

Response letter for AGL Macquarie SSD 8889679 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
SSD 8889679 1 Non-Compliance Recommendations				
Schedule 2, Condition A2	The development may only be carried out: (a) in compliance with the conditions of this consent	Non-compliances (NC) with SSD 8889679 conditions were identified during this IEA. Findings and recommendations in relation to each non-compliance are provided against the relevant conditions below.	Refer to actions throughout this table	Refer to actions throughout this table
Schedule 2, Condition B26	The Applicant must: (a) ensure the development is designed, constructed and maintained to minimise impacts on surface water, flooding and groundwater at the site;	It is recommended that the Progressive ESCP document is updated to reflect erosion and sediment control arrangements for the coal bays area and battery laydown area being used for Stage 2. It is also recommended that requirements from 'methodology' documents are communicated to the Project workforce and evidence retained, if permanent fencing is extended to other sections of the Project Boundary.	Progressive ESCP document has been updated	September 2025

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Schedule 2, Condition C19	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) make the following information publicly available on its website as relevant to the stage of the development: <ul style="list-style-type: none"> (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent; (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (vi) how complaints about the development can be made; (vii) a complaints register; (viii) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (ix) any other matter required by the Planning Secretary; 	<p>It is recommended that AGLM publish the remaining documents required by Condition C19 on the Project website. Or list the documents individually, and provide direct links to the Major Projects Portal, to ensure these documents are easily accessible to the general public.</p> <p>It is noted that AGLM made arrangements for these files to be uploaded to the project website on 4/09/25.</p>	<p>The AGLM website contains a link to the SSD 8889679 Major Projects website which contains these documents. This was available at the time of the audit.</p> <p>Arrangements already made as per recommendation text.</p>	Completed

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition D3	The development of the Ravensworth Coal Unloader Facility must be carried out in accordance with the following document: Proposed Macquarie Generation Rai Project at Ravensworth Environmental Impact Statement, HLA Envirosciences, December 1997.	It is recommended that the ANOEMP is revised to refer to relevant commitments from the 1997 EIS, to allow these requirements to be monitored and managed. It is also recommended that AGLM retain records to confirm that the facility is being managed generally in accordance with the requirements of the 1997 EIS and the ANOEMP.	The facility is currently under Care & Maintenance and is managed by Aurizon on behalf of AGLM. 1997 EIS commitments were general in nature and mostly related to construction. It is understood that the ANOEMP addresses EIS requirements, however they are not explicitly outlined in the document where requirements are addressed. This recommendation will be considered during update of site documents.	December 2025
Schedule 2, Condition D6	APPROVAL IN ACCORDANCE WITH PLANS - The development of the Coal/Rail Unloader Augmentation must be carried out generally in accordance with the development application and accompanying plans described as described in the following document: Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation, HLA Envirosciences, August 2000.	It is recommended that the ANOEMP is revised to refer to the requirements of the HLA-Envirosciences SEE (2000). It is also recommended that AGLM retain records to confirm that the facility is being managed generally in accordance with the requirements of the HLA-Envirosciences SEE (2000).	The facility is currently under Care & Maintenance and is managed by Aurizon on behalf of AGLM. 2000 EIS commitments were general in nature and mostly related to construction. It is understood that the ANOEMP addresses EIS requirements, however they are not explicitly outlined in the document where requirements are addressed. This recommendation will be considered during update of site documents.	December 2025
SSD 8889679 Non-Compliance Recommendations				

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition B3	The Applicant must implement the measures described in the Fire Safety Study approved by the Planning Secretary.	It is recommended that AGLM document the process for regular inspection and review of the measures documented in the approved Fire Safety Study.	Inspection and review of FSS measures to be included in existing reviews	December 2025
Schedule 2, Condition B4	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards;	It is recommended that AGLM confirm that all external fuel storages in Project construction areas comply with AS requirements.	AGLM to inspect all fuel storages on construction areas using inspection checklists	December 2025
Schedule 2, Condition B5	Prior to commissioning the battery energy storage system, the Applicant must prepare a comprehensive Emergency Plan and detailed emergency procedures for the battery energy storage system in consultation with FRNSW and the NSW RFS. (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent);	It is recommended that AGLM continue to engage with the RFS and with FRNSW to finalise and implement the Project Emergency Response Plans prior to commissioning of the BESS.	Engagement to continue	December 2025

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition B15	The Applicant must take all reasonable and feasible steps to: (c) minimise to the greatest extent practicable, dust generating surfaces exposed on the site.	It is recommended that AGLM review opportunities to establish vegetation cover on Project stockpiles that will remain in place in the medium to long-term.	Vegetation cover established for all new stockpiles	Ongoing
Schedule 2, Condition B17	The Applicant must: (b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; and • complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version. 	It is recommended that AGLM document the process for introduction of new lighting plants to site, to ensure any external lighting complies with SSD 8889679 conditions.	All new lights to be assessed on delivery for compliance with SSD	December 2025

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition B25	The Applicant must ensure that all surface discharges from the development comply with all relevant provisions of the POEO Act, including any discharge limits (both volume and quality) set for the development in any EPL.	It is recommended that AGLM retain correspondence between Project contractors that documents transfers from the Project to the Liddell Power Station water management system prior to discharge under EPL 2122. It is also recommended that the SSFSMP is updated to clarify that water of a quality outside of EPL 2122 criteria may be transferred to the adjacent Liddell Power Station water management system for treatment / settling prior to discharge in accordance with the EPL.	All documentation will be collated and stored on SharePoint SSFSMP will be updated to clarify that water of a quality outside of EPL 2122	December 2025
Schedule 2, Condition B28	The Applicant must rehabilitate the development to the satisfaction of the Planning Secretary. The rehabilitation must comply with the objectives in Table 2.	It is recommended that AGLM review opportunities to establish vegetation cover on Project stockpiles that will remain in place in the medium to long-term (see Plate 16 and Plate 17).	Stockpiles will be regularly inspected and reviewed	December 2025
Schedule 2, Condition C3	Revision of Strategies, Plans and Programs Within 3 months, unless the Planning Secretary agrees otherwise, of: (c) the approval of any modification to the conditions of this consent;	It is recommended that AGLM complete a review of the Project management plans by 18/09/25, to reflect the determination of MOD3.	Plans will be reviewed and updated as required.	As required by Schedule 2, Condition C3.

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition D1	The development of the Low Pressure Pump Station Stabilisation is to be undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the following document:	It is recommended that AGLM implement a process for the regular inspection of the Low Pressure Pump Station site, to document that appropriate environmental controls remain in place or any identify corrective actions required.	The LP Pump Station is maintained and inspected in accordance with the site SAP maintenance schedule. The LP Pump Station area will be added to the regular environmental department inspection schedule.	30 November 2025

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Schedule 2, Condition D5	<p>(a) The applicant is to prepare and implement a site Environmental Management Plan for the Ravensworth Coal Unloader Facility relating to:</p> <p>(i) Locations and designs for clean and contaminated water pathways, with detailed design drawings for all sediment basins.</p> <p>(ii) Segregated pathways and storage facilities for clean and contaminated stormwater runoff, with segregated reuse priority for contaminated water.</p> <p>(iii) A commitment not to allow any excess contaminated runoff to enter Bowmans Creek, and a suitable monitoring programme to demonstrate that no excess contaminated water leaves the site.</p> <p>(iv) A maintenance schedule for the pollution traps identifying cleaning periods and methods of disposal.</p> <p>(v) A maintenance schedule for the sediment ponds identifying cleansing periods and methods of disposal.</p> <p>(b) The applicant is to demonstrate a commitment to maintaining final drainage lines in a stable condition.</p>	<p>It is recommended that the ANOEMP is revised to refer to the requirements from Condition D5 of SSD 8889679 and where each requirement is addressed.</p>	<p>This recommendation will be considered during update of site documents.</p>	<p>December 2025</p>
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HR1	<p>During detailed design for the Project:</p> <p>A detailed bushfire threat assessment will be conducted for the Project, including establishment of an APZ, in consultation with the RFS</p> <p>The separation distance between infrastructure within the Battery will be determined in accordance with applicable Codes and Standards and manufacturer's recommendations so that the preferred strategy of allowing a fire in one Battery enclosure or inverter to burn without the risk of propagating to other infrastructure can be maintained without the need for external firefighting</p> <p>The separation distance within the Battery will be determined in accordance with applicable Codes and Standards and manufacturer's recommendations to allow safe escape in case of a fire</p> <p>The need for active firefighting requirements at the Battery will be determined in consultation with RFS, FRNSW and the DPIE. Detailed fire fighting response and any need for fire water containment will be assessed and reported (e.g.</p>	<p>It is recommended that AGLM incorporate the risk management measures from Planager (2021) relevant to Stage 2 in the Project compliance register prior to commissioning of the BESS.</p>	<p>Risk management measures from Planager (2021) relevant to Stage 2 will be uploaded into the Project compliance register prior to commissioning of the BESS.</p>	<p>Prior to commissioning</p>
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	<p>in the format of a Fire Safety Study) post development approval, for review by DPIE, Fire rescue NSW and the RFS. The FSS will be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper No. 2 – Fire Safety Study Guidelines (HIPAP No. 2)</p> <p>The health and safety associated with EMF on the site and the potential exposure to EMF will be considered for AGLM staff and contractors as part of AGLM’s obligations for their health and wellbeing under the Work Health and Safety Regulations 2011 (NSW)</p> <p>Measures to prevent a leak occurring from the brine pipeline, the emergency diesel generators and at the Battery, and for secondary containment should a leak occur, will be included as part of the detailed of the Project. The likelihood of a significant loss of containment event associated with this Project (Level 4) will be designed to Rare in accordance with AGL’s Risk Management and Assessment Standard</p> <p>The PHA be progressed to a FHA once the design of the</p>			
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	<p>development has been finalised. Commitments identified in the PHA will be integrated into the management for the Project. The register of commitments (Appendix 1 of the PHA (Planager Pty Ltd, 2021)) will be integrated into the management for the Project. This includes integration of 84 individual commitments, including for the design, installation and maintenance of the Battery automatic shutdown system on exceedance of safe limits; installation of deflagration venting and fire protection inside the Battery enclosures; design of the brine pipeline, waste oil facility, emergency diesel generators and the Battery such that the risk of pollution from a release is reduced to ALARP; installation of protective barriers, including at the transformers; and application of a rigorous and formal management of change process for the Project, including detailed hazard identification and risk assessment processes.</p>			

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AQ6	<p>The following will be undertaken to manage wind erosion from stockpiles and exposed surfaces:</p> <ul style="list-style-type: none"> • Watering stockpiles and exposed surfaces • Progressive rehabilitation of exposed surfaces (as feasible) where no longer required for construction. 	It is recommended that AGLM review opportunities to establish vegetation cover on Project stockpiles that will remain in place in the medium to long-term.		
BI05	Where native vegetation is removed topsoil is to be retained from excavation areas within construction footprint (where possible). Topsoil stockpiles will be delineated and protected from machinery compaction and contamination during construction. Following construction and infill, topsoil will be re-spread over impacted native vegetation areas (to retain native seedbank and assist with natural revegetation). Avoid stockpiling in the vicinity of drainage lines.	It is recommended that the locations of stockpiles from Project Stage 1 are added to the 'Liddell BESS' stockpile register for the Project maintained by Enerven.	Stockpiles from Stage 1 to be added to register	December 2025

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V6	<ul style="list-style-type: none"> All construction plant, equipment, waste and excess materials will be contained within the designated boundaries of the work site and will be removed from the site following the completion of construction Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality On completion of the work disturbed areas will be stabilised and rehabilitated. 	It is recommended that AGLM review opportunities to establish vegetation cover on Project stockpiles that will remain in place in the medium to long-term.	Stockpiles will be regularly inspected and reviewed	December 2025

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W3	<p>Stockpiles would be managed to minimise the potential for mobilisation and transport of dust, sediment and leachate in runoff. This would include:</p> <ul style="list-style-type: none"> • Minimising the number of stockpiles, area used for stockpiles, and time that they are left exposed • Locating stockpiles away from drainage lines, waterways and areas where they may be susceptible to wind erosion • Stabilising stockpiles, establishing appropriate sediment controls and suppressing dust as required. 	<p>It is recommended that AGLM review opportunities to establish vegetation cover on Project stockpiles that will remain in place in the medium to long-term.</p>	<p>Stockpiles will be regularly inspected and reviewed for long-term suitability (if required)</p>	<p>December 2025</p>