MNES	Matters of National Environmental Significance
NC Act	<i>Nature Conservation Act 1992 (Qld)</i>
O&M	operations and maintenance facilities
OSOM	oversize/overmass
LFP	Lithium Iron Phosphate (LiFePO ₄) battery
LGA	Local Government Area
Planning Act	<i>Planning Act 2016 (Qld)</i>
PO	Performance Outcome
QLD Waste Strategy	<i>Waste Management and Resource Recovery Strategy</i>
RWE	RWE Tully Battery Pty Ltd
SARA	State Assessment and Referral Agency
SDAP	<i>State Development Assessment Provisions</i>
State code 27	<i>State Code 27: Battery storage facility development</i>
WRR Act	<i>Waste Reduction and Recycling Act 2011 (Qld)</i>



1. Introduction

1.1 Background

RWE Tully Battery Pty Ltd (RWE) are seeking to develop the proposed Tully Battery Energy Storage System (BESS) (the Project) across a 28.7 hectare (ha) site (the Site), consisting of two freehold parcels, Lot 1 on RP735276 and Lot 1 on RP852238. Grid connection is proposed via the neighbouring Powerlink 132 kV Tully substation, located to the northeast on Lot 1 on RP716718.

The Site is located approximately 4 km south-west of the township of Tully in far north Queensland.

The Project will have a capacity of up to 200 MW / 800 MWh and is proposed to store electricity from the grid in periods of excess supply, and dispatch into the grid at periods of high demand.

RWE has commissioned Attexo Group Pty Ltd (Attexo) to prepare this Decommissioning Security Report to address contemporary State regulator expectations. Specifically, this report addresses the decommissioning outcomes within *State Code 27: Battery storage facility development* (State Code 27) under the Planning Act's *State Development Assessment Provisions* (v3.6) (SDAP) (refer **Section 4.1**).

1.2 Purpose and Scope

RWE has commissioned Attexo Group Pty Ltd (Attexo) to prepare this Decommissioning Security Report to address contemporary State regulator expectations. Specifically, this report addresses the decommissioning outcomes within State Code 27 under the Planning Act's SDAP. The State Code 27 Planning Guideline requires a development application to be supported by a Decommissioning Security Report to address PO35 (Department of State Development, Infrastructure and Planning, 2026). For completeness, this report also provides an overview of likely decommissioning strategies associated with PO31 – PO34 to demonstrate that RWE has considered decommissioning as part of current Project development. This report sets out the decommissioning strategies which will be implemented post construction and at the end of operations. These measures are adaptive and will be further refined during construction and asset operations.

The State Code 27 Decommissioning Performance Outcomes (POs) and where they are responded to in this report are included in **Table 1.1**.

Table 1.1: Compliance assessment table

State Code 27 Performance Outcome	Section addressed / response
PO11 Development is constructed to maintain the fertility and soil attributes of high-quality agricultural land and to enable decommissioning at the end of operations to return the land to pre-construction agricultural land productive value.	Refer to Section 7.7 and Section 7.7.2 .
PO31 Relevant components of development, both after completion of construction and at cessation of operations, are decommissioned in a timely and efficient manner.	Refer to Section 7.8 , Section 7.3 and Section 8 .
PO32 Development decommissioning ensures that: <ul style="list-style-type: none">materials removed from site are minimised;materials that are removed from the site are disposed of at approved disposal facilities capable of receiving the materials; andopportunities to reuse, recycle and/or repurpose the materials are deployed to the greatest extent feasible.	Refer to Section 7.1 and Section 7.5 .



State Code 27 Performance Outcome

Section addressed / response

PO33 Decommissioning at end of operations ensures disturbance footprints are rehabilitated, waterways and drainage patterns are reinstated.

Refer to **Section 7.7** and **Section 7.6**.

PO34 Decommissioning incorporates design features that enable reuse, recycling, and recovery of battery components and associated infrastructure at end-of-life.

Refer to **Section 7.3** and **Section 7.5**.

PO35 Decommissioning plans are secured by bonds or financial guarantees or other mechanism/s to safeguard compliance.

Refer to **Section 8**.

Overall, the intent of this report is to demonstrate the following, at the end of construction and end of operations, for the Project:

- The decommissioning strategies, practices, and processes will not result in adverse impacts on landowners, the community, the environment, or the State; and
- Financial security or other mechanisms are in place, resulting in minimal financial liability risks to landowners and the State.

1.3 Defined Terms

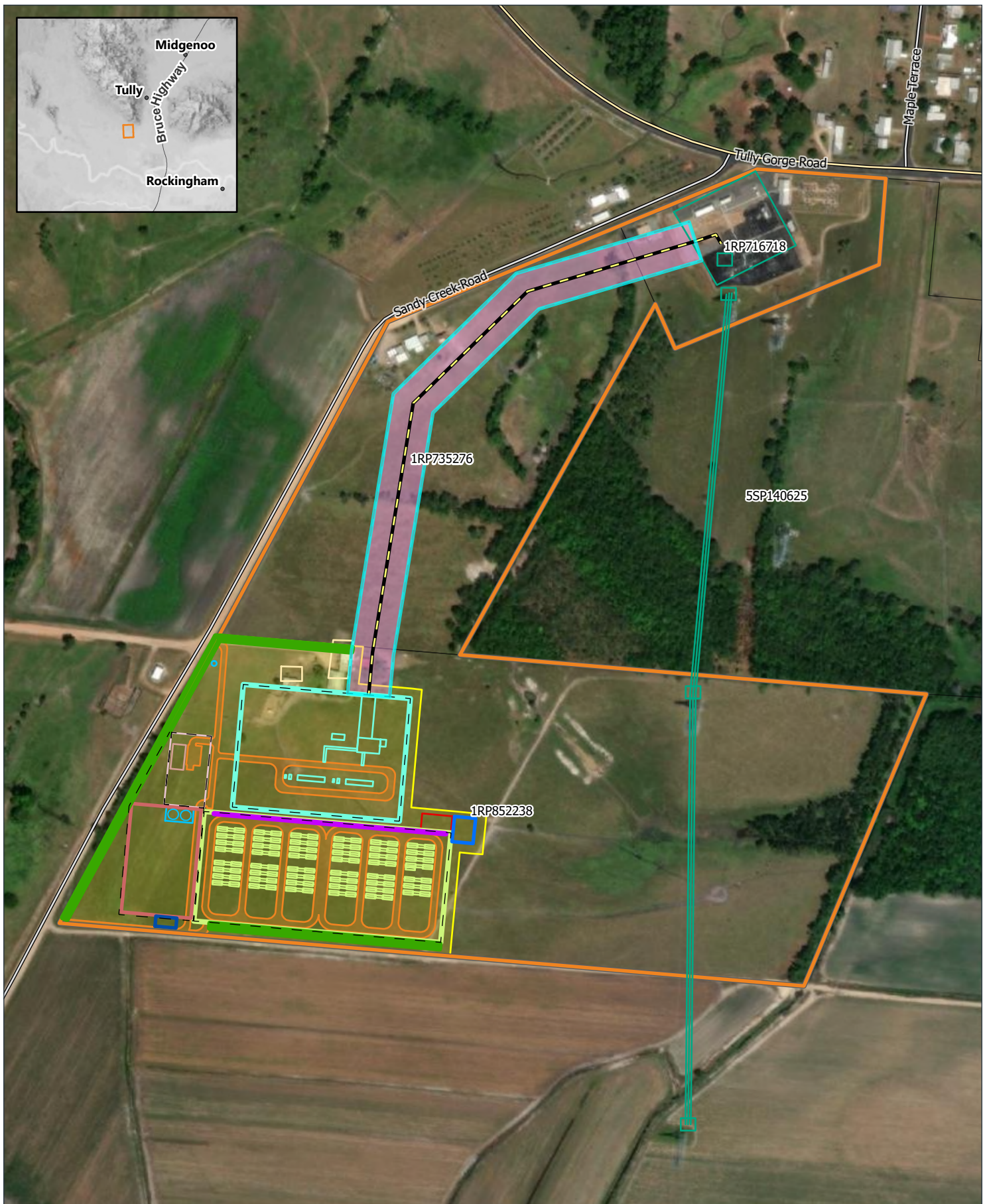
Where applicable, terms used within this report are consistent with definitions provided in State Code 27 (v3.5). A summary of the meaning of key terms used in this report are defined in **Table 1.2**.

Table 1.2: Key terms used within this report

Term	Definition
Project Site	The extent of the lot boundaries for Lot 1 on RP735276 and Lot 1 on RP852238. The combined area of both lots is 28.7 ha. The Project Site will host the BESS infrastructure and the majority of the overhead transmission line (OHTL).
Landowner	The owner of the Project Site, noting that RWE Renewables Australia Pty Ltd (RWE Australia) holds an option to purchase the land. It is expected that, prior to the commencement of construction of the Project, RWE Australia will use the Special Purpose Vehicle [SPV] to exercise the option and nominate RWE Tully Battery Pty Ltd to complete the purchase and become the registered proprietor of the Project Site.
Grid Connection	The proposed OHTL to the existing Powerlink 132kV Tully Substation within Lot 1 on RP716718. The Grid Connection requires approximately 540 m of OHTL to be constructed within the Project Site and 60 m of OHTL to be constructed within Lot 1 on RP716718.
Development Footprint	The area that will be directly impacted by the Project. The total area of the Development Footprint is approximately 9 ha and includes infrastructure located within the Project Site and the Grid Connection.
Decommission	The removal, rehabilitation and remediation of the battery storage facility in part, after finalisation of construction, then in entirety at cessation of operations. Decommissioning will be in accordance with strategies prepared by proponents and all decommissioning activities undertaken at full cost to proponents/operators.
Project infrastructure or infrastructure	Infrastructure associated with the BSF and ancillary OHTL construction and operation, as identified in Section 6 .

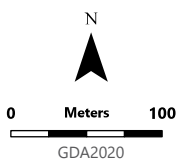


Term	Definition
Rehabilitate	<p>Restoration of areas of disturbance created for the construction of and operations of a battery storage facility. Rehabilitate means the act of undertaking a range of activities that collectively endeavour to return the landscape (over time) back to its condition prior to the battery storage facility land use. These activities aim to achieve a safe, stable, non-polluting and sustainable landform (over time) through methods including, but not limited to:</p> <ol style="list-style-type: none">1. decommissioning and removal of infrastructure;2. remodifying some areas of civil works;3. replanting with native vegetation species;4. installation of habitat elements (e.g. fallen woody debris);5. watering to enhance planting survival rates;6. weed and pest management;7. monitoring and reporting.
Stable	<p>Means the rehabilitation and restoration of Project infrastructure is enduring or permanent so that the site is unlikely to collapse, erode or subside</p>



Project Layout
Figure 1.1

DWG No: RWE-002-032 [A]
 DATE: 14/05/2026
 DRAWN: KB, JM
 REVIEWED EJ
 SCALE (A4): 1:5,000



- | | | | |
|-------------------------------------|----------------------------|---------------------|-------------------------------|
| Project Area | Proposed Transmission Line | Noise Wall | Emergency Containment Storage |
| Development Footprint | 20m Exclusion Zone | Landscaping Area | Fence |
| Proposed Access Track Footprint | Substation Area | Existing 132kV Line | Main Road |
| Proposed Transmission Line Corridor | BESS Area | Existing Dwellings | Local Road |
| | Bioretention Basin A | Water Storage | Cadastral Parcels |
| | Bioretention Basin B | O&M Building | |
| | Construction Laydown Area | O&M Area | |

1.4 Other Relevant Reports

This plan is intended to be consistent with and/or will inform the development of future plans required at various stage of Project delivery. These plans will detail how the Project Site will be managed to minimise potential impacts, seek to assist with decommissioning where relevant and detail the decommissioning procedure and process.

Relevant plans to be prepared prior to the commencing construction:

- Stormwater Management Plan
- Construction Rehabilitation Management Plan
- Erosion and Sediment Control Plan (ESCP) – Construction
- Construction Environmental Management Plan

Plans to be prepared prior to the completion of construction:

- End of Construction Decommissioning Management Plan (ECDMP)
- Rehabilitation Management Plan (RMP)
- Site Stabilisation Plan – Operations (SSPO)

Plans to be prepared prior to the cessation of operations:

- End of Operation Decommissioning Plan (EODMP)

1.5 Limitations

This report solely focusses on decommissioning activities that relate to proposed development within the submitted DA, which includes the components within the Project Site as presented in **Section 3**.

2. Roles and Responsibilities

At the time of decommissioning, the Proponent will be fully responsible for the decommissioning and rehabilitation of the Project infrastructure. Through RWE Australia’s Option to Purchase (OTP) it is expected that RWE Tully Battery Pty Ltd it will be the legal owner of the Project Site (two freehold lots) prior to the commencement of construction (**Table 1.2**). This report refers to the ‘landowner’ in relevant sections to acknowledge the rights and custodial responsibilities of the landowner at the time of these future project stages.

Through contractual arrangements with RWE project contractors will also be responsible for end of construction decommissioning, as indicated in **Table 2.1**. Further details of these arrangements will be revised in the ECDMP.

Table 2.1: Responsibilities for decommissioning

Role		Responsibilities
End of Construction	End of Operations	
Proponent (RWE)	Proponent (RWE)	<ul style="list-style-type: none"> • During Project construction, prepare an ECDMP that is consistent with the approvals obtained and regulatory requirements. • Prior to the cessation of Project operations, prepare an EODMP that is consistent with the approvals obtained and regulatory requirements. This is to be accompanied or informed by relevant technical studies and strategies for potential approvals, including: <ul style="list-style-type: none"> – waste and resource recovery – site contamination assessments (if applicable) – traffic management, including OSOM requirements • Ensure that decommissioning requirements in relevant approvals and landowner agreement requirements: <ul style="list-style-type: none"> – are communicated to construction and decommissioning contractors – are sufficiently addressed by construction and decommissioning tenders / bids, and – are contractually binding. • Review contractor management plans with respect to decommissioning to ensure that they achieve or exceed Project approval(s) and regulatory requirements. • Undertake regular assurance activities, including monitoring and auditing, to ensure that decommissioning activities are being properly undertaken by the construction contractor and end of operations decommissioning contractor.
Construction Project Manager (Contractor)	End of Operations Decommissioning Project Manager (Contractor)	<ul style="list-style-type: none"> • Ensure that adequate processes, plans and procedures are in place to manage decommissioning requirements in line with Project commitments, legislative requirements and approval conditions. • Allocate sufficient resources for a timely and efficient decommissioning process. • Review environmental incidents as they occur and ensure that adequate corrective actions have been undertaken to prevent recurrence.

Role		Responsibilities
End of Construction	End of Operations	
		<ul style="list-style-type: none"> • Ensure that reportable environmental incidents are communicated to the Project Owner and the relevant regulatory authority. • Ensure that sufficient training is provided to personnel to achieve awareness of decommissioning requirements.
Construction Manager (Contractor)	End of Operations Decommissioning Manager (Contractor)	<ul style="list-style-type: none"> • Take overall responsibility for the on-ground implementation of decommissioning activities, including processes, procedures, controls and incident response, and allocate sufficient on-ground resources for the same. • Consider environmental and land outcomes when scheduling works and allocating resources (e.g. staged activities, works appropriate for weather conditions, progressive rehabilitation, etc.). • Support the Health Safety and Environment (HSE) management team in achieving Project decommissioning outcomes.
Project HSE Manager (Contractor)	Project HSE Manager (Contractor)	<ul style="list-style-type: none"> • Develop and implement any additional plans necessary to achieve Project decommissioning. • Roll out training and awareness programs (e.g. environmental contamination/spills, waste and resource recovery). • Establish, monitor, maintain and audit effective environmental controls onsite, including rehabilitation. • Respond to, report and investigate environmental incidents (as necessary) and identify corrective actions to prevent recurrence. • Provide advice to the Project Manager and Construction Manager / End of Operations Decommissioning Project Manager in relation to decommissioning management and associated performance.
Site based HSE personnel (Contractor)	Site based HSE personnel (Contractor)	
Construction personnel	End of Operations Decommissioning personnel	<ul style="list-style-type: none"> • Attend training and maintain awareness regarding Project decommissioning requirements. • Comply with the ECDMP. • Establish, monitor and maintain physical environmental controls as directed. • Respond to and report environmental incidents as they occur.

3. Project Description

The Project includes a proposed BESS with a capacity up to 200 MW for a duration of 4 hours and associated infrastructure (e.g. transformer, OHTL, air insulated switchgear, access roads, laydown areas, foundations, hard stand, parking, switch rooms and storage). The BESS and associated infrastructure will comprise a total development footprint of approximately 9 ha within the 28.7 ha Project Site.

The primary components of the Project will consist of the following:

- **Battery Units:** Up to 188 battery units will cover a total area of up to 2.5 ha. The foundations for the proposed battery units will likely be screw piles, piers or concrete pad formations. The BESS will be connected to the adjacent switch rooms via underground cables.
- **Switching Station:** A switching station will be located to the north of the battery units and will include a 132/33 kV high-voltage transformer, associated switchgear, an auxiliary transformer, two 33 kV switch rooms, and, if required, harmonic filters.
- **Stormwater Management:** Stormwater infrastructure will be designed and constructed to ensure the safe collection, containment, and management of runoff across the site during both construction and operational phases. This will include any emergency containment storage for containment for fire water in an emergency event.
- **Site Access and Internal Circulation:** Access to the site will be via the existing road network, including the Bruce Highway and Tully Gorge Road, with upgrades proposed to the two access point from Sandy Creek Road. The BESS facility will be secured by perimeter fencing. Internal access tracks will be provided around the battery units to facilitate operations, maintenance, and emergency response.
- **Grid Connection Infrastructure:** The Project will connect to the adjacent Powerlink 132 kV Tully Substation via an overhead transmission line extending north from the BESS area. The line will be supported approximately five (5) single-circuit 132 kV poles, each approximately 27.5 m in height.
- **Asset Protection Zone (APZ):** An Asset Protection Zone will be established and maintained around the battery infrastructure to mitigate bushfire risk and provide access for firefighting activities.
- **Fire Safety Measures:** Fire protection infrastructure will include, subject to detailed design, approximately 472,000 litres (L) of on-site static water storage, together with a fire hydrant system designed in accordance with Australian Standard (AS) AS 2419.1.
- **Acoustic Treatment:** A 6 m high noise wall is currently incorporated along the northern boundary of the BESS area to mitigate potential noise impacts. The requirement for this wall will be confirmed during detailed design and may be refined or omitted subject to equipment specifications and acoustic performance.
- **Earthworks:** Earthworks will include site levelling, formation of batters, and clearing necessary to facilitate construction and access.
- **Lighting:** Lighting will be installed to support maintenance activities, when maintenance works are to be undertaken at night; these will be on 10 m high poles. Security lighting will be sensor-controlled. All lighting will be designed and operated in accordance with AS 4282:2023 Control of the obtrusive effects of outdoor lighting.
- **Lightning Protection:** Lightning arrestors, up to 20 metres in height, will be installed within the development footprint to protect critical infrastructure.
- **Laydown and Operations Areas:** Temporary construction laydown areas and a permanent operations and maintenance (O&M) building will be established adjacent to Sandy Creek Road. This will include an O&M building, yard, parking areas, office facilities, and storage sheds.
- **Landscaping and Screening:** Landscape buffer planting will be established along the frontage and partially along the side boundaries of Lot 1 on RP852238 to provide visual screening and enhance integration with the surrounding landscape.

Visual representation of the Project is provided with aerial view in **Plate 3.1**. Further details on the Project infrastructure components and Project staging is provided in **Section 6** and **Section 7**.

Plate 3.1: Photomontage of proposed BESS¹



¹ For information purposes only. This image is an artist's conceptual rendering, based upon preliminary development plans, and is subject to change. It is not to scale and shown solely for illustrative purposes.

4. Regulatory Framework

The below sections provide a summary of the key legislation for Battery storage facility development, with respect to primary approvals and associated decommissioning requirements.

4.1 Planning Act 2016

The Planning Act regulates and manages development in Queensland, providing a framework for the preparation and implementation of planning instruments. It requires the coordination and integration of State, regional and local planning outcomes. A Development Permit is required under the Planning Act prior to commencing assessable development.

As discussed in **Section 1.2**, this Decommissioning Security Report has been prepared to address the decommissioning outcomes within State Code 27 (PO 31-35) under the Planning Act's SDAP. In accordance with the State Code 27 Planning Guideline, conditions of a Development Permit for a BSF would require the management of decommissioning through the preparation of an ECDMP, SSPOs and EODMP.

4.2 Environmental Protection Act 1994

The EP Act establishes Queensland's key regulatory framework for protecting environmental values. The following regulatory requirements are relevant to decommissioning at end of construction and end of operations of the Project:

- The general environmental duty: a person must not carry out any activity that causes, or is likely to cause, environmental harm unless the person takes all reasonably practicable measures to prevent or minimise the harm.
- Duty to restore the environment: this provision applies where an incident involving contamination of the environment has caused unlawful environmental harm. The person must, as soon as reasonably practicable after the incident happens, take measures, as far as reasonably practicable, to rehabilitate or restore the environment to its condition before the harm.
- Duty to notify: notification requirements to report events, or changes in land condition, that relate to contaminated land or notifiable activities.
- Removal of contaminated soil: a soil disposal permit will be required to remove and treat or dispose of soil from land listed on the environmental management register (EMR) or contaminated land register (CLR).
- Waste management: waste characterisation is to be undertaken in accordance with the Environmental Protection Regulation 2019 (EP Regulation) to determine whether waste is a regulated waste (and which type). Trackable waste will be transported offsite by a regulator waste transporter in accordance with regulated waste tracking provisions. Waste will be taken to a facility that is authorised to accept that type of waste.

Should the release of contaminants to the environment occur, this will be cleaned up in accordance with Project-specific Construction and Operational Environmental Management Plans, and any other legal requirements. Accordingly, decontamination associated with decommissioning at the end of construction and end of operations is expected to be limited to:

- Potential incidents that occur while undertaking decommissioning activities.
- Remediation or restoration in response to environmental incidents.

Contamination and remediation in Project decommissioning are further discussed in **Section 7.6**.

4.3 Waste Reduction and Recycling Act 2011

The *Waste Reduction and Recycling Act 2011* (WRR Act) is Queensland’s principal legislation for waste avoidance and reduction, resource recovery, and transition to a circular economy. The WRR Act has linkages to the EP Act for the regulation and management of waste.

Section 8AA of the WRR Act defines waste as:

- Anything that:
 - is left over, or is an unwanted by-product, from an industrial, commercial, domestic or other activity; or
 - is surplus to the industrial, commercial, domestic or other activity generating the waste.
- However, waste does not include:
 - a resource under an end of waste approval
 - a thing prescribed by regulation not to be waste.
- A thing can be waste whether or not it is of value.

The WRR Act enacts Queensland’s *Waste Management and Resource Recovery Strategy* (QLD Waste Strategy) which establishes targets and high-level strategies for Queensland to become a zero-waste society where waste is avoided, reused and recycled to the greatest extent possible (Queensland Government, n.d.). The QLD Waste Strategy acknowledges that strategic investment in diverse and innovative resource recovery technologies and markets is required to produce high-value products and generate economic benefits. The QLD Waste Strategy is centred around the waste and resource management hierarchy (**Figure 4.1**) and circular economy principles (**Figure 4.2**) as established in the WRR Act.

Higher order preferences in the waste and resource management hierarchy and circular economy principles will be key standards adopted during detailed design, construction methodology, and decommissioning optioneering. The fate of end-of-life infrastructure components and other waste materials will depend on viable market solutions for recycling, reuse, repurposing, and recovery of materials. Accordingly, waste and resource recovery options considered within this report are based on current achievable options in Australia and will be further investigated as the Project progresses. Waste management and decommissioning optioneering is further discussed in **Section 7.1** and **Section 7.5**.

Figure 4.1: Waste and resource management hierarchy (WasteOnline, 2024)

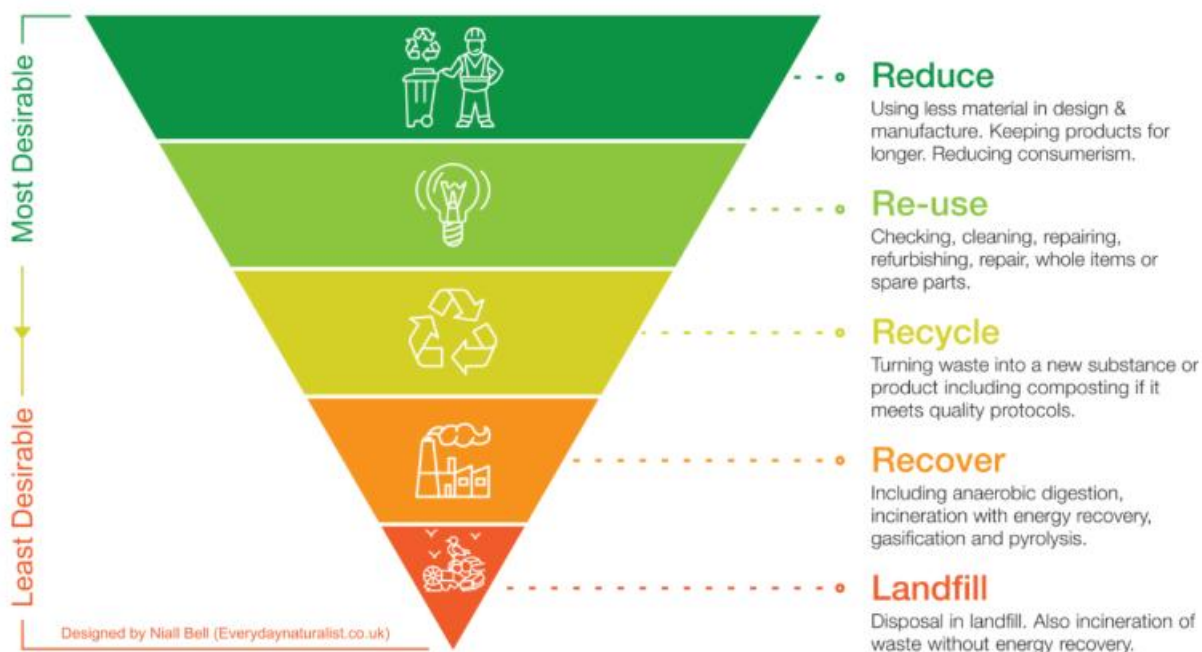
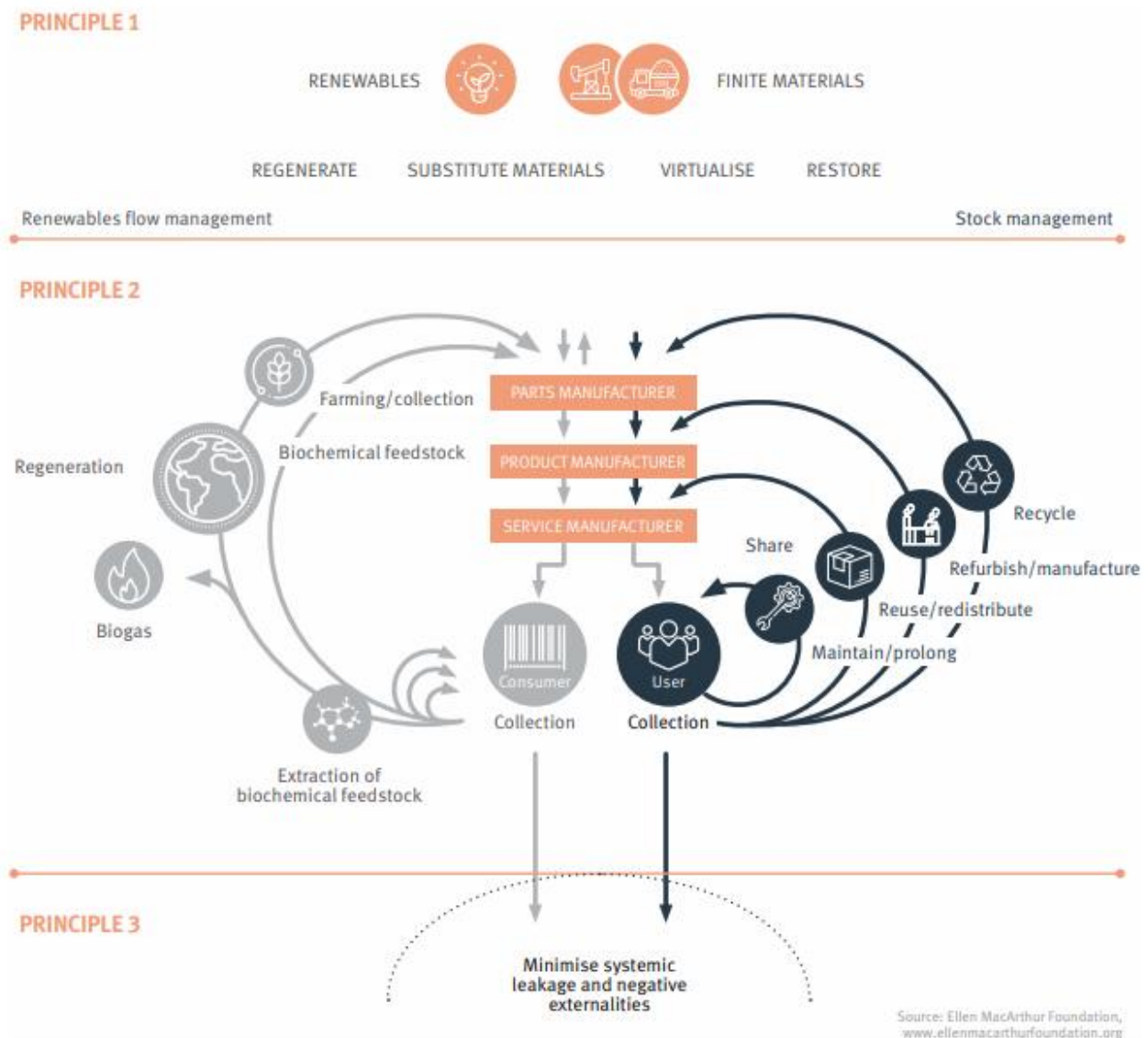


Figure 4.2 Circular economy principles (Queensland Government, n.d.)



5. Existing Environment

The existing environment is summarised below from information contained in reports and management plans, as submitted with the Project's DA (refer **Section 1.4**).

5.1 Land Use and Existing Structures

The Site consists of two lots (Lot 1 on RP735276 and Lot 1 on RP852238) that are both zoned as Rural under the CCRC planning scheme and currently used for livestock grazing.

Both lots are currently used as rural residential properties and are largely undeveloped. Lot 1 on RP852238 contains the Powerlink OHTL and infrastructure designation. The existing Powerlink 132 kV substation and 275 kV substation are located on adjacent lots to the north-east of the Site. Land to the south and east of the Site comprise rural areas used for sugar cane farming.

Each of the lots is associated with a rural residence on both, access tracks, and farm-related infrastructure. There is also a powerline easement that crosses Lot 1 on RP852238 in a north south direction from the Powerlink substations north of the Project Site.

RWE's intention is that the remaining area of the site continues to be used for cattle grazing and RWE will maintain the entirety of the site.

While the Project Site currently contains two dwellings, they are not occupied. The dwellings may be used as part of the on-site operations and maintenance (O&M) facilities during Project construction and operation, if not practicable these would be demolished and the area rehabilitated.

5.2 Soils

Soils within the Site have been mapped in the 1:50,000 *Soils of the Cardwell-Tully Area, North Queensland* by Cannon *et al.* (1992). The Cannon *et al.* (1992) mapping identifies the three mapped soil units (Hewitt, MSC and Tyson) over the Site as shown in **Figure 5.1** and detailed in **Table 5.1**. The Development Footprint is located entirely within the area mapped as comprising Hewitt soils.

The Hewitt soil series forms a continuum, becoming progressively more poorly drained with distance from higher, better drained levees. Overall, the Hewitt soil unit is mapped as containing poorly drained soils formed on alluvium. MSC is a miscellaneous map unit that has not been assessed in detail, located in the north of the Site.

Table 5.1: Soils (Cannon et al, 1992) mapped within the Site

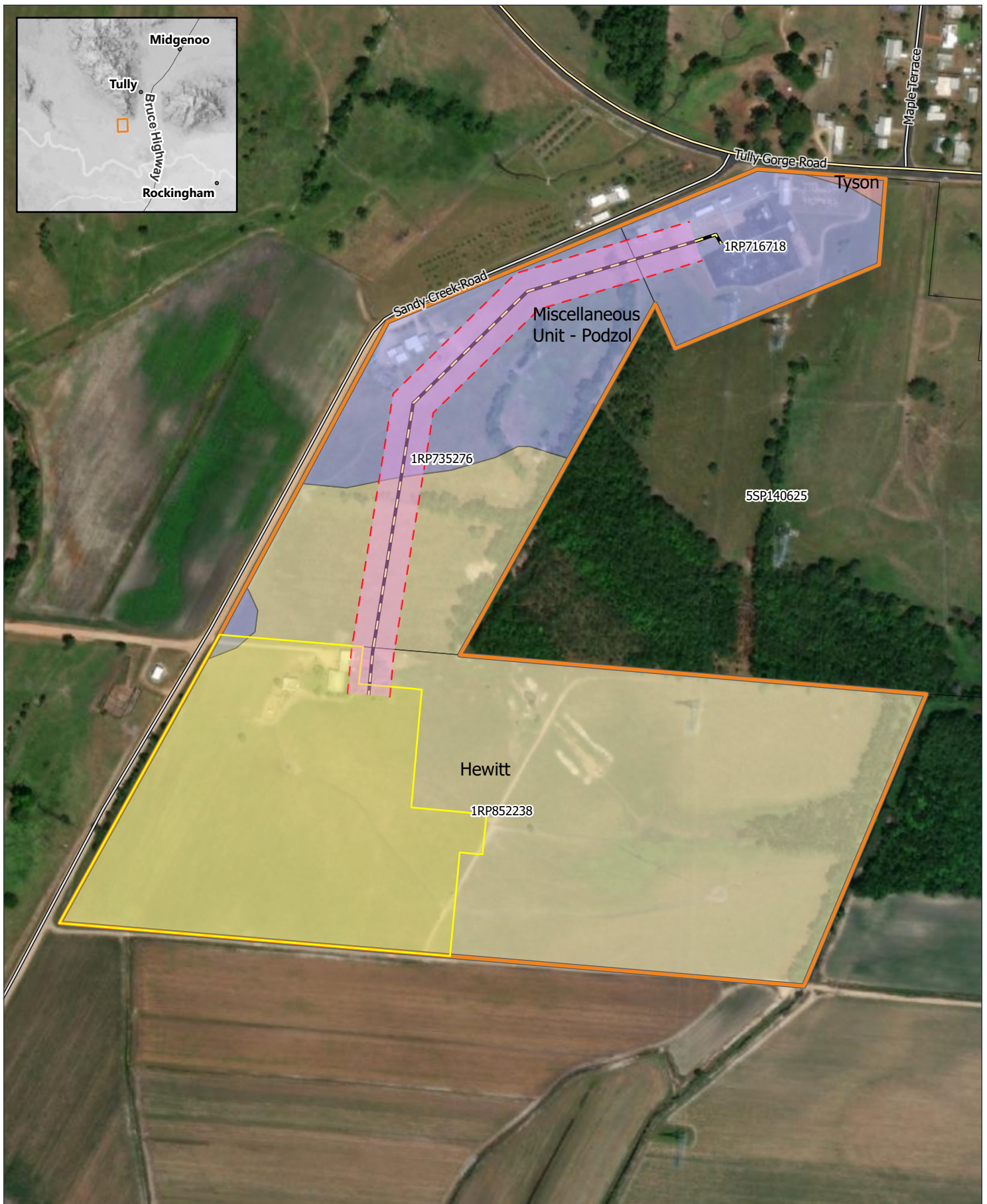
Soil	Landform	Major distinguishing features	Australian Soil Classification
Hewitt	Floodplain and swamps	Sapric loamy A horizon, grey whole coloured or mottled, silty clay B horizons	Hydrosols
MSC	-	Miscellaneous type of mapping unit, used to identify areas not typically assessed in detail.	Podosols
Tyson	Upper slope of fans	A gradational or uniform textured soil with a red massive B horizon. On granite fans with rainforest vegetation	Kandosols

The Hewitt soil series is described as having variable topsoil depths, from 9–80 cm thick, consisting of black to dark grey, sapric to fibric loams to clay loams. The terms sapric and fibric refer to peat materials, where fibric is undecomposed or weakly decomposed organic materials whilst sapric is strongly to completely decomposed organic material. Hewitt subsoils comprise brown to grey, clay loam to medium clays with mottling due to their commonly waterlogged status.

No soil sodicity was identified in the recorded analytical data, however soil pH is consistently acidic (<5.0) throughout the profile, with high presence of hydrogen and aluminium cations.

Due to the lack of information on the MSC soil, relevant to the proposed grid connection route north of the development footprint, it has been conservatively assumed that sodic, dispersive soils could potentially be disturbed by the Project.

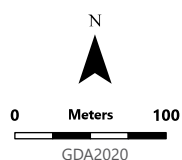
The Project Area is mapped as Bm(p4) from the national mapping in the Atlas of Australian Acid Sulfate Soils (Fitzpatrick et al 2011) which identifies an inland acid sulfate soil (ASS) mapping unit that indicates a low probability of occurrence containing Potential Acid Sulfate Soil (PASS) materials. This unit has a low confidence and is a provisional classification inferred from surrogate data with no on ground verification.



Soils of the Cardwell-Tully Area, North Queensland

Figure 5.1

DWG No: RWE-002-033 [A]
 DATE: 14/05/2026
 DRAWN: KB,JC
 REVIEWED EJ
 SCALE (A4): 1:5,000



- | | | |
|-------------------------------------|-----------------------------|-------------------|
| Project Area | Soil Types | Main Road |
| Development Footprint | Hewitt | Local Road |
| Proposed Transmission Line Corridor | Miscellaneous Unit - Podzol | Cadastral Parcels |
| 20m exclusion zone | Tyson | |
| Proposed transmission line | | |

5.3 Vegetation and Biodiversity

The majority of the Project Site has been subject to prior clearing associated with established rural, rural residential and infrastructure uses, with a large portion of the site remaining in a cleared condition.

Vegetation within the Project Site was ground-truthed during ecological survey in November 2024. Ground-truthed regional ecosystems (GTREs) within the Project Site are summarised in **Table 5.2**.

Table 5.2: Ground-truthed regional ecosystems

Regional Ecosystem	VM Act Status	Category	Description
7.3.5	Least Concern	B, C	<i>Melaleuca quinquenervia</i> and/or <i>Melaleuca cajuputi</i> subsp. <i>platyphylla</i> closed forest to shrubland on poorly drained alluvial plains
7.3.7a	Endangered	C	<i>Eucalyptus pellita</i> and <i>Corymbia intermedia</i> open forest and woodland. Poorly drained alluvium, including seasonal swamps. Contains Palustrine. (BVG1M: 9e).
Non-remnant	None	X	Non-remnant

No State or Commonwealth threatened flora species or vegetation aligning with the key diagnostic criteria for Commonwealth listed Threatened Ecological Communities (TEC) were identified within the Project Site.

No threatened fauna were observed during the one ecological survey conducted in November 2024.

5.4 Hydrology

The Project Site is located within the Wet Tropics Region, which is part of the Great Barrier Reef catchment identified under the *Great Barrier Reef catchment and river basins* map (Queensland Government, 2018). The Project Site is also mapped within the Tully catchment area, where the majority of the catchment is drained by the Tully River, characterised by steep ranges transitioning into coastal floodplains.

A Great Barrier Reef wetland protection area is located across the eastern extent of the Project Site, spanning through all subject land parcels. The wetland itself is predominantly located within the adjacent Lot 5 on SP140625 and is also identified as a wetland of high ecological significance (HES).

The Project Site contains several surface water features, including:

- Three unmapped watercourses under the *Water Act 2000*, that flow into the wetland area within Lot 5 on SP140625
- One of the unmapped watercourses is additionally mapped as a low impact (green) waterway for waterway barrier works under the *Fisheries Act 1994* and traverses both Lot 1 on RP735276 and Lot 1 on RP852238
- A mapped watercourse identified as an unnamed tributary of Tully River (Sandy Creek), located along the eastern boundary of Lot 1 on RP852238 and additionally mapped as a moderate impact (amber) waterway for waterway barrier works.

6. Project Infrastructure

The Project comprises the construction, operation and decommissioning of the BSF and OHTL. This section of the report provides an overview of the construction and operational activities of the Project, including details on the Project infrastructure, to provide context for the scope of the decommissioning process (**Section 7**) and cost estimation (**Section 8**).

A summary of the major components and the estimated construction footprint (i.e. disturbance footprint) is provided in **Table 6.1**. Further descriptions of infrastructure associated with decommissioning at the end of construction and end of operations are included in **Section 6.1** and **Section 6.2**.

Table 6.1 Summary of Proposed BESS Components and Associated Construction Disturbance

Component	Number	Disturbance area
Temporary workspaces for OHTL poles (within cleared areas)	5	~0.2 ha
OHTL access track	1	~0.3 ha
BSF	1	8.5 ha

6.1 Construction

There are no stand-alone facilities and/or areas that will need to be decommissioned post-construction.

All temporary construction activities for the BSF and OHTL will be undertaken within the 9 ha and may include construction compounds and site offices, workshops, storage, and other construction-related structures and amenities. The construction sequencing will either remove or repurpose these structures or areas as part of the overall construction program. It is anticipated that only minor areas are required to be stabilised/rehabilitated/landscaped as per the Project ESCP and RMP. Most of the Development Footprint will be for operational use including the temporary laydown areas for use during construction as these hard stand areas will remain in place following construction for future use.

The construction methodology for the OHTL has not been finalised but is likely to consist of an access track that will remain during operation, temporary workspaces i.e. at the location of each OHTL poles that will be disturbed during construction and the electrical pole footings. Access to the OHTL construction area will be via the BFS. The OHTL has been designed to span the waterway and direct impacts to the waterway are avoided.

6.1.1 BSF

Construction of the BSF is estimated to be undertaken over an 18-month period, subject to final equipment selection, construction methodology and appointment of construction contractor(s). **Table 6.2** provides a summary of the main construction stages.

Site Entrance

Access to the facility will be via the existing local road network with upgraded access proposed from Sandy Creek Road.

Table 6.2: Construction stages

Stage	Overview
<p>1 Site preparation</p>	<p><i>Vegetation clearing</i></p> <p>Although the Site consists of open grazing land, vegetation within the development footprint would be removed prior to construction works commencing. The clearing methodology has not yet been determined, however, clearing will likely be undertaken through mechanical methods that are suitable for the applicable environmental conditions. The types of machinery will be determined prior to construction by the relevant contractor.</p> <p><i>Existing infrastructure</i></p> <p>The existing dwellings and sheds on the Project Site will be assessed for suitability to be repurposed as O&M areas for Project operation. Where existing structures cannot be repurposed, they will be removed.</p> <p><i>Earthworks</i></p> <p>Civil works will be required to prepare the Project Site for construction of the BESS and ancillary facilities. Excavation and filling will be required to make the site level and cater to stormwater management requirements. Cut and fill volumes and battery design will be finalised during detailed design.</p>
<p>2 Construction</p>	<p><i>BESS Bench</i></p> <p>If relevant, topsoil will be removed and stockpiled on site for use in landscaping and rehabilitation once construction is completed.</p> <p>Where the quality of material is acceptable, excavated material would be used as backfill and compacted during the civil works program.</p> <p>Gravel sheeting will be applied to the BESS bench area.</p> <p><i>Access Roads</i></p> <p>New internal access roads will be constructed for delivery of equipment and material and ongoing maintenance activities. The access roads would be up to 6 m wide and connect the BESS compound entrance to the Project Site frontage at Sandy Creek Road.</p> <p>Any topsoil would be removed for use elsewhere where applicable, and the access roads will be finished with compacted gravel. A bitumen crossover will be constructed in accordance with the appropriate standards between Sandy Creek Road and the Project Site boundary.</p> <p><i>Battery Units</i></p> <p>The battery units and MV transformers would be installed on either screw piles, piers or concrete pad formations (to be determined through detailed design phase).</p> <p>Each BESS unit is expected to be 8.6 m in length, 2.8 m in height and 1.9 m wide.</p> <p>The battery units would be transported to Project Site via heavy vehicles and craned onto their concrete footings for anchoring. The associated transformers would also be trucked to site and arranged onto footings via mobile crane.</p> <p><i>Storage and Operation Area</i></p> <p>Areas will be designated on-site for the storage of materials in open air laydown, for use as required during operations.</p>

Stage	Overview
	<p><i>Switchgear Control Room</i></p> <p>A switchgear control room will be manufactured off-site and delivered to the BESS bench via trucks. The control building would sit on suitable concrete footings with trenches and conduits for the cabling entering the building.</p> <p><i>Perimeter Fencing</i></p> <p>Fencing will be erected at the perimeter of the BESS area, switching station and O&M area for safety and security reasons.</p> <p><i>Underground cabling</i></p> <p>Underground cabling within the BESS bench would be installed via open trenching, undertaken in accordance with relevant Australian Standards and marked accordingly. Upon installation of the cabling, the trench will be backfilled with excavated material and the surface rehabilitated.</p> <p><i>Grid Connection</i></p> <p>The proposed OHTL to the existing Powerlink 132kV Tully Substation within Lot 1 on RP716718 will require five (5) OHTL poles and an access track approximately 5 m wide and 600 m long.</p> <p>The OHTL pole footings locations will have an “up to” 20 m x 20 m temporary workspace that will be disturbed for construction equipment such as cranes, excavators, conductor stringing equipment etc. The OHTL foundation will be up to 6 m deep and concreted. Where the quality of material is acceptable, excavated material would be used as backfill and compacted during the civil works program on the broader Site.</p> <p><i>Asset Protection Zone (APZ)</i></p> <p>The APZ will be established and maintained around the Project Site to a width of 48.1 m along the northern and eastern sides and 10 m along the western and southern sides. The APZ will be cleared of any vegetation and have a minimal earth or grass surface.</p> <p><i>Demobilisation</i></p> <p>Following completion of construction, all construction equipment will be demobilised from the site.</p>
3	<p>End of Construction Rehabilitation</p> <p>Rehabilitation would occur in stages throughout the construction program. Rehabilitation works comprising compaction and surfacing of the BESS bench area would occur once civil works have been completed. Further rehabilitation of the site, including disposal of waste materials (at an appropriately licensed waste facility) would occur once equipment installation and construction has been completed.</p>
4	<p>Operation</p> <p>The BESS will be in operation 24 hours a day, every day of the year. O&M activities may occasionally extend beyond daylight hours for corrective maintenance activities as required.</p> <p>The site will be remotely monitored 24 hours a day.</p>
5	<p>Decommissioning</p> <p>The Project is intended to operate for a period of 20 years. Following this period a determination will be made whether to:</p> <ul style="list-style-type: none"> • Extend the life of the existing infrastructure with increased maintenance, refurbishment and/or replacement of certain components; or • Repower the site with new infrastructure; or

Stage	Overview
	<ul style="list-style-type: none"> Decommission the infrastructure and rehabilitate the site. For further information refer to Section 7.1 .

6.1.2 OHTL Corridor and Access Tracks

A single access track to facilitate the construction of the OHTL and for operational access will be construction within the OHTL corridor with access from the BSF.

The OHTL pole footings locations will have an “up to” 20 m x 20 m temporary workspace that will be disturbed for construction equipment such as cranes, excavators, conductor stringing equipment etc. The OHTL foundation will be up to 6 m deep and concreted. Where the quality of excavated material is acceptable, it would be reused during the civil works program on the broader Site.

6.2 Operation

6.2.1 BSF

The BSF area (~8.5 ha) will consist of consist of:

- Up to 188 battery units
- Switch rooms
- Inverters may be incorporated as part of the battery units or there may be separate Power Conversion Units (PCU) that convert the DC energy from the battery units
- Two lightning arrestors up to 20 m in height
- Stormwater drainage systems
- A perimeter road will be provided for operations, maintenance and emergency response.
- An acoustic wall of 6 m in height has been included with the design, this is located directly on the northern perimeter of the BESS units. Subject to further design enhancements of the BESS units to reduce noise emissions, the acoustic wall may not be required.

Fencing, including grids and gates, will be installed within the Site boundary to manage access and ensure safety during all Project phases.

Water sourcing for the construction of the Project has not been confirmed at this stage. Relevant permits will be sought for the selected water sourcing strategy in future stages of the Project.

The Site is intended to be self-sufficient for power generation during construction (i.e. no grid connection). Electrical infrastructure will be co-located and may include generators, solar power, and onsite small-scale BESS'. Ablution facilities for the construction workforce will be co-located with the BSF. Design specifications for power generation sources/facilities and ablation facilities will be determined in future stages of the Project.

Site entrance

The Project will require access for operational and decommissioning activities as per **Section 6.1.2**.

6.2.2 OHTL Corridor and Access Tracks

A single access track approximately 5 m wide and 600 m long to facilitate operational access and maintenance of the OHTL.

7. Decommissioning Process

Decommissioning and Demolition of a BSF is a multi-step process that requires careful planning and coordination. Prior to the start of work, the appropriate waste management pathway for all materials must be defined. The goal is to maximise reuse and repurposing wherever possible and recycling in full compliance with the local safety and environmental regulations, while properly disposing of any hazardous or non-recyclable components.

The decommissioning sequence involves the following activities (further detail of these is set out in the PBRs):

1. De-energisation and Isolation.
2. Module Removal and Packaging.
3. Infrastructure Disconnection.
4. Site Logistics and Removal
5. Material Disposition
6. Site Restoration

An overview of the decommissioning process considerations is discussed in the below sections.

7.1 End-of-life Options

End-of-life (EOL) Options will be investigated prior to potential full decommissioning which, for a BSF using Lithium Iron Phosphate (LFP) batteries, revolve around extending life, repurposing, recycling, or decommissioning. The likely options are:

1. Repowering to extend the life of the facility. Instead of closing the facility, it may be economic to extend the life of the facility by replacing or augmenting battery modules while keeping the rest of the infrastructure.
2. Decommissioning
 - a. Reuse of batteries for another purpose. Batteries retired from grid scale BSF are likely to still retain 60% capacity and can potentially be reused in lower-performance applications such as commercial backup power, EV charging buffers, microgrids or community storage.
 - b. Decommissioning of BSF and recycling of battery units.

The following sections discuss the strategy for full decommissioning of the BSF and application of the waste minimisation and resource management hierarchy.

A Preliminary Battery Recycling Strategy (Attexo, 2026f) has also been prepared for the Project addresses the decommissioning outcomes applicable to the reuse, recycling and recovery of battery components within State Code 27.

7.2 End of Construction Decommissioning Elements and Methods of Removal

At the end of construction decommissioning will involve demobilisation of people, equipment and removal of temporary construction facilities not required for permanent operations. These temporary construction facilities will be with the disturbance area of the BSF.

A summary of the key decommissioning elements and potential methods of infrastructure removal is provided in **Table 7.1**. Waste management for key infrastructure elements is discussed in **Section 7.5** and rehabilitation outcomes are discussed in **Section 7.7**. Key decommissioning of indicative elements and associated methodologies will be further investigated and documented within the ECDMP, which will be prepared prior to commissioning of the project.

Table 7.1: End of construction key decommissioning of indicative elements and potential methods of removal

Key Element	Components	Constituents	Indicative Removal / Disassembly Methodology and Options
Construction compound and facilities	Site offices, amenities, storage containers, workshops and laydown areas	Portable buildings, shipping containers, utilities connections, storage areas	Disconnect temporary services. Remove portable structures by truck or crane for reuse.
Temporary access and civil infrastructure	Access tracks, temporary drainage and earthworks	Gravel roads, aggregate surfacing, temporary drainage channels, sediment basins (if required), imported fill	Remove temporary roads and drainage infrastructure not required for operations. Reuse suitable materials onsite or remove offsite. Regrade land and restore natural drainage patterns (if required).
Temporary utilities and construction services	Power, water, wastewater and fuel storage systems	Generators, switchboards, cabling, water tanks, pumps, temporary pipework, fuel tanks, bunding, portable sanitation facilities	Isolate and disconnect services. Remove fuels, chemicals and wastes. Dismantle and remove equipment for reuse, recycling or disposal through licensed contractors.
Temporary environmental, security and safety infrastructure	Fencing, lighting, monitoring equipment, erosion and sediment controls	Temporary fencing, gates, security cameras, lighting, sediment fences, erosion control measures, signage	Remove fencing, lighting, monitoring equipment and environmental controls once no longer required.

7.3 End of Operations Decommissioning Elements and Methods of Removal

RWE are expected to own the land prior to the construction of the BSF and OHTL. RWE has undertaken consultation with key stakeholders and the community as part of preparing applications for the Project.

The final land use will be consistent with the surrounding land uses and rehabilitated in accordance with the Project’s RMP (to be developed) and discussed in **Section 7.7**. This is an adaptive management plan, which will be further refined in future rehabilitation plans, along with the ECDMP and EODMP.

The types of infrastructure that are expected to remain at decommissioning are summarised in **Table 7.2**. RWE will evaluate the suitability of these decisions in the decommissioning process end of operations. Discussions will be held with the future landholder/land manager prior to decommissioning to determine what will be retained.

Table 7.2: Infrastructure expected to be retained

Infrastructure type to be retained by landowner	Commentary
Potential opportunities	
Site entrance and access tracks	Access tracks used for the BESS may be useful for ongoing Site use.
Concrete foundations and hardstands	Hardstands may form an integral part of sustaining farming operations.

Infrastructure type to be retained by landowner	Commentary
Potential opportunities	
Operational and maintenance storage sheds	Operational and maintenance storage buildings may be advantageous to landowners to support farming operations.

A summary of the key decommissioning elements and potential methods of infrastructure removal is provided in **Table 7.3**. Waste management for key infrastructure elements is discussed in **Section 7.5** and rehabilitation outcomes are discussed in **Section 7.7**. Key decommissioning of indicative elements and associated methodologies will be further investigated and documented within the EODMP, which will be prepared during the operational phase of the project.

It is expected that the redundant O&M facilities (including offices, laydowns and ablution facilities) would be used during the decommissioning stage. However, additional temporary facilities during decommissioning are still likely to be required to support a workforce smaller than needed for construction .

Table 7.3: End of operations key decommissioning of indicative elements and potential methods of removal

Key Element	Components	Constituents	Indicative Removal / Disassembly Methodology and Options
Unsealed access tracks	Unsealed tracks	Crushed rock / possibly geotextile separators / geogrids on weaker ground	If tracks are not to be retained by the landowner or require partial rehabilitation, excavate using excavator and dumper trucks. Work from end point back to access point. Remove offsite via tipper truck.
Sealed track (bitumen)	Wearing course	Asphalt/bitumen, aggregate	Mill or excavate asphalt using road profiler or excavator. Load to trucks for recycling or disposal.
	Basecourse	Crushed rock, gravel	Excavate using excavator and loader. Screen and reuse onsite where possible or transport offsite.
	Sub-base	Compacted gravel, engineered fill	Remove to required rehabilitation depth. Regrade remaining material.
Buildings	Switching rooms, offices, workshops, warehouses, etc.	Timber / brick / prefabricated panels / glass / steel / concrete	Internal contents to be removed manually, recycled where possible, and taken off site via tipper truck. The switch room is portable and will be removed from the Project Site and repurposed. If buildings are not to be retained by the landowner, utilise an excavator to demolish buildings (if not modular and buildings cannot be repurposed). Remove offsite via low-loader or tipper trucks. If the concrete slab is not to be retained by the landowner, remove and break up concrete. Remove offsite via tipper truck.
Site services (buried, above)	Power generation, cables, pipes, sewage treatment plants, septic systems, water	Copper, aluminium, fibre optic, plastic, rubber sheaths	Isolate electrical power prior to removing cables. Underground services to remain in situ if 0.6 m below ground and do not pose a contamination or safety risk (to be reassessed in the EODMP).

Key Element	Components	Constituents	Indicative Removal / Disassembly Methodology and Options
ground, overhead)	treatment plants, water tanks		<p>For underground services that are to be removed:</p> <ul style="list-style-type: none"> Excavate using appropriate safe work methods Clean soil and topsoil to be temporary stockpiled and used as fill after site services are removed Site services to be removed offsite via truck. <p>Sewage treatment plant, water treatment plant, associated tanks and generators to be removed offsite via on low-loader trucks.</p> <p>If concrete slab is not to be retained by the landowner and will be removed down to 0.3m below ground level.</p> <p>Remove components offsite via low-loader and tipper trucks.</p>
Transformers	Transformer	Electrical components, oil	<p>Minor dismantling of MV transformers and lift onto trucks for offsite removal.</p> <p>HV transformer will be dismantled and cut up on site into small parts that can be transported on standard trucks</p> <p>Drain oil first and contain in IBCs. Drained oil will be filtered onsite and reused if possible. Filtered oil will be transported offsite for disposal if not reused.</p>
	Concrete Foundations	Concrete, steel reinforcement	<p>Foundations removed by excavator / hydraulic breakers.</p> <p>Steel burning equipment will be required to cut through reinforcing bars.</p>
BESS	Battery components (battery modules, racks, cabling, etc.)	Batteries (type to be determined), copper, aluminium, fibre optic, plastic and rubber sheaths	<p>The decommissioning process will include:</p> <ol style="list-style-type: none"> Discharge all energy from the BESS units, de energise and isolate. Remove all battery modules (that contain the Battery Cells) from the BESS units and prepare for transport to a tesla facility for recycling or reuse. Drain and remove all remaining fluids from the BESS units (Refrigerant) by certified professionals. Removal of BESS units from site using cranes and low loader trucks. Transported either to a Tesla facility or a 3rd party facility for complete dismantling for recycling/reuse. <p>Controlled removal of all components using cranes and specialist contractors. Remove offsite via low-loader, tipper or standard trucks.</p>
	System container housing, power conversion system, HVAC thermal management, fire suppression systems, etc.	Electrical components, iron, steel, copper, cabling, hazardous contaminants, other miscellaneous (fencing, lighting, etc)	

Key Element	Components	Constituents	Indicative Removal / Disassembly Methodology and Options
			More detail on the reuse, recycling and recover of material is contained in the Preliminary Battery Recycling Strategy (Attexo, 2026f)
	Concrete Foundations	Concrete, steel reinforcement	Foundations removed by excavator / hydraulic breakers. Steel burning equipment will be required to cut through reinforcing bars.
Substation	Power Transformer(s)	Steel tank, copper windings, insulating oil, radiators	De-energise and isolate. Drain and remove oil for reuse or disposal. Disconnect electrical connections and lift transformers onto transport vehicles using cranes. Recycle steel and copper components where practicable.
	Switchgear and High Voltage Equipment	Circuit breakers, disconnectors, busbars, instrument transformers, surge arresters, steel support structures	Isolate and disconnect all equipment. Recover any insulating gases where applicable. Dismantle and segregate metals for recycling. Remove support structures and foundations if required.
	Control Building and Auxiliary Equipment	Prefabricated building, protection and control panels, SCADA equipment, HVAC systems, cabling	Remove electrical and communications equipment. Dismantle building structure and remove associated services. Recycle metals and dispose of electronic waste through licensed facilities.
	Foundations, Earthing and Underground Services	Reinforced concrete foundations, copper earthing grid, underground power and communications cables, cable trenches	Excavate and remove foundations where required. Recover earthing conductors and cables where practicable. Break out concrete structures and backfill excavations with suitable material before site rehabilitation.
132 KV OHTL	Conductors and Overhead Hardware	Aluminium conductor, steel-core conductor (where applicable), insulators, crossarms, fittings, vibration dampers	De-energise and isolate line. Remove conductors using tensioning equipment and reels. Dismantle insulators and hardware. Segregate aluminium and steel components for recycling.
	Concrete Poles	Precast reinforced concrete poles, pole-top hardware	Remove attached conductors and fittings. Extract poles using crane or excavator. Poles may be reused, recycled as aggregate, or disposed of at an approved facility.
	Concrete Foundations	Reinforced concrete footings, anchor blocks (if present)	Excavate foundations to the depth required by EODMP. Break up concrete and recover reinforcing steel for recycling. Backfill and compact excavations.
Hardstand	BESS, substation and O&M	Compacted granular material / concrete plinths	If not retained by the landowner, remove using excavators, dumper trucks and/or tipper trucks. Remove offsite via tipper trucks.

Key Element	Components	Constituents	Indicative Removal / Disassembly Methodology and Options
Underground cables	Cables	Copper, aluminium, fibre optic, plastic and rubber sheaths	<p>Remain in situ if >0.6 m below ground and do not pose a contamination or safety risk (to be reassessed in the EODMP).</p> <p>For cables to be removed:</p> <ul style="list-style-type: none"> Remove using excavator to pull out of trench or duct and load onto tipper trucks Clean soil and topsoil to be temporary stockpiled and used as fill after cables are removed Remove offsite via tipper truck.

Source: Welstead, Hirst, Keogh, Robb, & Bainsfair, 2013; Electric Power Research Institute, 2017; NYSERDA, 2021; Australian Battery Recycling Initiative & Clean Energy Council, n.d.

7.4 Traffic Management

A Traffic Impact Assessment (TIA) has been prepared by Cambray Consulting (Cambray Consulting, 2026d). The TIA considers the anticipated access and traffic generation impacts during construction, operation and decommissioning phases of the Project. The TIA includes the following:

- Overview of the Route Assessment and Project Transport Route Options
- Location and form of intersections between the State Controlled Road Network and the Local Road Network expected to be used by construction and operational traffic
- Review of the proposed access to the BESS site from the Local Road Network
- Summary of existing road features (turn treatments and road corridors)
- Overview of the background traffic at key locations
- Anticipated traffic generation for the construction and operational phases
- Qualitative assessment of the development generated traffic impact
- A turn warrant assessment from State Controlled Road Network into Local Road Network.

Engagement with relevant regulatory authorities will be undertaken prior to construction and end of operations decommissioning to determine whether any approvals are required, including:

- CCRC and other relevant local governments (if applicable) to understand concerns and requirements from decommissioning haulage on local roads.
- DTMR to discuss impacts of decommissioning traffic on state transport infrastructure (road and rail), including:
 - OSOM loads (if required)
 - mitigation requirements
 - any separate approvals required directly from DTMR (for example constructing upgrades or placing third-party electricity infrastructure in state-controlled roads).
- Relevant railway managers to discuss approval requirements for taking OSOM loads over railway corridors or interfering with railway corridors (if required)
- The National Heavy Vehicle Regulator regarding approvals for OSOM movements (if required).

A Traffic Management Plan will also be prepared prior to the commencement of the decommissioning activities.

7.5 Waste Management

As discussed in **Section 4.3**, the Project will seek to maximise the recycling, repurposing and/or reuse of materials during the decommissioning process at the end of construction and end of operations. Accordingly, a key objective is to minimise materials destined for landfill and to implement the full decommissioning of the project as efficiently and sustainably as possible.

End of waste codes will be reviewed while preparing the ECDMP, EODMP or associated Waste Management Plans to determine whether any waste generated by decommissioning activities can be used as a resource under the WRR Act. Currently, there do not appear to be any relevant end of waste codes that relate to decommissioning activities covered by this report.

7.5.1 Waste Streams

Waste generated from decommissioning at end of construction and end of operations of the Project will primarily consist of the following overarching waste streams:

- Construction and demolition waste: inert waste such as bricks, pavers, ceramics, concrete, glass, steel, or general waste that does not biodegrade or decompose. This waste may be suitable for recycling, resource recovery, or reprocessing.
- Regulated waste: waste that contains hazardous characteristics and is classified as regulated waste under the EP Regulation. There are two categories of regulated waste: Category 1 (highest risk) and Category 2 (moderate risk). Regulated waste includes electrical waste (e-waste).
- General waste: waste that does not fit into the above categories, including organic and putrescible wastes.

7.5.2 Reuse, Recycling and Recover Options (Batteries)

A Preliminary Battery Recycling Strategy (Attexo, Preliminary Battery Recycling Strategy: Tully Battery Energy Storage System, 2026f) has been prepared for the Project. Specifically, this report addresses the decommissioning outcomes applicable to the reuse, recycling and recovery of battery component within *State Code 27: Battery storage facility development* (State Code 27) under the Planning Act's *State Development Assessment Provisions* (v3.5).

This high-level strategy is intended to be flexible and will be further refined throughout the operational life of the Project as new technologies and recycling processes emerge.

7.6 Contamination and Remediation

Management plans for the construction (e.g. Construction Environmental Management Plan) and operation (e.g. Operational Environmental Management Plan) of the Project contain details on the procedures and protocols for responding to unexpected environmental incidents. Procedures and protocols will be included in the Project's Construction Environmental Management Plan. These protocols include responding to unexpected environmental incidents, such as accidental spills, ensure quick, effective action to minimise harm to people, wildlife, and the environment, while maintaining compliance with regulatory requirements. Similar protocols would also be included in the ECDMP, EODMP, or related management plans.

Any potential contamination during the decommissioning process will be identified and cleaned up / remediated, as required (refer **Section 4.2**).

7.7 Rehabilitation

This Section discusses high-level overarching rehabilitation principles for the end of construction and end of operations of the Project.

Rehabilitation activities and associated outcomes will be carried out to "make good" the land in accordance with development conditions and future land use opportunities.

In accordance with State Code 27 PO11 the BSF will be constructed to maintain the fertility and soil attributes of high-quality agricultural land and to enable decommissioning at the end of operations to return the land to pre-construction agricultural land productive value.

Project rehabilitation activities are anticipated to include:

- Stockpiling topsoils and other suitable soils for use in rehabilitated areas with further information on soil management presented in **Section 7.7.2**
- Revegetation at reinstatement via hydroseeding, hydro-mulching or other suitable method for pasture establishment,
- Site stabilisation in accordance with the Preliminary Erosion and Sediment Control Plan, Tully Battery Energy Storage System (Attexo, 2025a) and the *Best Practice Erosion and Sediment Control Manual* (IECA, 2025).

Overarching rehabilitation principles and management strategies for the end of construction and end of operations of the Project are discussed in the below sections.

7.7.1 Rehabilitation Principles

Overarching rehabilitation objectives include rehabilitating the land to a sustainable land use that is:

- Safe to humans, wildlife and livestock
- Non-polluting (i.e. no residual contamination)
- Stable
- Sustainable landform (over time).

The following principles will guide all rehabilitation activities:

- To reduce the risk of erosion, the Project will develop and implement a Sediment and Erosion Control Plan (ESCP) to meet the Best Practice Erosion and Sediment Control Standard (IECA, 2025). A Preliminary ESCP (Attexo, 2025a) has been prepared, which will be further developed by the Construction Contractor.
- The soil management objectives and measures in **Section 7.7.2** to assist in returning the land to pre-construction agricultural land productive value are to be incorporated into relevant construction and decommissioning management plans.
- An RMP will be prepared will be developed as part of the ECDMP and EODMP.
- A Site Stabilisation Plan – Operations (SSPO) will be prepared prior to commencement of Project operations and will be implemented during operations and end of operations decommissioning.
- Weed management measures will be required at all Project sites before, during and after revegetation activities, generally in accordance with the Vegetation and Fauna Management Plan.

7.7.2 Soil Management

The Project is located on high-quality agricultural land². To enable decommissioning at the end of operations and to return the land to pre-construction agricultural land productive value (State Code 27 PO11) the BSF will be constructed to maintain the fertility and soil attributes of high-quality agricultural land. Soils present on the Project Site, their characteristics and an agricultural land impact analysis is presented in the Agricultural Land Assessment report (Attexo, 2026g).

The objectives and measures outlined below (also contained in the Agricultural Land Assessment report) are to be incorporated into relevant construction management plans (e.g. ESCP, CEMP, RMP) and civil design of the Project. Attention will be given to the identification and protection of topsoil resources to enable the reinstatement of the site to maintain the fertility and soil attributes of the land.

Topsoil stripping is one of the most important soil management measure to enable effective rehabilitation. In general the aim is to recover as much topsoil as possible due to its importance in overall soil fertility, whilst minimising

² High quality agricultural land, means strategic cropping land, and priority agricultural areas, or Agricultural Land Classification (ALC) Class A and Class B land identified on the SPP interactive mapping system, Development assessment mapping system (DAMs) or local planning instruments.

introduction of any potentially constrained subsoil materials. The depth of stripping is therefore critically important to be able to maintain the soils fertility at reinstatement.

The objectives of soil management can be summarised as:

- Topsoil management
 - preserve as much of the topsoil as possible
 - ensure topsoil is not degraded during construction and following reinstatement
 - ensure topsoil is not contaminated with other soil and spoil materials
- Subsoil management
 - prevent contamination of topsoil
 - prevent degradation of the subsoil structure
 - avoid or ameliorate subsoil constraints immediately below topsoils
 - ensure reinstatement of soil horizons in the correct order and depths.
- Soil amelioration
 - used to correct a chemical constraint and is often used as a mitigation measure and / or to improve rehabilitation outcomes. The most common ameliorants are the use of gypsum to address sodicity and agricultural lime to neutralise acidic soils.
 - soil sampling may be required to understand the amelioration requirements for specific soils. The P-ESCP outlines soil sampling requirements for the Project.
- Long-term stockpiling
 - should be revegetated to protect from erosion and to maintain fertility (i.e. soil organic matter and biological activity). Long-term stockpiles need to be stable and be integrated into the site stormwater management where appropriate.
- Soil reinstatement
 - at reinstatement, whether that is at the end of construction or at the end of the Project, the site will be reprofiled to be consistent with the landform. Ripping or cultivation of the reinstated/reprofiled subsoil may be required to overcome any compaction that occurs during stockpiling and the reinstatement procedure.
 - upper subsoils may benefit from amelioration with gypsum to minimise the impact of sodicity. Subsoil should be covered with at least 0.1 m of topsoil. Where stripping and stockpiling of topsoils will potentially increase the sodicity and potential surface condition issues gypsum should be applied prior to stripping.
 - topsoil from long term stockpiles would benefit from the addition of fertilisers and organic material such as composts to boost fertility, improve structure and biological activity, particularly where stockpiles have been higher than about 0.3 m.

7.7.3 End of Construction Rehabilitation

Those areas which are not required for the ongoing operation of the Project will be rehabilitated to pre-disturbance land use, as soon as practicable following construction. Decommissioning and rehabilitation activities at the end of construction intend to support the effective continuation of existing agricultural land uses, with RWE currently looking to continue grazing cattle on the Project area following construction.

The approximate rehabilitation and revegetation opportunities are anticipated to include temporary construction disturbance such as areas surrounding the BSF that were used for erosion and sediment control (ESC) and construction works and temporary workspaces at each of the electrical pole footings associated with the construction of the OHTL.

Further details on rehabilitation aims and management measures are to be included in the RMP. Detailed rehabilitation objectives, completion criteria, and management actions will be developed as part of the ECDMP or related management plans (e.g. Rehabilitation Management Plan, Construction ESCP).

A Landscape Plan has also been prepared by Cusp Landscape Architecture + Urban Design and provides proposed landscaping treatments for the Project Site to appropriately screen Project infrastructure and minimise visual impacts.

7.7.4 End of Operations Rehabilitation

The following measures will be implemented to facilitate decommissioning of the Project area:

- An EODMP will be developed prior to the cessation of operations and will be implemented during the decommissioning phase.
- Sequential rehabilitation will be undertaken as soon as practicable following decommissioning activities.

At the end of the Project's operational life, infrastructure will be decommissioned and the Site rehabilitated to facilitate continuation of the current land use (i.e. agriculture), unless a viable alternative is identified through a review of end-of-life options (**Section 7.1**). This will occur in accordance with the relevant regulatory framework applicable at the time and in consultation with the relevant landowner. However, the following high-level outcomes consistent with the rehabilitation principles in **Section 7.7.1** are expected:

- Removal of all above ground infrastructure, except for any permanent roadways and other improvements as agreed by the landowner (e.g. access tracks, foundations, O&M buildings) as detailed in **Section 7.3**
- Areas which may present hazards to livestock during decommissioning will be temporary fenced to prevent livestock access and for safety reasons or the properties will be destocked
- Any potential contamination during the decommissioning process will be identified and cleaned up / remediated, as required
- Rehabilitate the land to restore any damage caused by infrastructure removal and restore the surface of the land to a suitable condition for pastoral or other agricultural use (soil management objectives and measures are presented in **Section 7.7.2**).
- Biosecurity risks and weeds are to be managed as per relevant legislation.
- Ensure the land is electrically safe and otherwise in a safe condition free from hazardous structures and material introduced as part of the Project.

Areas disturbed by the Project will be rehabilitated in accordance with the high-level principles and actions identified in **Section 7.7.1**. Detailed rehabilitation objectives, completion criteria, and management actions will be developed as part of the EODMP or related management plans (e.g. Rehabilitation Management Plan, Site Stabilisation Plan – Operations).

7.8 Decommissioning timeframes

7.8.1 End of construction

There will be progressive rehabilitation of temporary disturbed areas (as described in **Section 7.7.3**) in accordance with the stabilisation timeframes in the ESCPs and/or SSPO.

There are no specific standalone areas required to be decommissioned at the end of construction and any decommissioning works are contained within the operational footprint and undertaken during construction of the operational infrastructure.

End of construction decommissioning will occur following the completing of all civil and electrical installation work and will occur in parallel with site commissioning over approximately two (2) months. Monitoring of the rehabilitation and assessment of areas meeting the completion criteria will be undertaken in accordance with the Rehabilitation Management Plan (to be developed in future stages of the Project).

7.8.2 End of operations

Following the end of operations, decommissioning activities are estimated to take place over 38 weeks, plus an allowance for site mobilisation and demobilisation of up to 4 weeks based on the study report "2025 Energy

Technology Retirement Cost & O&M Estimate Review: Retirement cost estimate and O&M review for existing NEM-connected plants and emerging technologies (GHD, 2025):

- 2 weeks for decommissioning
- 32 weeks for demolition and dismantling,
- 4 weeks for rehabilitation (GHD, 2025).

Monitoring of the rehabilitation and assessment of rehabilitated areas to ensure it meets the completion criteria will be undertaken in accordance with the final Rehabilitation Management Plan (to be developed in future stages of the Project).

In accordance with the Final Rehabilitation Management Plan, optioneering and waste and resource assessments will be undertaken prior to the end of operations. End of operations decommissioning activities and associated timeframes will be further discussed in the EODMP.

8. Decommissioning cost estimation

The estimated cost of decommissioning at the end of construction will be included in the construction budget, and no construction-specific infrastructure separate from the operational infrastructure is proposed. Standard rehabilitation and stabilisation will be undertaken for temporary disturbance areas outside of the Project operational footprint that is standard practice for construction projects and in line with construction environmental management plans.

The end of operations decommissioning cost estimation for this Project is based on a July 2025 study by GHD (GHD, 2025) on the Retirement cost estimate and O&M review for existing NEM-connected plants and emerging technologies developed for the Australian Energy Market Operator (AEMO). The GHD cost estimate is a high-level summary of the retirement and / or recycling cost of decommissioning BESS facilities and represents an assessment of cost (**Section 8.1**) based on a typical 200 MW/4 hr BSF.

It should be noted that processes to recycle lithium batteries is expected to significantly improve over coming years due to the size of the opportunity as will the ability for industry to handle larger volumes of batteries and that reduced costs and improve material recovery are likely outcomes that may materially affect these initial decommissioning cost estimates.

8.1 Cost Estimate for Standard BSF

The decommissioning cost estimate from the GHD July 2025 study for the AEMO is used in this report and a summary of the cost estimate for a 200 MW/4 hr BSF is provided in **Table 8.1**. The cost estimate was based on the following high level key assumptions for retirement of BESS technology:

- Cost estimates for battery retirement are to AACE Class 5 level.
- Estimates for longer duration batteries were based on assumed scaling of the elements of the cost buildup that are correlated with energy storage quantity (e.g. number of battery modules) but not those elements which scale more with power output (fixed in this case) or those which are fixed costs.
- 50% of the mass of copper cabling (including insulation) has been assumed to be recoverable as copper metal.
- 50% of the recoverable copper is tied to the AC side (power delivery). The remaining 50% is assumed to be on the DC side and therefore proportional to the total quantity of energy storage (which differs from case to case).
- Recycling value is assumed to be limited to the copper cabling, which is assumed to be saleable at a price which is at the midpoint of a publicly available published range³.
- It is assumed that the battery is located in relatively close proximity to a site for disposal and site for recycling (i.e. relatively close to a population centre, <100km).

Table 8.1: End of operations BESS decommissioning estimate (GHD, 2025)

	200MW/4hr	Total
Decommissioning, Demolition & Rehabilitation Costs (\$/MW)	\$76,000	\$15,200,000
Disposal Costs (\$/MW) ⁴	\$27,000	\$5,400,000
Recycling Costs (\$/MW) ⁵	(\$9,000)	-\$1,800,000
Retirement Costs (\$/MW)	\$94,000	\$18,800,000
OHTL removal (\$120k-\$180k per km) (assuming 0.75 km)		\$112,500
Total Cost Estimate⁶		\$18,912,500

³ Latest scrap metal prices | What is your scrap metal worth?

⁴ Positive value indicating this element has caused an increase in the Retirement Costs as shown

⁵ Negative value indicating this element has resulted in a reduction in the Retirement Costs as shown

⁶ Does not include repurposing of assets such as O&M buildings, hardstands, batteries, etc.

As noted previously should cost-effective recycling approaches be developed and be available at the time of decommissioning, the retirement cost could be significantly lower due to the significant proportion (21-31%) of the cost allocated to battery (GHD, 2025).

9. Decommissioning Security Arrangement

RWE (the Proponent) will finance decommissioning for the end of construction and end of operations of the Project in accordance with statutory obligations. An overview of end of construction decommissioning, end of operations decommissioning security mechanisms and additional supporting documentation is provided in the below sections.

The meanings of the terms used in the Decommissioning Security Arrangement are set out below.

Table 9.1: Meanings of the terms used in the Decommissioning Security Arrangement

Term	Meaning
BESS Land	Lot 1 on RP735276 and Lot 1 on RP852238.
Decommissioning Amount	AUD \$18,912,500 (eighteen million, nine hundred and twelve thousand, five hundred Australian dollars), being the estimated end of life decommissioning cost recorded in section 8.1 of the DSR.
Decommissioning Guarantee	the on-demand guarantee provided by RWE Australia to the Incoming Purchaser as set out in Appendix 1.
Decommissioning Security Arrangement	Part 9 of this document including the Decommissioning Guarantee in Appendix 1.
DSR	the Decommissioning Security Report prepared for the Project Entity dated 4 June 2026.
Guarantee Period	the date specified in accordance with the Decommissioning Guarantee, as specified in Appendix 1, clause 1.1(b)(3).
Incoming Purchaser	a person who is sold, transferred or otherwise receives legal title to the BESS Land.
Project	the proposed Tully Battery Energy Storage System.
Project Entity	RWE Tully Battery Pty. Ltd. ACN: 694 427 953.
Related Body Corporate	a 'related body corporate' of a corporation within the meaning of section 50 of the Corporations Act 2001 (Cth)
RWE Australia	RWE Tully Battery Pty Ltd. ACN 626 156 894.

9.1.1 Decommissioning Finance

The Proponent finance decommissioning activities associated with the Project at both the completion of construction and at the end of the Project's operational life, in accordance with applicable approval conditions.

9.1.2 End of Construction

The Project does not involve temporary construction infrastructure such as accommodation camps, concrete batching plants, or other facilities requiring substantial removal and rehabilitation following construction. Accordingly, no decommissioning security is proposed at the completion of construction.

Management measures during construction will include site stabilisation, erosion and sediment control, and rehabilitation activities, which will be implemented in accordance with the relevant Project management plans and approval conditions.

9.1.3 End of Operations

The Project will be decommissioned at the end of its operational life in accordance with the decommissioning process (**Section 7**) and decommissioning cost estimation methodology (**Section 8**) outlined in this DSR, and in accordance with any applicable statutory requirements.

The proposed decommissioning framework includes:

- Preparation of an EODMP no later than six (6) months prior to the end of the Project's operational life.
- Removal of Project infrastructure, equipment and associated facilities in accordance with relevant statutory requirements.
- Implementation of decommissioning and rehabilitation measures identified in the EODMP.
- Provision of decommissioning security in accordance with the arrangements outlined in this DSR.

9.1.4 Decommissioning Security Arrangement

The Proponent considers that the proposed Decommissioning Security Arrangement satisfies the intent of State Code 27 PO35 through a land ownership-based security mechanism.

RWE Renewables Australia Pty Ltd currently holds an option to acquire the Project land. Prior to construction, the Proponent has the right to and will exercise the option and become the registered owner of the land on which the Project is located.

The key elements of the arrangement are:

- While the Proponent, or a Related Body Corporate of RWE Renewables Australia Pty Ltd, remains the registered proprietor of the Project land (i.e. the land owner), a separate Decommissioning Guarantee is not proposed. This is because the Proponent, as landowner, retains direct responsibility for and capacity to meet decommissioning obligations associated with the Project.
- The arrangement nonetheless incorporates a mechanism to ensure ongoing compliance with State Code 27 PO35 in the event of a future change in land ownership. Should the land be sold (including the Project), transferred or otherwise disposed of to an unrelated third party, the Proponent must provide on-demand Decommissioning Guarantee to that purchaser equal to the estimated decommissioning liability determined in accordance with the methodology set out in this DSR (refer to **Appendix 1**).
- This mechanism ensures that the security required by State Code 27 PO35 is activated and in place at the point it is needed, preserving compliance regardless of any future change in land ownership.

10. References

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Appendix A

Decommissioning Guarantee

Appendix 1: Decommissioning Guarantee

1.1 Operational Life of the Project

- (a) The Project Entity must provide written notice to any Incoming Purchaser of the expected end of operational life of the Project no later than 18 months before the expected end of operational life.
- (b) This notice must specify:
 - (1) the date on which the Project Entity expects the operational life of the Project to end;
 - (2) whether the Project Entity (in its sole discretion) will take steps to extend the operational life of the Project; and
 - (3) a date that is 1 year before the end of the operational life (or the extended operational life), being the date on which the Guarantee Period will commence.

1.2 Provision of Security

- (a) The Decommissioning Guarantee shall be an on-demand guarantee provided by the [SPV or Related Entity] to the Incoming Purchaser.
- (b) The Decommissioning Guarantee shall be in the amount of the Decommissioning Amount.
- (c) [RWE Australia] must provide the Decommissioning Guarantee for the full Decommissioning Amount to the Incoming Purchaser within 14 days of the Guarantee Period date and keep the Decommissioning Guarantee in place until any end-of-life decommissioning obligations as specified in this DSR are discharged.

1.3 Return of Guarantee

- (a) The Decommissioning Guarantee must be returned to the [RWE Australia] once end-of-life decommissioning is completed in accordance with this DSR.

1.4 Breach and Remedy

- (a) If end-of-life decommissioning is not carried out in accordance with this DSR, any Incoming Purchaser must give the Project Entity a reasonable opportunity to remedy the breach before any draw down occurs.
- (b) If the breach is not remedied within a reasonable time, the draw down process under clause 1.5 may occur.

1.5 Draw Down

- (a) If the Project Entity fails to remedy outstanding end-of-life decommissioning works after being given a reasonable opportunity to do so by any Incoming

Purchaser, the Decommissioning Guarantee may be drawn down only to the extent of the costs required to complete those works.

- (b) Any unused funds must be returned, and invoices and receipts provided for all works undertaken.



T.C. Beirne Building
Level 4, 315 Brunswick Street
Fortitude Valley QLD 4006

www.attexo.com.au