

23 June 2022

ATTN: Major Projects
Department of Planning and Environment (DPE)
NSW 2000

To whom it may concern,

RE: Independent Environmental Audit Sebastopol Solar Farm (Operations) – June 2022

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 two (2) 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-22-NC1): *Work as executed plans were not submitted to the Department prior to commencing operations. The plans were submitted to the Department on 14 March 2022, which is after the date of commencement of operation of 22 February 2022.*

Recommendation No. 1 (SSF-IEA-22-R1): *In response to Non-compliance No. 1, the NSW Department of Planning and Environment should be notified of this non-compliance.*

As per Recommendation No. 1, a notification has been sent to the Department of Planning and Environment on 24th June 2022, regarding this non-compliance.

2. Non-compliance No. 2 (SSF-IEA-21-NC2): *Notification of commencement of operation was not submitted to the Department prior to commencing operations. Notification was provided to the Department on 08 March 2022, which is after the date of commencement of operation of 22 February 2022.*

Recommendation No. 2 (SSF-IEA-21-R2): *In response to Non-compliance No. 2, the NSW Department of Planning and Environment should be notified of this non-compliance.*

As per Recommendation No. 2, a notification has been sent to the Department of Planning and Environment 24th June 2022, regarding this non-compliance.

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

- *Based on the Auditor's observation of the vegetation buffer areas of the project site on 05 May 2022, it was considered that weed control should be undertaken in accordance with industry best practice to reduce the occurrence of invasive species such as Flaxleaf fleabane (*Conyza bonariensis*);*

Beon have discussed this improvement opportunity with our existing subcontractor. Control, through the use of slashing and brush cutting, will focus on all weeds in the vegetation buffer. This is anticipated to occur in Spring.

- *Given that operation of the Project has commenced, the Project website should be updated to indicate commencement of operation.*

The Project website (<http://sebastopolsolarfarm.com/>) is currently under review by FRV and will be updated to reflect the commencement of operations on site by 31st July 2022.

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