

27 April 2021

Major Projects
Department of Planning, Industry and Environment (DPIE)
Sydney NSW 2000

To whom it may concern,

RE: Independent Environmental Audit Sebastopol Solar Farm - April 2021

An Independent Environmental Audit was undertaken by Vantage Environmental Management Pty Ltd at the Sebastopol Solar Farm, in accordance with the requirements of Schedule 4, Condition 7 of the Project's Development Consent (Modification 1, July 2020) and conducted in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).

In reference to the finalised audit report, Beon Energy Solutions wishes to provide the following response to all audit findings, including recommendations and opportunities for improvement.

There were three (3) non-compliances identified with Development Consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

1. *Non-compliance No. 1 (SSF-IEA-21-NC1): Not all Aboriginal heritage items identified in Table 1 of Appendix 4 (and referred to in Schedule 3, Condition 17) of the Development Consent could be identified and recovered at the time of salvage works on 14 and 15 December 2020 as additional site disturbance from non-Project related agricultural activities (crop sowing and harvesting) had occurred between the time the Aboriginal Cultural Heritage Assessment Report (NGH Environmental, November 2018) was prepared, which listed the heritage items, and the commencement of salvage works. It was reported that the proponent was not in possession and/or control of the Project site at the time the cropping activities occurred. Notwithstanding this, it is considered that the proponent should have raised an internal investigation and informed DPIE and other relevant stakeholders that some previously identified heritage items could not be relocated at the time of the salvage program.*

Recommendation No. 1 (SSF-IEA-21-R1): In response to Non-compliance No. 1 the actions are recommended:

- a) *Advise DPIE and relevant stakeholders of salvage outcomes; and*

b) Complete required heritage reporting and prepare Aboriginal Site Impact Recording Form (ASIRF), as necessary, for inclusion within the Aboriginal Heritage Information Management System (AHIMS) database;

In response to Non-compliance recommendation 1a, a draft Aboriginal Cultural Heritage Salvage Report can be submitted to DPIE, as notification that identified heritage items could not be relocated at the time of the salvage program, if deemed necessary. A finalised version of the Report will be submitted shortly after the reburial of the salvage artefacts, which is scheduled for the coming months.

Additionally, in response to Recommendation 1b, NGH (the consultant responsible for the salvage program) have confirmed that impact site cards have been submitted to AHIMS for all the sites salvaged within the approved development footprint for the Sebastopol Solar Farm.

2. Non-compliance No. 2 (SSF-IEA-21-NC2): Section 5.1.2 of the Environmental management Strategy (EMS) was not implemented in accordance with Schedule 4, Condition 1 of the Development consent. Section 5.1.2 of the EMS stated: “During construction Beon will ensure that sufficient water for firefighting (minimum 20,000 L water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection) is stored in water tanks located on site adjacent to the internal access road”. It was confirmed that in excess of 20,000L of water that could be used for firefighting was held on site within water carts, however the proposed 20,000L tank would be installed to satisfy operational requirements as detailed in Schedule 3, Condition 25 of the Development Consent.

Recommendation No. 2 (SSF-IEA-21-R2): In response to Non-compliance No. 2, update EMS to confirm tank will be installed for operation, rather than construction, as per Development consent.

In response to Non-compliance No. 2, Beon have ordered and arranged for the 20,000 L water supply tank to be installed onsite in the coming weeks. This is an alternative resolution to that provided in the recommendation. Beon deemed this a more time and cost-effective response to the Non-compliance. Despite this not being installed at the time of construction commencement, Beon can confirm that sufficient water was available during vegetation clearing and continues to be utilised for onsite dust suppression and other site activities.

3. Non-compliance No.3 (SSF-IEA-21-NC3): Section 7.5 of the EMS was not implemented in accordance with Schedule 4, Condition 1 of the Development Consent as no evidence of the publication of newspaper advertisements and posting of newsletters and project updates on a prominent community noticeboard in Temora and Junee was identified during the audit.

Recommendation No. 3 (SSF-IEA-21-R3): In response to Non-compliance No. 3, prepare and publish required notifications or amend EMS to document only those stakeholder and community and engagement initiatives that can be reasonably and practicably achieved.

In response to Non-compliance No. 3, Beon has prepared and published a notification in the local newspaper Temora Express on Friday 9th April. Furthermore, this notification was also placed on the community noticeboard in Temora. Moving forward, Beon will review the stakeholder engagement initiatives and ensure that these are reasonably and practicably achieved.

In addition to the above noted non-compliances, the following continual environmental management improvement opportunities were identified during the audit:

- *Section 5.4.2, Table 5-1 and Table 2-2 could be updated in regard to the Fire Safety Study (FSS) to explain that the FSS has not been prepared as battery storage is not being constructed on the Project; and*
- *Review Project phone contact information, that is presented within the EMS and associated management plans to allow community to obtain Project-related information, to ensure the number is consistent in all relevant documentation.*

In response to these improvement opportunities, a review of the EMS and associated management plans will be undertaken.

To discuss these audit findings and responses further, please contact myself, Kirsten Lee at kirlee@beon-es.com.au.

Yours sincerely,

A handwritten signature in blue ink that reads "Kirsten Lee".

Kirsten Lee
Compliance, Sustainability and Stakeholder Lead
Beon Energy Solutions