

AGL Macquarie response to SSD 8889679 Independent Environment Audit Recommendations and Proposed Actions 13/03/2026

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
<b>SSD 8889679 Non-Compliance Recommendations</b>				
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 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. j) include details of the location, management, and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone;	It is recommended that AGLM update the Operational and Maintenance Emergency Plan to include details of the location, management, and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of this area for Stage 2	AGLM will update the BESS Operation and Maintenance Emergency Plan as recommended.	June 2026

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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 update the Stage 2 SWMP to ensure that Figure 6-1 shows the location of EPL 2122 Discharge Point No. 27, and outline procedures to be followed when discharging from Stage 2 attenuation basins.	The Stage 2 SWMP will be updated as recommended.	June 2026

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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:	<p>It is recommended that AGLM consult with Aurizon to ensure that that the Ravensworth Coal Unloader Facility maintenance checklist for care and maintenance is updated to include items that align with the relevant confirm that care and maintenance inspections and monitoring are being completed generally in accordance with the requirements of the 1997 EIS, NOEMP and 2000 SEE.</p> <p>recommended that AGLM has a process in place with Aurizon to confirm that inspections for the Ravensworth Coal Unloader and Coal/Rail Unloader Augmentation Facilities are effective in appropriately managing these sites.</p>	The Ravensworth Coal Loader is in a state of care and maintenance and has a lower risk profile than that assessed in the EIS and SEE. Routine inspections commensurate with this reduced level of risk continue to be undertaken by Aurizon. AGLM will request Aurizon update the ANOEMP to specifically reference commitments made in the EIS and SEE and how these are currently being managed and include this area as part of AGLM routine inspections.	June 2026

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
GHG1	The CEMP will include requirements for identification and minimise greenhouse gases (GHG) during construction.	It is recommended that AGLM revise the Stage 3 Construction Environmental Management Plan to include requirements for identifying and minimising greenhouse gases (GHG) during construction	No action proposed. CEMPs for Stage 3 projects are generally prepared on a per-project basis. While the Car Park Upgrade CEMP did not explicitly reference greenhouse gas minimisation, it contained many fuel and energy saving measures. The Car Park Upgrade project has been completed hence updating the CEMP would serve no benefit. AGL will include greenhouse gas measures in CEMPs for future Stage 3 projects.	
<b>SSD 8889679 Recommendations</b>				
Schedule 2, Condition A9	The Applicant must 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.	It is recommended that AGLM ensure that a building certificate is issued for the BESS operations and maintenance building, if required.	AGLM will review requirements for building certificates for the BESS operations and maintenance building, and will take measures to obtain the certificates if required.	Prior to occupancy of buildings
Schedule 2, Condition B7	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	It is recommended that AGLM inspect 'no-go zone' flagging in the Stage 2 Liddell BESS area and undertake maintenance to reinstate any fallen or damaged sections.	Flagging will be inspected, maintained and reinstated as recommended.	June 2026

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition B9	The Applicant must implement the Biodiversity Management Plan approved by the Planning Secretary.	It is recommended that AGLM revise the Stage 3 Biodiversity Management Plan to reflect current practices regarding stockpile management.	The Biodiversity Management Plan will be corrected to remove the erroneous requirement to cover topsoil stockpiles with a water proof membrane.	June 2026
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 establish a topsoil stockpile register for the Stage 3 area and review opportunities for long term stabilisation of the stockpiles of material salvaged for the car park construction for Stage 3.	AGLM will establish a topsoil register for Stage 3 activities.  AGLM will apply seed to the Stage 3 stockpile areas.	June 2026  June 2026
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 AGLM inspect the erosion and sediment controls within the Stage 2 and Stage 3 areas and undertake maintenance works to reinstate any sediment fences and review opportunities to prevent or minimise further erosion.	Erosion and sediment controls within the Stage 2 area will be inspected and maintenance completed as recommended.  Erosion and sediment controls for Stage 3 were inspected and corrective actions assigned ahead of the audit. Maintenance work for identified issues is planned for completion.	June 2026  September 2026
Schedule 2, Condition B27	The Applicant must:  (c) dispose of all waste at appropriately licensed waste facilities or as expressly permitted in an applicable EPL	It is recommended that AGLM retain copies of all waste tracking records for the BESS Project, including associated certificates for the transportation of scheduled waste.	This information will be requested from the primary construction contractor.	May 2026

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition C8	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020).	It is recommended that AGLM consult with DPHI to confirm when Compliance Reports for the Project must be carried out, given that the Project is staged, with Stage 1 being completed, and Stage 2 nearing completion.	Initial discussions have been held with DPHI. AGLM has been requested to provide correspondence to confirm this requirement.	June 2026

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition C16	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020, or its latest version), the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) review and respond to each Independent Audit Report prepared under condition C13 of this approval, or condition C15 where notice is given by the Planning Secretary;</li> <li>(b) submit the response to the Planning Secretary; and</li> <li>(c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.</li> </ul>	<p>It is recommended that AGLM add a date on the response document to this IEA prior to submission and publishing on the AGLM public website.</p>	<p>This will be completed as recommended</p>	<p>This report</p>

<p>Schedule 2, Condition D5</p>	<p>(a) The applicant is to prepare and implement a site Environmental Management Plan for the Ravensworth Coal Unloader Facility relating to:</p> <ul style="list-style-type: none"> <li>(i) Locations and designs for clean and contaminated water pathways, with detailed design drawings for all sediment basins.</li> <li>(ii) Segregated pathways and storage facilities for clean and contaminated stormwater runoff, with segregated reuse priority for contaminated water.</li> <li>(iii) A commitment not to allow any excess contaminated runoff to enter Bowmans Creek, and a suitable monitoring programme to demonstrate</li> </ul>	<p>It is recommended that AGLM update site ANOEMP documents to note the relevant requirements from Condition D5 of SSD 8889679 and where each requirement is addressed (as relevant to care and maintenance activities)</p>	<p>Refer to Schedule 2, Condition D3</p>	
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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
	<p>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>WR01</p>	<p>A Waste Management Plan will be developed for the Project with the following criteria:</p> <ul style="list-style-type: none"> <li>• A hierarchical waste management approach will be used, from the most preferable (reduce, reuse or recycle wastes) to the least preferable (disposal) to prioritise waste management strategies to avoid waste generation</li> <li>• The plans will promote the use of materials with minimal packaging requirements, removal of packaging offsite by suppliers and fabrication of parts offsite</li> <li>• Where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or disposal) by licensed contractors</li> <li>• All waste types will be separated at source for recycling</li> <li>• A licensed service provider will be appointed to collect waste during</li> </ul>	<p>It is recommended that AGLM retain copies of all waste tracking records for the BESS Project, including associated certificates for the transportation and disposal of scheduled waste.</p>	<p>Refer to Schedule 2, Condition B27</p>	
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	<p>construction and operation</p> <ul style="list-style-type: none"> <li>• Each waste type will be classified for transport to ensure correct handling.</li> <li>• Any waste that cannot be recovered or recycled will be disposed of at a suitably authorised or licensed treatment or disposal facility</li> </ul> <p>where it will be treated and disposed of according to its classification.</p>			