



MYTILINEOS

Environmental Management Strategy

PLAN

MYT-AU-PL-PRO-EV-0002

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AUTHORISATION

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1 PURPOSE

The purpose of this EMS is to provide an overarching framework for the management of environmental issues during the life of the project, including development, construction operations and decommissioning.

2 SCOPE

The EMS provides the means by which MYT can manage project-related environmental risks by:

- systematically tracking and documenting compliance with DC conditions, environmental impact statement (EIS) commitments, external regulatory requirements and internal policy obligations
- effectively communicating with external and internal stakeholders, including regulators, the community, contractors and company personnel
- achieving continuous improvement in environmental management.

The framework enables MYT to meet its environmental obligations and, along with its contractors, to implement environmental management best practices to identify, manage and mitigate environmental impacts during the construction of the Wyalong SF project

3 DEFINITIONS

Term	Definition
Contractor	Any independent contractor engaged directly by MYT to work on one of its Workplaces
HammerTech	HammerTech is a cloud-based software platform that MYT uses to support their HSE systems, processes, and daily field management into one paperless, integrated workflow that is used across all MYT operations
Non-conformance	A failure to meet one or more of the existing requirements
Procure	A 3rd Party management platform used by MYT that is designed to connect all stakeholders throughout the construction lifecycle.
Project	Wyalong Solar Farm
Site	Newell Highway, Wyalong
Sub-contractor	An entity engaged by a MYT contractor, who engages its own employees to complete activities/works on MYT sites

4 ABBREVIATIONS

Abbreviation	Definition
Accent	Accent Environmental Pty Ltd
AES	Accommodation and Employment Strategy
ALARP	As low as reasonably practical
ARA	Appropriate regulatory authority
BESS	Battery Energy Storage System
BMP	Biodiversity Management Plan
BoP	Balance of Plant
BSC	Bland Shire Council
C&SEP	Consultation and Stakeholder Engagement Plan
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan



CMP	Compliance Monitoring Plan
CoC	Condition of Consent
DC	Development Consent
DoEE	Department of the Environment and Energy
DPE	Department of Planning and Environment
DPIE	Department of Planning, Industry and Environment
EIR	Environmental Incidents Register
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EMS	Environment Management Strategy
EPA	Environment Protection Authority
EPC	Engineering, Procurement and Construction
ERP	Emergency Response Plan
ESCO	ESCO Pacific Australia Pty Ltd
ESCP	Erosion and Sediment Control Plan
GPS	Global Positioning System
HMP	Heritage Management Plan
HSE	Health, Safety and Environment
HSQE	Health, Safety, Quality and Environmental
km	Kilometre
kV	Kilovolt
LP	Landscaping Plan
MYT	Mytilneos-RSD Australia
mm	Millimetre
MP	Management plan
MV / HV	Medium voltage / high voltage
MW	Megawatt
NEM	National Energy Market
NMP	Noise Management Plan
NSW	New South Wales
O&M	Operations and Maintenance
OEMP	Operations EMP
PoEO Act	Protection of the Environment Operations Act 1997
QA	Quality assurance
QC	Quality control
RAP	Registered Aboriginal Parties
RUG	Releasable User Guide
SOP	Standard Operating Procedures
TBD	To be determined
TfNSW	Transport for NSW
TMP	Traffic Management Plan
WMP	Waste Management Plan
WPMP	Weed and Pest Management Plan
Wyalong SF	Wyalong Solar Farm



5 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

All personnel working for MYT on the Wyalong SF project are responsible for:

- reporting all environmental incidents to their supervisor
- carrying out work duties at all times in an environmentally sensitive and responsible manner.

MYT, as the proponent and owner of the Wyalong SF project has ultimate responsibility and accountability to ensure the project is designed, constructed, operated, upgraded and decommissioned in compliance with the approvals requirements.

Actions to achieve compliance during construction and during operations will be undertaken by MYT.

5.1 Key Project Stakeholders

There are many different stakeholders in the Wyalong WF project and these include regulators, direct project stakeholders and community stakeholders. Table 5.1 lists the key project stakeholders.

Regulators	Project stakeholders	Community stakeholders
<ul style="list-style-type: none"> • DPIE • Bland Shire Council • Registered Aboriginal Parties (RAPs) • NSW Rural Fire Service • Dept of the Environment and Energy (DoEE) • Transport of NSW (TfNSW) • SafeWork NSW • Essential Energy 	<ul style="list-style-type: none"> • MYT • Balance of Plant (BoP)n Civil Contractor • BoP Electrical Contractor • Operations and Maintenance (O&M) Contractor • Specialist subcontractors • Specialist consultants • Transport and logistics companies • Project financiers/ investors 	<ul style="list-style-type: none"> • Host farms • Non-host farms • Other neighbours • Local business owners • Local employers • Local suppliers • Local employees • Local accommodation providers

Table 5.1 Project stakeholders

5.2 Project Organisational Structure

Understanding the organisational structure of the project is important when it comes to understanding the roles and responsibilities of the various project stakeholders. A high-level, generalised depiction of the project's organisational structure is shown in Figure 5.1.

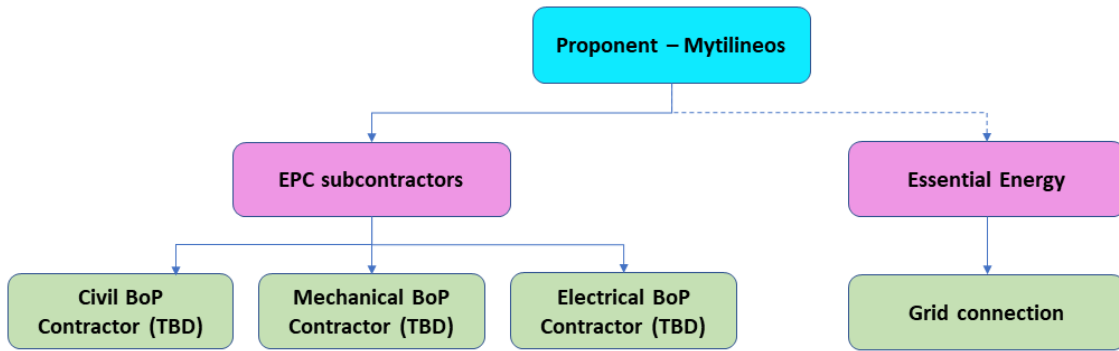


Figure 10.1 Project organisational structure

5.3 Roles and Responsibilities

The project roles that MYT has assigned to the project are shown in Figure 5.2, along with their relationship to each other and are briefly described below. The responsibilities of the roles are more fully described in the CEMP and subplans.

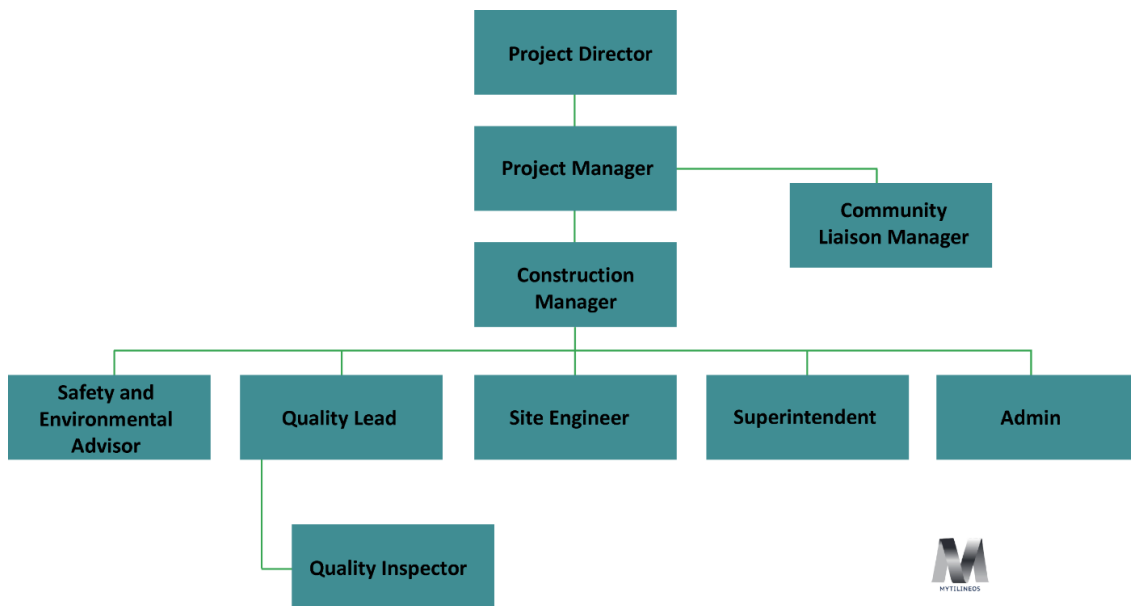


Figure 5.2 Project roles and their relationships

MYT Project Director

The Project Director is responsible for project delivery and has ultimate responsibility for ensuring the project meets regulatory requirements. The Project Director is accountable to MYT leadership.

MYT Project Manager

The Project Manager is responsible for providing general support to the Construction Manager and the health, safety, quality and environmental (HSQE) management team and for ensuring the Project Director is informed on all major project developments. The Project Manager is accountable to the Project Director.

MYT Community Liaison Manager

The Community Liaison Manager is responsible for maintaining relationships with a range of community groups, RAPs, local government, agencies and service providers, delivering information sessions, attending relevant community events, undertaking stakeholder consultations and providing project updates. The Community Liaison Manager is accountable to the Project Director through the Project Manager.

MYT Construction Manager

The Construction Manager is responsible for the general supervision and day-to-day coordination of works on the Project site. The Construction Manager is also responsible for ensuring all site works are completed in accordance with the contractor and subcontractor scopes of works and for ensuring safety and environmental procedures/processes are followed. He/she is also responsible for reporting non-conformances to the Project Manager. The Construction Manager also provides support to the Site Engineer, Superintendent and HSQE management team and for ensuring the Project Manager is informed on all major project developments. The Construction Manager is accountable to the Project Director through the Project Manager.

MYT HSE Advisor

The Health, Safety and Environmental (HSE) Advisor is responsible for providing safety and environmental advice to the project team. He/she is in charge of implementation of all environmental, fire protection, and safety plans and for reporting non-conformances to the Construction Manager. The HSE Advisor is responsible for conducting daily site inspections. The HSE Advisor is accountable to the Project Manager through the Construction Manager.

Quality Lead and Quality Inspector

The Quality Lead, assisted by the Quality Inspector is responsible for project quality assurance (QA) and quality control (QC). The Quality Lead is in charge of implementation of all environmental, fire protection, and safety plans and for reporting non-conformances to the Construction Manager.

Superintendent

The Superintendent is responsible for ensuring day-to-day works are completed in accordance with the subcontractor scope of works. He/she is also responsible for reporting non-conformances, including safety and environmental issues, to the Construction Manager.

Admin

The Admin is responsible for providing general administrative support to the site team.

6 PROJECT OVERVIEW

The Wyalong Solar Farm (Wyalong SF) is a circa 70 megawatt (MW) solar farm development. ESCO Pacific Australia Pty Ltd (ESCO) submitted the development application in 2018 to the Department of Planning, Industry and Environment NSW (DPIE). Mytilneos-RSD Australia (MYT) acquired the project from ESCO and is now the owner and the engineering, procurement and construction (EPC) contractor.

MYT engaged Accent Environmental Pty Ltd (Accent) to provide this Environment Management Strategy (EMS).



The Development Consent (DC) - Application Number: SSD 9564 – requires the preparation, approval and implementation of an EMS and subordinate environmental management plans (EMPs) for both construction and operations phases of the project.

This EMS is focused on construction, but will be adapted and updated for operations and then again in preparation for decommissioning.

In meeting the specific environmental performance criteria established under the DC, MYT will implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.

MYT will carry out the development:

- a) generally in accordance with the EIS; and
- b) in accordance with the conditions of this consent.

6.1 MYT’s Environmental Management Documentation

This EMS is the overarching document in MYT’s environmental management system, which includes a number of plans and strategies that have been put in place to manage environmental impacts that may arise from the construction and/or operations of the project. Figure 6.1 shows the EMS and its relationship to the other management plans.

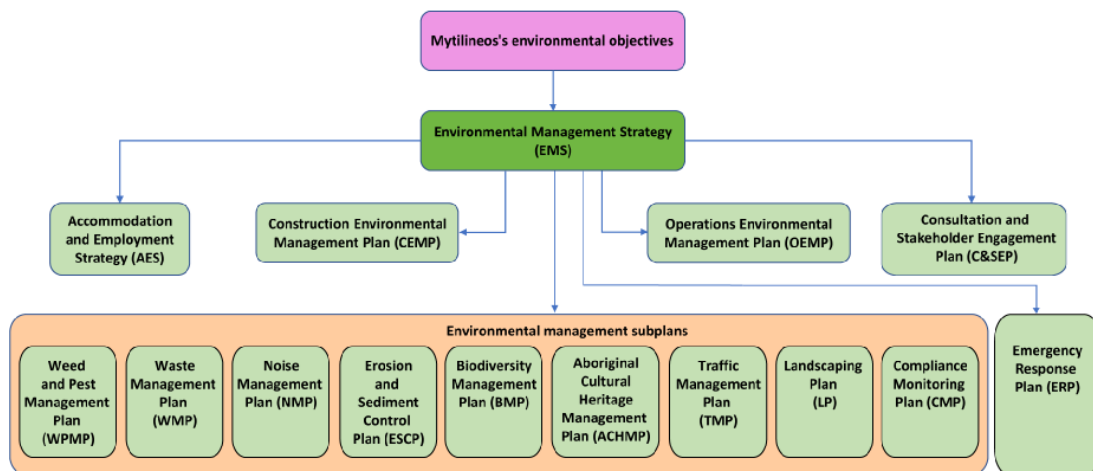


Figure 6.1 Main project environmental management documentation

6.1.1 Prior to commencing construction

In accordance with Condition 5 (Schedule 2) of the DC, prior to commencing construction, MYT will submit detailed plans of the final layout of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure.

6.1.2 Upgrading of infrastructure

In accordance with Condition 6 (Schedule 2) of the DC, over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, MYT will



provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.

6.1.3 Prior to commencing operations or following the upgrades

In accordance with Condition 7 (Schedule 2) of the DC, prior to commencing operations, or following the upgrades of any solar panels or ancillary infrastructure, the MYT will submit work as executed plans of the development to the Department.

6.2 The Project

The Wyalong SF is a solar energy project located approximately 100 km southwest of Forbes in Central West NSW and approximately 350km west of Sydney. Wyalong SF will occupy approximately 260 hectares and is located predominantly on agricultural (cropping) land.

The closest town is West Wyalong, which is approximately 7.5km to the southwest. The Wyalong SF site is located within the Rural (General Rural) and Rural (Agricultural) zones of the Bland Shire Council (BSC). Electricity is to be supplied to the National Energy Market (NEM) via a connection to a 132 kilovolt (kV) transmission line, which crosses the project area.

The locality of the solar farm is shown below in Figure 6.2 and the layout of the solar farm is shown in Figure 6.3.

6.2.1 Project works

The components of the solar farm include:

- up to 350,000 solar photovoltaic modules – the solar panels
- 33 kV underground electrical cables, with fibre optic communication cables
- connection into an existing 132 kV transmission line
- Medium Voltage/High Voltage (MV/HV) substation
- a construction compound
- access tracks
- temporary construction facilities including a site office, parking and materials storage areas.

6.2.2 Scheduled program overview

No.	Milestone	Date
1	Civil works completion	December 2021
2	Solar farm electrical and mechanical works completion	April 2022
3	High voltage works completion	April 2022
4	Testing and commissioning	June 2022
5	R1 (GPS studies, compliance reporting, Releasable User Guides (RUGs), benchmarking, test plans) & R2 model validation	October 2022

Table 6.1 Key construction milestones

6.2.3 Buildings and structures, demolition work, protection of public infrastructure

Buildings and structures

In accordance with Condition 9 (Schedule 2) of the DC, MYT will ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the *Building Code of Australia*.



Demolition work

In accordance with Condition 10 (Schedule 2) of the DC, MYT will ensure that all demolition work on site is carried out in accordance with *Australian Standard AS 2601-2001: The Demolition of Structures*, or its latest version.

Protection of public infrastructure

In accordance with Condition 11 (Schedule 2) of the DC, MYT Unless MYT and the applicable authority agree otherwise, MYT will:

- a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and
- b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.

6.2.4 Operation of plant and equipment

In accordance with Condition 12 (Schedule 2) of the DC, MYT will ensure that all plant and equipment used on site, or in connection with the development, is:

- a) maintained in a proper and efficient condition; and
- b) operated in a proper and efficient manner.

6.2.5 Subdivision

In accordance with Condition 13 (Schedule 2) of the DC, MYT may subdivide Lot 160 DP 750615 to create one new allotment, as identified in Appendix 4 and in accordance with the requirements of the EP&A Act and EP&A Regulation.





Figure 6.2 Locality map



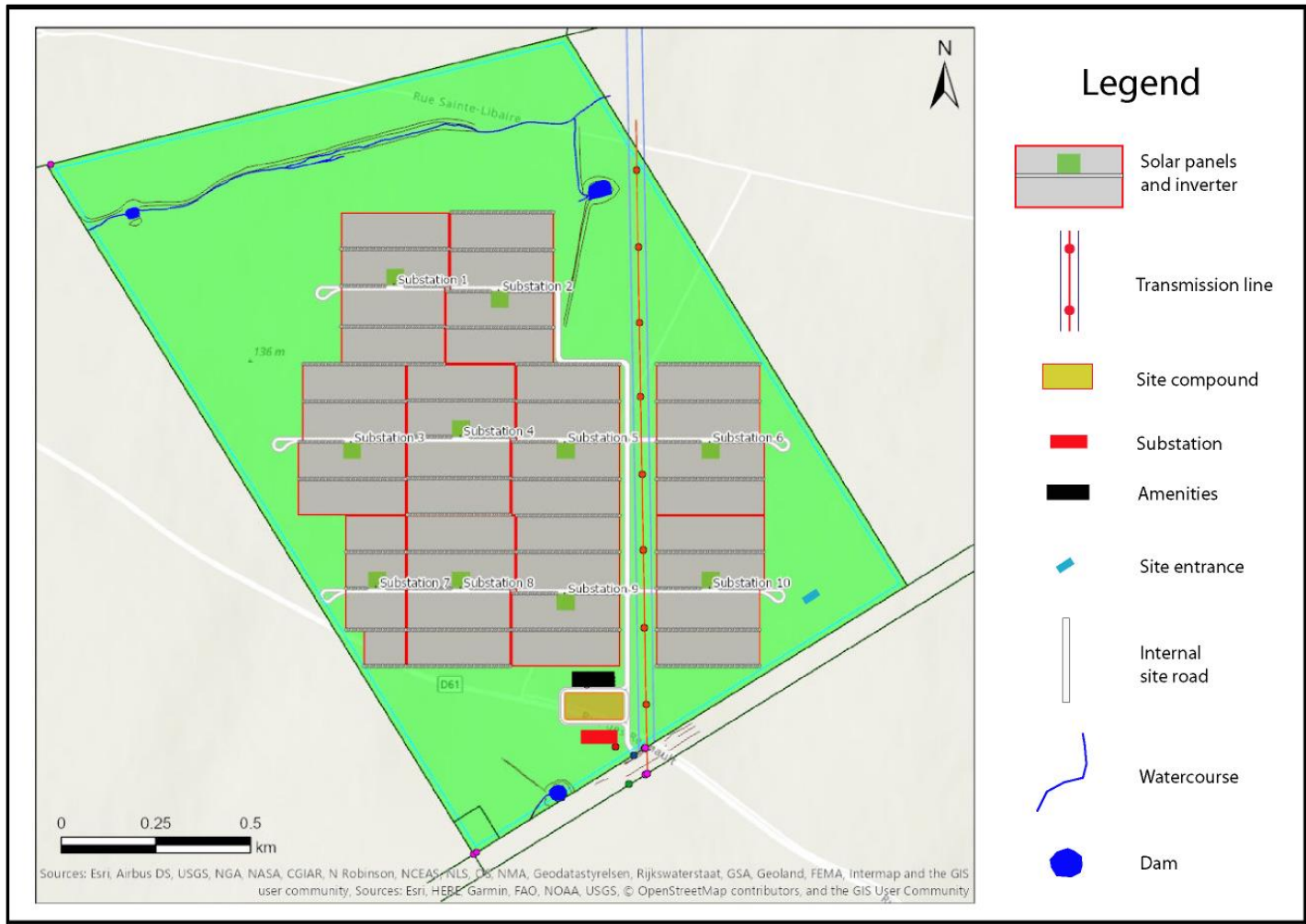


Figure 6.3 Site layout plan



7 STATUTORY REQUIREMENTS

7.1 Conditions of Approval

This EMS has been developed to comply with the relevant DC conditions set out in DC Application Number: SSD 9564.

Schedule 4 Condition 1 of the approval requires an EMS to be developed to the satisfaction of the NSW Planning Secretary. The conditions of consent (CoCs) as they relate to construction management described in Schedule 2 and Schedule 4 of the DC (Environmental Management and Reporting) are presented in Table 7.1.

Schedule 4		
No.	Condition	Reference
Environmental Management		
1	<i>Environmental Management Strategy</i> Prior to commencing the development, the Applicant must prepare an EMS for the development to the satisfaction of the Secretary. This strategy must:	This EMS has been prepared to comply with this condition
	(a) provide the strategic framework for environmental management of the development	EMS Section 9 and Appendix B
	(b) identify the statutory approvals that apply to the development	EMS Section 7 (this section) and Appendix A
	(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development	EMS Section 5.3 and Table 10.1
	(d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development • receive, handle, respond to, and record complaints • resolve any disputes that may arise • respond to any non-compliance • respond to emergencies, and 	Community and stakeholder engagement, EMS Section 11 Complaints management, EMS Section 12 Non-compliance management in EMS Sections 10.3 Emergency response in EMS Section 10.3.2
	(e) include: <ul style="list-style-type: none"> • references to any plans approved under the conditions of this consent, and • a clear plan depicting all the monitoring to be carried out in relation to the development. 	Plans referenced throughout EMS Monitoring in EMS Section 10.1
	Following the Secretary's approval, the Applicant must implement the EMS.	MYT to implement
2	<i>Revision of Strategies, Plans and Programs</i>	EMS Section 8.3



Schedule 4		
No.	Condition	Reference
	<p>The Applicant must prepare an EMS for the development to the satisfaction of the Secretary. This strategy must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> • submission of an incident report under condition 4 of Schedule 4 • submission of an audit report under condition 7 of Schedule 4, or • any modification to the conditions of this consent 	
3	<p>Updating and Staging of Strategies, Plans or Programs</p> <p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval. With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p><i>Notes:</i></p> <p><i>While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.</i></p> <p><i>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</i></p>	EMS Section 8.3
Compliance		
4	<p>Incident Notification</p> <p>The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident</p>	EMS Section 10.3.3
5	<p>Non-Compliance Notification</p> <p>The Department must be notified in writing to compliance@planning.nsw.gov.au within 7 days after the</p>	EMS Section 10.3.1



Schedule 4		
No.	Condition	Reference
	Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance	
6	Compliance Reporting Prior to commencing the construction, upgrading and decommissioning of the development, the Applicant must submit a compliance report to the Department in accordance with the relevant <i>Compliance Reporting Post Approval Requirements</i> (DPE 2018), or its latest version	EMS Section 10.4.4
Independent Environmental Audit		
7	Within 6 months of commencing construction, or as directed by the Secretary, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must: (a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018) (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary (c) be carried out in consultation with the relevant agencies (d) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent, and (e) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent. Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary	EMS Section 10.6
Access to information		
8	The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: <ul style="list-style-type: none"> • the EIS • the final layout plans for the development • current statutory approvals for the development 	EMS Section 11.5



Schedule 4		
No.	Condition	Reference
	<ul style="list-style-type: none"> • approved strategies, plans or programs required under the conditions of this consent • the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged • how complaints about the development can be made • a complaints register • compliance reports • any independent environmental audit, and the Applicant's response to the recommendations in any audit, and • any other matter required by the Secretary, and (b) keep this information up to date.	

Table 7.1 Conditions of approval reference table relevant to this EMS

7.2 Relevant Legislation, Guidance Documents and Terms and Definitions

Legislation, policies and guidelines relevant to this project are listed below and summarised in Appendix A.

7.2.1 Commonwealth legislation

Relevant Commonwealth legislation includes:

- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*
- *Aboriginal and Torres Strait Islander Heritage Protection Amendment Act 2005*
- *Biosecurity Act 2015*
- *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)
- The EPBC Act Environmental Offsets Policy
- *Native Title Act 1993*
- *Renewable Energy (Electricity) Act 2000*

7.2.2 State legislation

Relevant NSW legislation includes:

- Biodiversity Conservation Act 2016
- Biodiversity Conservation Regulation 2017 (BC Regulation)
- Biosecurity Act 2015
- Contaminated Land Management Act 1997
- Conveyancing Act 1919
- Crown Lands Act 1989
- Environmental Planning and Assessment Act 1979 (EP&A Act)
- Environmental Planning and Assessment Regulation 2000
- Fisheries Management Act 1994 (FM Act)
- Heavy Vehicle National Law (NSW)
- Heritage Act 1977
- Local Land Services Amendment Act 2016
- Mining Act 1992
- National Parks and Wildlife Act 1974
- National Parks and Wildlife Regulation 2009



- Protection of the Environment Operations Act 1997 (PoEO Act)
- Roads Act 1993
- Rural Fires Act 1997
- State Environmental Planning Policies (SEPPs)
 - State and Regional Development 2011
 - Infrastructure 2007 (ISEPP)
 - Hazardous and Offensive Development (SEPP 33)
 - Mining, Petroleum Production and Extractive Industries 2007
 - Remediation of Land (SEPP 55)
 - Rural Lands 2008
 - Koala Habitat Protection (SEPP 44)
- *Water Management Act 2000*
- *Waste Avoidance and Resource Recovery Act 2001*

7.2.3 Local legislation and policies

Relevant local legislation includes:

- Bland Local Environmental Plan 2011
- Riverina Murray Regional Plan 2036

7.2.4 Guidelines and standards

Relevant guidelines and standards include:

- AS/NZ ISO 31000:2009 Risk Management Principles and Guidelines
- AS 2436 2010 Guide to noise and vibration control on construction, demolition and maintenance sites
- HB203:2006 Environmental Risk Management Principles and Processes
- Interim Construction Noise Guideline
- National Environment Protection (Ambient Air Quality) Measure 1998

7.2.5 Terms and definitions

Under the PoEO, the following terms are defined.

Relevant guidelines and standards include:

Material harm to the environment

Material harm to the environment is material if:

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Pollution incident

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



8 EMS STRUCTURE, APPROVAL AND REVIEW

8.1 Structure

The EMS is supported by a range of specific management plans that address project impacts on potentially affected aspects of the environment. Whereas the management plans are 'live' documents that should be updated between project phases (e.g. from construction to operations) or in response to changing circumstances (e.g. design modifications or specific environmental issues that arise), the EMS is a strategic document that sets out the context, legislative framework and embedded design elements of the project and describes the overarching management system, procedures and protocols that apply to all plans.

The general environmental principles to be adopted by MYT for the Wyalong SF during construction are:

- compliance with statutory, legislative and consent conditions
- minimisation of impacts on the community and environment
- the timely and efficient response to any environmental incidents and complaints
- rehabilitation of all disturbed land
- continual monitoring, review and reporting on the environmental impacts of construction activities.

The structure of MYT's main environmental management documentation is shown in Figure 6.1.

This EMS provides the strategic context for environmental management across the entirety of the Project during its construction phase. The EMS is required as a CoC of the DC, as are other plans including:

- an Accommodation and Employment Strategy (AES)
- a Consultation and Stakeholder Engagement Plan (C&SEP)
- a Heritage Management Plan (HMP)
- a Biodiversity Management Plan (BMP)
- a Traffic Management Plan (TMP)
- a Landscaping Plan (LP)
- a Compliance Monitoring Plan (CMP)
- an Emergency Response Plan (ERP).

In addition to those required as direct CoCs of the DC, the following plans are commitments made in the approved EIS:

- a Construction Environmental Management Plan (CEMP)
- an Erosion and Sediment Control Plan (ESCP).
- a Noise Management Plan (NMP).
- a Weed and Pest Management Plan (WPMP)
- a Waste Management Plan (WMP).

This EMS should be read in conjunction with the CEMP, associated plans and sub-plans, procedures and protocols. Operational phase management plans (including an Operations EMP (OEMP)) will be produced prior to operations and decommissioning, respectively.

8.2 EMS Approval

In accordance with CoC 1, Schedule 4 of the DC, the Applicant must have developed the EMS to the satisfaction of the Secretary of the DPIE prior to commencing the development.



8.3 Review and Update

MYT will undertake on-going review and improvement of existing systems and controls.

In accordance with CoC 2, Schedule 4 of the DC, this EMS (and any strategy, plan or program required under the DC) will be reviewed to the satisfaction of the Secretary of DPIE. The EMS will be:

- updated prior to carrying out any upgrading or decommissioning activities on site
- reviewed and, if necessary, the strategies, plans or programs required under this consent revised to the satisfaction of the Secretary within 1 month of the:
 - submission of an incident report under CoC 4, Schedule 4
 - submission of an audit report under CoC 7, Schedule 4, or
 - any modification to the conditions of this consent

When revised, the revision status of this EMS will be indicated on the title page of this document. This EMS will be made publicly available on the project website (Section 8.5), in accordance with CoC 8, Schedule 4 of the DC. A hard copy of the EMS will also be kept at the site project office during construction.

The EMS will be adapted and updated for operations and then again in preparation for decommissioning.

As the EMS is an overriding framework, it should be reviewed and updated yearly (at a minimum). However, MYT and its contractors will undertake on-going review and improvement of existing systems and controls.

Review is a critical element of environmental management systems and involves a formal evaluation of the adequacy of the CEMP, subordinate plans and documents – taking into account any new environmental issues, legislation, changing circumstances and continual improvement.

To ensure a rigorous, all-encompassing review process, the contractors will conduct quarterly management review meetings. These meetings should be attended by individuals with either executive or specialist responsibility. At the Wyalong SF this may include:

- the MYT Project Manager
- the MYT Site Manager
- the MYT HSE Advisor
- the subcontractor management representatives, as appropriate.

MYT commits to complying with CoC 4 of Schedule 2 and will:

- comply with any requirement/s of the Secretary arising from the Department's assessment of:
 - a) any strategies, plans or correspondence that are submitted in accordance with this consent;
 - b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and
 - c) the implementation of any actions or measures contained in these documents

MYT commits to complying with CoC 2 in full.



9 ENVIRONMENTAL MANAGEMENT FRAMEWORK

MYT strives for excellence through its commitment to leading practice in environmental management and performance. Implementation of this EMS will assist in minimising the environmental impacts of construction-related activities by facilitating continual improvement in environmental performance.

This Strategy outlines the minimum standard to ensure MYT manages the environmental aspects and impacts of the project in a manner that is planned, controlled, monitored, recorded and audited, using a management system that drives continual improvement.

9.1 Environmental and Health and Safety Policies

MYT has both an environmental policy and a health and safety policy, which set out the company's aims and objectives with respect to their projects' environmental and health and safety management. These policies are attached as Appendix B.

9.2 Environmental Management System

A well designed and carefully implemented environmental management system provides an important framework for environmental management activities. The MYT system is a five-step iterative system which comprises the documented systems and processes used for the safe construction, operations and decommissioning of the Project. The system enables hazards to be identified and assessed to eliminate or minimise the risk of impact to the environment to a level that is as low as reasonably practical (ALARP) throughout construction of the project. The site's environmental management plans for construction and operations describe how the risks are assessed and managed.

The main components of MYT's environmental management system are outlined below and in and shown diagrammatically in Figure 9.1.

Step 1 – Policy establishment: The environmental management system development process starts with establishing an Environmental Policy that is tied to the organization's mission. MYT has an environmental policy.

Step 2 – Planning: The planning step consists of identifying regulatory and other requirements; identifying processes, resources, and significant environmental impacts; identifying management and mitigation measures; developing objectives and targets for improvement efforts; and creating a planning, programming, and budgeting system

The implementation and operation of various components of the environmental management system are detailed in the management plans, as appropriate.

Step 3 – Implementation: The implementation step consists of defining the structure, responsibilities, and programs; implementing induction and training; creating the environmental management system documentation (including document control and record keeping); communicating the environmental management system to personnel; developing and implementing standard operating procedures [SOPs]; and developing and implementing emergency preparedness and response procedures.

The implementation and operation of various components of the environmental management system are detailed in the management plans, as appropriate.

Step 4 – Checking and correction: The checking and corrective action step includes monitoring and measuring (e.g., internal assessments), problem and cause identification, corrective and preventative action implementation, and an environmental management system review.



Step 5 – Review: In the management review step, upper management reviews the environmental management system, including the results of internal assessments. Modifications to the environmental management system are made, as necessary, to ensure compliance. The management review is designed to ensure continual improvement of the environmental management system, taking into account the results of checking and corrective actions undertaken in Step 4.

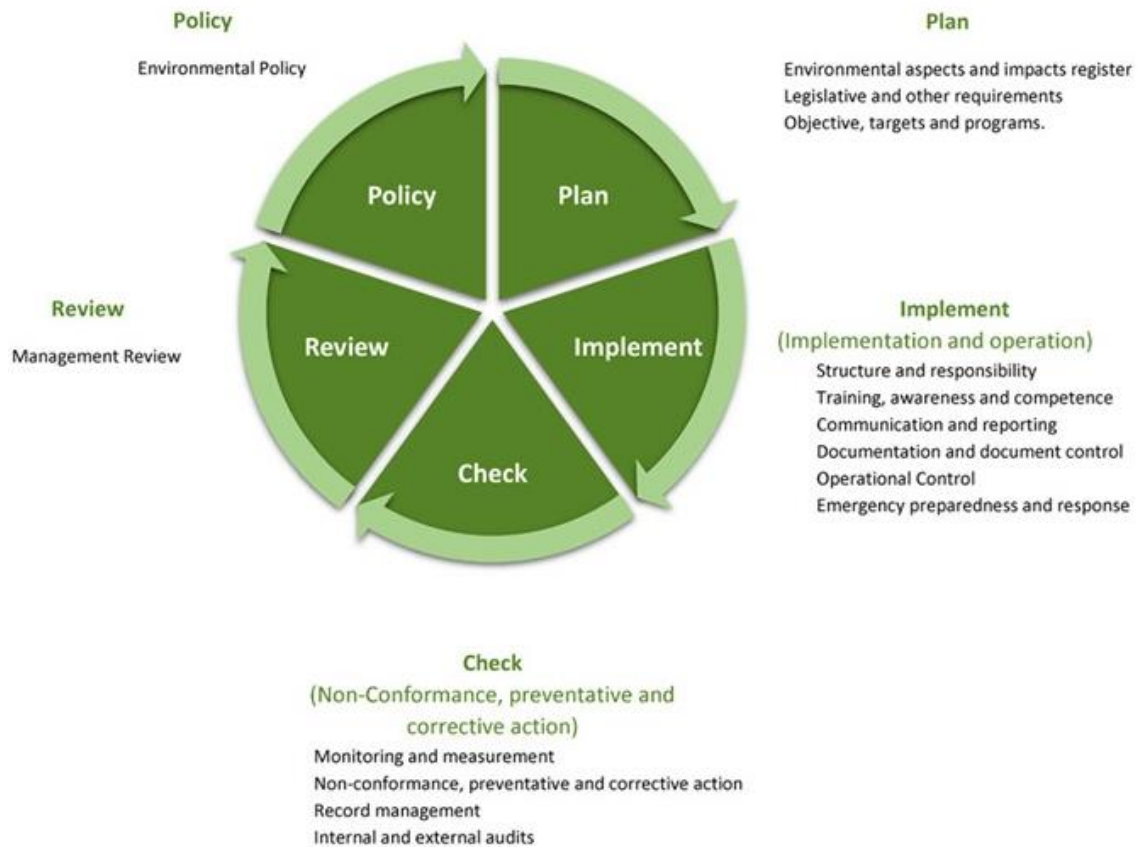


Figure 9.1 Environmental Management System Process



10 MONITORING, AUDITING, REPORTING AND REVIEW

During construction there will be continuous monitoring, auditing, reporting and review by MYT and its contractors of the construction area and construction activities. Individuals and work crews will be required to demonstrate that the requirements of this EMS, the CEMP (including its subplans) and other management plans are being adhered to.

All reports, reviews, and audits will be maintained by the MYT Project Manager and made available to the appropriate Managers (MYT and subcontractors) and regulatory authorities as required. Audit results will be used to review management techniques to ensure compliance with the CEMP.

10.1 Monitoring

Monitoring of environmental impacts is an important aspect of environmental management. Specific monitoring requirements for individual environmental aspects are set out in the CEMP and sub-plans. Aspects that will be monitored include:

- site condition - to identify any environmental issues (daily)
- consistency with design footprint - to ensure all construction footprints are compliant with approved development plans (weekly)
- air quality - to ensure air quality objectives are met (weekly)
- noise and vibration - to ensure noise and vibration objectives are met (weekly)
- biosecurity (weeds and pests) - to ensure biosecurity objectives are met (weekly)
- vegetation clearing - to ensure vegetation clearing objectives are met (weekly)
- soil management - to soil management objectives are met (weekly)
- water management - to with water management objectives are met (weekly)
- traffic management - to with traffic management objectives are met (weekly)

The monitoring schedule, including responsibility, compliance indicator/s and records/actions, and timing / frequency are described in Table 10.1. The monitoring to be implemented in the sub-plans is summarised below.

10.1.1 Landscaping Plan

MYT will:

- monitor glare from Newell Highway, following installation of PV solar farm infrastructure
- conduct ongoing monitoring to assess the effectiveness of the landscaping as visual screening
- conduct ongoing monitoring (every 3 months) to assess the effectiveness of the landscaping as visual screening for the initial 12-month period
- conduct ongoing monitoring to assess the effectiveness of the landscaping as visual screening for the subsequent 12-month periods

10.1.2 Biodiversity Management Plan

During construction MYT will:

- inspect the clearing site to ensure relevant protocol requirements are met daily during clearing activities
- inspect and maintain fencing weekly
- maintain a log of salvaged animals and actions taken to relocate them, as required (incident-based)



- inspect for weeds and for the presence of feral pests on Project Site weekly
- inspect Erosion and Sediment Control devices installed and operational daily
- inspect chemical storage areas daily

During operation MYT will:

- maintain a log of salvaged animals and actions taken to relocate them, as required (incident-based)
- inspect and maintain fencing monthly for first year of operation and then monthly or annually as determined by incident frequency
- inspect habitat boxes to identify occupancy and damage twice yearly: once in late winter and once in mid-summer
- monitor rehabilitated areas quarterly for first three years of operation then as required
- inspect for weeds and for the presence of feral pests on Project Site quarterly
- inspect lighting in project area upon commencement of operation then annually as required
- inspect chemical spills or leaking monthly

10.1.3 Heritage Management Plan

MYT will:

if previously unknown Aboriginal object(s) are identified within impact areas, do the following:

- send information, such as location and photographs, to an archaeologist to gain a preliminary determination of whether the discovery is an Aboriginal object
- if it is determined to be an Aboriginal object, the object(s) will be recorded and assessed by an archaeologist to determine the management group of the site comprising the objects
- any Aboriginal objects identified within impact areas will be salvaged

if discovery of additional Aboriginal objects and/or human skeletal material, do the following:

- implement the discovery of unrecorded aboriginal objects procedure and the discovery of aboriginal ancestral remains procedure, respectively

if any ground land-disturbing activities extend beyond the assessed area, do the following:

- conduct further archaeological assessment

10.1.4 Accommodation and Employment Strategy

During construction MYT will:

- conduct monthly reviews of the AES to assess the continuing suitability of the AES in relation to construction progress, workforce requirements, changing conditions and other projects in the area
- assess the extent to which the AES objectives are being met with regard to:
 - accommodation requirements for upcoming construction stages and staff levels using local accommodation options are sufficient or, if not, in purpose-built accommodation
 - prioritising local employment where reasonable and practicable, by monitoring the percentage of workforce that is locally sourced.
- assess the suitability of purpose-built accommodation
- incorporate feedback from external stakeholders



10.2 Site Inspection

During the construction phase, MYT and its contractors will conduct regular inspections to confirm compliance with the EMS and CEMP (and subplans). Each supervisor will be required to record daily and weekly activities on pre-prepared checklists addressing relevant requirements. Inspection records will be maintained by the contractors and reported to MYT on a regular basis as detailed in Table 10.1.

10.2.1 Daily inspections

The MYT Safety and Environmental Advisor will conduct daily inspections of construction activities to ensure general compliance with the EMS, CEMP and all subordinate plans. All areas identified for improvement will be addressed directly and added to the Environmental Incidents Register (EIR).

Daily inspection reports will be circulated to the MYT Construction Manager and the on-site team. Key environmental risks and issues will be discussed daily at pre-start team meetings and toolbox meetings.

10.2.2 Weekly inspections

Once per week (at least) during construction, the MYT Construction Manager and/or the MYT Safety and Environmental Advisor will conduct a thorough weekly inspection of construction activities to ensure compliance with the EMP, CEMP and all subordinate plans. All areas identified for improvement will be added to a corrective action register.

Weekly inspection reports will be circulated to the MYT Construction Manager and the on-site team. Key environmental risks and issues will be discussed daily at pre-start team meetings and toolbox meetings.



Inspection type	Purpose	Responsibility	Compliance indicator/s and records/actions	Timing / frequency
Daily site inspection	To identify any environmental issues	MYT Safety and Environmental Advisor	Record of completed inspection and, if necessary, corrective action lodged and undertaken	Daily during construction activities
Consistency with design footprint	Ensure all construction footprints are compliant with approved development plans	MYT Project Manager	No non-compliances. Maps and geographic information system (GIS) outputs	Weekly or during clearance activities
Compliance with air quality objectives	Ensure air quality objectives are met	MYT Project Manager	Record of completed inspection and, if necessary, corrective action lodged	Weekly and immediately after any complaint is raised
Compliance with noise and vibration objectives	Ensure noise and vibration objectives are met	MYT Project Manager	Record of completed inspection and, if necessary, corrective action lodged	Weekly and immediately after any complaint is raised
Compliance with biosecurity objectives	Ensure biosecurity objectives are met	MYT Project Manager	Record of completed inspection and, if necessary, corrective action lodged	Weekly
Compliance with vegetation clearing objectives	Ensure vegetation clearing objectives are met	MYT Project Manager	Record of completed inspection and, if necessary, corrective action lodged	Weekly or during clearance activities
Compliance with soil management objectives	Ensure soil management objectives are met	MYT Project Manager	Record of completed inspection and, if necessary, corrective action lodged	Weekly or daily during excavation activities
Compliance with water management objectives	Ensure water management objectives are met	MYT Project Manager	Record of completed inspection and, if necessary, corrective action lodged	Weekly and after any significant (>50 mm) rainfall event
Compliance with traffic management objectives	Ensure traffic management objectives are met	MYT Project Manager	Record of completed inspection and, if necessary, corrective action lodged	Daily during delivery of oversize components (e.g. BESS containers (if part of the project)). Weekly during normal construction activity



Inspection type	Purpose	Responsibility	Compliance indicator/s and records/actions	Timing / frequency
Compliance with waste objectives	Ensure waste management objectives are met	MYT Project Manager	Record of completed inspection and, if necessary, corrective action lodged	Weekly
Rehabilitation	Ensure timely and effective progressive rehabilitation of disturbed areas	MYT Project Manager	Records of before and after condition	Weekly

Table 10.1 Indicative inspection program



10.3 Non-Compliance, Incident Management and Corrective Actions

10.3.1 Non-compliance

A project non-compliance is a project condition that is not in compliance with the DC conditions.

Environmental non-compliances will be reported and actioned through the incident management procedures detailed in Section 10.4.2, below.

As per Schedule 4 Condition 5 of the CoC, MYT will notify the Department in writing at compliance@planning.nsw.gov.au within 7 days after MYT becomes aware of any non-compliance with the conditions of this consent. The notification will identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.

10.3.2 Emergency management

All environmental emergencies will be managed in accordance with processes documented in the Emergency Response Plan (ERP). The plan and procedures that will be implemented to respond to emergencies include the following:

- Emergency Response Plan - MYT-AU-PL-PRO-HS-0006
- Extreme Weather Conditions Procedure - MYT-AU-PR-COR-HS-0006
- Hazardous Chemicals Procedure - MYT-AU-PR-COR-HS-0008
- Incident Investigation Procedure - MYT-AU-PR-COR-HS-0012
- Incident Reporting Procedure - MYT-AU-PR-COR-HS-0013

Emergency Response Plan

The ERP is to document how MYT manages its obligations for Emergency Response during the construction phase of the Wyalong Solar Farm. It includes:

- Site emergency contact details
- Organisational emergency management flowcharts
- Emergency management responsibilities
- Emergency response duty cards
- Legislative requirements
- Communication guideline
- Emergency management risk framework
- Project emergency risk identification & analysis
- Regional locality hazard identification
- Risk assessment & risk register (emergencies)
- Preparedness
- Training & competency
- Emergency response
- Recovery
- Monitoring & measuring
- Emergency response plan review
- Crisis management



- Emergency response arrangements for:
 - Medical Emergencies – First Aid
 - Medical Emergencies - Triage
 - Medical Emergencies - Fatality
 - Fires – Building Fire
 - Fires – Vehicle Fire
 - Dangerous Goods Fire – Flammable & Combustible Materials
 - Major Gas / Chemical Fire or Explosion
 - Bush / Grass Fire
 - Vehicle Accidents – Light Vehicles
 - Vehicle Accidents – Heavy Vehicles
 - Chemical Incident – Spill
 - Bomb Threat – Received
 - Electrocutation or Rescue from Electrical Contact – Portable Electrical Equipment
 - Electrocutation or Rescue from Electrical Contact – High Voltage Commissioning
 - Confined Spaces – Person asphyxiated (overcome by fumes)
 - Confined Space – Fire in a confined space
 - Engulfment of Soil(s) Earth in Excavation or Trench
 - Falls from Height – Suspension Trauma

10.3.3 Incident management

Any incident or accident that results in harm to the environment and/or off-site receptors is to be regarded as an environmental incident. Where an incident results from a failure of a system process, or requirements of contractor CEMPs, the incident shall also be regarded as a non-conformance.

As defined in the CoC an incident is “a set of circumstances that causes or threatens to cause material harm to the environment”.

Overview

It is a mandatory requirement for any personnel working for or on behalf of MYT to report and respond to all hazards and events that have affected or have the potential to adversely affect the environment.

Examples of events include:

- fauna mortality
- fuel spillage
- excessive noise incidents
- chemical spills
- bushfire
- complaint from a neighbour.

The first line of response is to take immediate actions to minimise risks to persons, plant, equipment and the environment. These actions may include:

- stop work
- assess site and make the area safe
- notify other parties that may be affected by the hazard/event.





Notifiable environmental incidents

DPIE must be notified in writing to compliance@planning.nsw.gov.au immediately after the Proponent becomes aware of an incident on site which has the potential to cause material environmental harm. The notification must identify the development, including the application number and the name of the development, and set out the location and nature of the incident.

Examples of an environmental incident that results in 'material harm to the environment' could be:

- an uncontained spill into a water course resulting in harm to the health or safety of human beings or non-trivial harm to ecosystems
- the mortality of or serious injury to wildlife as a result of project activity
- a breach of Cultural Heritage Management Plan (CHMP) protocol, resulting in damage to an objective of aboriginal heritage value.

Response agencies need to be informed of pollution incidents quickly, so action can be coordinated to prevent or limit harm to the environment and human health generally. These are listed in Table 10.2.

Response agency	Contact details
Environment Protection Authority NSW (EPA NSW)	131 555 or (02) 9995 5555
Ministry of Health NSW	(02) 9391 9000
SafeWork NSW	131 050
The local authority, Bland Shire Council	(02) 6972 2266 or, outside office hours, on 0418 402 350
Fire and Rescue NSW	000 or, for Mobiles only, 112
Rural Fire Service Bland Temora Region	(02) 6977 4737

Table 10.2 Responsible agency contact details

10.4 Reporting and Record Keeping

Environmental non-conformances, incidents and complaints will be reported by the EPC subcontractor to MYT's Project Manager.

The MYT Safety and Environmental Advisor will record all environmental non-conformances, incidents and complaints in an Environmental Incident Register which will include the following information:

- time, date and location of incident
- nature of incident
- personnel and machinery involved in incident
- corrective measures taken in response to incident
- date of incident close-out.

MYT will maintain the Environmental Incident Register for the project and will make this available to the Responsible Authority upon request.

10.4.1 Record-keeping

The Environmental Incident Register will document, record, track, manage and report all environmental-related incidents and observations. An example of an Environmental Incident Register is attached as Appendix C.

10.4.2 Corrective actions

Once an incident or non-conformance has been reported to the MYT Project Manager, a set of appropriate corrective actions will be raised by the contractor. Measures already implemented, additional measures to be implemented as a result and any corrective actions will be reported to the MYT Project Manager. Actions will be implemented to the satisfaction of the MYT Project Manager and their effectiveness confirmed to demonstrate appropriate measures have been implemented to prevent reoccurrence of impacts, as far as practical.

10.4.3 Reporting to DPIE

The conditions of the DC require a report summarising complaints, investigations and responses be submitted to DPIE (compliance@planning.nsw.gov.au).

Where an exceedance of environmental levels/criteria has occurred, or a validated complaint was received, an incident report and set of corrective actions will be raised by the construction contractor and immediately reported to the for inclusion in the incident register. MYT is responsible for submission of environmental reports to DPIE, as required.

10.4.4 Compliance reporting

As a condition of consent of the DC, prior to commencing the construction, upgrading and decommissioning of the development, the Applicant (MYT) must submit a compliance report to DPIE in accordance with the relevant *Compliance Reporting Post Approval Requirements* (DPE 2018), or its latest version.

To meet this condition, a Compliance Monitoring Plan (CMP), which includes a Compliance Report template, has been completed. This includes:

- a compliance monitoring and reporting schedule, which sets out the required frequency of compliance monitoring and reporting
- a compliance table
- a compliance report template

10.5 Continuous Improvement of Environmental Performance

Areas for improvement identified during daily inspections will be addressed by the environment team at daily pre-start (Toolbox) meetings with the appropriate construction supervisor and crew.

At the discretion of the environment team, identified areas of improvement may also form the basis for more formalised weekly project meeting. Addressing non-conformance and areas for improvement with the construction crews in this forum is aimed at continuously improving the environmental performance of the project and driving environmental awareness on site.

10.5.1 EMS approval

In accordance with CoC 1, Schedule 4 of the DC, the Applicant must have developed the EMS to the satisfaction of the Secretary of DPIE prior to commencing the development.

10.5.2 Audit input into continuous improvement

Audits also play an important part in the continuous improvement process and the results of the audits should be considered when updating the EMS. Audits are more fully described in Section 11.6 below.

10.6 Auditing

10.6.1 Independent environmental audit

An Independent Environmental Audit of the Wyalong SF will be conducted in accordance with CoC 7, Schedule 4 of the DC. An audit will be undertaken:

- within 6 months of commencing construction
- or as directed by the Secretary of DPIE.

The audit will:

- be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018)
- be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary of DPIE
- be carried out in consultation with the relevant agencies
- assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent
- recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report will be submitted to the Secretary of DPIE, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. Table 10.3 summarises the independent audit program.

The recommendations of the Independent Environmental Audit will be implemented to the satisfaction of the Secretary of DPIE.

10.6.2 Internal audits

In addition to the requirement for an Independent Environmental Audit under the CoCs, MYT will conduct regular internal, six-monthly audits of management controls to monitor compliance with the CEMP and other plans. All audit actions will be resolved by the responsible entity/contractor, providing evidence that the action has been completed. Table 10.3 summarises the internal audit program.

Timing	Type	Objective
Within six months start of construction	Independent	Assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent
Every six months subsequent to the initial	Internal	Establish that all management controls are being implemented, and compliance with environmental performance objectives is being achieved. Ensure any prior non-conformances have been addressed



Independent audit		
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Table 10.3 Indicative audit program

11 COMMUNITY AND STAKEHOLDER ENGAGEMENT

As noted in Section 5.3, MYT has appointed a Community Liaison Manager for the project, who is responsible for maintaining relationships with a range of community groups, RAPs, local government, agencies and service providers, delivering information sessions, attending relevant community events, undertaking stakeholder consultations and providing project updates.

11.1 Consultation During Project Planning

Community and stakeholder consultation was undertaken during the preparation of the EIS for the Project and responses were taken into consideration in the design of both the Project and the environmental impact mitigation measures.

Details of the consultation undertaken during the EIS stage are provided in Section 6 of the EIS.

11.2 Notifications to DPIE Prior to Key Project Stages

In accordance with CoC 8, Schedule 2, prior to the commencement of construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Project Owner (MYT) will notify DPIE in writing of the date of commencement, or cessation, of the relevant phase.

If any of these phases of the development are to be staged, then the Project Owner (MYT) will notify DPIE in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage.

11.3 Consultation During Construction

A Consultation and Stakeholder Engagement Plan (C&SEP) is being prepared for the Project which outlines the consultation strategies and protocols to manage the concerns of stakeholders and any impacts on local landowners during construction of the Project. The plan will include (but not be limited to) the following:

- protocols to keep the community and stakeholders updated about the progress of the project and its benefits
- protocols to inform relevant stakeholders of potential impacts of construction activities such as changes to traffic conditions and out of hours works (if Secretary approval for out of hours works are obtained)
- protocols to allow the community to make complaints or identify any concerns with the Project.

Information on how local businesses, contractors or service providers can express an interest in the project will be continually disseminated via various methods throughout the Pre-construction and Construction phases.

The C&SEP includes the following proposed engagement activities and communication tools:

Stakeholder	Recommended Engagement	Who	When
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Neighbours	<ul style="list-style-type: none"> - Check preferred method of communication - Check for any ownership or lease changes - Confirm how they would like to be communicated with and how often - Provide an overview of the project construction and likely impacts to their property and at approximately what stage - Provide a project fact sheet 	<p>One Mytilineos or consultant team member should be the prime contact</p>	<p>Initial contact asap then ongoing based in their preferences</p>
Broader Community and Local Business	<ul style="list-style-type: none"> - School tours of the site in construction to support science and technology education - Community BBQ/ picnic with information posters and project flyer - Investment in local project or infrastructure - Project website with key information and frequently asked questions - Support local employment and procurement where possible 	<p>One Mytilineos or consultant team member should be the prime contact</p> <p>Project email to be managed by Mytilineos to respond to community enquiries</p>	<p>Project website June 2021</p> <p>Community Picnic/ BBQ in June prior to construction commencing</p>
Bland Shire Council	<ul style="list-style-type: none"> - It is recommended that a meeting is set up at Council or online to provide a project update and to introduce the Mytilineos and the key consultant contact/s if this has not already been done. - Confirm how and how often Council would like to be communicated with, establish two way communication - Ask Council for appropriate ideas on how Mytilineos can invest and contribute to the community 	<p>One Mytilineos or consultant team member should be the prime contact</p> <p>Project team to attend first meeting with Council</p>	<p>Initial meeting in June 2021 then ongoing as negotiated</p>



Department of Planning, Industry and Environment	<ul style="list-style-type: none"> - Provide a project update and likely timeframe for construction and operation - Ask DPIE how often and how they want to be contacted for the during of the project 	One Mytilineos or consultant team member should be the prime contact	June 2021
NSW Environment, Energy and Science	<ul style="list-style-type: none"> - Provide a project update and likely timeframe for construction and operation - Ask EES how often and how they want to be contacted for the during of the project 	One Mytilineos or consultant team member should be the prime contact	June 2021
Transport for NSW	<ul style="list-style-type: none"> - Provide a project update and likely timeframe for construction and operation - Ask TfNSW how often and how they want to be contacted for the during of the project 	One Mytilineos or consultant team member should be the prime contact	June 2021

Table 11.1 Proposed engagement activities and communication tools

11.4 Consultation During Operations

The C&SEP prepared prior to the Construction phase of the project will be adapted for and utilised during the Operations phase.

11.5 Website

A website will be established for the Project <https://wyalongsolar.com.au/>

This website will be maintained and kept up-to-date by the Project Owner (Mytilineos). In accordance with CoC 8 Schedule 4, the website will make the following information publicly available at minimum, as relevant to the stage of the development:

- EIS and response to submissions
- the final layout plans for the development
- current statutory approvals for the development
- approved strategies, plans or programs required under the conditions of this consent
- the proposed staging plans for the development if the construction, operations or decommissioning of the development is to be staged
- how complaints about the development can be made
- a complaints register (see Section 12)
- compliance reports
- any independent environmental audit, and the Applicant's response to the recommendations in any audit (see Section 10.6)

- any other matter required by the Secretary.

11.6 Dissemination of environmental information

MYT commits to ensuring stakeholders are kept informed about the environmental performance of the development. This will be achieved by:

- ensuring the website is updated with environmental performance data
- regular stakeholder meetings chaired by MYT, where environmental performance will be discussed as an agenda item

12 COMPLAINTS MANAGEMENT

In the event that a complaint is received from the community, MYT's Community Liaison Manager (or their representative during construction and the Project Manager during operations) will ensure the complaint is recorded and will undertake further investigation. The process for managing complaints is described below.

12.1 Complaints Management Procedure

The details of the complaint will be recorded in a Complaints Register, which will include the following:

- the date and time, where relevant, of the complaint
- the means by which the complaint was made (telephone, mail, email or in person)
- who received the complaint
- any personal details of the complainant that were provided, or if no details were provided, a note to that effect
- the nature of the complaint
- any actions taken in relation to the complaint, including timeframes for implementing the action
- if no action was taken in relation to the complaint, the reason(s) why no action was taken
- the status of the complaint (i.e. open/closed)
- measures to avoid reoccurrence (if any).

The Complaints Register will be managed and maintained by the MYT's Community Liaison Manager or their representative during construction and the Project Manager during operations. They will be responsible for:

- providing a response to the person complaining within 72 hours of the complaint being made
- ensuring that the complaint is addressed in a timely manner and that the complaint is addressed adequately
- logging all details of the complaint in the Complaints Register
- notifying the relevant management staff as appropriate
- ensuring the Complaints Register is made available on the Project website and updated regularly, in accordance with Condition 8, Schedule 4, with personal details kept private.



12.2 Contact Details for Complainants

The following avenues are available for complaints and enquiries to be lodged by the community and other stakeholders:

Title: Community Liaison Manager, Lluvia Murillo

Email: Lluvia.Murillo@mytilineos.gr

Phone line: 0458 012 491

Online contact form: see website

The above email and phone number will be disclosed on the website along with the online contact form and included on all community notifications.

12.3 Dispute Resolution

In the event that the actions taken to address a complaint, including the measures for avoiding a recurrence, are not sufficient to satisfy the complainant and a dispute arises, the Project Owner (MYT) will do the following:

- advise DPIE that there is a dispute
- provide DPIE with copies of the relevant complaint history
- if determined necessary by DPIE, engage a specialist with expertise relevant to the issue at hand to investigate the dispute and provide recommendations for resolution
- advise the third party in dispute (the complainant) and DPIE in writing, as to when the dispute investigation will be completed
- provide the third party and DPIE a copy of the dispute investigation report, inclusive of the MYT's intentions with regards to the implementation of the recommendations for resolution.



13 REFERENCES

Accent (2018) Wyalong Solar Farm: Environmental Impact Statement, prepared for ESCO Pacific Pty Ltd by Accent Environmental Pty Ltd. November 2018

DIPNR (2004) Guideline for the Preparation of Environmental Management Plans, Department of Infrastructure Planning and Natural Resources. 2004

DPE (2018) Independent Audit – Post Approval Requirements, Department of Planning and Environment. June 2018



Appendix A Relevant legislation and guidelines



Appendix B MYT's Environmental and Health and Safety policies



Appendix C Community Enquiries and Complaints Register example

