



xenith

Independent Environmental Audit

Liddell Future Land Use & Enabling Works Project
AGL Macquarie Pty Limited
December 2025

Contents

1.	INTRODUCTION	1
1.1	Background	1
1.2	Audit Team	2
1.3	Audit Objectives	2
1.4	Audit Scope	2
1.5	Audit Period	2
2.	AUDIT METHODOLOGY	6
2.1	Overview	6
2.2	IEA Preparation	6
2.3	Compliance Evaluation	6
2.4	Site Inspection	7
2.4.1	Opening Meeting	7
2.4.2	Site Overview and Orientation Session	7
2.4.3	IEA Interviews	8
2.4.4	Focused Site Inspection	8
2.4.5	Site Documentation Review	8
2.4.6	Follow Up Auditing	8
2.4.7	Exiting Briefing	8
2.5	Audit Consultation	8
3.	AUDIT FINDINGS	12
3.1	Approval and Document List	12
3.2	Compliance Status Descriptors	12
3.3	Compliance Performance	12
3.4	Summary of Agency Notices and Orders	12
3.5	Actions from Previous Audit	12
3.6	Non-Compliances During the Audit Period	13
3.7	Environmental Performance	14
3.7.1	Site Inspection Summary	14
3.7.2	Environmental Management Documents	14

3.7.3	Waste Management	14
3.7.4	Erosion and Sediment Control	15
3.7.5	Operation of Plant and Equipment	15
3.7.6	Air Quality	15
3.7.7	Biodiversity	15
3.7.8	Visual Amenity and Lighting	16
3.7.9	Noise	16
3.7.10	Aboriginal Heritage	16
3.7.11	Rehabilitation	16
3.7.12	Bushfire Management	17
3.7.13	Contamination	17
3.7.14	Environmental Incidents	17
3.7.15	Environmental Complaints	17
3.7.16	Environmental Impact Comparison	17

4.	Recommendations	18
----	-----------------	----

Figures

Figure 1	SSD 24937520 Development Layout and Disturbance Areas	4
Figure 2	SSD 84937520 Key Areas	5

Tables

Table 1	IEA Guideline Requirements	3
Table 2	Feedback received from IEA consultation	8
Table 3	Summary of Compliance	12
Table 4	IEA Non-Compliances	13
Table 5	IEA Recommendations	18






Appendices

Appendix A	Endorsement of IEA Team
Appendix B	IEA Declaration
Appendix C	IEA Compliance Tables
Appendix D	Stakeholder Engagement
Appendix E	IEA Site Visit Agenda
Appendix F	Site Inspection Plates



Document issue approval				
Title	Independent Audit Report			
Client	AGL Macquarie Pty Limited			
Status	Final	Project/document no.	3401AGLM	
Date	December 2025	Revision no.	01	

Approvals				
	Name	Position	Signature	Date
Prepared by	SM	Principal		08/12/25
Reviewed by	DW	Principal		09/12/25
Approved by	DW	Principal		12/12/25

Distributions				
Organisation	Attention	Hard copies	Electronic copies	Actioned
AGL Macquarie Pty Limited	MP, TB	0	1	DW

To be initialled and dated by the person who actions the issue of the documents.

DISCLAIMER

Xenith Consulting Pty Ltd makes no representation, undertakes no duty, and accepts no responsibility to any third party who may use or rely upon this document, or the drawings, information and data recorded in this document.

We do not accept responsibility or liability for losses arising from the assessment and determination of the Project, or if approved, the reliance on this document for any other purpose.

Any operating or capital cost estimation (as relevant) is current as at the date of estimation only. The estimation assessed herein may change significantly and unexpectedly over a relatively short period (including as a result of general market movements and factors specific to the particular mine, project or deposit). We do not accept responsibility or liability for losses arising from such subsequent changes in cost.

1. INTRODUCTION

1.1 Background

Xenith has been commissioned by AGL Macquarie Pty Limited (AGLM) to conduct the first Stage 1 phase Independent Environmental Audit (IEA) for the Liddell Future Land Use & Enabling Works Project (SSD 24937520) (the Project).

AGLM owns and operates the Bayswater Power Station (BPS), Liddell Power Station (LPS), Hunter Valley Gas Turbines (HVGT) and associated ancillary infrastructure systems. LPS and BPS are located approximately 25 kilometres (km) north-west of Singleton, 15 km south-east of Muswellbrook and 165 km north west of Sydney. The Project is located within the Singleton and Muswellbrook Local Government Areas (LGAs) and located within an area dominated by mining and power generation industries.

State Significant Development (SSD) 24937520 provides for the following activities:

- › Construction and use of a borrow pit, including the expansion and use of the existing 'borrow pit area', for the extraction of material for use as capping material and for civil works to support final landform establishment;
- › Construction and use of an asbestos disposal facility for disposal of asbestos contaminated soil, asbestos containing materials (ACM), synthetic mineral fibre (SMF) and small amounts of other suitable material associated with the asbestos material that is not feasible to separate;
- › The demolition of the LPS and redundant associated infrastructure;
- › The demolition of the HVGTs and any associated transmission lines and infrastructure;
- › Recontouring of landform and revegetation of relevant areas of the site, if required;
- › Some works ancillary to the approved Liddell Ash Dam (LAD), to manage surface water and maintain the structural integrity of ash retaining structures;
- › Surrender, consolidation and modernisation of existing relevant consents, including:
 - Continued operation of the LAD which is approved under DA 1/2011 as modified including borrow pit works;
 - Sewerage effluent reuse works which are approved under DA 98/1995;
 - Ash line settling pond and associated infrastructure which is approved under DA 90/2015;
 - Effluent pipeline from the LPS water treatment plant to the outfall canal which is approved by DA 91/2015; and
 - Construction and operation of the HVGTs approved under DA 51/86 (note to be surrendered only as HVGTs will be decommissioned and demolished under this project).

Demolition of LPS and ancillary infrastructure and recontouring of the site, if required, will be carried out to enable the continued industrial use of the LPS site. The proposed borrow pit area would also support ongoing rehabilitation of the LAD, site recontouring works as required and other relevant civil project works at AGLM.

Works associated with the development include the following:

- › Stage 1:
 - Demolition of LPS and redundant associated infrastructure;
 - Demolition of the HVGTs and any associated transmission infrastructure;
 - Construction and use of asbestos disposal facility containment cells, including access road;
 - Construction and use of a borrow pit for the extraction of up to 1.5 Million m³ including; establishment of the access road and associated water management controls;

- Rock crushing associated with LAD capping works; and
 - Rerouting of the existing dual water supply pipeline from the Tinkers Creek area along the existing ash pipeline corridor to the LAD to supply water for dust suppression and rehabilitation works.
- › Stage 2:
- LAD ancillary works to manage surface water including works on the Skimmer Dam.
- › Stage 3:
- Remediation (as required), recontouring and final landform works;
 - LPS: Following completion of the demolition works the site will be prepared for ongoing industrial use;
 - Borrow pit area and asbestos disposal facility: The borrow pit area and asbestos disposal facility will be rehabilitated to a safe, stable and non-polluting landform;
 - Additional works associated with extraction from the Borrow Pit (up to a total of 13.5 Million m³); and
 - Works associated with the LAD to maintain the structural integrity of the ash retaining structures.

SSD 24937520 was approved subject to conditions on 31 January 2025 by the Director Resources Assessments in accordance with Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Figure 1 and **Figure 2** shows the layout of the Project as approved under SSD 24937520.

The IEA has been conducted generally in accordance with the NSW DPIE *Independent Audit Post Approval Requirements May 2020* (IEA Guidelines).

1.2 Audit Team

The IEA was completed by Dorian Walsh (Certified Auditor Certificate Number: 201881) and Sarah Moore of Xenith.

1.3 Audit Objectives

The IEA assesses the Project activities during the audit period (see **Section 3**) and compliance with key regulatory approvals for the Project. The IEA assessed the status of conditions and commitments from:

- › SSD 24937520; and
- › SSD 24937520 approved management plans, strategies and programs.

1.4 Audit Scope

The IEA scope is provided under Schedule 2, Condition D1 of SSD 24937520 which requires that:

'Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020, or its latest version).'

The relevant requirements from the IEA Guidelines are outlined in **Table 1**.

1.5 Audit Period

The IEA covers the period from 23 July 2025 (date of commencement of Project construction and demolition) to 14 October (the day of the IEA site visit).

Table 1 IEA Guideline Requirements

Requirement			Report Section												
Independent Audits must be properly documented, and their outcomes reported in an Independent Audit Report. This communicates an independent evaluation of a project’s environmental performance and compliance status			This IEA report												
The appointment of the auditor and technical experts must be agreed in writing by the Planning Secretary before each audit is commissioned. Each member of the audit team must receive the Department’s agreement			Appendix A												
The Planning Secretary may direct a proponent to undertake Independent Audits in addition to those provided for in an Independent Audit when considered necessary to address a particular issue, for example, following an incident			N/A; No direction has been made by DPHI for an additional audit												
<p>Audit Frequency:</p> <table border="1"> <thead> <tr> <th>Phase</th> <th>Initial Independent Audit</th> <th>Ongoing Independent Audit Intervals</th> </tr> </thead> <tbody> <tr> <td>Construction</td> <td>Within 12 weeks of the commencement of construction</td> <td>At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.</td> </tr> <tr> <td>Operation</td> <td>Within 26 weeks of the commencement of operation</td> <td>At intervals, no greater than 3 years or as otherwise agreed by the Secretary.</td> </tr> <tr> <td>Closure / Rehabilitation</td> <td>Within 52 weeks from notifying of suspension/ceasing of operations</td> <td>At intervals no greater than 1 year or as otherwise agreed by the Secretary.</td> </tr> </tbody> </table> <p>The timeframes in Table 1 include completion of all activities required in undertaking an Independent Audit.</p>			Phase	Initial Independent Audit	Ongoing Independent Audit Intervals	Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.	Operation	Within 26 weeks of the commencement of operation	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.	Closure / Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary.	<p>Section 2.4; AGLM notified DPHI that construction and demolition works would commence on 23 July 2025. Xenith conducted the IEA site inspection on 14 October 2025.</p>
Phase	Initial Independent Audit	Ongoing Independent Audit Intervals													
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.													
Operation	Within 26 weeks of the commencement of operation	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.													
Closure / Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary.													
A recommended action must be proposed to address each non-compliance and/or incident identified by the auditor.			Section 4												
The proponent must submit their response to the audit findings to the Department in a separate document to the final Independent Audit Report.			N/A; AGLM to complete												
The final Independent Audit Report and the proponent’s response to audit findings must be submitted to the Department within 2 months of undertaking the independent audit site inspection, unless otherwise agreed by the Department.			N/A; AGLM to complete												

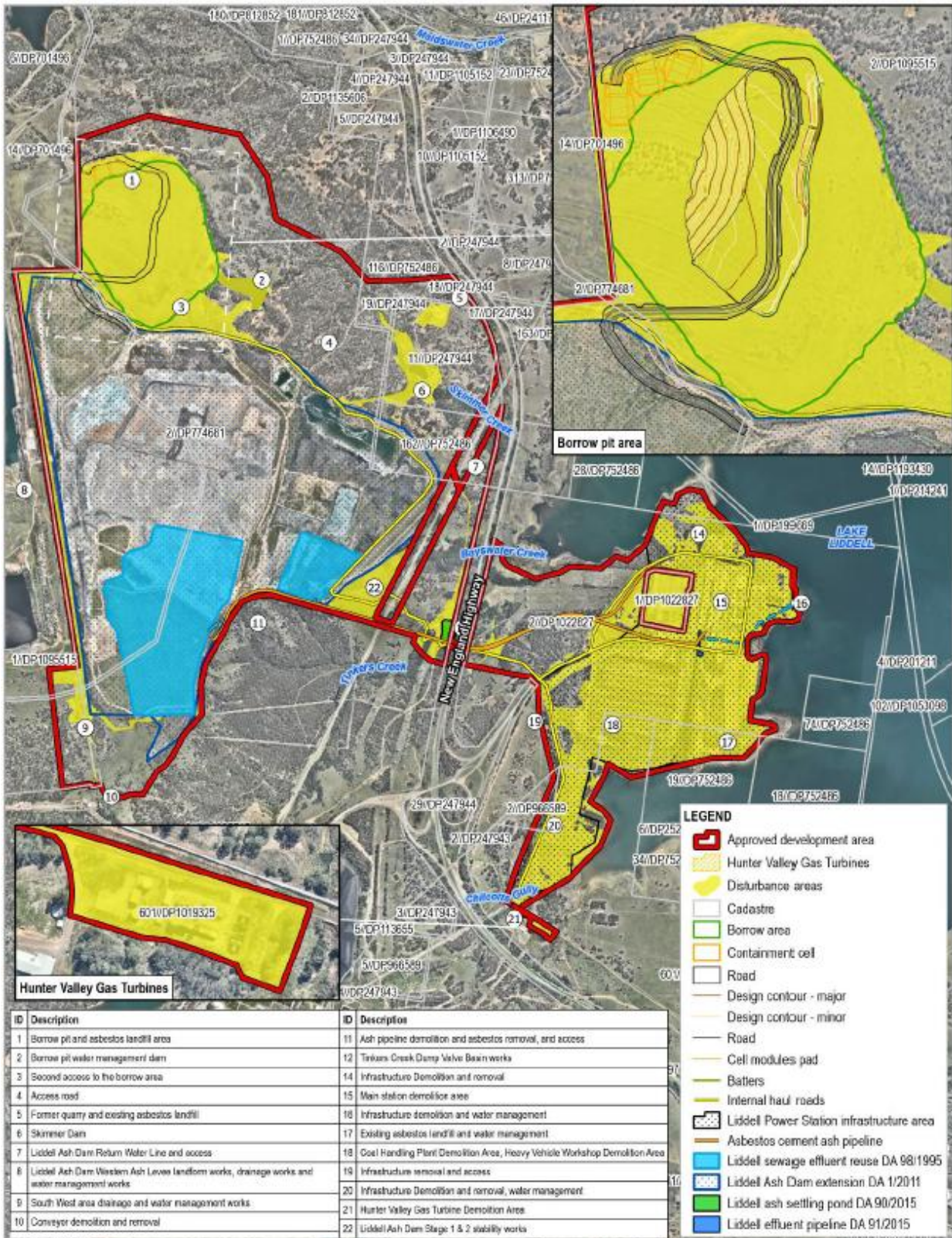


Figure 1 SSD 24937520 Development Layout and Disturbance Areas

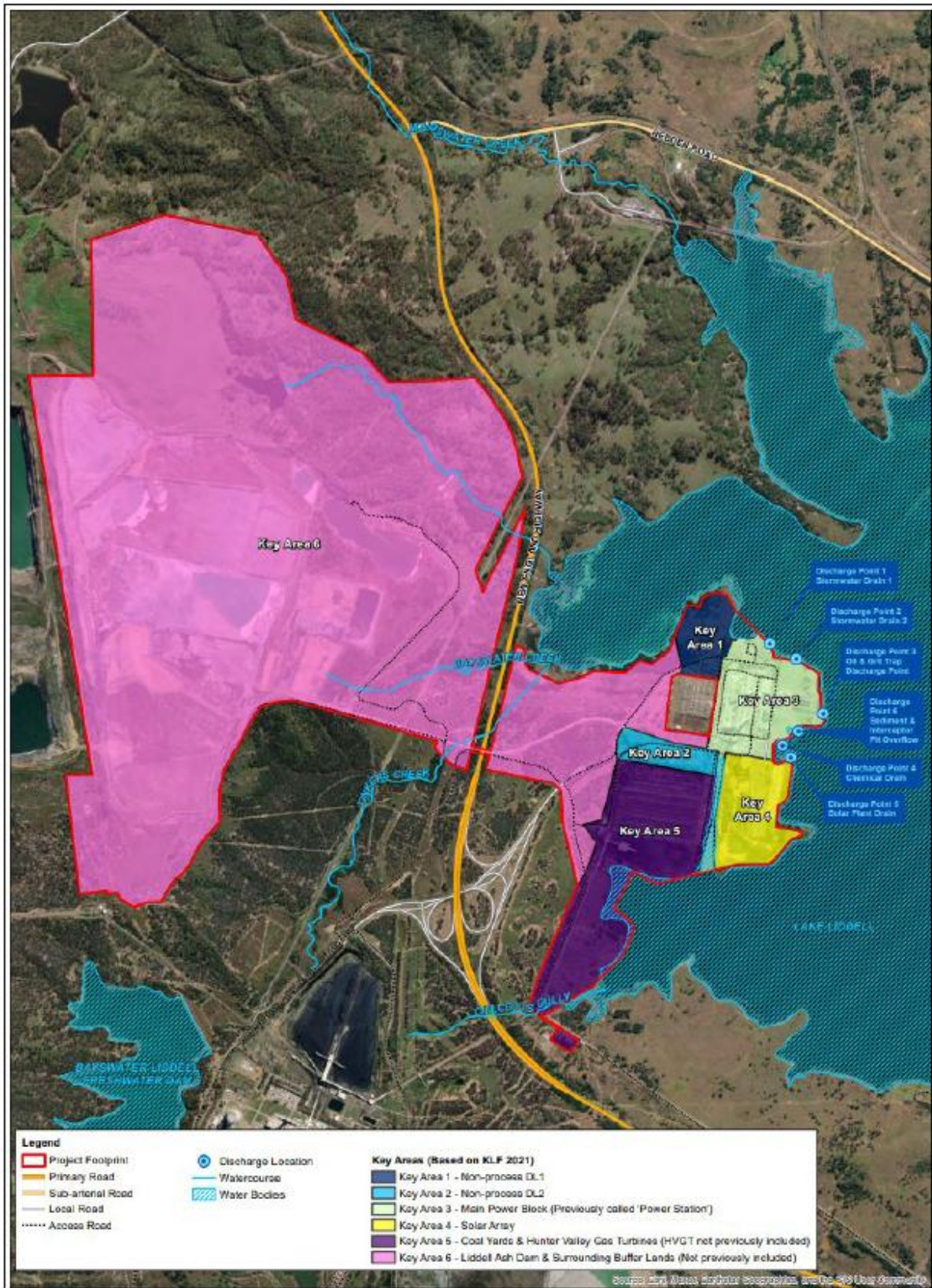


Figure 2 SSD 84937520 Key Areas

2. AUDIT METHODOLOGY

2.1 Overview

This IEA was undertaken in accordance with the requirements of SSD 24937520 (see **Section 1.4**) and the IEA Guidelines. **Appendix A** includes a copy of DPHI endorsement for the IEA team (see **Section 1.2**) and confirmation over audit requirements.

The compliance status of Project activities during the audit period was determined by assessment of key approval documents regulating site activities (see **Section 3.3**) and a desktop review of all plans, strategies, programs, monitoring data and correspondence relevant to the audit period. The desktop review was used as a basis for this IEA report and identified potential compliance issues that were verified during the Project site inspection and in interviews with key AGLM personnel.

The audit methodology also included consultation with NSW DPHI, Environment Protection Authority (EPA), NSW Government Department of Climate Change, Energy, the Environment and Water (DCCEEW), Conservation Programs, Heritage and Regulation Group (CPHR), DCCEEW Water Group and Muswellbrook Shire Council (MSC) to seek any specific environmental issues that should be a focus of the IEA (see **Section 2.5**).

2.2 IEA Preparation

Preparation of the IEA involved:

- › Submission of an information request to the Client for the provision of evidence to verify the compliance status of AGLM Project activities during the audit period;
- › Engagement with key regulatory agencies for the Project regarding any specific issues that should be a particular focus of the IEA;
- › Submission of an audit agenda (see **Appendix E**) and confirmation over the scope of the Xenith site inspection component of the IEA;
- › Desktop review of documentation provided by the Client to determine the compliance status of approval and licencing conditions, identify good site practice and opportunities for improvement, in accordance with the requirements of the IEA Guidelines; and
- › Preparation of compliance tables and protocols for the site inspection, including a checklist of specific regulatory requirements obtained from documents provided.

2.3 Compliance Evaluation

The IEA consisted of a detailed desktop review of approval documentation and a site inspection. The findings of this IEA were based on verifiable evidence collected by:

- › Review of Project documentation (including document reference, revision numbers, dates and authors) by Xenith;
- › Interviews with key site personnel completed by Xenith; and
- › Inspections of the Liddell Future Land Use & Enabling Works Project site, activities and processes. Selected images taken during the site inspections are included in **Appendix F**.

Matthew Parkinson (MP) (Manager Environment and Approvals) and Trescinda Brown (TB) (Advisor Environment (Contractor)) were the primary AGLM contacts for the audit and were present during the audit site inspection and interviews.

A list of the key documentation reviewed for the IEA is found in **Section 3.1**. The evidence that was used to determine the compliance status with respect to each condition has been documented in the tables provided in **Appendix C**, along with relevant observations, notes and recommended opportunities for improvement.

2.4 Site Inspection

A site inspection of the SSD 24937520 development site was conducted by Xenith on 14 October 2025 and undertaken to ensure that all aspects of environmental management and performance of the Project were reviewed.

At the time of audit, AGLM had:

- › Commenced demolition works at the LPS, targeting redundant infrastructure (see Plate 3 and Plate 6 in **Appendix F**). Activities focused on enabling works and non-structural strip-out to prepare for dismantling. Internal strip-out had progressed through the Administration buildings, Turbine Hall, and ancillary facilities. Asset recovery was occurring concurrently, with significant ferrous and non-ferrous materials processed and removed.
- › Commenced construction of the asbestos disposal facility containment cells, including access road (see Plate 1 in **Appendix F**).
- › Commenced construction with topsoil stripping for the sediment basin and drains. Muck removal from the oil and grit trap has progressed (see Plate 2 in **Appendix F**). Excavation of the new overflow weir and channel for the oil and grit trap structure has been completed.
- › Asbestos containing material (ACM) and hazardous material removal including ACM removal from Turbine Hall Levels 1 and 2, and Boiler 3 Lower Downcomer. A temporary asbestos storage facility was established for recovered ACM (see Plate 36 in **Appendix F**). Scaffold installation was completed at the Southern Chimney Stack southern gas inlet duct to facilitate ACM removal. Additional ACM removal works have also been completed across minor support infrastructure.

Development of the other activities approved under SSD 24937520 had not commenced during the audit period.

2.4.1 Opening Meeting

The IEA site inspection completed by Xenith commenced with an opening meeting. Attendees included Dorian Walsh (Xenith), Sarah Moore (Xenith), Matthew Parkinson (AGLM Manager Environment and Approvals), Trescinda Brown (AGLM Advisor Environment (Contractor)), Imogen Waters (AGLM Environment Advisor), Chris Druery (AGLM Station Closure Manager – Liddell), Simon Bradley (AGLM Closure Superintendent), Simon Bohm (AGLM Civil Project Engineer), Ollie Easingwood (CMA Contracting (CMA) Engineer), Todd Soloman (CMA Director – Major Projects), Ruan Zaayman (CMA Project Manager), and Lincoln Tucker (CMA QSE Manager).

The briefing included clarification of the audit objectives, scope, resources required and the methodology of the IEA.

2.4.2 Site Overview and Orientation Session

A site overview was conducted by AGLM and CMA (Project contractor) site personnel to provide Xenith with a general overview of the Project during the audit period, an indication of the environmental setting, near neighbours, safety and emergency requirements and known environmental issues.

2.4.3 IEA Interviews

The IEA included interviews with key AGLM personnel involved with the management and operation of the Project. The IEA interviews during the Xenith site inspection were conducted to assist with verifying the compliance status of the Project.

AGLM personnel interviewed by Xenith during the audit process included:

- › Matthew Parkinson (AGLM Manager Environment and Approvals);
- › Trescinda Brown (AGLM Advisor Environment (Contractor)); and
- › Lincoln Tucker (CMA QSE Manager).

2.4.4 Focused Site Inspection

A focused site inspection was conducted on 14 October 2025 following the initial site overview session. The purpose of the site inspection was to review specific operation and environmental aspects of the Project that were completed during the audit period and to assess Project environmental management systems and performance in detail.

2.4.5 Site Documentation Review

Relevant site documentation was reviewed with AGLM personnel to verify compliance information. Key documents reviewed included SSD 24937520 environmental assessments, correspondence with regulatory agencies, Environmental Management Plans, and procedures.

2.4.6 Follow Up Auditing

Follow up interviews and document reviews were conducted by Xenith to clarify any outstanding compliance issues to be resolved prior to inclusion in the final IEA report.

2.4.7 Exiting Briefing

Attendees of the exit briefing included Dorian Walsh, Sarah Moore, Matt Parkinson, Trescinda Brown, Imogen Waters, Todd Soloman, Ruan Zaayman and Lincoln Tucker.

The exit meeting included the discussion of preliminary audit findings, recommendations and explanation of actions required by AGLM and by Xenith to complete the audit process required under the IEA Guidelines.

2.5 Audit Consultation

Correspondence was sent to the DPHI, EPA, DCCEEW CPHR, DCCEEW Water, and MSC, requesting their input into the scope of the IEA. Responses were received from DPHI and DCCEEW Water during the audit process and in response to the IEA report (see **Appendix D**), with comments provided in **Table 2**. No comments were received from the NSW EPA, DCCEEW CPHR or MSC.

Table 2 Feedback received from IEA consultation

Comment	Response
DPHI	
The IEA must include:	An assessment of compliance for all conditions of SSD 24937520 is included in Appendix C .

Comment	Response
<ul style="list-style-type: none"> › an assessment of compliance for all conditions of development consent SSD-24937520 (the consent) 	
<ul style="list-style-type: none"> › an assessment of the adequacy of each environmental management document required under the consent and 	An assessment of the adequacy of each environmental management document required under SSD 24937520 is included in Appendix C .
<ul style="list-style-type: none"> › an assessment of the implementation of each environmental management plan required under the consent. 	An assessment of the implementation of each environmental management plan required under the consent is included in Appendix C .
<p>The following stakeholders are to be contacted for consultation prior to the site inspection:</p> <ul style="list-style-type: none"> › NSW Department of Climate Change, Energy, the Environment, and Water <ul style="list-style-type: none"> ▪ Water Group ▪ Conservation Programs, Heritage and Regulation (CPHR) Group › NSW Environment Protection Authority Muswellbrook Shire Council 	Consultation with listed stakeholders is included in Appendix D and outlined below.
DCCEEW Water Group	
<p>NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:</p> <ul style="list-style-type: none"> › Identification of compliance requirements and documentation of any non-compliances. › Assessment of the adequacy and implementation of management plans and sub plans. › Assessment of compliance against relevant regulatory requirements and legislation. › Assessment of compliance between actual and predicted impacts in the environmental assessment. › Reporting requirements for management plans. › Identification of strengths of the project in environmental management and opportunities for improvement. <p>NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:</p>	<p>Noted. This IEA report was completed generally in accordance with the IEA Guidelines. Further detail on the assessment of compliance for all conditions of SSD 24937520 is included in Appendix C.</p>

Comment	Response
<p>› The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:</p> <ul style="list-style-type: none"> ▪ Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. ▪ Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan. 	<p>AGLM have the requirement for a Water Management Plan (WMP) under SSD 24937520 Schedule 2, Condition B15 and a Soil and Water Management Sub Plan (SWMSP) specific to demolition works, under EIS Statement of Commitment (SoC) SC1.</p> <p>Detail on AGLM compliance with these management plans is provided in in Appendix C.</p>
<p>› The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.</p>	<p>AGLM have the requirement for a Trigger Action Response Plan (TARP) to be included within the WMP under SSD 24937520 Schedule 2, Condition B15(i). In addition, a TARP is included within the SWMSP under Schedule 2, Condition C16(g).</p> <p>Detail on AGLM compliance with these management plans is provided in in Appendix C.</p>
<p>› Water supply availability is clearly defined for the project.</p>	<p>Water supply availability is detailed in the '<i>Water Impact Assessment Liddell Future Land Use and Enabling Works Project</i>' (GHD, 2023) [WIA], provided as Appendix J of SSD 24937520 '<i>Liddell Future Land Use and Enabling Works Environmental Impact Statement</i>' (GHD, 2023) [EIS]. AGLM holds a Water Licensing Package (WLP) for the operation of the BPS and LPS authorising water extraction and use in accordance with the WLP. No changes to this WLP are proposed under the Project. The WLP details, including an annual allocation of 114,367 ML (based on 100% available water determination), are outlined in Table 4.2 of the Project Water Impact Assessment (WIA).</p> <p>Water security for the Project was evaluated for key activities, including Borrow Pit operations and demolition of LPS infrastructure, under maximum demand scenarios. The combined peak water demand was assessed as approximately 600 megalitres (ML) per year. This represents only 0.5% of the total WLP allocation. The WIA concludes that no additional water licences or approvals are required for the Project.</p>
<p>› Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant</p>	<p>Matthew Parkinson and Trescinda Brown (pers comms) confirmed that the water licencing is not relevant to Stage 1, hence AGLM sought approval</p>

Comment	Response
<p>Water Access Licence or exemption under the Water Management (General) Regulation 2025.</p>	<p>for staging of the management plan (refer to Schedule 2, Condition A19 in Appendix C).</p> <p>Sighted letter from DPHI to AGLM dated 10/05/25 stating that <i>'No change to the current water licencing strategy is required for Stage 1A Works. Further information on the water licences timing and strategy will be provided with the management plans for Stage 2 of the Development as agreed with DPHI.'</i> Within the letter, DPHI further states that <i>'The water licencing recommendations previously received by the Department of Climate Change, Energy, the Environment and Water – Water Group are not relevant to the Stage 1 works, as they relate to the Sediment Dam which will not be utilised until Stage 2 and 3 works commence.'</i></p>
<p>› Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.</p>	<p>Matthew Parkinson and Trescinda Brown (pers comms) confirmed that the water metering is not relevant to Stage 1, hence AGLM sought approval for staging of the management plan (as abovementioned, and also refer to Schedule 2, Condition A19 in Appendix C).</p>
<p>› Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.</p>	<p>Matthew Parkinson and Trescinda Brown (pers comms) confirmed that the water licencing is not relevant to Stage 1, hence AGLM sought approval for staging of the management plan (as abovementioned, and also refer to Schedule 2, Condition A19 in Appendix C).</p>
<p>› Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.</p>	<p>AGLM have the requirement for annual compliance reporting under SSD 24937520 Schedule 2, Condition D2 and this has not been triggered at the time of audit.</p> <p>Development under SSD 24937520 commenced on 28 March 2025. Therefore, the first Compliance Report for the Project will be required by the end of March 2026.</p>

3. AUDIT FINDINGS

3.1 Approval and Document List

AGLM documentation for the IEA was sighted during a detailed desktop review and the audit site inspection of 9 July 2025. Approvals and documents assessed during the audit were related to:

- › SSD 24937520 approval conditions;
- › SSD 24937520 Statement of Commitments;
- › SSD 24937520 Environmental Management Plans and procedures;
- › AGLM environmental monitoring data; and
- › AGLM correspondence with regulatory agencies and other records of consultation.

The tables included within **Appendix C** discuss the documentation that was used to determine compliance with the conditions of SSD 24937520 assessed during the IEA.

3.2 Compliance Status Descriptors

The compliance status of each condition reviewed during the IEA was assessed based on evidence provided and determined in accordance with the descriptors provided in the IEA Guidelines. No other terms have been used to describe the compliance status of conditions within this IEA.

3.3 Compliance Performance

Table 3 provides a summary of compliance for key AGLM approvals and licensing during the audit period. A description of each identified non-compliance is provided in **Section 3.5** and **Appendix C**.

Table 3 Summary of Compliance

Document	C	NC	NT	Note	Total
SSD 24937520	109	6	154	11	169
SSD 24937520 Statement of Commitments (Soc)	69	3	26	0	98

3.4 Summary of Agency Notices and Orders

No notices or orders regarding the Project were issued to SSD 24937520 were issued to AGLM during the audit period.

3.5 Actions from Previous Audit

As this is the first SSD 24937520 IEA, there are no actions from a previous audit.

3.6 Non-Compliances During the Audit Period

Table 4 lists the non-compliances identified during the audit period. Recommendations made in relation to these non-compliances are provided in **Section 4**, with further context provided in **Appendix C**.

Table 4 IEA Non-Compliances

Ref	Non-Compliance
SSD 24937520	
Schedule 2, Condition A2	Non-compliances (NC) with SSD 24937520 conditions were identified during this IEA (see below).
Schedule 2, Condition B13	Two chemical pods were observed to be not on bunds in the temporary asbestos storage facility (Plate 21 of Appendix F) and there was a diesel spill at a small self-bunded diesel storage tank which had been covered with spill-sorb but not cleaned up (Plate 22 of Appendix F).
Schedule 2, Condition B18	It could not be determined whether the quantities of dangerous goods stored and handled by the development are below the threshold quantities listed in the <i>DPHI Hazardous and Offensive Development Application Guidelines – Applying SEPP 33</i> .
Schedule 2, Condition B34	Sighted Notification of Incident Report dated 03/10/25 from AGLM to DPHI, in relation to a contractor tracking machinery through a flagged 'No Go' zone which is a non-compliance with the Biodiversity Management Plan Stage 1 (BMP S1) requirements.
Schedule 2, Condition C15	Evidence was not available at the time of the audit to demonstrate that the clearance certificates were submitted to DPHI prior to 23/07/25.
Schedule 2, Condition D7	Evidence was not available at the time of the audit that AGLM had completed a review of existing environmental management documents within three months of notifying DPHI of a change in phase from commencement to construction and demolition.
SSD 24937520 EIS Commitments	
BIO10	The BMP S1 doesn't contain a commitment that the population of Pine Donkey Orchids will be resurveyed during subsequent flowering periods, and no evidence was available at the time of the audit that Pine Donkey Orchards identified were fenced prior to commencement of the demolition / construction.
WQ14	There is no commitment within the Soil and Water Management Sub Plan (SWMSP) to use 'amphibian friendly' flocculants during dewatering.
SE1	The Stakeholder Engagement Strategy (SES) does not include procedures for communication of housing demand to Project stakeholders.

3.7 Environmental Performance

3.7.1 Site Inspection Summary

The site inspection of 14 October 2025 included a review of the Project site, focussing on the Stage 1 development sites where demolition and construction work was ongoing during the audit period (see **Figure 1**). Selected images taken during the site inspection are included as **Appendix F**.

The site inspection found that Stage 1 construction areas for the asbestos storage facility and sediment dam upgrade, as well as Stage 1 demolition areas for the LPS, are generally being well maintained (see Plates 1, 3, 16, 33 of **Appendix F**). The boundaries of approved disturbance areas for the Project were clearly marked in the field at the time of audit and evidence that regular inspections of these controls are carried out by the Project contractor was available (see Plates 13, 24, 29 and 30 of **Appendix F**).

Evidence provided by AGLM and the Project contractor (CMA) also showed that maintenance and corrective actions (e.g. water management, erosion and sediment controls, waste management and housekeeping) recorded during internal environmental inspections were being tracked and completed.

The audit site inspection also confirmed that dust emissions from exposed surfaces within the Stage 1 demolition and construction areas were being well controlled at the time of the audit and that a water cart was in operation (see Plates 4 – 6 in **Appendix F**).

3.7.2 Environmental Management Documents

The adequacy of AGLM environmental management documents for the Project and the implementation of these plans was reviewed as a component of this IEA. In general, this review found that AGLM is operating in accordance with procedures and systems required under SSD 24937520.

Management plans and strategies reviewed as part of this IEA included the AGLM Lidell Future Land Use and Enabling Works Environmental Management Strategy (EMS) and the associated sub plans including the Noise and Vibration Management Plan (NVMP), Traffic Management Plan (TMP), Stage 1A Water Management Plan (WMP S1A), BMP S1, Demolition Environmental Management Plan (DEMP), Asbestos Management Sub-Plan (AMSP), Dust Management Sub-Plan (DMSP), and SWMSP. AGLM has not yet prepared the Rehabilitation Management Plan or the Blast Management Sub-Plan.

Non-compliances and recommendations identified in relation to Project management plans are listed in **Table 4** and **Table 5**.

3.7.3 Waste Management

The EMS outlines the waste management measures for the Project, in conjunction with supporting measures outlined within the DEMP. The EMS identifies the waste management measures undertaken in relation to storage, tracking, disposal, reuse, recycling, and training. The site inspection confirmed the active construction and demolition areas for Stage 1 were generally well-managed, with only minor housekeeping required. Waste materials were being contained within the designated boundaries of the Project construction area and waste segregation bins were in place and being used appropriately (see Plates 9, 10, 26, 27, and 28 of **Appendix F**).

Discussions with key AGLM and Project contractor personnel confirmed that Stage 1 waste continues to be removed from the Project site by waste contractors and taken to licenced facilities for disposal. The desktop review confirmed that waste removal is being tracked via a waste register and removal docketts from the AGLM-appointed waste contractor are being retained.

Interviews conducted during the site inspection confirmed that a batch of concrete potentially contaminated with PCB has been stockpiled pending testing. Test results will determine whether disposal at a licensed waste facility is required in accordance with the EMS.

3.7.4 Erosion and Sediment Control

Stage 1 of the Project operates in accordance with the Stage 1A Water Management Plan (WMP S1A) which excludes the demolition and Liddell Ash Dam rehabilitation works associated with the Project. Records were made available to demonstrate that the Project contractor was using excess water from sediment dams for dust suppression to minimise clean water use.

The site inspection confirmed that appropriate controls around stockpiles and the perimeter of the Stage 1 disturbance footprint were in place at the time of the audit (see Plates 8, 12, 13, and 14 of **Appendix F**). AGLM have designed the containment cells at the asbestos storage facility to separate and exclude as much clean water as practical through diversion drains around the cells, which is then pumped through sediment basins which ultimately report to the Borrow Pit sediment dam. During audit site inspection, the initial use of geofabric liner that which will be used to prevent long-term erosion for planned drains was observed (see Plate 12 of **Appendix F**).

During the audit period, AGLM reported to the NSW EPA an exceedance of the concentration limit for Total Suspended Solids at EPL 2122 Point 17 which occurred on 4 August 2025.

3.7.5 Operation of Plant and Equipment

Schedule 2, Condition A24 of SSD 24937520 requires all plant and equipment used on site, or in connection with the development, to be maintained in a proper and efficient condition and operated in a proper and efficient manner.

Interviews with key Project contractors during the site inspection confirmed that operators working on Stage 1 complete site inductions, which include content on the safe operation of plant and equipment. A desktop review of maintenance reports verified that plant and equipment are appropriately assessed prior to mobilisation to site (including completion of pathogen inspections during the mobilisation of equipment to site). Example evidence was also provided to show that daily inspections of equipment and regular maintenance actions were being completed.

Equipment in operation during the audit site inspection was seen to be operating effectively to minimise dust emissions (see Plates 1 – 3 of **Appendix F**).

3.7.6 Air Quality

Dust emissions from Project work areas and stockpiles within the Stage 1 construction areas was observed to be well controlled at the time of audit (see Plates 4 – 7 of **Appendix F**).

Discussions with key AGLM personnel confirmed that water carts are retained on site for dust suppression and water carts were operating at the time of audit.

No complaints in relation to air quality impacts from the Project were received during the audit period.

3.7.7 Biodiversity

As noted above, the disturbance boundary of Stage 1 is clearly delineated in the field and weekly inspections are being completed to verify that environmental controls from the Stage 1 Biodiversity Management Plan (BMP S1) are being implemented, including evidence of pre-clearing biodiversity inspections and monitoring.

Discussions with key AGLM personnel confirmed that during the audit period, a contractor tracked machinery through a flagged 'No Go' zone. The 'No Go' exclusion flagging was reinstated following the incident, and the requirements around 'No Go' zones were tool boxed with the work crew. At the time of the audit, flagging and signage identifying 'no-go' zones was observed to be maintained around the extent of active disturbance areas (see Plates 13, 29 and 30 in **Appendix F**).

Two Hunter Valley Delma (*Delma vescolineata*) deaths also occurred during pre-stripping works in the audit period. These events were reported to DPHI by AGLM in accordance with the requirements of SSD 24937520 requirements as a precaution and DPHI did not consider that either met the definition of an incident (see Schedule 2, Condition D5 of **Appendix C**).

Evidence was provided to confirm that contractor inductions include content on biodiversity management requirements. During the audit site inspection, a work notice displayed in the pre-start area for the Liddell Power Station demolition contractor included a site reminder stating: 'Watch out for wildlife on all roads'.

3.7.8 Visual Amenity and Lighting

Discussions with key AGLM personnel confirmed that Project demolition and construction works are only undertaken during daylight hours, with outdoor only used for the Project carpark and offices. No mobile lighting plant was observed within the Project site during the audit inspections.

The colour and layouts of the temporary site offices and construction laydown areas were generally non-intrusive and located in an area that is not readily visible to private receptors.

AGLM continue to maintain a sign-in and sign-out register for all personnel coming onto the Project site, which records working hours.

No complaints were received during the audit period in relation to visual amenity or lighting impacts.

3.7.9 Noise

Discussions with key AGLM personnel confirmed that the Project operates in accordance with the Noise and Vibration Management Plan (NVMP). The desktop review confirmed that AGLM are operating noise monitors in accordance with the NVMP. AGLM employees and contractors undertake site inductions which includes content on noise management considerations.

3.7.10 Aboriginal Heritage

Discussions with AGLM personnel confirmed that prior to carrying out any activities in the vicinity of the Aboriginal objects AHIMS 37-2-6561 and 37-2-6284, AGLM will salvage the Aboriginal objects and relocate them to a suitable location. AGLM confirmed that an Aboriginal Cultural Heritage Management Plan (ACHMP) will be developed prior to the work commencing. The desktop review confirmed that the EMS outlines the procedures to be followed in the event of any unanticipated Aboriginal and non-Aboriginal heritage items being identified during construction. A review of Project induction packages confirmed that all Project staff and contractors are briefed on Aboriginal heritage obligations and response procedures.

Discussions with key AGLM personnel confirmed that there were no unanticipated heritage finds during the audit period.

3.7.11 Rehabilitation

No Project rehabilitation establishment activities were undertaken during the audit period. AGLM have not developed a Rehabilitation Management Plan at the time of audit, however this will be required within 12 months of commencement of the Project (i.e. March 2026).

Discussions with AGLM confirmed that no progressive rehabilitation has been completed, however the topsoil stockpiles from Stage 1 construction areas were being shaped and are scheduled for hydroseeding in the weeks following the audit site inspection to minimise potential dust generation (see Plate 8 in **Appendix F**).

3.7.12 Bushfire Management

AGLM manage bushfire risks in accordance with the Liddell Ash Dam Bushfire Management Plan (LAD BMP) (AGLM, 2025). The LAD BMP outlines hot work management measures, and interviews with contractors confirmed that personnel carrying out any hot work for the Project are required to complete Hot Works Permits. A review of Project induction packages confirmed that all Project staff and contractors are briefed on mitigation measures taken for bushfire management.

The site inspection confirmed that fire response equipment is in place within Stage 1 work areas (see Plate 16 and Plate 27 of **Appendix F**).

3.7.13 Contamination

The desktop review confirmed that NSW Environment Protection Authority (EPA) Accredited Site Auditor Jason Clay (Site Auditor) has been engaged for the Project, as documented in the DEMP. The formal site contamination audit has commenced with preliminary work underway. Several interim audit advice letters have been issued by the Site Auditor, covering reviews for the 'Liddell Ash Dam Groundwater and Surface Water Monitoring Program', 'Concrete Beneficial Re-Use Sampling, Analysis and Quality Plant (SAQP), and 'Asbestos Containment Cell Construction SAQP'.

The audit site inspection confirmed that the asbestos disposal facility is currently under construction (see Plate 1 of **Appendix F**), and a temporary asbestos storage facility at the LPS site is being used in the interim (Plate 35 of **Appendix F**).

3.7.14 Environmental Incidents

Discussions with key AGLM personnel confirmed that no environmental incidents reportable under SSD 24937520 were recorded during the audit period. As noted in **Section 3.7.7** AGLM proactively reported two events that occurred during pre-clearing activities to DPHI. Both reports were reviewed by DPHI and found to not meet the definition of an incident under SSD 24937520.

3.7.15 Environmental Complaints

Discussions with key AGLM personnel confirmed that no community complaints were received regarding Project activities during the audit period.

3.7.16 Environmental Impact Comparison

Project activities during the audit period were found to be being undertaken generally in accordance with those described in SSD 24937520 environmental assessment documents.

A detailed review of AGLM compliance with SSD 24937520 conditions and commitments during the audit period is provided in **Appendix C**.

4. Recommendations

A summary of the non-compliances with SSD 24937520 approvals identified during the audit period is provided in **Table 4**. Recommendations made to respond to these non-compliances, as well as opportunities identified to improve AGLM's general environmental performance for the Project are provided in **Table 5**.

Table 5 IEA Recommendations

Ref	Recommendation Description
SSD 24937520	
Schedule 2, Condition B13	It is recommended that AGLM: <ul style="list-style-type: none"> › Inspect chemical storage pods at the temporary asbestos facility and ensure all pods have self-bunding. › Deliver a Tool Box Talk that communicates spill containment and cleanup requirements to Project.
Schedule 2, Condition B15	It is recommended that AGLM updates the Water Management Plan Stage 1A to document it as a 'final' version and to include the correct endorsement letter from DPHI in Appendix A.
Schedule 2, Condition B18	It is recommended that AGLM update the 'Hazardous Substance Register' to list the current quantities of all hazardous and dangerous goods stored on site, and state the maximum quantities allowed to be stored in a register, as per the DPHI <i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33</i> .
Schedule 2, Condition B34	It is recommended that AGLM conduct regular toolbox talks with contractors to reinforce the importance of adhering to flagged 'No-go' zones. These sessions should be scheduled regularly to ensure all new starters receive this training.
Schedule 2, Condition C15	It is recommended that AGLM review the Project's compliance tracking mechanisms to ensure that future notifications to the Department occur in accordance with consent condition timeframes, and records are maintained.
Schedule 2, Condition D7	
SSD 24937520 EIS Commitments	
BIO9	Refer to action under Schedule 2, Condition B34.
BIO10	It is recommended that AGLM: <ul style="list-style-type: none"> › Identify Pine Donkey Orchids within and nearby (within 10 metres) the 'Project Footprint' of SSD 24937520 and install exclusion fencing with 'No Go' zone signs attached. › Update the BMP S1 to include a commitment to resurvey the population of Pine Donkey Orchids identified in 'Biodiversity Development Assessment Report Liddell Future Land Use and Enabling Works Project' (Kleinfelder, 2023).

Ref	Recommendation Description
WQ14	It is recommended that AGLM update the Soil and Water Management Sub Plan to outline AGLM commitments in relation to using 'amphibian friendly' flocculants in Project sediment basins.
NV1	It is recommended that AGLM update the Noise and Vibration Management Plan to include the commitment to notify relevant stakeholders a minimum of seven calendar days prior to the start of works and should include information such as total building time, what works are expected to be noisy, their duration, what is being done to minimise noise and when respite periods will occur.
SE1	It is recommended that AGLM update the SES to outline measures for communicating with stakeholders regarding housing demand.
GG3	It is recommended that AGLM updates the DEMP to outline that the use of biodiesel has been investigated and it has been determined that biodiesel is not feasible for the Project.



Appendix A Endorsement of IEA Team

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSD-24937520-PA-31

Matthew Parkinson
Manager Environment and Approvals
AGL MACQUARIE PTY LIMITED
15/09/2025

Sent via the Major Projects Portal only

Subject: Liddell Future Landuse and Enabling Works - Auditor Endorsement Request - September 2025

Dear Mr Parkinson

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Environmental Audit (IEA) of the Liddell Future Landuse and Enabling Works project, submitted as required by Condition D1 of SSD-24937520 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 12 September 2025.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Condition D1 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Dorian Walsh (Lead Auditor)
- Sarah Moore (Assistant Auditor)

Please note:

- This correspondence must be appended to the IEA Report.
- The IEA must be prepared, undertaken, and finalised in accordance with the conditions of consent and the NSW Planning *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- The above audit team is approved for the duration of construction and the initial operational audit of the development. However, NSW Planning reserves the right to request an alternate auditor or audit team at any time.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.

Department of Planning, Housing and Infrastructure

- The audit period is the date of commencement of construction to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact me on 02 6575 3401 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary



Appendix B

IEA Declaration

Appendix E – Independent Audit Report Declaration Form Template

Independent Audit Report Declaration Form

Project Name Liddell Future Land Use & Enabling Works Project

Consent Number SSD 24937520

Description of Project Liddell Future Land Use & Enabling Works Project

Project Address Off New England Highway, Muswellbrook NSW 2333

Proponent AGL Macquarie Pty Limited

Title of Audit AGL Macquarie SSD 24937520 Independent Environmental Audit

Date 12/12/2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor Dorian Walsh

Signature



Qualification Auditor for Environmental Management, EMS and Compliance Audits. Exemplar Global No. 201881

Company

Xenith Consulting Pty Ltd

Company Address The Singleton Centre, Shops 4 - 6, Mezzanin Level, 157 - 159 John Street, SINGLETON NSW 2330

Appendix E – Independent Audit Report Declaration Form Template

Independent Audit Report Declaration Form

Project Name	Liddell Future Land Use & Enabling Works Project
Consent Number	SSD 24937520
Description of Project	Liddell Future Land Use & Enabling Works Project
Project Address	Off New England Highway, Muswellbrook NSW 2333
Proponent	AGL Macquarie Pty Limited
Title of Audit	AGL Macquarie SSD 24937520 Independent Environmental Audit
Date	12/12/2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor Sarah Moore`

Signature 

Qualification Lead Auditor – Integrated Management Systems (Quality – Environment – OH&S 45001) No. EGCA/35769915/15

Company Xenith Consulting Pty Ltd

Company Address The Singleton Centre, Shops 4 - 6, Mezzanin Level, 157 - 159 John Street, SINGLETON NSW 2330



Appendix C

IEA Compliance

Tables

Table C1 Project Approval SSD 24937520

Cond	Condition Text	Status	Evidence	Recommendations
SCHEDULE 2: PART A – ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
A1.	In addition to meeting the specific performance measures and criteria established under this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from preliminary works, construction or any other part of the development including, any rehabilitation required under this consent.	C	A review of AGLM records and inspection of the Project site found that reasonable and feasible controls are in place to minimise the potential for material environmental impacts from site operations. Comments on AGL environmental controls are discussed under relevant conditions below.	
TERMS OF CONSENT				
A2.	The Applicant may only carry out the development: a) in compliance with the conditions of this consent;	NC	Non-compliances (NC) with SSD 24937520 conditions were identified during this IEA. Findings and recommendations in relation to each non-compliance (NC) are provided against the relevant conditions below.	
	b) in accordance with all written directions of the Planning Secretary;	C	Correspondence from Department of Planning, Housing and Infrastructure (DPHI) regarding SSD 24937520 documents are noted against the relevant conditions below.	
	c) generally in accordance with the EIS; and	C	A review of AGLM documentation found that the Project is being carried out generally in accordance with the EIS.	

Cond	Condition Text	Status	Evidence	Recommendations
	d) generally in accordance with the Development Layout in Appendix 1.	C	The site layout is generally consistent with that shown in Appendix 1 of SSD 24937520.	
A3.	Consistent with the requirements in this consent, the Planning Secretary may make written directions in relation to: a) the content of any strategy, study, system, plan, program, review, audit, notification, report, or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and	C	Noted. Directions from DPHI on SSD 8889679 documentation are noted against the relevant conditions below.	
	b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).	C	Noted. Directions from DPHI on SSD 8889679 documentation reviews are noted against the relevant conditions below.	
A4.	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document/s listed in condition A2(c). In the event of any inconsistency, ambiguity, or conflict between any of the document/s listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity, or conflict.	C	MP (pers comms) confirmed that inconsistencies were not identified during the audit period.	
LIMITS OF CONSENT				
A5.	Development activities may be carried out within the approved development area, until 31 December 2044.	NT	Date not yet reached.	
ASBESTOS DISPOSAL FACILITY				
A6.	A maximum of 30,000 cubic metres of asbestos waste, asbestos containing material, synthetic mineral fibre and other associated wastes authorised by	NT	MP (pers comms) confirmed that the asbestos disposal facility is not yet fully constructed or commissioned for use, and disposal has not commenced. Site	

Cond	Condition Text	Status	Evidence	Recommendations
	the Site auditor, may be disposed of at the asbestos disposal facility, unless otherwise agreed by the Planning Secretary.		inspection confirmed construction is progressing but not completed (see Plate 1).	
BORROW PIT				
A7.	A maximum of 13.5 million cubic metres of material may be extracted from the Borrow Pit Area identified on Figure 1 in Appendix 1, unless otherwise agreed by the Planning Secretary.	NT	MP (pers comms) confirmed that AGLM has not started extracting material from the Borrow Pit and is using material from the western ash levee instead. MP stated that extraction from the Borrow Pit will only occur if extra material is needed for capping beyond what's available, based on performance monitoring and Site Auditor recommendations.	
ROCK CRUSHING				
A8.	A maximum of 200,000 tonnes of material from the Borrow Pit Area and Liddell Ash Dam may be crushed per annum, for a maximum total of 10 years from the commencement of extraction, unless otherwise agreed by the Planning Secretary.	NT	MP (pers comms) confirmed that AGLM has not commenced rock crushing at the Borrow Pit Area or Liddell Ash Dam and is instead focusing on the beneficial reuse of available rock.	
DEVELOPMENT HOURS				
A9.	The development may only be undertaken during the hours set out in Table 1.	C	Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which contains a slide informing the hours of operation in accordance with Table 1 of SSD 24937520. LT (pers comms) confirmed that CMA [Project Contractor] undertake a team pre-start at 6:30am, followed by a Daily Site Diary which contractors are required	

Cond	Condition Text	Status	Evidence	Recommendations										
	<p>Table 1 – Operating hours</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Permissible Hours</th> </tr> </thead> <tbody> <tr> <td>Development activities- other than as identified separately in this table.</td> <td> <ul style="list-style-type: none"> 7 am to 6 pm Monday to Friday 8 am to 6 pm Saturday At no time on Sundays or public holidays </td> </tr> <tr> <td>Blasting</td> <td> <ul style="list-style-type: none"> 9 am to 5 pm Monday to Saturday No blasting on public holidays </td> </tr> <tr> <td>Maintenance, security, office work, cleaning, etc</td> <td>May be conducted at any time, provided that these activities are not audible at any residence on privately-owned land</td> </tr> <tr> <td>Delivery or dispatch of materials as requested by Police or other public authorities Emergency work to avoid the loss of lives, property or to prevent environmental harm Delivery of oversized plant or structures</td> <td>At any time, only after notifying the Department</td> </tr> </tbody> </table>	Activity	Permissible Hours	Development activities- other than as identified separately in this table.	<ul style="list-style-type: none"> 7 am to 6 pm Monday to Friday 8 am to 6 pm Saturday At no time on Sundays or public holidays 	Blasting	<ul style="list-style-type: none"> 9 am to 5 pm Monday to Saturday No blasting on public holidays 	Maintenance, security, office work, cleaning, etc	May be conducted at any time, provided that these activities are not audible at any residence on privately-owned land	Delivery or dispatch of materials as requested by Police or other public authorities Emergency work to avoid the loss of lives, property or to prevent environmental harm Delivery of oversized plant or structures	At any time, only after notifying the Department		<p>to fill out prior to work commencing at 7:00am. Sighted completed CMA Daily Pre-Start Forms for 25/09/25, 26/09/25, 22/09/25 and 23/09/25 which state that the time of the pre-start was 6:30am. Sighted completed CMA Daily Site Diary Form dated 02/09 which state that '<i>Works to be performed between council approved hours for the site being 7am to 5pm Monday to Saturday</i>'. MP (pers comms) confirmed that that no blasting has occurred to date and expects blasting would not be required until Q1 2026. LT (pers comms) confirmed that no out of hours construction or maintenance (cleaning, etc.) has occurred outside of work hours and development of an Out of Hours Procedure (OoHP) has not been triggered. MP (pers comms) advised that only ecological monitoring work such as bat surveys has occurred out of hours.</p>	
Activity	Permissible Hours													
Development activities- other than as identified separately in this table.	<ul style="list-style-type: none"> 7 am to 6 pm Monday to Friday 8 am to 6 pm Saturday At no time on Sundays or public holidays 													
Blasting	<ul style="list-style-type: none"> 9 am to 5 pm Monday to Saturday No blasting on public holidays 													
Maintenance, security, office work, cleaning, etc	May be conducted at any time, provided that these activities are not audible at any residence on privately-owned land													
Delivery or dispatch of materials as requested by Police or other public authorities Emergency work to avoid the loss of lives, property or to prevent environmental harm Delivery of oversized plant or structures	At any time, only after notifying the Department													
NOTIFICATION OF COMMENCEMENT														
A10.	The Department must be notified, in writing, of the date of commencement of each of the following phases of the development: a) commencement of development under the consent;	C	Sighted letter from MP to DPHI dated 13/03/25 notifying that development under SSD 24937520 is scheduled to commence on 28/03/25. DPHI responded on 18/03/25 acknowledging the notification.											
	b) commencement of construction under the consent;	C	Sighted letter from MP to DPHI dated 08/07/2025 notifying the commencement of construction and commencement of											

Cond	Condition Text	Status	Evidence	Recommendations
			demolition under SSD 24937520 is scheduled to commence on 23/07/25. DPHI responded on 09/07/25 acknowledging the notification.	
	c) commencement of demolition under the consent; and	C	See Schedule 2, Condition A10 b) above.	
	d) cessation of operations.	NT	Not triggered.	
	The notification must be provided at least two weeks before the commencement of each stage and no more than three months before the commencement of each stage.	C	See Schedule 2, Condition A10 a) and b) above.	
A11.	If the phases of the development are to be further staged, the Department must be notified in writing at least two weeks before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	NT	MP (pers comms) confirmed that AGLM has not required phases of Project development to be further staged, and no relevant notifications to DPHI have been made during the audit period.	
SURRENDER OF EXISTING CONSENTS AND APPROVALS				
A12.	Within 12 months of the date of commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the following Council development consents must be surrendered in accordance with the EP&A Regulation:	NT	MP (pers comms) confirmed AGLM has not surrendered any of the Council Developments as listed under Schedule 2 Condition A12.	
	a) DA1/2011;			
	b) DA98/1995;	NT	See Schedule 2, Condition A12(a).	
	c) DA90/2015;	NT	See Schedule 2, Condition A12(a).	
	d) DA91/2015; and	NT	See Schedule 2, Condition A12(a).	
	e) DA51/86.	NT	See Schedule 2, Condition A12(a).	
	Note: Condition A12 does not extend to the surrender of construction and occupation certificates for existing and proposed building works under the	Note	Note only.	

Cond	Condition Text	Status	Evidence	Recommendations
	<i>former Part 4A of the EP&A Act or Part 6 of the EP&A Act as applies from 1 September 2018. The surrender should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</i>			
A13.	Upon the commencement of development under this consent, and before the surrender of existing development consents or project approvals required under condition A12, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents or approvals.	NT	TB (pers comms) confirmed that the Project is operating under SSD 24937520 conditions and no existing consents have been surrendered.	
APPLICATION OF EXISTING ENVIRONMENTAL MANAGEMENT DOCUMENTS				
A14.	Prior to the approval of environmental management documents under this consent, any equivalent or similar environmental management documents required under the development consents listed in condition A12 continue to apply to the satisfaction of the Planning Secretary.	NT	MP (pers comms) confirmed that the Project is operating under environmental management documents required under SSD 24937520 conditions.	
PAYMENT OF REASONABLE COSTS				
A15.	The Applicant must pay all reasonable costs incurred by the Department to engage a suitably qualified, experienced, and independent expert(s) to review the adequacy of any environmental management document required under this consent.	NT	TB (pers comms) confirmed that DPHI have not requested payment of costs incurred for the review of any environmental management document required under SSD 24937520.	
EVIDENCE OF CONSULTATION				
A16.	Prior to submitting any environmental management document required by this consent to the Planning Secretary, any consultation with an identified party must be completed. Documentary evidence and a tabulated summary of the consultation must be submitted with the subject document via the Major Projects Website, including: a) dates of the consultation with the identified party, copies of the identified party's response, and a summary of the issues raised;	C	'Demolition Environmental Management Plan' (DEMP) dated 03/07/25 and DPHI approval of the DEMP on 08/07/25. The DEMP required consultation with SafeWork NSW and the Site Auditor. Appendix B contains a tabulated summary of consultation for SafeWork NSW and the Site Auditor (Jason Clay – NSW EPA	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>Accredited Site Auditor). The tabulated summary contains relevant dates, party's response, summary of issues raised and AGLM's response. The summary contains dates of the consultation with the identified party, copies of the identified party's response, and a summary of how AGLM has addressed the issues raised.</p> <p>'Biodiversity Management Plan – Stage 1' (BMP S1) dated 18/07/25. The BMP S1 was approved by DPHI on 23/07/25. The BMP S1 requires consultation with the Conservation Programs, Heritage & Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW). Appendix A of the BMP S1 contains a tabulated summary of the consultation with CPHR. The summary contains dates of the consultation with the identified party, copies of the identified party's response, and a summary of how AGLM has addressed the issues raised.</p> <p>'Water Management Plan – Stage 1A' (WMP S1A) dated 03/07/25. The WMP S1A was approved by DPHI on 07/07/25. The WMP S1A requires consultation with NSW EPA. AGL is also required to consult with DCCEEW Water Group regarding the water licencing strategy. Appendix A contains a tabulated summary of consultation with NSW EPA and DPHI. The summary contains dates of the consultation with the identified party, copies of the identified party's response,</p>	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>and a summary of how AGLM has addressed the issues raised. It is noted that DPHI stated <i>'No change to the current water licensing strategy is required for Stage 1A Works. Further information on the water licences timing and strategy will be provided with the management plans for Stage 2 of the Development as agreed with DPHI.'</i> DPHI further stated that <i>'The water licensing recommendations previously received by the Department of Climate Change, Energy, the Environment and Water – Water Group are not relevant to the Stage 1 works, as they relate to the Sediment Dam which will not be utilised until Stage 2 and 3 works commence.'</i> Therefore consultation with DCCEE Water Group has not been triggered yet. TB and MP (pers comms) confirmed that the water licencing strategy is not relevant to Stage 1, hence AGLM sought approval for staging of the management plan (refer to Schedule 2, Condition A19).</p>	
	b) the outcome of that consultation, including how the issues have been addressed in the subject document; and	C	See Schedule 2, Condition A16 (a).	
	c) details of any disagreement remaining between the party consulted and the Applicant, and how the Applicant has addressed the matters not resolved.	C	See Schedule 2, Condition A16 (a).	
APPLICABILITY OF GUIDELINES				

Cond	Condition Text	Status	Evidence	Recommendations
A17.	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	Note	Note only.	
A18.	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	NT	MP (pers comms) confirmed that no directions have been received from DPHI requiring compliance with an updated guideline, protocol, Standard or policy, or a replacement of them.	
STAGING, COMBINING AND UPDATING ENVIRONMENTAL MANAGEMENT DOCUMENTS				
A19.	With the approval of the Planning Secretary, any environmental management document required by this consent may be staged, combined or updated.	C	Sighted AGLM letter dated 27/03/25 to DPHI requesting approval to stage management plans. The letter included a clear description of the trigger for staging, related to each of the three stages of development. AGLM proposed to initially prepare the Environmental Management Strategy (EMS), Water Management Plan (WMP), Biodiversity Management Plan (BMP), DEMP, Asbestos Management Sub Plan (AMSP), Blast Management Sub Plan (BMSP), Soil and Water Management Sub Plan (SWMSP) and Dust Management Sub Plan (DMSP) for Stage 1 works only. AGLM proposed that an individual EMS, WMP, and BMP would be developed for Stage 2 and Stage 3 works. Further to this, AGLM sought approval to stage the submission of the BMSP, requesting to develop individual BMSPs for each of the four	

Cond	Condition Text	Status	Evidence	Recommendations
			anticipated blast events for the Project. DPHI approved AGLM's request for staging the relevant management plans on 03/04/25.	
A20.	Staging requests made to the Planning Secretary must include a clear description of the trigger for staging, the specific stage and scope of the development to be staged and any future stages planned.	C	See Schedule 2, Condition A19.	
A21.	If the Planning Secretary agrees, an environmental management document may be staged or updated without: <ul style="list-style-type: none"> a) consultation being undertaken with all parties required to be consulted in the relevant condition in this consent; and/or 	NT	MP (pers comms) confirmed that AGLM has not requested any environmental management document be staged or updated without consultation being undertaken with all parties required (See Schedule 2, Condition A16 (a)). Relevant parties were consulted with for the BMP S1 and WMP S1A.	
	b) addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	NT	See Schedule 2, Condition A21.	
A22.	Any request to combine environmental management documents must demonstrate a clear relationship between the nominated documents.	NT	TB (pers comms) confirmed that AGLM has not requested any environmental management documents be combined within the audit period.	
PROTECTION OF PUBLIC INFRASTRUCTURE				
A23.	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: <ul style="list-style-type: none"> a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development (excluding damage to roads caused as a result of general road usage); and 	NT	TB (pers comms) confirmed that repairs to public infrastructure have not been required during the audit period.	

Cond	Condition Text	Status	Evidence	Recommendations
	b) relocate, or pay the full costs associated with relocating, any public infrastructure present at the time of the determination of this application that needs to be relocated as a result of the development.	NT	See Schedule 2, Condition A23.	
OPERATION OF PLANT AND EQUIPMENT				
A24.	<p>All plant and equipment used by the development, or to monitor the performance of the development must be:</p> <p>a) maintained in a proper and efficient condition; and</p>		<p>Sighted examples of maintenance records and site procedures including:</p> <ul style="list-style-type: none"> › A 'Daily Work Record and Plant Inspection Record for Cat 263' dated 08/10/25; › CMA 'Plant and Equipment Induction to Site Compliance Checklist' dated 25/08/25 for Plant ID TBHV003. › CMA 'Plant and Equipment Induction to Site Compliance Checklist' dated 03/08/25 for Plant ID WT139. › Sighted SiteHive dust monitoring records for the period 31 July 2025 to 21 October, stating that monitoring points LD01 and LD02 were calibrated 30 July 2025 and 14 April 2025, respectively; and › Delta Group Mobile Procedure which states that 'All Powered Mobile Plant must be fully serviced, maintained in safe and adequate condition and be fit for purpose' and outlines the inspection process; and › Delta Scheduled 1000 hour Maintenance Report for 9150LIEB dated 14 August 2025; 	

Cond	Condition Text	Status	Evidence	Recommendations
			<ul style="list-style-type: none"> › Benchmark Monitoring 3 Monthly Maintenance Form for AGL3 E-Sampler dated 04/09/2025; and › Benchmark Monitoring calibration certificate for wind-sensor on weather station dated 12/10/2025. 	
	b) operated in a proper and efficient manner.		<p>Sighted the following documents demonstrating operator competency:</p> <ul style="list-style-type: none"> › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11 dated 22/05/2025; › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11A dated 22/05/2025; › Completed Verification of Competency for Demo Saw VOC 7 dated 01/08; › Completed Verification of Competency for Water Truck VOC 50 dated 01/08/25; and › ‘Liddell Power Station Environmental Induction’ powerpoint presentation; › My Rapid – Induction Register with list of general contractors and status showing that contractors have completed their relevant site induction. <p>Plant and equipment in operation during the audit site inspection were observed to be operating in a proper and efficient manner (see Plate 1, Plate 2 and Plate 3).</p>	
SCHEDULE 2: PART B – GENERAL ENVIRONMENTAL CONDITIONS				

Cond	Condition Text	Status	Evidence	Recommendations
ENVIRONMENTAL MANAGEMENT STRATEGY				
B1.	An environmental management strategy must be prepared for the development. The strategy must:	C	Viewed letter from MP to DPHI dated 08/07/2025 notifying the Department that commencement of construction and demolition under SSD 24937520 is scheduled to commence on 23/07/25. The EMS was approved by DPHI on 23/05/25 via letter, two months prior to commencing construction.	
	a) be submitted for approval to the Planning Secretary prior to the commencement of construction;			
	b) describe the environmental management context and outline the scope of the strategy, including:	C	Section 3 of the EMS includes a summary of the environmental management framework for the Project and Table 1 outlines the associated environmental management plans.	
	i. the relationship of the strategy to other environmental management documents;			
	ii. relevant statutory criteria, performance measures or operational requirements including conditions of consent and other legislative or regulatory licences, guidelines, policies or standards;	C	Table 4 and Table 5 of the EMS contains the relevant consent conditions. Table 10 of the EMS outlines objectives and performance criteria. Section 3.3 of the EMS outlines the relevant licences and approvals.	
	iii. sensitive receivers;	C	Sensitive receptors are described in Section 4 and shown on Figure 4-1 of the EMS.	
	iv. consideration of the consultation outcomes from the documents listed in condition A2(c) where relevant or other environmental management documents required by this consent; and	C	Section 4.5 outlines the consultation requirements for individual environmental management plans.	
	v. detailed plans of the development location and development, sensitive receivers and environmental monitoring locations;	C	Figure 5 of the EMS shows the monitoring locations.	

Cond	Condition Text	Status	Evidence	Recommendations
b.	list the role and responsibility of all key personnel and contractors involved in the environmental management of the development;	C	Section 4 of the EMS outlines the roles and responsibilities of key personnel.	
c.	include an environmental risk assessment of the development activities and specific risk management controls and mitigations to: <ul style="list-style-type: none"> i. comply with statutory requirements, limits or performance measures and criteria; ii. manage the predicted impacts identified in the documents listed in condition A2(c); and iii. manage any other environmental risk or impact that has been subsequently identified after the documents in condition A2(c) were submitted; 	C	The Project risk assessment is included as Appendix 3 of the EMS.	
	Note: <i>Environmental risk assessment cannot be used to identify and assess physical changes to the development or an increase in impacts that are not described and assessed in the approved EIS. These may require a new planning approval and may need to be referred to the Department.</i>	Note	Note only.	
d.	include processes to review the environmental risk assessment annually and determine whether the measures implemented to manage the risks are effective;	C	Section 4.2.3 of the EMS outlines that the risk assessment will be reviewed annually.	
e.	include an adaptive management process to be implemented if the review of the risk assessment indicates that any measure that has been implemented is not effective in managing the identified risk(s) and a process to update the measure;	C	Section 7.5 of the EMS outlines the adaptive management process.	
f.	include a clear plan depicting all the monitoring to be carried out under the conditions of this consent;	C	Figure 5 of the EMS shows the monitoring locations.	
g.	include processes to report and review environmental performance that: <ul style="list-style-type: none"> i. provides for an annual review of the environmental risk assessment with consideration of the evaluation findings; 	C	Section 4.2.3 of the EMS outlines that the risk assessment will be reviewed annually in consideration of evaluation findings.	

Cond	Condition Text	Status	Evidence	Recommendations
	ii. respond to any non-compliance and/or incident;	C	Section 7.1.3 of the EMS outlines the process for non-compliance and incident reporting.	
	iii. address the findings of any audit undertaken for the development;	C	Section 7.3 of the EMS outlines the process for addressing the findings of any audit.	
	iv. provide for adaptive management mechanisms that enable continuous improvement; and	C	Section 7.5 of the EMS outlines the adaptive management process.	
	v. keep the local community and relevant agencies informed about the operation and environmental performance of the development;	C	Section 4.8 of the EMS describes overall community and stakeholder engagement processes.	
	h. include procedures to: <ul style="list-style-type: none"> i. receive record, handle and respond to complaints; ii. resolve any disputes that may arise during the course of the development; and iii. respond to emergencies. 	C	Section 7.2 of the EMS outlines the enquiry, complaint and dispute management process.	
B2.	Construction must not commence until the environmental management strategy is approved by the Planning Secretary.	C	See Schedule 2, Condition B1 (a).	
B3.	The environmental management strategy, as approved by the Planning Secretary, must be implemented for the development.	C	A review of the following documents found that AGLM were generally implementing the EMS during the audit period: <ul style="list-style-type: none"> › Sighted SiteHive dust monitoring records (Particulate Matter \leq 10 Microns / Particulate Matter \leq 2.5 Microns) for the period 31 July 2025 to 21 October 2025; 	

Cond	Condition Text	Status	Evidence	Recommendations
			<ul style="list-style-type: none"> › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11 dated 22/05/2025; › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11A dated 22/05/2025; › Sighted Preclearance Survey of the Haul Road and Landfill Cells dated August 2025 (EMM, 2025); › Sighted EMM Preclearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025); › Sighted AGL groundwater monitoring records for the period October 2024 to July 2025; › Sighted SiteHive noise monitoring records for the period 1 August 2025 to 21 October 2025; › Sighted surface water monitoring records for the period January 2020 to September 2025; › Sighted AGLM Complaints Register for 2025. There were no complaints during the audit period against the Project. <p>AGLM undertake weekly environmental inspections with CMA personnel. Sighted AGLM HSE Site Inspection Checklists dated 16/07/25 (LPS area), 07/10/25 (containment cell area), 08/10/25 (LPS area). Also sighted CMA Weekly Environmental AGL Audits dated 31/07/25. AGLM use 'myHSE' system to</p>	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>track and record the progress against actions raised during inspections. Sighted myHSE actions raised along with completion status, for the period 17/07/25 to 24/10/25.</p> <p>Site inspection undertaken during the audit demonstrated that the general layout of the site was in accordance with SSD 24937520 and EMS (see Appendix C).</p> <p>MP advised (pers comms) that the Project is discussed regularly at the AGLM Community Consultative Committee (CCC) meetings. Viewed minutes of the AGLM Hunter CCC from August 2025, which note that an update on the Project was provided by James Coventry.</p> <p>MP (pers comms) confirmed that environmental incidents are recorded in the 'myHSE' system and that two incidents were proactively reported to DPHI as a precautionary measure. Please refer to Schedule 2, Condition D5 for summaries of the incidents.</p>	
	ABORIGINAL HERITAGE			
	PROTECTION OF ABORIGINAL OBJECTS			
B4.	The Applicant must not directly or indirectly harm the Aboriginal objects AHIMS 37-2-6560 and 37-2-6559, or any Aboriginal objects located outside the approved development area.	C	TB (pers comms) confirmed that no new heritage items were identified during the audit period and no known heritage sites were impacted.	

Cond	Condition Text	Status	Evidence	Recommendations
B5.	Prior to carrying out any development that could directly or indirectly harm the Aboriginal objects AHIMS 37-2-6561 and 37-2-6284, the Applicant must salvage the Aboriginal objects via surface collection and relocate the items that would be impacted to a suitable alternative location, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.	NT	TB (pers comms) confirmed that there has been no proposed works in the vicinity of 37-2-6561 and 37-2-6284 and that the salvage has not been required yet.	
AIR QUALITY AND GREENHOUSE GAS				
B6.	All reasonable and feasible avoidance and mitigation measures must be implemented to prevent the generation of dust from the development.	C	<p>LT (pers comms confirmed that CMA have 2 large watercarts and 2 smaller units on site for dust suppression. Generation of dust from Project equipment and exposed areas was adequately managed during the audit site inspection through watercart use and watering down of active work areas (see Plate 4, Plate 5, Plate 6 and Plate 7).</p> <p>The following supporting documentation was sighted:</p> <ul style="list-style-type: none"> › CMA Site Diary dated 1 August 2025, with an assessment of weather conditions; › CMA Day Works Authorisation dated 19 September 2025 with two listed watercarts scheduled for operation; and › Delta Group Monthly Report August 2025 with period total of 'Significant Dust Events' and 'Total to Date' which was reported. <p>MP noted that no progressive rehabilitation has been completed, however recent topsoil stockpiles in the</p>	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>oil and grit trap works area have been shaped to allow for reduced dust and are scheduled for hydroseeding in the weeks following the audit site inspection (see Plate 8).</p> <p>During the audit site inspection, operators at the asbestos facility construction were observed to be operating competently and maintaining low drop heights (see Plate 1).</p>	
B7.	All reasonable and feasible avoidance and mitigation measures must be implemented to minimise greenhouse gas emissions from the development.	C	Refer to commitments GG1 to GG8 in Table 2.	
NOISE				
B8.	The operational noise generated by the development must not exceed 40 Db $L_{Aeq}(15min)$ during daytime hours at residential receivers R21 and R28 shown on Figure 3 in Appendix 3.	NT	<p>Not triggered. As defined in SSD 24937520, 'operation' refers to "<i>The carrying out of the asbestos facility and borrow pit authorised by this consent upon completion of the associated construction works</i>". The asbestos facility is currently being constructed and not in operation (see Plate 1), and MP (pers comms) confirmed that AGLM has not started extracting material from the Borrow Pit.</p> <p>Appendix 4 of the EMS contains a Noise and Vibration Management Plan (NVMP) which outlines this requirement. Section 8.4 of the NVMP outlines that attended noise monitoring will be undertaken as required throughout the development, however it is not done at regular intervals</p>	

Cond	Condition Text	Status	Evidence	Recommendations											
			<p>and has not been done since Project commencement.</p> <p>MP (pers comms) stated that attended noise monitoring had not been undertaken to date. Sighted SiteHive noise monitoring records for the period 1 August 2025 to 21 October 2025. Monitoring Station LD01 is representative of receivers R21 and R28.</p> <p>The NVMP states that the predicted construction noise and operational noise pertaining to the Project were assessed as being well below the limit for daytime hours (40 dB(A) LAeq 15-minute) established by condition B8.</p>												
B9.	<p>The noise limit set out in condition B8 apply under the meteorological conditions defined in Table 2.</p> <p>Table 2 – Meteorological conditions</p> <table border="1"> <thead> <tr> <th colspan="2">Location</th> <th>Day L_{Aeq(15min)}</th> </tr> <tr> <th>Assessment Period</th> <th colspan="2">Meteorological Conditions</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Day</td> <td colspan="2">Stability Categories A, B, C and D with wind speeds up to and including 3 m/s at 10m above ground level from the ESE wind direction.</td> </tr> <tr> <td colspan="2">Stability Categories A, B, C and D with wind speeds up to and including 0.5 m/s at 10m above ground level from all other wind directions.</td> </tr> </tbody> </table>	Location		Day L _{Aeq(15min)}	Assessment Period	Meteorological Conditions		Day	Stability Categories A, B, C and D with wind speeds up to and including 3 m/s at 10m above ground level from the ESE wind direction.		Stability Categories A, B, C and D with wind speeds up to and including 0.5 m/s at 10m above ground level from all other wind directions.		C	<p>Section 5.1 of the NVMP outlines the meteorological conditions which the noise limits apply to. Sighted SiteHive noise monitoring records for the period 1 August 2025 to 21 October 2025 which reports weather graphs, including windspeed.</p>	
Location		Day L _{Aeq(15min)}													
Assessment Period	Meteorological Conditions														
Day	Stability Categories A, B, C and D with wind speeds up to and including 3 m/s at 10m above ground level from the ESE wind direction.														
	Stability Categories A, B, C and D with wind speeds up to and including 0.5 m/s at 10m above ground level from all other wind directions.														
B10.	<p>For all other meteorological conditions, operational noise from the development during the day period must not exceed the criteria in condition B8 plus 5 dB. The meteorological conditions are to be determined by monitoring at the meteorological station required under condition B22.</p>	C	<p>See Schedule 2, Condition B8.</p> <p>Refer to Schedule 2, Condition B22 for meteorological station compliance status.</p>												
B11.	<p>The development may only occur outside of the hours listed in Table 1 if:</p>	NT	<p>See Schedule 2, Condition A9.</p>												

Cond	Condition Text	Status	Evidence	Recommendations
	a) noise levels are no more than 5 dB $L_{Aeq(15min)}$ above the rating background level at any residence and no more than the noise management levels in Table 3 of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) for sensitive receivers other than residences; or			
	b) works are implemented in accordance with an out-of-hours work protocol detailed in condition B12 and as approved by the Planning Secretary.	NT	See Schedule 2, Condition A9.	
B12.	An out-of-hours work protocol must be submitted to the satisfaction of the Planning Secretary prior to the commencement of any out-of-hours construction work (other than the exceptions listed in conditions B11(a) and B11(b)). The protocol must: <ul style="list-style-type: none"> a) include noise modelling of proposed activities including consideration of noise enhancing meteorological conditions, annoying noise characteristics and implementation of reasonable and feasible noise mitigation measures; b) identify a process for the consideration and management of construction which is outside the hours defined in Table 1; c) be consistent with the requirements of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) (or its latest or final version); d) justify why the construction needs to be undertaken as out-of-hours construction, including consideration of consultation undertaken as part of the documents listed in condition A2(c); e) identify low, medium and high-risk out-of-hours work, proposed mitigation and management measures; and f) include written notification arrangements for affected residences for approved out-of-hours work. 	NT	See Schedule 2, Condition A9.	
	b) identify a process for the consideration and management of construction which is outside the hours defined in Table 1;	NT	See Schedule 2, Condition A9.	
	c) be consistent with the requirements of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) (or its latest or final version);	NT	See Schedule 2, Condition A9.	
	d) justify why the construction needs to be undertaken as out-of-hours construction, including consideration of consultation undertaken as part of the documents listed in condition A2(c);	NT	See Schedule 2, Condition A9.	
	e) identify low, medium and high-risk out-of-hours work, proposed mitigation and management measures; and	NT	See Schedule 2, Condition A9.	
	f) include written notification arrangements for affected residences for approved out-of-hours work.	NT	See Schedule 2, Condition A9.	
WATER				

Cond	Condition Text	Status	Evidence	Recommendations				
B13.	<p>The development must comply with the performance measures in Table 3.</p> <p>Table 3 – Water management performance measures</p> <table border="1"> <thead> <tr> <th>Feature</th> <th>Performance measure</th> </tr> </thead> <tbody> <tr> <td>Water management – general</td> <td> <ul style="list-style-type: none"> • Maintain separation between clean and dirty water management systems • Minimise the use of clean and potable water by the development • Maximise water recycling, reuse and sharing opportunities • Design, install, operate and maintain water management systems in a proper and efficient manner </td> </tr> </tbody> </table>	Feature	Performance measure	Water management – general	<ul style="list-style-type: none"> • Maintain separation between clean and dirty water management systems • Minimise the use of clean and potable water by the development • Maximise water recycling, reuse and sharing opportunities • Design, install, operate and maintain water management systems in a proper and efficient manner 	NC	<p>Table 1 of the Water Management Plan – Stage 1A (WMP S1A) S1A outlines the performance measures in Table 3 and outlines where they are addressed within the WMP S1A. Table 2-2 of the Soil and Water Management Sub Plan (SWMSP) outlines the performance measures in Table 3 and outlines where they are addressed within the SWMSP.</p> <p>Sighted Liddell Ash Dam Modification Haul Road Erosion and Sediment Control Plan (ESCP) dated 31/07/25, written by GHD.</p> <p>Also sighted AGLM Liddell Ash Dam Closure Containment Cell Design Sediment and Erosion Control Plan (ESCP) (GHD, 2025) showing the use of drainage paths moving around the containment cells. AGLM have designed the containment cells at the asbestos storage facility to separate and exclude as much clean water as practical through diversion drains around the cells, which is then pumped through sediment basins which ultimately report to the Borrow Pit sediment dam. During audit site inspection, observed initial trial use of geofabric liner which will be used to prevent long-term erosion for planned drains (see Plate 12).</p> <p>AGLM are currently in construction works to enlarge the existing Liddell Power Station oil and grit trap overflow basin to increase its size (see Plate 2) and have built two diversion drains to manage the</p>	<p>It is recommended that AGLM:</p> <ul style="list-style-type: none"> › Inspect chemical storage pods at the temporary asbestos facility and ensure all pods have self-bunding. › Deliver a Tool Box Talk that communicates spill containment and cleanup requirements to Project.
Feature	Performance measure							
Water management – general	<ul style="list-style-type: none"> • Maintain separation between clean and dirty water management systems • Minimise the use of clean and potable water by the development • Maximise water recycling, reuse and sharing opportunities • Design, install, operate and maintain water management systems in a proper and efficient manner 							

Cond	Condition Text	Status	Evidence	Recommendations														
	<table border="1"> <thead> <tr> <th>Feature</th> <th>Performance measure</th> </tr> </thead> <tbody> <tr> <td>Erosion and sediment control</td> <td> <ul style="list-style-type: none"> Design, install and maintain erosion and sediment controls generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction including Volume 1: Blue Book</i> (Landcom, 2004), <i>Volume 2A: Installation of Services</i> (DECC, 2008), <i>Volume 2C: Unsealed Roads</i> (DECC, 2008), <i>Volume 2D: Main Road Construction</i> (DECC, 2008) and <i>Volume 2E: Mines and Quarries</i> (DECC, 2008) Design, install and maintain sediment dams generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> (Landcom, 2004) and <i>2E Mines and Quarries</i> (DECC, 2008) </td> </tr> <tr> <td>Water diversion and storage</td> <td> <ul style="list-style-type: none"> Maximise the diversion of clean water around disturbed areas within the approved development area, except where clean water is captured for use by the development Design, install and maintain water storage infrastructure to avoid unlicensed or uncontrolled discharge of water </td> </tr> <tr> <td>Chemical and hydrocarbon storage</td> <td> <ul style="list-style-type: none"> Chemical and hydrocarbon products stored in bunded areas in accordance with the relevant Australian Standard </td> </tr> <tr> <td>Aquatic and riparian ecosystems</td> <td> <ul style="list-style-type: none"> Negligible environmental consequences beyond those predicted in the documents listed in condition A2(c) </td> </tr> <tr> <td>Alluvial aquifers</td> <td> <ul style="list-style-type: none"> Negligible impacts to the alluvial aquifer as a result of the development, beyond those predicted in the document/s listed in condition A2(c), including: <ul style="list-style-type: none"> Negligible change in groundwater levels Negligible change in groundwater quality Negligible impact to other groundwater users </td> </tr> <tr> <td>Works on waterfront land</td> <td> <ul style="list-style-type: none"> All works within waterfront land is managed in accordance with the guidance series for <i>Controlled Activities on Waterfront Land</i> (DPE, 2022) Minimise disturbance of banks and implement appropriate stabilisation mitigation </td> </tr> </tbody> </table>	Feature	Performance measure	Erosion and sediment control	<ul style="list-style-type: none"> Design, install and maintain erosion and sediment controls generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction including Volume 1: Blue Book</i> (Landcom, 2004), <i>Volume 2A: Installation of Services</i> (DECC, 2008), <i>Volume 2C: Unsealed Roads</i> (DECC, 2008), <i>Volume 2D: Main Road Construction</i> (DECC, 2008) and <i>Volume 2E: Mines and Quarries</i> (DECC, 2008) Design, install and maintain sediment dams generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> (Landcom, 2004) and <i>2E Mines and Quarries</i> (DECC, 2008) 	Water diversion and storage	<ul style="list-style-type: none"> Maximise the diversion of clean water around disturbed areas within the approved development area, except where clean water is captured for use by the development Design, install and maintain water storage infrastructure to avoid unlicensed or uncontrolled discharge of water 	Chemical and hydrocarbon storage	<ul style="list-style-type: none"> Chemical and hydrocarbon products stored in bunded areas in accordance with the relevant Australian Standard 	Aquatic and riparian ecosystems	<ul style="list-style-type: none"> Negligible environmental consequences beyond those predicted in the documents listed in condition A2(c) 	Alluvial aquifers	<ul style="list-style-type: none"> Negligible impacts to the alluvial aquifer as a result of the development, beyond those predicted in the document/s listed in condition A2(c), including: <ul style="list-style-type: none"> Negligible change in groundwater levels Negligible change in groundwater quality Negligible impact to other groundwater users 	Works on waterfront land	<ul style="list-style-type: none"> All works within waterfront land is managed in accordance with the guidance series for <i>Controlled Activities on Waterfront Land</i> (DPE, 2022) Minimise disturbance of banks and implement appropriate stabilisation mitigation 		<p>surface water run-off. During the inspection, erosion and sediment controls were observed to be in place for the works (see Plate 13, Plate 14, Plate 15).</p> <p>Viewed Ramboll presentation to AGLM dated 23 July 2025 on the concept designs for Project sediment basins for the 'Main Block Catchment Area'. The presentation confirms Project design criteria, existing environmental controls and provides concept designs for the area occupied by the Liddell Power Station catchment.</p> <p>MP advised that these construction works are within waterfront land. As observed during the audit site inspection recent topsoil stockpiles in the works area have been shaped to allow for reduced dust and are scheduled for hydroseeding in the weeks following the audit site inspection (see Plate 8).</p> <p>AGLM utilises clean water for general uses such as in offices and kitchens and minimises the use of clean water through reusing water for dust suppression. Water reused is primarily sourced from run-off water in sediment basins. Sighted Delta Monthly Report August 2025 stating the reported 'Recycled Water Usage' for the period, and 'Total to Date'. Also sighted Water Movement Permit dated 29/08/25 authorising the reuse of 2.5 Mega litres (ML) for dust suppression.</p>	
Feature	Performance measure																	
Erosion and sediment control	<ul style="list-style-type: none"> Design, install and maintain erosion and sediment controls generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction including Volume 1: Blue Book</i> (Landcom, 2004), <i>Volume 2A: Installation of Services</i> (DECC, 2008), <i>Volume 2C: Unsealed Roads</i> (DECC, 2008), <i>Volume 2D: Main Road Construction</i> (DECC, 2008) and <i>Volume 2E: Mines and Quarries</i> (DECC, 2008) Design, install and maintain sediment dams generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> (Landcom, 2004) and <i>2E Mines and Quarries</i> (DECC, 2008) 																	
Water diversion and storage	<ul style="list-style-type: none"> Maximise the diversion of clean water around disturbed areas within the approved development area, except where clean water is captured for use by the development Design, install and maintain water storage infrastructure to avoid unlicensed or uncontrolled discharge of water 																	
Chemical and hydrocarbon storage	<ul style="list-style-type: none"> Chemical and hydrocarbon products stored in bunded areas in accordance with the relevant Australian Standard 																	
Aquatic and riparian ecosystems	<ul style="list-style-type: none"> Negligible environmental consequences beyond those predicted in the documents listed in condition A2(c) 																	
Alluvial aquifers	<ul style="list-style-type: none"> Negligible impacts to the alluvial aquifer as a result of the development, beyond those predicted in the document/s listed in condition A2(c), including: <ul style="list-style-type: none"> Negligible change in groundwater levels Negligible change in groundwater quality Negligible impact to other groundwater users 																	
Works on waterfront land	<ul style="list-style-type: none"> All works within waterfront land is managed in accordance with the guidance series for <i>Controlled Activities on Waterfront Land</i> (DPE, 2022) Minimise disturbance of banks and implement appropriate stabilisation mitigation 																	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>AGLM undertake weekly inspections with CMA personnel. Sighted AGLM HSE Site Inspection Checklists dated 16/07/25 (LPS area), 07/10/25 (containment cell area), 08/10/25 (LPS area) which include checks of erosion and sediment controls, diversions, sediment dams, waterways and run-off. Also sighted myHSE safety observations dated 12/08/25 and 11/90/25 entered by SB, for inspections of the containment cell erosion and sediment controls after a significant rainfall event and in relation to silt fence installation. AGLM use 'myHSE' system to track and record the progress against actions raised during inspections. Sighted myHSE actions raised along with completion status, for the period 17/07/25 to 24/10/25.</p> <p>Chemicals and hydrocarbons were found to be stored in bunded areas during the audit site inspection, including stand alone bunds and self-bunded dangerous goods containers (see Plate 16, Plate 17, Plate 20), with spill kits in place at key locations (see Plate 18, Plate 19, Plate 20).</p> <p>Two chemical pods were observed to be not on bunds in the temporary asbestos storage facility (Plate 21) and there was a diesel spill at a small self-bunded diesel storage tank which had been covered with</p>	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>spill-sorb but not cleaned up (Plate 22).</p> <p>Reviewed AGL groundwater monitoring records for the period October 2024 to July 2025, noting no discernible change to groundwater depth or quality.</p>	
B14.	The performance measures in Table 3 apply to the entire approved development area, including all landforms constructed under previous development consents. However, these performance measures do not require any additional earthmoving works to be undertaken for landforms that have been approved and constructed under previous consents, except where those earthworks are required for the establishment of a stable and non-polluting landform.	C	MP (pers comms) confirmed that no additional earthmoving works will be undertaken for landforms that previously been constructed and approved under previous consents.	
B15.	<p>A water management plan must be prepared for the development, excluding the Liddell Ash Dam and demolition activities considered by the demolition environmental management plan. The plan must:</p> <p>a) be submitted to the Planning Secretary for approval prior to the commencement of construction;</p>	C	<p>Letter from MP to DPHI dated 08/07/2025 notifying the commencement of construction and commencement of demolition under SSD 24937520 is scheduled to commence on 23/07/25.</p> <p>Water Management Plan – Stage 1A (WMP S1A) dated 03/07/25. The WMP S1A was approved by DPHI on 07/07/25.</p> <p>The WMP S1A as approved is marked as 'DRAFT' on the top of each page and there is an endorsement letter in Appendix A for the BMP S1.</p>	<p>It is recommended that AGLM updates the Water Management Plan Stage 1A to document it as a 'final' version and to include the correct endorsement letter in Appendix A.</p>
	<p>b) be prepared:</p> <ol style="list-style-type: none"> i. by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; and ii. in consultation with the NSW EPA; 	C	Sighted DPHI letter dated 26/03/2025 endorsing Kelly Mulhearn and Greg Matthews as authors for the WMP S1. The WMP S1A has an endorsement letter for the BMP. WMP S1 refers to a letter dated	See action against Schedule 2, Condition B15.

Cond	Condition Text	Status	Evidence	Recommendations
			<p>26 March 2025 (under stakeholder consultation).</p> <p>Appendix A of the WMP S1A contains a tabulated summary of consultation with NSW EPA. The summary contains dates of the consultation with the identified party, copies of the identified party's response, and a summary of how AGLM has addressed the issues raised.</p>	
	c) include a development water balance;	C	Section 6 of the WMP S1A includes the water balance.	
	d) include a review of the water licensing strategy for the development in consultation with DCCEE Water Group;	NT	See Schedule 2, Condition A16 (a).	
	e) ensure all works carried out as part of the development comply with the performance measures detailed in Table 3;	C	See Schedule 2, Condition B13.	
	f) address the risks identified in the environmental risk assessment undertaken in accordance with condition B1;	C	Section 1.6 of the WMP S1A lists the risk identified in the environmental risk assessment, being unauthorised discharge to surface water, unauthorised discharge to groundwater, and authorised discharges exceeding criteria. Table 3 of the WMP S1A then describes how AGLM manages those risks. One of the key risk management measures was to remove unnecessary chemicals and hydrocarbons from site (to de-risk). See Schedule, Condition B13 which assesses compliance status of storing chemicals in bunded areas.	
	g) support the implementation of the relevant mitigation measures identified in the documents listed in condition A2(c);	C	Table 15 of the WMP S1A currently identifies the relevant mitigation	

Cond	Condition Text	Status	Evidence	Recommendations
			measures from the EIS and lists roles and responsibilities.	
	h) include a monitoring and evaluation program to: <ul style="list-style-type: none"> i. record surface water inflows and outflows from the approved development area including controlled and uncontrolled discharges; ii. assess compliance with the relevant performance measures and conditions of this consent; and iii. the achievement of the surface water and groundwater objectives; 	C	Section 8 of the WMP S1A outlines the monitoring program, Section 9 outlines how relevant performance measures are being addressed,	
	i) include a TARP to respond to any exceedances of the relevant performance measures, objectives or performance indicators including reporting requirements and repair, mitigation and/or offsetting of any adverse surface water or groundwater impacts; and	C	Section 11 of the WMP S1A contains a Trigger Action Response Plan (TARP) to respond to exceedances and Section 13 outlines the reporting requirements.	
	j) include processes to review the plan, including responding to non-compliances, incidents or complaints.	C	Section 13 of the WMP S1A outlines the reporting requirements and addresses how complaints are managed.	
B16.	Construction other than demolition must not commence until the water management plan is approved by the Planning Secretary.	C	Letter from MP to DPHI dated 08/07/25 notifying the commencement of construction and commencement of demolition under SSD 24937520 is scheduled to commence on 23/07/25. Water Management Plan – Stage 1A (WMP S1A) dated 03/07/25. The WMP S1A was approved by DPHI on 07/07/25.	
B17.	The water management plan, as approved by the Planning Secretary, must be implemented for the development.	C	See Schedule 2, Condition B13.	
DANGEROUS GOODS				
B18.	The quantities of dangerous goods stored and handled by the development must be below the threshold quantities listed in the Department’s	NC	Table 6.1 of <i>Liddell Future Land Use and Enabling Works Project Preliminary Hazard Analysis</i> (GHD, 2023) outlines the	It is recommended that AGLM update the ‘Hazardous

Cond	Condition Text	Status	Evidence	Recommendations
	<p><i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.</i></p>		<p>indicative hazardous chemicals and quantities that will be used during the Project. All dangerous goods storages previously used for the operation of the Liddell Power Station were excluded from analysis as they will be evacuated and considered empty in preparation for demolition. The following items have thresholds under SEPP 33:</p> <ul style="list-style-type: none"> › Oxygen › LPG › Acetylene › Paint (spray cans) › Diesel › Cleaning Agents › Gearbox Oil/grease/hydraulic fluid › Explosives <p>During the audit site inspection, it was observed that the bulk hydrocarbon tanks had been emptied and the tanks decommissioned (Plate 23). Chemical and hydrocarbon storage areas including diesel and oil storage were also inspected (Plate 16 to Plate 22).</p> <p>Sighted 'Delta Group Dangerous / Hazardous Substance Register' which lists the dangerous and hazardous goods allowed on site and the quantity. Within the Register, diesel, oxygen, LPG, acetylene and some oils are listed as having a quantity of 'As required only', without a current maximum quantity listed and it is undetermined what the</p>	<p>Substance Register' to list the current quantities of all hazardous and dangerous goods stored on site, and state the maximum quantities allowed to be stored in a register, as per the DPHI <i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33.</i></p>

Cond	Condition Text	Status	Evidence	Recommendations
			current quantities are on site. As such, it is unable to be determined whether the quantities of dangerous goods stored and handled by the development are below the threshold quantities listed in the DPHI Hazardous and Offensive Development Application Guidelines – Applying SEPP 33.	
B19.	Dangerous goods must be stored and handled strictly in accordance with: a) all relevant Australian Standards; and		See Schedule 2, Condition B13.	
	b) for liquids, the <i>NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual</i> .		See Schedule 2, Condition B13.	
	In the event of inconsistency between the requirements of condition B19(a) and B19(b), the most stringent requirement must prevail to the extent of the inconsistency.	Note	Note only.	
TRANSPORT				
B20.	All heavy vehicle travel and transport used by the development must be undertaken in accordance with a Driver's Code of Conduct, prepared in consideration of registered industry codes of practice published by the National Heavy Vehicle Regulator.	C	Appendix 5 of the EMS contains the Traffic Management Plan (TMP), which outlines the Drivers Code of Conduct. The Driver Code of Conduct will outline arrangements for light and heavy vehicle drivers, including: <ul style="list-style-type: none"> › General requirements, including site induction requirements; › Travelling speeds and safe driving practices; › Fatigue management; and › Adherence to designated haulage routes and heavy vehicle noise. 	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>Sighted:</p> <ul style="list-style-type: none"> › CMA QSE Weekly Toolbox Talk for Liddell Power Station dated 25/07/2025 (and sign-off sheet). The monthly safety commitment focussed on was 'Safe Driving & Plant Operation' and included an overview of a truck incident at a NSW coal mine and discussed the responsibilities that equipment operators have on site; › Delta Group Safety Notice – Driver Fatigue which was distributed on site to communicate the risks associated with driver fatigue; › CMA Contracting Safety Commitments signage displayed at the entry of the site offices stating 'Safe driving and plant operations' and 'Be fit for work'. <p>During the audit site inspection, safety signage and a speed tracker was observed to be in place (see Plate 24 and Plate 25).</p>	
B21.	All mine overburden material excavated from the Borrow Pit must be transported using private haul roads.	NT	See Schedule 2, Condition A7.	
METEOROLOGICAL MONITORING				
B22.	<p>Prior to the commencement of development activities and for the life of the development, a suitable meteorological station must operate in the vicinity of the development that:</p> <p>a) complies with the requirements in the <i>Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales</i> (DEC, 2007);</p>	C	AGLM operates an on-site meteorological station 'AGL08' (EPL No. 2122 Monitoring Point 15). The location of this station is displayed in Figure 5-3 of the DMSP. The DMSP states that 'The meteorological	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>station is a requirement of Condition M5.1 of EPL 2122.</p> <p>Sighted Benchmark Monitoring Reports for July, August, September and October containing the raw data for the AGLM AGL08 meteorological station. The report lists the parameters measured, date of last maintenance (29/05/25), model serial numbers and applicable Australian Standards.</p> <p>Sighted calibration certificates for meteorological station AGL08 for:</p> <ul style="list-style-type: none"> › Solar radiation, dated 17/09/25; › Wind sensor, dated 12/10/25; › Relative humidity, dated 18/10/25; › Tipping bucket rain gauge, dated 18/10/25; and › Ambient temperature, dated 18/10/25. 	
	b) is capable of measuring meteorological conditions in accordance with the <i>NSW Industrial Noise Policy</i> (EPA, 2000) or <i>NSW Noise Policy for Industry</i> (EPA, 2017); and		See Schedule 2, Condition B22 (a).	
	c) unless a suitable alternative is approved by the Planning Secretary following consultation with the EPA.	NT	Approval of an alternative method has not been sought.	
WASTE				
B23.	All waste generated by the development must be classified in accordance with the <i>Waste Classification Guidelines</i> (EPA, 2014) and disposed of at appropriately licensed waste facilities unless subject to condition B27 unless otherwise permitted by an EPL.	C	Section 5.8.15 of the EMS states that all waste generated throughout the Development will be classified for disposal in accordance with the NSW EPA Waste Classification Guidelines and disposed of at and appropriately licenced facility.	

Cond	Condition Text	Status	Evidence	Recommendations
			TB (pers comms) confirmed that Project waste is managed under contract. Viewed CMA Waste Tracking Register for July to September 2025 and examples of waste transport dockets for the Project dated 30/07, 21/08/25, and 04/09/25. Waste is classified by scheduled type, in accordance with EPA guidelines.	
B24.	No waste from outside the approved development area must be received, stored, treated, processed, re-processed or disposed of within the approved development area except as expressly permitted by an applicable EPL, specific resource recovery order or exemption under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> .	C	MP (per comms) confirmed that Liddell Power Station receives organics for rehabilitation as approved under EPL 2122.	
B25.	Waste generated by the development must be secured and maintained within designated waste processing or storage areas at all times prior to disposal, re-use or recycling.	C	Segregated waste bins were in place at key locations within the Stage 2 area at the time of inspection (see Plate 26 , Plate 27 and Plate 28).	
B26.	Any concrete confirmed to be impacted with PCB above acceptable levels determined by the Site auditor must be disposed of at a licensed waste facility.	NT	MP (pers comms) advised that AGLM will have the first concrete batch tested next week. As such, this has not been triggered to date.	
B27.	Asbestos soils requiring disposal, asbestos containing materials, synthetic mineral fibre and other associated wastes authorised by the Site auditor must be disposed of at the asbestos disposal facility constructed within the Borrow Pit Area identified on Figure 1 in Appendix 1.	NT	See Schedule 2, Condition A7.	
BIODIVERSITY				
B28.	The biodiversity credits specified in Table 4 and Table 5 must be retired in accordance with the Biodiversity Offset Scheme of the <i>Biodiversity Conservation Act 2016</i> , including the application of any ancillary rules published under Section 6.5 of the <i>Biodiversity Conservation Regulation</i>	C	Sighted Biodiversity Conservation Trust (BCT) 'Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation' (Statement) for	

Cond	Condition Text	Status	Evidence	Recommendations																										
	<p>2017, except as otherwise permitted by conditions B30 or B31. Evidence must be provided to the Department that the correct number and class of credits has been retired prior to undertaking the disturbance associated with each stage</p>		<p>SSD 24937520 dated 03/07/25 (prior to commencement). Credits have been retired for Stage 1 and Stage 2, with the exception of species credits for the Hunter Valley Delma (see Schedule 2, Condition B29).</p> <p>Sighted Major Projects Portal submission record showing that that MP submitted the Statement confirming retirement of Stage 1 and 2 biodiversity credits to DPHI.</p>																											
	<p>Table 4 – Biodiversity credit requirements – ecosystem credits</p> <table border="1"> <thead> <tr> <th rowspan="2">Vegetation community</th> <th colspan="2">Stage 1</th> <th colspan="2">Stage 2</th> <th colspan="2">Stage 3</th> <th colspan="2">Total</th> </tr> <tr> <th>Area (ha)</th> <th>Credits</th> <th>Area (ha)</th> <th>Credits</th> <th>Area (ha)</th> <th>Credits</th> <th>Area (ha)</th> <th>Credits</th> </tr> </thead> <tbody> <tr> <td>PCT 1603: Narrow-leaved Ironbark - Bull Oak - Grey Box shrub - grass open forest of the central and lower Hunter (moderate to good condition)¹</td> <td>0.04</td> <td>1</td> <td>0.18</td> <td>4</td> <td>0.19</td> <td>4</td> <td>0.41</td> <td>9</td> </tr> </tbody> </table>	Vegetation community	Stage 1		Stage 2		Stage 3		Total		Area (ha)	Credits	Area (ha)	Credits	Area (ha)	Credits	Area (ha)	Credits	PCT 1603: Narrow-leaved Ironbark - Bull Oak - Grey Box shrub - grass open forest of the central and lower Hunter (moderate to good condition) ¹	0.04	1	0.18	4	0.19	4	0.41	9			
Vegetation community	Stage 1		Stage 2		Stage 3		Total																							
	Area (ha)	Credits	Area (ha)	Credits	Area (ha)	Credits	Area (ha)	Credits																						
PCT 1603: Narrow-leaved Ironbark - Bull Oak - Grey Box shrub - grass open forest of the central and lower Hunter (moderate to good condition) ¹	0.04	1	0.18	4	0.19	4	0.41	9																						

Vegetation community	Stage 1		Stage 2		Stage 3		Total	
	Area (ha)	Credits	Area (ha)	Credits	Area (ha)	Credits	Area (ha)	Credits
PCT 1603: Narrow-leaved Ironbark - Bull Oak - Grey Box shrub - grass open forest of the central and lower Hunter (low condition)	1.72	16	2.39	-	6.11	56	10.22	72
PCT 1603: Narrow-leaved Ironbark - Bull Oak - Grey Box shrub - grass open forest of the central and lower Hunter (cleared - derived grassland)	0.73	-	7.27	88	3.79	47	11.79	135
PCT 1603: Narrow-leaved Ironbark - Bull Oak - Grey Box shrub - grass open forest of the central and lower Hunter (rehab grassland)	21.95	-	2.76	-	18.62	-	43.33	-
PCT 1604: Narrow-leaved Ironbark - Grey Box - Spotted Gum shrub - grass woodland of the central and lower Hunter (moderate condition) ¹	2.32	38	0.12	2	0.16	3	2.60	43
PCT 1604: Narrow-leaved Ironbark - Grey Box - Spotted Gum shrub - grass woodland of the central and lower Hunter (planted/rehabilitation)	0.65	13	0.17	2	1.83	24	2.65	39
PCT 1692: Bull Oak grassy woodland of the central Hunter Valley (moderate condition)	0.16	3	1.23	22	3.14	55	4.53	80
PCT 1731: Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley (moderate condition)	0.49	-	0.12	-	0.53	-	1.14	-
PCT 1071: Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin Bioregion (moderate condition)	0.42	10	4.02	64	-	-	4.44	74

Note: ¹ This PCT constitutes the Central Hunter Valley Eucalypt Forest and Woodland community listed under the Environment Protection and Biodiversity Conservation Act 1999

Cond	Condition Text	Status	Evidence	Recommendations																														
	<p>Table 5 – Biodiversity credit requirements – species credits</p> <table border="1"> <thead> <tr> <th>Threatened Species</th> <th>Stage 1</th> <th>Stage 2</th> <th>Stage 3</th> <th>Total</th> </tr> <tr> <td></td> <td>Credits</td> <td>Credits</td> <td>Credits</td> <td>Credits</td> </tr> </thead> <tbody> <tr> <td>Hunter Valley Delma (<i>Delma vescolineata</i>)</td> <td>198</td> <td>216</td> <td>334</td> <td>748</td> </tr> <tr> <td>Southern Myotis (<i>Myotis macropus</i>)</td> <td>35</td> <td>129</td> <td>149</td> <td>313</td> </tr> <tr> <td>Squirrel Glider (<i>Petaurus norfolcensis</i>)</td> <td>75</td> <td>47</td> <td>154</td> <td>276</td> </tr> <tr> <td>Brush-tailed Phascogale (<i>Phascogale tapoatafa</i>)</td> <td>55</td> <td>33</td> <td>94</td> <td>182</td> </tr> </tbody> </table>	Threatened Species	Stage 1	Stage 2	Stage 3	Total		Credits	Credits	Credits	Credits	Hunter Valley Delma (<i>Delma vescolineata</i>)	198	216	334	748	Southern Myotis (<i>Myotis macropus</i>)	35	129	149	313	Squirrel Glider (<i>Petaurus norfolcensis</i>)	75	47	154	276	Brush-tailed Phascogale (<i>Phascogale tapoatafa</i>)	55	33	94	182			
Threatened Species	Stage 1	Stage 2	Stage 3	Total																														
	Credits	Credits	Credits	Credits																														
Hunter Valley Delma (<i>Delma vescolineata</i>)	198	216	334	748																														
Southern Myotis (<i>Myotis macropus</i>)	35	129	149	313																														
Squirrel Glider (<i>Petaurus norfolcensis</i>)	75	47	154	276																														
Brush-tailed Phascogale (<i>Phascogale tapoatafa</i>)	55	33	94	182																														
B29.	Prior to undertaking construction or operations within the:	C	See Schedule 2, Condition B28.																															
	a) Stage 1 impact area (as shown on Figure 4 in Appendix 4), the Applicant must retire the Stage 1 biodiversity credits as specified in Table 4 and Table 5;																																	
	b) Stage 2 impact area (as shown on Figure 4 in Appendix 4), the Applicant must retire the Stage 2 biodiversity credits as specified in Table 4 and Table 5; and	NT	MP (pers comms) confirmed Stage 2 works and Stage 3 works have not commenced.																															
	c) Stage 3 impact area (as shown on Figure 4 in Appendix 4), the Applicant must retire the Stage 3 biodiversity credits as specified in Table 4 and Table 5.	NT	See Schedule 2, Condition B29(b).																															
B30.	With the agreement of the Planning Secretary, the retirement of credits for the Hunter Valley Delma (<i>Delma vescolineata</i>) as listed in Table 5 may be carried out in an alternative timeframe to the timing specified in condition B29.	NT	Sighted DPHI letter to AGLM approving AGLM's retirement of credits for the Hunter Valley Delma for Stage 1 and Stage 2 by 28/11/25.																															
	Note: The option for an alternate timeframe is provided given the recent listing of the species under the Biodiversity Conservation Act 2016.	Note	Note only.																															
B31.	The biodiversity credit requirements outlined in condition B28 may be reduced if the Applicant demonstrates, in consultation with CPHR that the biodiversity credit requirements in Table 4 and Table 5 do not accurately reflect the extent of impacts on these species as a result of the development physically avoiding areas of the PCTs assessed by the	NT	Not triggered by AGLM.																															

Cond	Condition Text	Status	Evidence	Recommendations
	documents listed in condition A2(c). Any request made by the Applicant to reduce biodiversity credits must:			
	a) be submitted prior to the commencement of any works that will impact biodiversity values within the relevant stage impact area;			
	b) be in writing and addressed to the Planning Secretary; and	NT	See Schedule 2, Condition B31(a).	
	c) be supported by a report outlining the requested reduction in impact to biodiversity values which has been prepared by a person accredited under the <i>Biodiversity Conservation Act 2016</i> .	NT	See Schedule 2, Condition B31(a).	
B32.	A biodiversity management plan must be prepared for the development. The plan must:			
	a) be submitted to the Planning Secretary for approval prior to the commencement of construction;	C	Letter from MP to DPHI dated 08/07/25, notifying the Department that construction and demolition under SSD 24937520 is scheduled to commence on 23/07/25. Biodiversity Management Plan – Stage 1 (BMP S1) dated 18/07/25. AGLM submitted the BMP S1 for DPHI approval on 09/05/25 and it was approved on 23/07/25.	
	b) be prepared: <ul style="list-style-type: none"> i. (i) by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; ii. (ii) in consultation with CPHR; iii. (iii) in accordance with the Biodiversity Assessment Method and be consistent with the avoid and minimise commitments in the Biodiversity Development Assessment Report for the development (dated 22 October 2024); and iv. (iv) with reference to any relevant biodiversity management plan guidance material provided by CPHR; 	C	Appendix B of the BMP S1 contains a copy of DPHI letter dated 26/03/25 which provides endorsement for Rob Townsend, Dr. Nigel Fisher, Fig Forest and Kirsty Peter to prepare the BMP. Appendix A of the BMP S1 contains a tabulated summary of the consultation with CPHR. The summary contains dates of the consultation with the identified party, copies of the identified party's	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>response, and a summary of how AGLM has addressed the issues raised.</p> <p>The BMPS references the BAM and Section 1.4 of the BMP S1 outlines the avoidance and minimisation of impacts as per the approved BDAR.</p> <p>The tabulated summary of consultation with CPHR in Appendix A contains CPHR's guidance and feedback on the BMP S1, and a summary of how AGLM has addressed the issues raised.</p>	
	<p>c) support the enhancement and composition of any threatened ecological community found within the approved development area including, the Central Hunter Grey Box – Ironbark Woodland;</p>	C	<p>Section 2.2 of the BMP S1 outlines the key threats to threatened ecological communities (TECs) and how these will be managed. These measures contribute to supporting to the areas of Central Hunter Grey Box – Ironbark Woodland. This includes the commitment delineate TEC interfaces and erect signage to clearly identify them as 'No Go Zone/Environment Protection Zones'. During the audit site inspection 'No Go' zones were observed across construction areas as shown in Plate 29 and Plate 30.</p>	
	<p>d) implement measures to minimise the use of pesticides and herbicides within the approved development area;</p>	C	<p>Section 2.2.1 of the BMP S1 states management controls to minimise the use of pesticides and herbicides including:</p> <ul style="list-style-type: none"> › AGL maintain ongoing weed survey and mapping of their landholdings which includes the Development Site. This weed mapping of the Development site (including a 10m 	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>buffer to manage edge effects will be used to inform initial weed control works and one follow up treatment prior to the commencement of construction as required, dependent on the outcomes of surveys.</p> <ul style="list-style-type: none"> › Imported construction materials should be inspected to ensure it is free from all biosecurity matters. › All plant and equipment coming on to site must be declared free of organic matter including mud etc., and free of seed or other propagules, either through certification where appropriate (e.g.VENM) or inspection. › Excavated topsoil from areas identified to have high-threat weed infestations must be stockpiled appropriately. <p>Sighted 'Weekly Works Summary – AGL Liddell Ash Dam 28/07/25 to 01/08/25' (Global Soils, 2025) providing weed maintenance summary of works.</p>	
	<p>e) support the integrity of habitat for insectivorous bat and amphibian species;</p>	<p>C</p>	<p>Section 2.2.3 of the BMP S1 states that temporary frog exclusion fences will be installed where aquatic habitat interfaces with the Development Site. In addition, Aquatic Habitat identified outside of the development site within close proximity of an active work zone within of the development site will have frog exclusion fences installed.</p>	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>Controls to prevent impacts of clearing are outlined in Section 2.2.3 of the BMP S1 which include:</p> <ul style="list-style-type: none"> › Delineation of the development site; › Pre-clearance surveys 4 weeks prior to clearing; › Having a fauna spotter catcher during felling and when dewatering dams; › Re-use of hollows for nest boxes and salvaging of larger woody debris; › Installation of artificial hollows (nest-boxes prior to clearing); › Re-location of displaced fauna. › Avoiding tree clearing when temperatures exceed 35°. <p>During the audit site inspection 'No Go' zones were observed across construction areas as shown in Plate 29 and Plate 30. The 'No Go' zones delineate the Project footprint.</p>	
	<p>f) incorporate salt tolerant species as part of the saline discharge rehabilitation works associated with the Liddell Ash Dam as outlined in the Statement of Environmental Effects prepared by Coffey Environments and dated 18 July 2011;</p>	<p>NT</p>	<p>Section 2.2.5.7 of the BMP S1 states that this requirement will be managed by the Rehabilitation Management Plan (RMP) which is not yet developed. The RMP requires development within 12 months of commencement of the SSD-24937520 (see Schedule 2, Condition B38).</p>	
	<p>g) include a description of measures and timeframes that would be implemented to:</p> <ul style="list-style-type: none"> i. minimise clearing and avoiding unnecessary disturbance of vegetation by the development; 	<p>C</p>	<p>Section 1.4 of the BMP S1 outlines the measures proposed by AGLM to avoid and minimise ecological impacts, which is largely through Project design and</p>	

Cond	Condition Text	Status	Evidence	Recommendations
			revision. Section 1.5.1 outlines the development stages.	
	ii. minimise impacts on fauna, and implementing fauna recovery and management protocols;	C	See Schedule 2, Condition B32 e).	
	iii. maximise the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement of rehabilitation of the approved development area;	C	See Schedule 2, Condition B32 e).	
	iv. control weeds, feral pests, and pathogens;	C	Section 2.2.1 of the BMP S1 outlines the controls for weeds and pathogens. Section 2.2.2 lists the known pest species and management measures.	
	v. manage any incidental threatened species discovered within the approved development area during construction, operation, upgrading or decommissioning of the development, including a protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered within the approved development area; and	C	Section 3.5 of the BMP S1 outlines the unexpected threatened species finds protocol, which lists steps to be taken in the event of an unexpected threatened species being found within the development footprint.	
	vi. retain, rehabilitate or restore vegetation connectivity and provide habitat for threatened species such as the squirrel glider.	NT	Appendix D of the BMP S1 contains a 'Habitat Relocation Management Plan'. According to the BMP S1, 'Tree hollows from trees cleared for the Project will be relocated and installed in suitable mature trees as close to their original location as possible. If existing tree hollows cannot be successfully relocated (e.g., they are damaged during clearing), artificial nest boxes are to be installed in appropriate habitat at a 4:1 ratio to those lost. TB (pers) comms) confirmed that no hollows had been salvaged during pre-clearance surveys to date, therefore no artificial hollows (nest-boxes) have been installed.	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>This is supported by the following sighted Pre-Clearance Surveys:</p> <ul style="list-style-type: none"> › Sighted Pre-Clearance Survey of the Haul Road and Landfill Cells dated August 2025 (EMM, 2025); › Sighted EMM Pre-Clearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025). <p>Regarding rehabilitation, Section 3.4 of the BMP S1 states that the RMP will include a description of measures and timeframes that would be implemented to rehabilitate or restore vegetation connectivity and provide habitat for threatened species such as the squirrel glider. The RMP requires development within 12 months of commencement of the SSD-24937520 (see Schedule 2, Condition B38) and LT (pers comms) confirmed the document has not been prepared at the time of audit.</p>	
B33.	Construction must not commence until the biodiversity management plan is approved by the Planning Secretary.	C	See Schedule 2, Condition B32.	
B34.	The biodiversity management plan, as approved by the Planning Secretary, must be implemented for the development.	NC	<p>A review of the following documents found that AGLM were generally implementing the BMP S1 during the audit period:</p> <ul style="list-style-type: none"> › Sighted Preclearance Survey of the Haul Road and Landfill Cells dated August 2025 (EMM, 2025); 	It is recommended that AGLM conduct regular toolbox talks with contractors to reinforce the importance of adhering to flagged 'No-go' zones. These

Cond	Condition Text	Status	Evidence	Recommendations
			<ul style="list-style-type: none"> › Sighted EMM Preclearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025); › Sighted 'Weekly Works Summary – AGL Liddell Ash Dam 28/07/25 to 01/08/25' (Global Soils, 2025) providing weed maintenance summary of works; › Ground and Vegetation Disturbance Approval (GVDA) – Application Form for Construction of the overflow weir in the eastern wall of the existing O&G trap and the overflow channel discharging to Lake Liddell, including localized bun works and erosion protection, as per the approved final design' (GVDA) dated 22/09/25; › GVDA – Application Form for 'Clear and grub the haul road phase one to install stormwater pipe in existing drainage channel' dated 31/07/25; › GVDA – Application Form for 'removal of vegetation encroaching on sediment lagoons, connecting drain and coal stockpile surface' dated 10/06/25; and › GVDA – Application Form for 'Install new Project signage around the Liddell perimeter and entries attached plan set (Gate 1 CMA authorized access; Gate 2 authorized Project vehicle car park; Gate 3 visitor car park; Gate 4 site access; muster points A–C; directional/site map board). Sign 	<p>sessions should be scheduled regularly to ensure all new starters receive this training.</p>

Cond	Condition Text	Status	Evidence	Recommendations
			<p>content and locations per the "Site Signs_R1.pptx", dated 29/09/25.</p> <p>During the audit site inspection 'No Go' zones were observed across construction areas as shown in Plate 29 and Plate 30. Frog exclusion zone fencing was also observed (Plate 29).</p> <p>Sighted Notification of Incident Report dated 03/10/25 from AGLM to DPPI, in relation to a contractor tracking machinery through a flagged 'No Go' zone which is a non-compliance with the BMP requirements. The 'No go' area was immediately inspected for any injured fauna. No injured fauna was identified during the inspection. There was some disturbance to the groundcover, no native vegetation was impacted. The 'No Go' exclusion flagging was reinstated following the incident, and the requirements around 'No Go' zones were tool boxed with the work crew. Sighted DPPI response to AGLM's notification dated 09/10/25, which notes that DPPI reviewed the notification and considers it to generally satisfy Schedule 2, Condition D4 of the consent.</p>	
REHABILITATION				
B35.	The approved development area must be rehabilitated progressively, that is, as soon as practicable following disturbance associated with the development, to minimise the total area exposed at any time. Interim stabilisation and temporary vegetation strategies must be implemented in	C	See Schedule 2, Condition B6.	

Cond	Condition Text	Status	Evidence	Recommendations																								
	areas prone to dust generation, soil erosion and weed incursion that are not yet rehabilitated.																											
B36.	<p>The rehabilitation of the approved development area must comply with the rehabilitation objectives in Table 6 and the conceptual final landforms shown on Figure 5 and Figure 6 in Appendix 5.</p> <p>Table 6 - Rehabilitation Objectives</p> <table border="1"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>All areas of the approved development area affected by the development</td> <td> <ul style="list-style-type: none"> Safe and stable Free draining Fit for the intended post-closure land use/s Negligible post-closure environmental impacts beyond predictions in the documents listed in condition A2(c) </td> </tr> <tr> <td>Areas proposed for native vegetation</td> <td> <ul style="list-style-type: none"> Ecosystem function is self-sustaining Vegetation composition and structure commensurate with native vegetation communities found in the local area Habitat, feed and foraging resources for threatened fauna species established </td> </tr> <tr> <td>Areas proposed for grassland</td> <td> <ul style="list-style-type: none"> Rehabilitated areas only requires maintenance consistent with intended post-closure land use/s </td> </tr> <tr> <td>Crushed concrete</td> <td> <ul style="list-style-type: none"> Crushed concrete used as stabilisation material does not contain PCB above acceptable levels determined by the Site auditor </td> </tr> <tr> <td>Asbestos wastes</td> <td> <ul style="list-style-type: none"> Asbestos containing material (excluding those contained in existing asbestos landfills subject to condition C27) and synthetic mineral fibre wastes are removed and encapsulated at the onsite asbestos disposal facility </td> </tr> <tr> <td>Asbestos disposal facility</td> <td> <ul style="list-style-type: none"> Landfill capping completed generally in accordance with NSW EPA Environmental Guidelines Solid Waste Landfills (2016) requirements for special wastes </td> </tr> <tr> <td>Borrow Pit and landfill area</td> <td> <ul style="list-style-type: none"> Rehabilitated with Woodland species commensurate with the Central Hunter Grey Box - Ironbark Woodland Vegetation is connected to existing endangered communities, enhancing wildlife movement </td> </tr> <tr> <td>Liddell Ash Dam</td> <td> <ul style="list-style-type: none"> Capped in-situ so that land is suitable for the intended post-closure land use Minimise dust emissions from ash dam surface Mitigate and manage seepage and leachate from the ash dam to surface water and groundwater </td> </tr> <tr> <td>Temporary stabilisation</td> <td> <ul style="list-style-type: none"> Areas of land at risk of erosion due inactivity, grade or any other reason are stabilised with temporary groundcover or vegetation </td> </tr> <tr> <td>Water quality</td> <td> <ul style="list-style-type: none"> Negligible changes in groundwater quality as a result of the development beyond those predicted in the documents listed in condition A2(c) </td> </tr> <tr> <td>Community</td> <td> <ul style="list-style-type: none"> Ensure public safety </td> </tr> </tbody> </table>	Feature	Objective	All areas of the approved development area affected by the development	<ul style="list-style-type: none"> Safe and stable Free draining Fit for the intended post-closure land use/s Negligible post-closure environmental impacts beyond predictions in the documents listed in condition A2(c) 	Areas proposed for native vegetation	<ul style="list-style-type: none"> Ecosystem function is self-sustaining Vegetation composition and structure commensurate with native vegetation communities found in the local area Habitat, feed and foraging resources for threatened fauna species established 	Areas proposed for grassland	<ul style="list-style-type: none"> Rehabilitated areas only requires maintenance consistent with intended post-closure land use/s 	Crushed concrete	<ul style="list-style-type: none"> Crushed concrete used as stabilisation material does not contain PCB above acceptable levels determined by the Site auditor 	Asbestos wastes	<ul style="list-style-type: none"> Asbestos containing material (excluding those contained in existing asbestos landfills subject to condition C27) and synthetic mineral fibre wastes are removed and encapsulated at the onsite asbestos disposal facility 	Asbestos disposal facility	<ul style="list-style-type: none"> Landfill capping completed generally in accordance with NSW EPA Environmental Guidelines Solid Waste Landfills (2016) requirements for special wastes 	Borrow Pit and landfill area	<ul style="list-style-type: none"> Rehabilitated with Woodland species commensurate with the Central Hunter Grey Box - Ironbark Woodland Vegetation is connected to existing endangered communities, enhancing wildlife movement 	Liddell Ash Dam	<ul style="list-style-type: none"> Capped in-situ so that land is suitable for the intended post-closure land use Minimise dust emissions from ash dam surface Mitigate and manage seepage and leachate from the ash dam to surface water and groundwater 	Temporary stabilisation	<ul style="list-style-type: none"> Areas of land at risk of erosion due inactivity, grade or any other reason are stabilised with temporary groundcover or vegetation 	Water quality	<ul style="list-style-type: none"> Negligible changes in groundwater quality as a result of the development beyond those predicted in the documents listed in condition A2(c) 	Community	<ul style="list-style-type: none"> Ensure public safety 	NT	See Schedule 2, Condition B6.	
Feature	Objective																											
All areas of the approved development area affected by the development	<ul style="list-style-type: none"> Safe and stable Free draining Fit for the intended post-closure land use/s Negligible post-closure environmental impacts beyond predictions in the documents listed in condition A2(c) 																											
Areas proposed for native vegetation	<ul style="list-style-type: none"> Ecosystem function is self-sustaining Vegetation composition and structure commensurate with native vegetation communities found in the local area Habitat, feed and foraging resources for threatened fauna species established 																											
Areas proposed for grassland	<ul style="list-style-type: none"> Rehabilitated areas only requires maintenance consistent with intended post-closure land use/s 																											
Crushed concrete	<ul style="list-style-type: none"> Crushed concrete used as stabilisation material does not contain PCB above acceptable levels determined by the Site auditor 																											
Asbestos wastes	<ul style="list-style-type: none"> Asbestos containing material (excluding those contained in existing asbestos landfills subject to condition C27) and synthetic mineral fibre wastes are removed and encapsulated at the onsite asbestos disposal facility 																											
Asbestos disposal facility	<ul style="list-style-type: none"> Landfill capping completed generally in accordance with NSW EPA Environmental Guidelines Solid Waste Landfills (2016) requirements for special wastes 																											
Borrow Pit and landfill area	<ul style="list-style-type: none"> Rehabilitated with Woodland species commensurate with the Central Hunter Grey Box - Ironbark Woodland Vegetation is connected to existing endangered communities, enhancing wildlife movement 																											
Liddell Ash Dam	<ul style="list-style-type: none"> Capped in-situ so that land is suitable for the intended post-closure land use Minimise dust emissions from ash dam surface Mitigate and manage seepage and leachate from the ash dam to surface water and groundwater 																											
Temporary stabilisation	<ul style="list-style-type: none"> Areas of land at risk of erosion due inactivity, grade or any other reason are stabilised with temporary groundcover or vegetation 																											
Water quality	<ul style="list-style-type: none"> Negligible changes in groundwater quality as a result of the development beyond those predicted in the documents listed in condition A2(c) 																											
Community	<ul style="list-style-type: none"> Ensure public safety 																											

Cond	Condition Text	Status	Evidence	Recommendations
B37.	The rehabilitation objectives in Table 6 apply to the entire approved development area, including all landforms constructed under either this consent or previous consents. However, the Applicant is not required to undertake any additional earthmoving works on landforms that have been approved and constructed under previous consents, except where those earthworks are required for the establishment of a stable, non-polluting and free-draining landform.	NT	See Schedule 2, Condition B6. Rehabilitation has not commenced. Not triggered.	
REHABILITATION MANAGEMENT PLAN				
B38.	A rehabilitation management plan must be prepared for the approved development area, excluding the Liddell Ash Dam. The plan must:	NT	Letter from MP to DPPI dated 13/03/25 notifying the commencement of development under SSD 24937520 is scheduled to commence on 28/03/25. MP (pers comms) confirmed that the RMP has not yet been prepared.	
	a) be submitted to the Planning Secretary for approval within 12 months of commencing the development;			
	b) be prepared:	NT	See Schedule 2, Condition B38(a).	
	i. by suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; and			
	ii. in consultation with the Site auditor, Department, Council, CPHR and the NSW EPA;			
	c) describe how rehabilitation will be integrated with other development activities occurring concurrently with rehabilitation;	NT	See Schedule 2, Condition B38(a).	
	d) provide an overview of the risks to achieving successful rehabilitation and the strategies to be implemented to address the identified risks;	NT	See Schedule 2, Condition B38(a).	
	e) include a strategic plan for the refinement and improvement of the final landform over time;	NT	See Schedule 2, Condition B38(a).	
	f) align with the rehabilitation strategy included in the documents listed in condition A2(c);	NT	See Schedule 2, Condition B38(a).	
	g) describe how the rehabilitation measures would be integrated with:	NT	See Schedule 2, Condition B38(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	<ul style="list-style-type: none"> i. the measures in the biodiversity management plan referred to in condition B32; ii. the management of contaminated land required by conditions C1 to C13; and iii. the Liddell Ash Dam Closure and Rehabilitation Plan required by condition C30; 			
	h) include detailed plans and scheduling for progressive rehabilitation to be initiated, undertaken and/or completed over the next five years, or other suitable time period as agreed with the Planning Secretary;	NT	See Schedule 2, Condition B38(a).	
	i) set out detailed completion criteria for each rehabilitation objective included in Table 6, and any other rehabilitation objective identified in the documents listed in condition A2(c), and: <ul style="list-style-type: none"> i. describe the measures to be implemented within the approved development area to achieve the completion criteria; and ii. the performance indicators to be implemented to ensure compliance with each completion criteria and the rehabilitation objectives in Table 6; 	NT	See Schedule 2, Condition B38(a).	
	j) include a program to monitor, independently audit and report on progress against the completion criteria and the effectiveness of the measures implemented to achieve the completion criteria;	NT	See Schedule 2, Condition B38(a).	
	k) describe an adaptive management process that will be implemented if monitoring indicates that the measures implemented to achieve the completion criteria are not effective and/or if progress against the completion criteria is not consistent with the plan;	NT	See Schedule 2, Condition B38(a).	
	l) include a program to review and update the plan every five years;	NT	See Schedule 2, Condition B38(a).	
	m) include details of who would be responsible for monitoring, reviewing and implementing the plan.	NT	See Schedule 2, Condition B38(a).	

Cond	Condition Text	Status	Evidence	Recommendations
B39.	The rehabilitation management plan must be approved by the Planning Secretary. Following the Planning Secretary's approval, the plan must be implemented as approved by the Planning Secretary.	NT	See Schedule 2, Condition B38(a).	
SCHEDULE 2: PART C – SPECIFIC ENVIRONMENTAL CONDITIONS				
CONTAMINATION				
SITE AUDIT PROCESS				
C1.	A multi-stage site audit must be undertaken for the development. The audit must: a) be undertaken by a Site auditor;	C	Appendix B of the DEMP contains a tabulated summary of consultation for SafeWork NSW and confirms that Site Auditor Jason Clay has been engaged as the NSW Environment Protection Authority (EPA) Accredited Site Auditor. TB (pers comm) confirmed the site audit has not occurred, however preliminary work on the audit is occurring. Sighted the following documents: <ul style="list-style-type: none"> › Letter from Jason Clay titled 'Interim Audit Advice #48: Review – Liddell Ash Dam Groundwater and Surface Water Monitoring Program SAQP' dated 20/06/25. This advice provided comments in review of the Sampling and Analysis Quality Plan (SAQP) Revision 2, for the LAD Groundwater and Surface Water Monitoring Program; › Letter from Jason Clay titled 'Interim Audit Advice #59: Review of Concrete Beneficial Re-Use Assessment - 	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>Sampling, Analysis and Quality Plan (Final)' dated 07/08/25; and</p> <ul style="list-style-type: none"> › Letter from Jason Clay titled 'Interim Audit Advice #59: Review of Concrete Beneficial Re-Use Assessment - Sampling, Analysis and Quality Plan (Final)' dated 07/08/25 which provided comments in review of the of the SAQP developed as part of the first stage of the concrete suitability assessment, so that the stockpiles of crushed concrete generated during the demolition process is properly handled and managed for potential re-use or contained in containment facility on-site, or off-site disposal; and › Letter from Jason Clay titled 'Interim Audit Advice #62: Asbestos Containment Cells – Construction Quality Assurance' dated 23/09/25 to clarify the auditor's construction approvals during construction of the asbestos containment cells . <p>A Section A1 or Section A2 audit statement has not been provided from the Site Auditor at the time of this IEA.</p>	
	<p>b) be undertaken in accordance with the Contaminated Land Guidelines;</p>	<p>C</p>	<p>Sighted Letter from Jason Clay titled 'Interim Audit Advice #62: Asbestos Containment Cells – Construction Quality Assurance' dated 23/09/25 which states that he accredited under the Contaminated Land Management Act CLM Act) 1997 for Liddell Power Station.</p>	

Cond	Condition Text	Status	Evidence	Recommendations
	c) include the provision of interim audit advice by the Site auditor in relation to (as applicable): <ol style="list-style-type: none"> i. sampling analysis and quality plans; ii. detailed site investigation reports; iii. human health and ecological risk assessment reports; iv. remediation action plan; v. site validation reports; and vi. long-term environmental management plans; 	C	See Schedule 2, Condition C1(a).	
	d) conclude with the Site auditor issuing either a Section A1 or Section A2 audit statement for the development.	NT	See Schedule 2, Condition C1(a).	
SAMPLING ANALYSIS AND QUALITY PLANNING				
C2.	Sampling analysis and quality plans must be prepared for all further contamination investigations proposed within the approved development area. The plans must: <ol style="list-style-type: none"> a) be prepared, or reviewed and approved, by consultants certified under either the CEnvP(SC) or the CPSS CSAM scheme; 	NT	This has not been triggered. There have been no additional investigations proposed by the Site Auditor (Jason Clay) to the date of this IEA. See Schedule 2 Condition C1 a).	
	b) be prepared: <ol style="list-style-type: none"> i. in accordance with the Contaminated Land Guidelines; ii. before sampling for contamination investigations is conducted; 	NT	See Schedule 2 Condition C1 a).	
	c) address additional investigations identified by the Stage 2 detailed site investigation, for the proposed Stage 3 investigations and any unexpected finds;	NT	See Schedule 2 Condition C1 a).	
	d) be accompanied by interim audit advice from the Site auditor; and	NT	See Schedule 2 Condition C1 a).	
	e) be provided to the Planning Secretary and the NSW EPA for information prior to the commencement of the detailed site investigation/s required under condition C4.	NT	See Schedule 2 Condition C1 a).	

Cond	Condition Text	Status	Evidence	Recommendations
C3.	<p>A sampling analysis and quality plan must be prepared for the PCB contaminated material for the testing and reuse of concrete and/or any other recycled/re-used material during the development. The plan must:</p> <p>a) be prepared, or reviewed and approved, by consultants certified under either the CEnvP(SC) or the CPSS CSAM scheme;</p>	C	<p>MP (pers comms) advised that AGLM will have the first concrete batch tested next week. Please provide the SAQP.</p> <p>Sighted letter from Jason Clay titled 'Interim Audit Advice #59: Review of Concrete Beneficial Re-Use Assessment - Sampling, Analysis and Quality Plan (Final)' dated 07/08/25 which provides comments in review of the of the SAQP developed as part of the first stage of the concrete suitability assessment, so that the stockpiles of crushed concrete generated during the demolition process is properly handled and managed for potential re-use or contained in containment facility on-site, or off-site disposal. The SAQP developed is titled 'Liddell Power Station - Concrete Beneficial Re-Use Assessment, Sampling and Analysis Quality Plan'. Jason Clay stated <i>'The auditor considers that the SAQP has adequately addressed the comments provided in previous IAAs and can be considered as a final document.'</i></p>	
	<p>b) be prepared:</p> <ol style="list-style-type: none"> i. in accordance with the Contaminated Land Guidelines; and ii. prior to the re-use, recycling or burying of PCB contaminated materials within the approved development area; 	C	See Schedule 2, Condition C1(a).	
	<p>c) be accompanied by interim audit advice from the Site auditor.</p>	C	See Schedule 2, Condition C1(a).	
DETAILED SITE INVESTIGATIONS				

Cond	Condition Text	Status	Evidence	Recommendations
C4.	<p>A detailed site investigation must be undertaken for the development. The investigation report must:</p> <p>a) be prepared, or reviewed and approved, by consultants certified under either the CEnvP(SC) or CPSS CSAM scheme;</p>	NT	As per Schedule 2, Condition C5, the detailed site investigation must commence within 12 months after the completion of demolition. Demolition has not been completed during the audit period.	
	<p>b) be prepared in accordance with the relevant Contaminated Land Guidelines;</p>	NT	See Schedule 2, Condition C4.	
	<p>c) be accompanied by interim audit advice from the Site auditor confirming the investigation report is satisfactory;</p>	NT	See Schedule 2, Condition C4.	
	<p>d) include, but not limited to, the following:</p> <ul style="list-style-type: none"> i. all works outlined by Stage 3 detailed investigation scope included in the EIS; ii. a discussion on the characterisation of groundwater across the development and the ongoing groundwater monitoring of PFAS required under the existing PFAS Management Plan for the Liddell Power Station; iii. assessment of the background concentrations of metals and other contaminants so that the contamination associated with the former Liddell Power Station (including but not limited to the ash dam) can be distinguished from other sources and addressed in the remediation works; iv. assessment of the extent of PFAS in soils and groundwater in Key Areas 1 and 3 as mapped by Figure 2 in Appendix 1, noting that high concentrations have been detected in onsite groundwater so that the feasibility and benefits of PFAS treatments can be addressed in the remedial action plan/s; v. assessment of off-site migration of contaminants in accordance with the Guidelines for the NSW Site Auditor Scheme; vi. an updated conceptual site model and a discussion on contamination migration offsite and impacts to both onsite and offsite receptors; and 	NT	See Schedule 2, Condition C4.	

Cond	Condition Text	Status	Evidence	Recommendations
	vii. any other matter raised by the Site auditor;			
	e) include the EPL premises on all relevant plans; and	NT	See Schedule 2, Condition C4.	
	f) be provided to the Planning Secretary and NSW EPA for information.	NT	See Schedule 2, Condition C4(a).	
	Note: <i>The detailed site investigation is required to assess areas that were inaccessible prior to the determination of the application.</i>	Note	Note only.	
C5.	The detailed site investigation must commence within 12 months after the completion of demolition provided that the Site auditor has issued interim audit advice for the preceding sampling analysis and quality plan and be completed within 18 months of the completion of demolition, unless otherwise agreed by the Planning Secretary.	NT	See Schedule 2, Condition C4(a).	
HUMAN HEALTH AND ECOLOGICAL RISK ASSESSMENT				
C6.	If required by the Site auditor, a human health and ecological risk assessment must be prepared for the development. The assessment must:	NT	TB (pers comms) confirmed that this has not been triggered.	
	a) be prepared, or reviewed and approved, by consultants certified under either the CEnvP(SC) or CPSS CSAM scheme;			
	b) be prepared in accordance with the Contaminated Land Guidelines;	NT	See Schedule 2, Condition C6(a).	
	c) be accompanied by interim audit advice from the Site auditor confirming the assessment is satisfactory;	NT	See Schedule 2, Condition C6(a).	
	d) address the contamination assessment findings detailed in the EIS;	NT	See Schedule 2, Condition C6(a).	
	e) assess the onsite and offsite environmental and human health risks associated with chemical contamination;	NT	See Schedule 2, Condition C6(a).	
	f) detail any mitigations required to manage the identified risks;	NT	See Schedule 2, Condition C6(a).	
	g) include a strategy detailing the actions to be taken based on the findings of the assessment; and	NT	See Schedule 2, Condition C6(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	h) be provided to the Planning Secretary and NSW EPA for information.	NT	See Schedule 2, Condition C6(a).	
	<i>Note: The human health and ecological risk assessment is required consider areas that were inaccessible prior to the determination of the application.</i>	Note	Note only.	
C7.	The human health and ecological risk assessment must be completed following the completion of demolition and prior to the site validation report required by condition C10, unless otherwise agreed by the Planning Secretary.	NT	See Schedule 2, Condition C6(a).	
REMEDIAL ACTION PLAN				
C8.	If the Site auditor considers that remediation is required and feasible to make any areas of the approved development area suitable for an intended land use, a Remedial Action Plan/s must be prepared and implemented for the development. The plan must: <ul style="list-style-type: none"> a) be prepared, or reviewed and approved, by consultants certified under either the CEnvP(SC) or CPSS CSAM scheme. 	NT	TB (pers comms) confirmed that this has not been triggered.	
	b) be prepared in accordance with the Contaminated Land Guidelines;	NT	See Schedule 2, Condition C8(a).	
	c) include a remedial options assessment and provide the rationale for the selected remediation strategy;	NT	See Schedule 2, Condition C8(a).	
	d) as a minimum, unless otherwise agreed by the Site auditor, include: <ul style="list-style-type: none"> i. an assessment of the suitability of the borrow pit material as remediation capping material ii. information on the leachability of contaminants in soils and assess if there is potential for contaminants to leach into groundwater; iii. an investigation of remediation options to mitigate and manage contaminated groundwater and ongoing seepage from the Liddell Ash Dam and within the Liddell Power Station; iv. an investigation of PFAS (including within Lake Liddell) to be undertaken concurrently with the remedial action plans to address 	NT	See Schedule 2, Condition C8(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	onsite sources of PFAS within Key Area 1 and Key Area 3 identified by the EIS; and v. the remediation of previously unvalidated areas including, the former USTs in Key Area 3 and the former UST in Key Area 5.			
C9.	A remedial action plan must be prepared for all remediation undertaken as part of development. The remedial action plan/s must:	NT	See Schedule 2, Condition C8(a).	
	a) be prepared prior to commencing the remediation identified in the plan;			
	b) be submitted to the Planning Secretary and NSW EPA for information; and	NT	See Schedule 2, Condition C8(a).	
	c) be accompanied by a Section B2 or B5 Site Audit Statement;	NT	See Schedule 2, Condition C8(a).	
SITE VALIDATION REPORT				
C10.	A site validation report detailing the outcome of any remediation must be prepared at the completion of remediation works undertaken in accordance with a remedial action plan and prior to the issue of a Section A1 or A2 site audit statement. The report must:	NT	See Schedule 2, Condition C8(a).	
	a) be prepared, or reviewed and approved, by consultants certified under either CEnvP(SC) or CPSS CSAM scheme;			
	b) be prepared in accordance with the Contaminated Land Guidelines;			
	c) be accompanied by interim audit advice from the Site auditor confirming the report is satisfactory;	NT	See Schedule 2, Condition C8(a).	
	d) include the validation of the former UST pits in Key Area 3 and the former UST in Key Area 5; and	NT	See Schedule 2, Condition C8(a).	
	e) be provided to the Planning Secretary and NSW EPA for information.	NT	See Schedule 2, Condition C8(a).	
LONG-TERM ENVIRONMENTAL MANAGEMENT PLAN				

Cond	Condition Text	Status	Evidence	Recommendations
C11.	Where required by a site audit statement issued by the Site auditor, a long-term environmental management plan/s must be prepared for the development. The plan must:	NT	TB (pers comms) confirmed that this has not been triggered.	
	a) be prepared, or reviewed and approved, by consultants certified under CEnvP(SC) or CPSS CSAM scheme;			
	b) be prepared in accordance with the with the Contaminated Land Guidelines;	NT	See Schedule 2, Condition C11(a).	
	c) be accompanied by interim audit advice from the Site auditor confirming the plan is satisfactory;	NT	See Schedule 2, Condition C11(a).	
	d) address the risks to human health and environment (onsite and offsite);	NT	See Schedule 2, Condition C11(a).	
	e) include the asbestos disposal facility and other existing asbestos landfills within the approved development area;	NT	See Schedule 2, Condition C11(a).	
	f) any other issue the Site auditor considers necessary; and	NT	See Schedule 2, Condition C11(a).	
	g) be provided to the Planning Secretary and NSW EPA for information.	NT	See Schedule 2, Condition C11(a).	
C12.	If required by a Section A2 Site Audit Statement, the long-term environmental management plan must be implemented as required by the site audit statement.	NT	See Schedule 2, Condition C11(a).	
SITE AUDIT STATEMENTS				
C13.	A Section A1 or Section A2 Site Audit Statement (accompanied by an Environmental Management Plan) and its accompanying Site Audit Report must be obtained for the development. The site audit statement(s) must:	NT	See Schedule 2, Condition C1(a).	
	a) certify that the site is suitable for an intended land use; and			
	b) be submitted to the Planning Secretary within 12 months of completing remediation and no later than one month prior to any post-remediation	NT	See Schedule 2, Condition C1(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	land use within the approved development area subject to the site audit statement.			
	Note: Contaminated land must not be used for the purpose approved under the terms of this the SSD until a Section A1 or Section A2 Site Audit Statement is obtained which states that the land is suitable for that purpose.	NT	See Schedule 2, Condition C1(a).	
DEMOLITION				
C14.	All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures.	C	See Schedule 2, Condition C16.	
C15.	Prior to the commencement of demolition works, a clearance certificate from an occupational hygienist to certify that asbestos containing materials, PBC capacitors, and transformers have been removed before demolition work must be provided to the Department. Any hazardous materials that cannot be removed should be assessed in consultation with SafeWork NSW.	NC	<p>Sighted the following clearance certificates:</p> <ul style="list-style-type: none"> › Switchroom (Coal Bunkering), Liddell Power Station Muswellbrook NSW 2333 – Interim Asbestos Clearance Certificate (Prensa) dated 13/03/25; › TH1 Ground Level Switchrooms, Liddell Power Station, Muswellbrook NSW 2330 – Interim Asbestos Clearance Certificate (Prensa) dated 30/05/25; › TH1 and TH2 Basement Floor Switchboards – Interim Asbestos Clearance Certificate (Prensa) dated 11/06/25; and › TH2 Ground Level Switchrooms, Liddell Power Station, Muswellbrook NSW 2333 – Interim Asbestos Clearance Certificate (Prensa) dated 26/05/25. <p>Sighted letter from MP to DPHI dated 08/07/2025 notifying the Department that</p>	It is recommended that AGLM review the Project's compliance tracking mechanisms to ensure that future notifications to the Department occur in accordance with consent condition timeframes, and records are maintained.

Cond	Condition Text	Status	Evidence	Recommendations
			<p>commencement of construction and demolition under SSD 24937520 is scheduled to commence on 23/07/25.</p> <p>Sighted Major Protect Portal submission record, showing that MP submitted the clearance certificates to DPHI in accordance with Schedule 2, C15. The record is not dated, and evidence was not available at the time of the audit to demonstrate that the clearance certificates were submitted to DPHI prior to 23/07/25.</p>	
C16.	<p>A demolition environmental management plan must be prepared for the development. The plan must:</p> <p>a) be submitted to the Planning Secretary for approval prior to the commencement of demolition;</p>	C	<p>Sighted letter from MP to DPHI dated 08/07/2025 notifying the Department that commencement of construction and demolition under SSD 24937520 is scheduled to commence on 23/07/25.</p> <p>Sighted the Demolition Environmental Management Plan (DEMP) dated 03/07/25 and DPHI approval of the DEMP on 08/07/25.</p>	
	<p>b) be prepared in consultation with SafeWork NSW and the Site auditor;</p>	C	<p>Appendix B of the DEMP contains a tabulated summary of consultation for SafeWork NSW and the Site Auditor (Jason Clay – EPA Accredited Site Auditor). The tabulated summary contains relevant dates, party’s response, summary of issues raised and AGLM’s response. The summary contains dates of the consultation with the identified party, copies of the identified party’s response, and a summary of how AGLM has addressed the issues raised.</p>	

Cond	Condition Text	Status	Evidence	Recommendations
	c) include a description and schedule of activities to be undertaken during demolition;	C	<p>Section 2.2 of the DEMP contains a description of activities to be undertaken during Stage 1 demolition works, which includes:</p> <ul style="list-style-type: none"> › Demolition of LPS and redundant associated infrastructure. › Demolition of the HVGTs and any associated transmission infrastructure. › Construction and use of the onsite asbestos disposal facility, including access road. <p>Table 1 of the DEMP provides a high level indicative schedule for activities, with indicative start and finish dates.</p>	
	d) include a risk assessment;	C	Appendix A of the DEMP contains an Environmental Risk Assessment.	
	e) addresses the commitments detailed in the documents listed in condition A2(c);	C	Table 3 and Table 4 of the DEMP outline the conditions and commitments relevant to the DEMP, and where they are addressed within the plan.	
	f) include the sub-plans detailed in conditions C19 to C22; and	C	See Schedule 2, Conditions C19 to C22.	
	g) include a TARP to respond to any exceedances of the relevant performance measures, objectives or performance indicators.	C	Appendix D (SWMSP) and Appendix E (DMSP) within the DEMP contain Trigger Action Response Procedures.	
	Note: <i>The health and safety risks associated with demolition are regulated by the Work Health and Safety Regulation 2017.</i>	Note	Note only.	
C17.	Demolition must not commence until the demolition environmental management plan is approved by the Planning Secretary.	C	See Schedule 2, Condition C16 a).	

Cond	Condition Text	Status	Evidence	Recommendations
C18.	The demolition environmental management plan, as approved by the Planning Secretary, must be implemented for the duration of demolition.	C	<p>A review of the following documents found that AGLM were generally implementing the DEMP during the audit period:</p> <ul style="list-style-type: none"> › CMA WMS015.1 Mechanical Strip-Out (Turbine Hall & Auxillary Bay) Work Method Statement dated 15/10/25 which describes the methods and sequence of works required to safely complete the tasks in accordance with AS2601, Demolition Code of Practice & AGL’s requirements; › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11 dated 22/05/2025; › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11A dated 22/05/2025; › Completed Verification of Competency for Demo Saw VOC 7 dated 01/08; › Completed Verification of Competency for Manual Handling VOC 24 dated 01/08/25; › Friable Asbestos Removal Licence issued to Delta Pty Ltd – period 07/02/2014 to 06/02/2029; and › My Rapid – Induction Register with list of general contractors and status showing that contractors have completed their relevant site induction. › SafeWork NSW Notice of intent to remove friable asbestos dated 	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>08/04/25 (Notification number: 943R-00435291-01);</p> <ul style="list-style-type: none"> › SafeWork NSW Notice of intent to remove friable asbestos dated 08/04/25 (Notification number: 943R-00435291-02); › Email from SafeWork NSW to CMA Contracting dated 25/11/25 confirming Notification (943R-00435291-02) for Class A asbestos removal licence is acknowledged. <p>MP advised (pers comms) that demolition works at the Liddell Power Station has been focussed on preliminary works such as stripping out buildings and doing non-structural demolition.</p> <p>Site inspection undertaken during the audit demonstrated that the general layout of the site was in accordance with SSD 24937520 and DEMF. Observations noted include:</p> <ul style="list-style-type: none"> › The asbestos storage facility is currently under construction (Plate 1); › Demolition stripping out works is occurring at the Liddell Power Station (see Plate 3 and Plate 34); › Work areas are being well maintained and dust is being managed (Plate 1 and Plate 6); › Work Permits and Procedures pertaining to specific demolition tasks are being implemented (Plate 31); 	

Cond	Condition Text	Status	Evidence	Recommendations
			<ul style="list-style-type: none"> › Safety signage was present around the demolition work area (Plate 32, Plate 33); and › A temporary storage facility with restricted access to personnel has been established for asbestos containing material (Plate 35). <p>Sighted letter from SafeWork NSW dated 19/09/25 confirming AGLM's request to temporarily store asbestos wastes on-site at Liddell Power Station.</p>	
C19.	<p>An asbestos management sub-plan must be prepared as part of the demolition environmental management plan. The plan must:</p> <p>a) be prepared in accordance with the <i>SafeWork NSW 2022 Code of practice: How to safely remove asbestos, SafeWork: guidance on managing asbestos in soil</i>, Schedule B2 of the NEPM and any requirements of the Site auditor;</p>	C	<p>Asbestos Management Sub Plan (AMSP) (approved by DPHI on 18/06/25). The AMSP is a sub-plan within the DEMP (Appendix C). Section 2.1.2 states that prepared in accordance with the <i>SafeWork NSW 2022 Code of practice: How to safely remove asbestos, SafeWork: guidance on managing asbestos in soil</i>, Schedule B2 of the NEPM and requirements of the Site auditor. The DEMP required consultation with SafeWork NSW and the Site Auditor. Appendix B contains a tabulated summary of consultation for SafeWork NSW and the Site Auditor (Jason Clay – NSW EPA Accredited Site Auditor). The tabulated summary contains relevant dates, party's response, summary of issues raised and AGLM's response.</p>	
	<p>b) identify any known or potential areas of concern within the approved development area for asbestos containing materials and synthetic mineral fibre;</p>	C	<p>Section 7.2 of the AMSP states that an intrusive Asbestos Audit was completed by Prensa in 2024 (<i>Destructive Hazardous</i></p>	

Cond	Condition Text	Status	Evidence	Recommendations
			<p><i>Building Materials Assessment, Liddell Power Station, Muswellbrook, NSW prepared by Prensa for CMA Contracting Pty Ltd, dated November 2024</i>). The audit found that friable and non-friable asbestos containing material (ACM) is currently either enclosed or deemed to be in a condition that does not pose a risk provided the materials are not disturbed.</p>	
	<p>c) include:</p> <ul style="list-style-type: none"> vi. procedures for identifying, handling and disposing of asbestos waste, asbestos containing materials and synthetic mineral fibre; vii. procedures for interim storage of asbestos prior to disposal and disposal of asbestos; and viii. outline the relevant requirements of conditions C1 to C13 for the management of asbestos waste, asbestos containing materials and synthetic mineral fibre. 	C	<p>Section 3 of the AMSP outlines the indicative schedule of activities including demolition zones and start/finish dates for ACM removal. Appendix C of the AMSP also contains an example of an asbestos removal control plan. Section 8 outlines synthetic fibre management and strategy. Section 7.14.1 of the AMSP outlines onsite transport, disposal and tracking of asbestos. The AMSP states that once the construction of the onsite asbestos disposal facility is completed, all ACM waste deemed suitable, will be disposed of permanently within the onsite asbestos disposal facility. The ASMP also states that a tracking system will be implemented to track the ACM waste from the source location to the onsite disposal facility.</p> <p>Table 4.2.1 of the AMSP lists the consent conditions relevant to the AMSP and where they are addressed within the AMSP.</p>	

Cond	Condition Text	Status	Evidence	Recommendations
C20.	A blast management sub-plan must be prepared as part of the demolition environmental management plan. The plan must: a) be prepared by a suitably qualified and experienced person/s;	NT	AGLM sought approval to substage the submission of the BMSP, requesting to develop individual BMSPs for each of the four anticipated blast events for the Project. DPHI approved AGLM's request for staging the relevant management plans on 03/04/25. Refer to Schedule 2, Condition A18	
	b) include: i. an assessment of blasting impacts at sensitive receivers and infrastructure, including the Liddell Ash Dam. The assessment must include predicted airblast overpressure and ground vibration; ii. consultation with the relevant private landowners or infrastructure owners if the assessment predicts blasting by the development will impact sensitive receivers; and iii. a strategy to monitor, assess, mitigate or compensate for the effects of blasting at sensitive receivers identified by the assessment required by condition C20(b)(i);	NT	See Schedule 2, Condition C20(a).	
	c) describe the mitigation measures that will be implemented to: i. (i) comply with the conditions of this consent; ii. (ii) manage the risks identified in the environmental risk assessment required by condition B1; and iii. (iii) manage blast generated dust and fumes, protect public safety and manage road closures;	NT	See Schedule 2, Condition C20(a).	
	d) include a monitoring, evaluation and reporting program that uses an approach that is consistent with the environmental management strategy required by condition B1.	NT	See Schedule 2, Condition C20(a).	
C22.	A dust management sub-plan must be prepared as part of the demolition environmental management plan. The plan must: a) be prepared by a suitably qualified and experienced person/s;	C	Dust Management Sub Plan (DMSP) (approved on 23/05/25). The AMSP is a sub-plan within the DEMP (Appendix E).	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>Section 1.5 of the DMSP states that it was prepared by Luke Spencer, who is a member of CASANZ and Chartered Professional Engineer (CPEng), with more than 16 years' experience in air quality impact assessment and management and Sam Putland, who is a Certified Air Quality Practitioner (CAQP) with the Clean Air Society of Australia and New Zealand (CASANZ) with more than 10 years' experience. Appendix A of the DSMP contains Luke's Curriculum Vitae.</p>	
	<p>b) describe the mitigation measures that will be implemented to:</p> <ul style="list-style-type: none"> i. comply with the conditions of this consent; and ii. manage the risks identified in the environmental risk assessment required by condition B1; 	C	<p>Section 3.2 of the DMSP outlines the relevant consent conditions and where in the DMSP they are addressed.</p> <p>Section 7.2 of the DMSP outlines the emission sources and management measures proposed to prevent generation of dust during Stage 1 demolition activities, and Table 7-2 outlines the GHG management measures.</p>	
	<p>c) include a monitoring, evaluation and reporting program that uses an approach that is consistent with the environmental management strategy required by condition B1.</p>	C	<p>Section 8 of the DMSP outlines inspections, training, monitoring, reporting, and how enquiries and complaints are managed. The DMSP states that workers and visitors are required to undergo training and awareness programs regarding environmental management requirements, including dust management, and the importance adhering to related requirements during activities.</p>	

Cond	Condition Text	Status	Evidence	Recommendations
			Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which content on general air quality management obligations.	
ASBESTOS DISPOSAL FACILITY				
C23.	The asbestos disposal facility must be designed and constructed in accordance with the relevant requirements of the <i>NSW EPA Environmental Guidelines Solid Waste Landfills (2016)</i> , unless otherwise agreed by the Site auditor and the Planning Secretary.	C	See Schedule 2, Condition C1(a).	
C24.	A final design for the asbestos disposal facility must be prepared for the development. The design must: a) be accompanied by interim audit advice from the Site auditor;	C	Sighted 'Liddell Ash Dam Closure Containment Area Detailed Design Report' (GHD) dated 04/09/25. Sighted letter from Jason Clay (Site Auditor) titled 'Interim Audit Advice #62: Asbestos Containment Cells – Construction Quality Assurance' dated 23/09/25 to clarify the auditor's construction approvals during construction of the asbestos containment cells. The Site Auditor advised that he had undertaken a review of the following documents: <ul style="list-style-type: none"> › Liddell Ash Dam closure – Containment Cells Detailed Design Report; › Combined Detailed Design Drawings Set; › Liddell Ash Dam Closure – Technical Specification – Containment Area; and › Liddell Ash Dam Closure – Construction Quality Assurance Plan. 	

Cond	Condition Text	Status	Evidence	Recommendations
			The Site Auditor listed several hold points to occur during the construction process.	
	b) be prepared in consultation with the NSW EPA;	C	Sighted letter from NSW EPA dated 17/07/25 in response to a request from AGLM to review and comment on the 'Liddell Ash Dam Closure - Containment Area Detailed Design Report' (Design Report), dated 23/05/25, prepared by GHD. The EPA noted that a site auditor (Jason Clay) has provided interim audit advice on the Design Report, and that the proponent is currently addressing the auditor's comments. Accordingly, the EPA has not undertaken a comprehensive review of the Design Report.	
	c) be submitted to the Planning Secretary for approval prior to the commencement of construction of the asbestos disposal facility; and	C	Sighted letter from DPPI to AGLM dated 11/09/25 advising that DPPI approves the Asbestos Final Design in accordance with Schedule 2, Condition C24. DPPI also acknowledged AGLM's response to the DPPI's review comments and request for additional information.	
	d) be implemented, as approved, by the Planning Secretary.	C	Site inspection undertaken during the audit demonstrated that the asbestos storage facility is currently being constructed in accordance with the 'Liddell Ash Dam Closure Containment Area Detailed Design Report' (GHD) dated 04/09/25 (Plate 1). AGLM have designed the containment cells at the asbestos storage facility to separate and exclude as much clean	

Cond	Condition Text	Status	Evidence	Recommendations
			water as practical through diversion drains around the cells, which is then pumped through sediment basins which ultimately report to the Borrow Pit sediment dam. Sighted AGLM Liddell Ash Dam Closure Containment Cell Design Sediment and Erosion Control Plan (GHD, 2025) showing the use of drainage paths moving around the containment cells. During audit site inspection, the initial trial use of geofabric liner which will be used to prevent long-term erosion for planned drains at the Liddell Ash Dam was observed (see Plate 12).	
C25.	<p>A construction quality assurance plan must be prepared for the asbestos disposal facility. The plan must:</p> <p>a) be provided to the NSW EPA for review prior to the commencement of the construction of the asbestos disposal facility; and</p>	C	Sighted 'Liddell Ash Dam Closure Construction Quality Assurance Plan – Containment Area' (GHD) dated 01/08/25.	
	<p>b) be prepared in accordance with the relevant requirements of the NSW EPA <i>Environmental Guidelines Solid Waste Landfills</i> (2016).</p>	C	Sighted letter from EPA to AGLM dated 17/07/25 thanking AGLM for requesting advice from the NSW EPA to review and comment on the (GHD) dated 22/05/25. The EPA noted that a site auditor has provided interim audit advice on the plan and that the proponent is currently addressing the auditor's comments.	
C26.	<p>A construction quality assurance report must be prepared for the asbestos disposal facility. The report must:</p> <p>a) be provided to the NSW EPA for review prior to the commencement of the operation of the asbestos disposal facility; and</p>	NT	MP (pers comms) confirmed that the asbestos storage facility has not been fully constructed at the time of audit (see Plate 1).	

Cond	Condition Text	Status	Evidence	Recommendations
	b) be prepared in accordance with <i>NSW EPA Environmental Guidelines Solid Waste Landfills</i> (2016).	NT	See Schedule 2, Condition C26.	
	Note: Under the POEO Act, all new landfills or landfill cells require the approval of the NSW EPA, in addition to obtaining development consent under the EP&A Act.	Note	Note only.	
EXISTING ASBESTOS LANDFILLS				
C27.	A verification of the existing asbestos landfills identified in the EIS must be undertaken for the development. The assessment must: a) be prepared: i. by a suitably qualified and experienced person/s; and ii. within 2 years of the date of commencement of development under this consent, unless otherwise agreed by the Planning Secretary;	NT	Appendix D outlines relevant consultation undertaken for the DEMP preparation. Appendix D states AGLM's comments that <i>'the existing asbestos landfills are not part of Stage 1 and are not relevant to the current Asbestos Management Plan which is a subplan of the demolition environment management plan. The existing asbestos landfills are part of Stage 3 of the works and will be covered by separate plans at the appropriate time.'</i> DPHI did not make any comment in relation to AGLM's statement or request action.	
	b) determine the suitability of the existing capping to achieve final closure requirements identified by the NSW EPA;	NT	See Schedule 2, Condition C27(a).	
	c) be accompanied by interim advice from the Site auditor; and	NT	See Schedule 2, Condition C27(a).	
	d) include any recommendations to supplement the existing capping in required by the Site auditor and an implementation plan for the recommendations.	NT	See Schedule 2, Condition C27(a).	
C28.	The recommendations required by the Site auditor must be implemented as outlined in the assessment required by condition C27.	NT	See Schedule 2, Condition C27(a).	

Cond	Condition Text	Status	Evidence	Recommendations
LIDDELL ASH DAM CLOSURE AND REHABILITATION PLAN				
C29.	The Liddell Ash Dam must be rehabilitated to the satisfaction of the Planning Secretary. Rehabilitation must comply with the objectives listed in Table 6.	NT	MP (pers comms) confirmed that no rehabilitation work has been completed for the Project.	
C30	<p>A closure and rehabilitation plan must be prepared for the Liddell Ash Dam. The plan must:</p> <p>a) be submitted to the Planning Secretary for approval within twelve months of commencing development under this consent;</p>	NT	Letter from MP to DPFI dated 13/03/25 notifying the commencement of development under SSD 24937520 is scheduled to commence on 28/03/25. Therefore the closure and rehabilitation plan must be submitted by 28/03/26.	
	<p>b) be prepared:</p> <p>i. by suitably qualified and experienced person/s;</p> <p>ii. in consultation with the Site auditor, NSW EPA, DS NSW and Council; and</p> <p>iii. generally in accordance with the <i>Australian National Committee on Large Dams (ANCOLD) Guidelines on Tailing Dams (ANCOLD, 2019a)</i>, to the satisfaction of the Secretary:</p>	NT	See Schedule 2, Condition C30(a).	
	c) include a stakeholder consultation strategy to guide rehabilitation closure planning processes and outcomes;	NT	See Schedule 2, Condition C30(a).	
	d) include detailed completion criteria for the relevant rehabilitation objectives included in Table 6;	NT	See Schedule 2, Condition C30(a).	
	e) describe the measures to be implemented for the Liddell Ash Dam to achieve the completion criteria;	NT	See Schedule 2, Condition C30(a).	
	f) include an overview of the risks to achieving successful rehabilitation and the strategies to be implemented to address the identified risks;	NT	See Schedule 2, Condition C30(a).	
	g) describe the performance indicators to be implemented to ensure compliance with each completion criteria and the relevant rehabilitation objectives in Table 6 and triggers for remedial action;	NT	See Schedule 2, Condition C30(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	h) describe the program to monitor, independently audit and report on progress against the performance indicators and effectiveness of the measures implemented to achieve the completion criteria during and following closure of the ash dam;	NT	See Schedule 2, Condition C30(a).	
	i) describe an adaptive management process that will be implemented if monitoring indicates that the measures implemented to achieve the completion criteria are not effective and/or progress against the completion criteria is not consistent with the plan;	NT	See Schedule 2, Condition C30(a).	
	j) include details of who would be responsible for monitoring, reviewing and implementing the plan;	NT	See Schedule 2, Condition C30(a).	
	k) include a process to characterise, monitor and evaluate groundwater seepage from the Liddell Ash Dam;	NT	See Schedule 2, Condition C30(a).	
	l) include an air quality management sub-plan that: <ul style="list-style-type: none"> i. is prepared in accordance with the NSW EPA’s best practice guidance; ii. ensures compliance with the conditions of this consent; iii. implements all reasonable and feasible mitigation measures to minimise dust emissions from the dam; iv. provides for air quality monitoring, undertaken in accordance with the <i>Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales</i> (DEC, 2007) to collect data that can be used to evaluate the effectiveness of the air quality mitigation measures outlined in the sub-plan; and v. incorporates a TARP for dust emissions. 	NT	See Schedule 2, Condition C30(a).	
C31.	The closure and rehabilitation plan must be approved by the Planning Secretary. Following the Planning Secretary’s approval, the plan must be implemented as approved by the Planning Secretary.	NT	See Schedule 2, Condition C30(a).	
SCHEDULE 2: PART D – REPORTING AND AUDITING				
AUDITING				

Cond	Condition Text	Status	Evidence	Recommendations
D1.	Independent Environmental Audits of the development must be conducted and carried out in accordance with <i>the Independent Audit Post Approval Requirements (2020)</i> , or its latest version published on the Department's website.	C	This IEA. Under the <i>Independent Audit Post Approval Requirements (2020)</i> (IAPAR), an initial independent audit must be completed within 12 weeks of the commencement of construction. Development under SSD 24937520 commenced on 23/07/25. The site inspection for this IEA occurred on 14/10/25 (within 12 weeks of commencement).	
COMPLIANCE REPORTING				
D2.	By the end of March each year, after the date of commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the development.	NT	Sighted letter from MP to DPHI dated 13/03/25 notifying that the commencement of development under SSD 24937520 is scheduled to commence on 28/03/25. Therefore, the first Compliance Report for the Project will be required by the end of March 2026.	
D3.	Compliance Reports must be prepared in accordance with the <i>Compliance Reporting Post Approval Requirements</i> (Department of Planning, Industry and Environment, 2020) or its latest version published on the Department's website and must also:	NT	See Schedule 2, Condition D2.	
	a) identify any trends in the monitoring data over the life of the development;			
	b) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and	NT	See Schedule 2, Condition D2.	
	c) describe what measures will be implemented over the next year to improve the environmental performance of the development.	NT	See Schedule 2, Condition D2.	
COMPLIANCE				

Cond	Condition Text	Status	Evidence	Recommendations
NON-COMPLIANCE NOTIFICATION				
D4.	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must: <ol style="list-style-type: none"> a) be in writing; 	C	<p>Sighted Notification of Non-Compliance Report dated 03/10/25 from AGLM to DPHI, in relation to a contractor tracking machinery through a flagged 'No-go' zone which is a non-compliance with the BMP requirements. The incident occurred on 27/09/25. The 'No-go' area was immediately inspected for any injured fauna. No injured fauna was identified during the inspection. There was some disturbance to the groundcover, no native vegetation was impacted. The notification letter met the relevant following SSD 24937520 requirements:</p> <ul style="list-style-type: none"> › It was submitted via the DPHI Major Projects Portal; › The development number and name were stated at the top of the letter; › The letter identifies that AGLM has been non-compliant with Condition B34 of SSD 24937520 and provides explanation as to why and the reasons the non-compliance has occurred; and › The letter outlines the actions taken to address the non-compliance. <p>Sighted DPHI response to AGLM dated 09/10/25 stating that <i>'NSW Planning has reviewed the notification and considers it to generally satisfy Schedule 2, Condition D4 of the consent.'</i></p>	

Cond	Condition Text	Status	Evidence	Recommendations
			Sighted email from AGLM to DPPI dated 27 June 2025 advising that a large tree within the Project footprint has been cut down, potentially by an illegal trespasser. The tree had been mapped in the Project Biodiversity Development Assessment Report as a habitat tree with a number of hollows. Sighted letter from DPPI to AGLM in response to notification submitted to DPPI on 2 July 2025 regarding the unauthorised felling. DPPI determined there has been no breach of the consent, as the tree felling was not associated with the activities approved under the consent. DPPI also noted that they reviewed the notification and considered it to generally satisfy the conditions of consent in relation to non-compliance reporting.	
	b) submitted via the NSW planning portal (Major Projects);	C	See Schedule 2, Condition D4(a).	
	c) identify the development (including the development application number and name);	C	See Schedule 2, Condition D4(a).	
	d) set out the condition of this consent that the development is non-compliant with;	C	See Schedule 2, Condition D4(a).	
	e) why it does not comply;	C	See Schedule 2, Condition D4(a).	
	f) the reasons for the non-compliance (if known); and	C	See Schedule 2, Condition D4(a).	
	g) what actions have been undertaken, or will be undertaken; and when, to address the non-compliance.	C	See Schedule 2, Condition D4(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Note	Note only.	
INCIDENT NOTIFICATION				
D5.	<p>The Applicant must notify the Department within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and address details of the incident including:</p> <p>a) date, time and location;</p>	NT	<p>MP (pers comms) confirmed that no incidents required notification under D5, however AGLM reported the following two events to DPHI as a precautionary measure:</p> <p><u>1. Hunter Valley Delma death during pre-clearance checks</u> –</p> <p>Sighted Notification of Incident Report dated 15/08/25 from AGLM to DPHI, in relation to the death of a Hunter Valley Delma (<i>Delma vescolineata</i>). AGLM stated that <i>'During the course of undertaking the pre-clearing surveys, the Fauna Spotter Catcher (FSC) checked under a rock and inadvertently caused the death of a Hunter Valley Delma.'</i> AGLM became aware of the incident on 14/08/25 and made the notification to DPHI on 15/08/25.</p> <p>The notification letter met the relevant following SSD 24937520 requirements:</p> <ul style="list-style-type: none"> › It was submitted via the DPHI Major Projects Portal; › Date, time and location were defined; › Brief description was provided; › The letter identifies that AGLM considers that they don't consider the event technically an 'incident' because 	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>all relevant SSD 24937520 requirements had been followed leading up to the event; and</p> <p>The letter outlines immediate steps and a contact person (MP) for the incident.</p> <p>Sighted DPHI response to AGLM on 20/10/25 stating that <i>'Whilst this death of a Hunter Valley Delma does not appear to be an incident as defined in the consent, NSW Planning appreciates the precautionary reporting of it under Schedule 2, Condition D5 and D6 of the consent.'</i></p> <p><u>2. Hunter Valley Delma death during pre-stripping works</u> – Sighted Notification of Incident Report dated 29/08/25 from AGLM to DPHI, in relation to the death of a Hunter Valley Delma (<i>Delma vescolineata</i>). AGLM stated that <i>'During topsoil stripping for the drainage pipe running along the top side of the three containment cells, a deceased Hunter Valley Delma was found on 27/09/25 with significant injuries to its body and deceased. It was assumed by the Project Ecologist/FSC that the individual was injured during topsoil stripping. All preclearance and FSC requirements were completed for the works.'</i> AGLM became aware of the incident on 27/08/25 when the Hunter Valley Delma was found, and made the notification to DPHI on 29/08/25. The notification letter met the</p>	

Cond	Condition Text	Status	Evidence	Recommendations
			<p>relevant SSD 24937520 requirements as follows:</p> <ul style="list-style-type: none"> › It was submitted via the DPHI Major Projects Portal; › Date, time and location were defined; › The letter identifies that AGLM considers that they don't consider the event technically an 'incident' because all relevant SSD 24937520 procedures had been followed leading up to the event; and <p>The letter outlines immediate steps and a contact person (MP) for the incident.</p> <p>Sighted DPHI response to AGLM on 20/10/25 stating that <i>'Whilst this death of a Hunter Valley Delma does not appear to be an incident as defined in the consent, NSW Planning appreciates the precautionary reporting of it under Schedule 2, Condition D5 and D6 of the consent.'</i></p>	
	b) a brief description of what occurred and why it has been classified as an incident;	NT	See Schedule 2, Condition D5(a).	
	c) a description of what immediate steps were taken in relation to the incident; and	NT	See Schedule 2, Condition D5(a).	
	d) identifying a contact person for further communication regarding the incident.	NT	See Schedule 2, Condition D5(a).	
D6.	The Applicant must provide the Department with a subsequent incident report in accordance with Appendix 6 (Incident Notification and Reporting Requirements).	NT	See Schedule 2, Condition D5(a).	

Cond	Condition Text	Status	Evidence	Recommendations
REVISION OF ENVIRONMENTAL MANAGEMENT DOCUMENTS				
D7.	Within three months of the following events:	NT	See Schedule 2, Condition D5 a). The submission of incident reports to DPHI were not required during the audit period.	
	a) the submission of an incident report under conditions D5 or D6;			
	b) the submission of a compliance report under condition D3;	NT	See Schedule 2, Condition D2.	
	c) the submission of an Independent Environmental Audit under condition D1;	NT	See Schedule 2, Condition D1.	
	d) the approval of any modification of the conditions of this consent (unless the conditions require otherwise); or	NT	Not triggered.	
	e) notification of a change in the development phase under condition A10; The suitability of the existing environmental management documents required under this consent must be reviewed. If the review concludes an update to an environmental management document is required, or to comply with a directive, the relevant environmental management document must be revised and submitted to the Planning Secretary for approval within three months of the review.	NC	See Schedule 2, Condition A10 above. AGLM notified DPHI on 08/07/25 that commencement of construction and demolition was to start on 23/07/25. Therefore AGLM must have completed a review of the existing approved management plans by 08/10/25 (3 months after notification of a phase change was to occur). Evidence was not available at the time of the audit that AGLM had completed a review of existing environmental management documents within three months of notifying DPHI of a change in phase from commencement to construction and demolition. Existing approved management plans at that time notification occurred included the Environmental Management Strategy (approved 23/05/25), Asbestos Management Sub Plan (approved	Refer to action under Schedule 2, Condition C15.

Cond	Condition Text	Status	Evidence	Recommendations
			18/06/25), Dust Management Sub Plan (approved 23/05/25).	
	<i>Note: This is to ensure environmental management documents are updated regularly and to incorporate any recommended measures to improve the environmental performance of the development.</i>	Note	Note only.	
ACCESS TO INFORMATION				
D8.	Within 12 months of the commencement of development under this consent until the completion of all rehabilitation required under this consent, the following information and documents must be publicly available on the development website as they are obtained, approved or as otherwise stipulated within the conditions of this consent: a) the documents listed in condition A2(c) of this consent;	NT	Development under SSD 24937520 commenced on 28/03/25 (see Schedule 2, Condition A10. Therefore the documents are required to be publicly available by 28/03/26. The documents listed in Schedule 2, Condition A2(c) and Schedule 2, Condition D8 were not available on AGLM's public website at the time of audit.	
	b) all current statutory approvals for the development;	NT	See Schedule 2, D8(a).	
	c) all approved environmental management documents required under the conditions of this consent;	NT	See Schedule 2, Condition D8(a).	
	d) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;	NT	See Schedule 2, Condition D8(a).	
	e) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any environmental management documents approved under the conditions of this consent;	NT	See Schedule 2, Condition D8(a).	
	f) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any	NT	See Schedule 2, Condition D8(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	conditions of this consent, or any approved environmental management documents;			
	g) a summary of the current phase and progress of the development;	NT	See Schedule 2, Condition D8(a).	
	h) contact details to enquire about the development or to make a complaint;	NT	See Schedule 2, Condition D8(a).	
	i) complaints register, updated monthly;	NT	See Schedule 2, Condition D8(a).	
	j) the Compliance Reporting of the development in accordance with the Compliance Reporting Post Approval Requirements (May 2020);	NT	See Schedule 2, Condition D8(a).	
	k) audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant's response to the recommendations in any audit report;	NT	See Schedule 2, Condition D8(a).	
	l) any other matter required by the Planning Secretary; and	NT	See Schedule 2, Condition D8(a).	
	m) kept such information up to date.	NT	See Schedule 2, Condition D8(a).	

Table 2 EIS Statement of Commitments (GHD 2024)

Ref	Management Measure	Timing	Status	Evidence	Recommendations
BIODIVERSITY					
BIO1	<ul style="list-style-type: none"> › Avoid and minimise clearing impacts to native vegetation where possible. › Clearly delineate the boundaries of the project footprint to prevent any unnecessary clearing beyond its extent. › Ensure vehicle and equipment parking areas and stockpile areas are identified and positioned to avoid areas containing ecological value. › Appropriate signage such as 'no go zone' or 'environmental protection area' should be installed. › Identify and communicate the location of any 'no go zones' in site inductions. 	Prior to and during vegetation clearing	C	<p>See Schedule 2, Condition B32(c) regarding minimising clearing impacts.</p> <p>During the audit site inspection 'No Go' zones were observed across construction areas as shown in Plate 29 and Plate 30. The 'No Go' zones delineate the Project footprint.</p> <p>During the audit site inspection designated vehicle parking areas were observed as shown in Plate 11. Stockpile areas were observed within the disturbance boundary (as delineated). Refer to Plate 8.</p> <p>Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which contains a slide for 'Land Management including Bushfire and Biodiversity'. The induction has a slide showing threatened species and no-go zone areas, which are flagged for delineation.</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
BIO2	<ul style="list-style-type: none"> › Limit removal of trees to that required within the project footprint where possible. › A pre-clearing protocol will be implemented during clearing works, as follows: <ul style="list-style-type: none"> ▪ Pre-clearance surveys will be undertaken to determine if any inhabiting fauna are present and to identify habitat features such as dens, roosts, or animal breeding places (nests, hollows, woody debris etc.). ▪ A suitably qualified and trained fauna spotter catcher will be present during all vegetation clearing to capture, assess, and relocate displaced fauna (injured fauna to be taken to a veterinarian for further assessment). ▪ Appropriate exclusion fencing around any trees and woodland that are to be retained within the project Area should be erected, considering allowance for Tree ▪ Protection Zones in accordance with AS4970 (Standards Australia, 2009). 	Prior to and during tree clearing	C	<p>See Schedule 2, Condition B32(e).</p> <p>Sighted the following examples of Pre-Clearance Surveys:</p> <ul style="list-style-type: none"> › Sighted Pre-Clearance Survey of the Haul Road and Landfill Cells dated August 2025 (EMM, 2025); › Sighted EMM Pre-Clearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025). › Sighted letter to AGLM from EMM confirming that EMM qualified fauna spotter / catcher Joshua Smart attended site on 16/10/25 to conducted a pre-clearance survey. <p>BMP S1. Section 2.2.3.3 states that all habitat features must be felled or otherwise disturbed in the presence of a Fauna Spotter Catcher (FSC) who will be an appropriately qualified and experienced Ecologist. Sighted letter dated 05/09/25 from AGLM to DPPI, in relation to the death of a Hunter Valley Delma. In the letter, AGLM states <i>that 'In compliance with the requirements of the BMP, AGLM engaged a suitably</i></p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				<p><i>qualified ecologist to act as a FSC and be present during clearing activities.</i> 'AGLM confirmed with DPHI that clearing procedures had been undertaken in accordance with the approved BMP S1, despite the death of the Hunter Valley Delma.</p> <p>During the audit site inspection 'No Go' zones were observed across construction areas as shown in Plate 29 and Plate 30. The 'No Go' zones delineate the Project footprint.</p>	
BIO3	<ul style="list-style-type: none"> › Source controls such as sediment fences, mulching and jute matting will be utilised where appropriate. › Site-based vehicles will carry spill kits. Dedicated refuelling and storage places will be constructed away from watercourses/wetland areas (>50 m). › Erosion and sediment control will be required for the development generally in accordance with Managing Urban Stormwater: Soils and Construction (Landcom, 2004) prior to commencement of construction. › Limit the use of pesticides in the project footprint where possible to avoid contamination of nearby watercourses/wetland areas. 	During vegetation clearing, Demolition, recontouring and stabilisation works	C	<p>During audit site inspection:</p> <ul style="list-style-type: none"> › Observed initial trial use of geofabric liner which will be used to prevent long-term erosion for planned drains within the Liddell Ash Dam area (see Plate 12). › Erosion and sediment controls including sediment fencing in place for the works (see Plate 13, Plate 14, Plate 15); › Dedicated refuelling and storage places were constructed away from watercourses (see Plate 20 and Plate 22), with 	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				<p>spill kits in place at key locations (see Plate 18, Plate 19, Plate 20). LT (pers comms) confirmed that site-based vehicles carry spill kits.</p> <p>See Schedule 2, Condition B32 d) regarding minimising use of pesticides.</p>	
BIO4	Speed limits within the Development Site should be limited to 40 km/hr. This limit should be clearly signed at all entry points to site.	During project	C	During the audit site inspection safety signage, 40 kilometre speed sign and a speed tracker was observed (see Plate 24 and Plate 25).	
BIO5	<ul style="list-style-type: none"> › Vehicles and construction plant must be cleaned appropriately before arrival on site to help prevent the spread of the fungal pathogens <i>Phytophthora cinnamomi</i> and Myrtle Rust (<i>Puccinia psidii</i>). › As most of the site contains exotic species, including some high-threat weeds, excavated topsoil from areas with high threat weed infestations must be stockpiled appropriately to limit the risk of transferring invasive species into surrounding vegetation. High-threat weed infestations should be mapped during pre-clearance surveys. 	Clearing works, earthworks	C	Section 2.2.4 of the BMP S1 states that all plant and equipment coming on to site must be declared free of organic matter including mud, vegetation, seeds etc., via a documented inspection. Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which contains a slide stating that 'vehicles and equipment coming and going from site must be free of mud, vegetation and seeds'. Also sighted CMA Plant and Equipment Induction dated 05/09/25 which has a tick box which confirmed that plant	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				<p>and equipment coming on to site is free of organic matter including mud, vegetation, seeds etc.</p> <p>Sighted EMM Pre-Clearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025) which describes the vegetation and weeds present.</p> <p>Recent topsoil stockpiles in the oil and grit trap works area have been shaped to allow for reduced dust and are scheduled for hydroseeding by GSS in the upcoming weeks (see Plate 8).</p>	
BIO6	<p>Measures to mitigate impacts on flora and fauna from noise, vibration, waste, light and air pollution such as:</p> <ul style="list-style-type: none"> › Enforce 'carry-in, carry-out' policy regarding rubbish and waste materials generated on-site during construction to avoid waste materials entering adjacent vegetation. › Restriction of public access and associated impacts from domestic pets, waste dumping and damage to adjoining vegetation must be enforced pre, during and post construction. › Fence sensitive areas to delineate 'no go' zones. › Levels of lighting that will accompany the access road will be reduced to a minimal level to reduce any adverse effects upon the essential behavioural patterns of light-sensitive fauna. › Lighting should comply with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting. › Noise minimisation practices in accordance with DPE recommendations. 	During project	C	<p>Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which contains a slide for 'Land Management including Bushfire and Biodiversity'. The induction has a slide outlining waste requirements, and states 'no waste produced offsite is allowed to be brought onto the EPL boundary for disposal, unless it is compliant to EPL requirements'.</p> <p>During the audit site inspection, it was observed that public access to the Project is restricted by a</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<ul style="list-style-type: none"> Dust control measures such as covering loads where required; amending operations under excessive wind conditions including ceasing operations if required; use of water tankers as required, to control dust; revegetation/stabilisation of surfaces to be left unsealed; or other dust removal measures. 			<p>manned security entry and boom gate.</p> <p>See SoC BIO1 for observed 'no go' zones during inspection.</p> <p>Levels of lighting that accompany the access road are minimal because no out of hours construction or maintenance (cleaning etc.) has occurred outside of work hours (as confirmed by LT (pers comms)).</p> <p>See Schedule 2, Condition B8 for evidence of noise minimisation practices. See Schedule 2, Condition B6 for evidence of dust control measures.</p>	
BIO7	Detailed design will ensure that impacts to habitat for the Hunter Valley Delma (<i>Delma vescolineata</i>) / Striped Legless Lizard (<i>Delma impar</i>) are minimised to the fullest extent practical.	Prior to any clearing	C	See Schedule 2, Condition B32(g).	
BIO8	<ul style="list-style-type: none"> Installation of artificial hollows (nest-boxes) prior to clearing. Improve and protect connectivity between habitat, commitment to planting nectar food trees as part of restoration of habitat (during vegetation clearing). Target habitat restoration/revegetation projects to provide suitable nesting habitat, which includes a number of existing nest sites, a number of potential sites and a number of sites that will be suitable in the future (during vegetation clearing). 	Prior to and during native vegetation clearing.	NT	Refer to Schedule 2, Condition B32 (g and iv).	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
BIO9	<ul style="list-style-type: none"> › Avoid and minimise clearing impacts to native vegetation where possible. › No clearing will occur outside the approved project boundaries identified in this report. › Where possible, the clearing works will be scheduled to avoid the breeding seasons of identified threatened species and fauna that may breed on site. › Clearing will cease when temperatures exceed 35°C › Clearly delineate the boundaries of the project footprint to prevent any unnecessary clearing beyond its extent. › Ensure vehicle and equipment parking areas and stockpile areas are identified and positioned to avoid areas containing ecological value. › Appropriate signage such as 'no go zone' or 'environmental protection area' should be installed. › Identify and communicate the location of any 'no go zones' in site inductions. 	Prior to and during vegetation clearing	C	<p>Refer to SoC BIO1 for evidence that 'no-go' zones are implemented on site.</p> <p>Sighted Notification of Non-Compliance Report dated 03/10/25 from AGLM to DPFI, in relation to a contractor tracking machinery through a flagged 'No Go' zone which is a non-compliance with the BMP requirements. Despite the machinery tracking through a 'No-Go zone', no fauna was injured and no vegetation was cleared, only some disturbance to groundcover occurred. Refer to Schedule 2, Condition D4 for further details.</p> <p>Section 7 of the Microbat Management Plan (Appendix C of the BMP S1) outlines that work will be scheduled where possible to avoid sensitive periods.</p> <p>During the audit site inspection designated vehicle parking areas were observed as shown in Plate 11.</p>	Refer to action under Schedule 2, Condition B34.
BIO10	<ul style="list-style-type: none"> › Individuals beyond the area of direct impacts and nearby translocated individuals will be protected from potential stock impacts by the installation of exclusion fencing. This area will also be considered a no-go area to those personnel not authorised and 	Prior to and during the Project	NC	<p>Section 2.2.1 of the BMP S1 states that 'One threatened species, <i>Diuris tricolor</i> (Pine Donkey Orchid), was recorded</p>	<p>It is recommended that AGLM:</p> <ul style="list-style-type: none"> › Identify Pine Donkey Orchids

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<p>briefed to work in proximity to the Pine Donkey Orchids for management or monitoring activities.</p> <p>The population identified in this BDAR shall be resurveyed during subsequent flowering periods and if necessary, the no-go area will be expanded.</p>			<p>outside the revised Development Site alongside an existing unsealed track to the north of the LAD'. Section 2.2.3.1 of the BMP S1 states that <i>'Populations or individuals of Diuris tricolor within 10m of the Development Site must be identified and exclusion fencing/bunting and no-go signage installed to avoid any indirect impacts.'</i></p> <p>The BMP S1 doesn't contain a commitment that the population of Pine Donkey Orchids will be resurveyed during subsequent flowering periods, and no evidence was available at the time of the audit that Pine Donkey Orchards identified were fenced prior to commencement of the demolition / construction.</p>	<p>within and nearby (within 10 metres) the 'Project Footprint' of SSD 24937520 and install exclusion fencing with 'No Go' zone signs attached.</p> <p>› Update the Biodiversity Management Plan Liddell Future Land Use and Enabling Works Project (Kleinfelder, 2025) to include a commitment to resurvey the population of Pine Donkey Orchids identified in 'Biodiversity Development Assessment Report Liddell Future Land Use and Enabling Works Project' (Kleinfelder, 2023).</p>

Ref	Management Measure	Timing	Status	Evidence	Recommendations
SOIL AND CONTAMINATION					
SC1	<p>Prior to construction/demolition commencing, a site-specific Soil and Water Management Plan (SWMP) will be prepared. The plan will include arrangements for managing wet weather events, specific controls, traffic controls and environmental inspection requirements. The SWMP will include an Erosion and Sediment Control Plan (ESCP) which will be prepared in accordance with the Blue Book -Managing Urban Stormwater: Soils and Construction Volume 1 (4th edition), (Landcom, 2004) and Volume 2 (DECC, 2008).</p> <p>Preparation of an Erosion and Sediment Control Plan (ESCP) as part of a SWMP will be in accordance with Blue Book - Managing Urban Stormwater: Soils and Construction (Volume 1 (4th edition) (Landcom, 2004) and Volume 2 (DECC, 2008).</p> <p>The ESCP must include the following:</p> <ul style="list-style-type: none"> › All erosion and sediment control measures will be established before ground disturbance work commences and will remain in place until all surfaces have been fully restored and/or stabilised. › The process for stabilisation and progressive revegetation of all disturbed area inclusive of LPS, HVGTs, borrow pit area and the landfill area. › Include a maintenance and inspection program and checklist including: › Conditions that would trigger watering of exposed and revegetated areas. › Requirements for maintenance of revegetated areas. › Maintenance of erosion and sediment controls including clean out before 30% capacity remaining. › Progressive revegetation/stabilisation methodology for exposed areas that are susceptible to wind generated dust particles. Where vegetation is not yet possible, dust suppression by watering will occur. 	Prior to works commencing	C	<p>Sighted the Soil and Water Management Sub Plan (SWMSP) (approved by DPHI on 22/05/25) which is the sub-plan within the DEMP. Erosion and sediment controls are described in Section 7 of the SWMSP. Also sighted the WMP S1A which outlines the Key Performance Indicators (KPIs) relevant to erosion and sediment control works and references the 'Blue Book'.</p> <p>Refer to Schedule 2, Condition B13 for evidence of ESCP implementation.</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<ul style="list-style-type: none"> › Provide clean water diversions around disturbed areas. › Provide procedures for how any sediment laden water will be treated prior to leaving the project area. <p>The ESCP must be prepared by appropriately qualified specialists (e.g. completed an International Erosion Control Association (IECA) endorsed course or passed the examination for Certified Professional in Erosion and Sediment Control (CPESC)) as a coordinated sub plan to the SWMP.</p>				
SC2	Erosion and sediment controls will be established prior to works commencing.	Prior to work commencing	C	See Schedule 2, Condition B13.	
SC3	<p>Temporary stabilisation of working areas as necessary in periods of inactivity which potentially may occur between stages.</p> <p>Borrow area design considers a staged approach and a range of smaller volumes to ensure a stable landform can be achieved if a smaller volume is required.</p>	Demolition	C	MP noted that no progressive rehabilitation has been completed, however recent topsoil stockpiles in the oil and grit trap works area have been shaped to allow for reduced dust and are scheduled for hydroseeding by GSS in the upcoming weeks (see Plate 8).	
SC4	Rehabilitation Management Plan for the borrow pit and landfill areas will be developed by AGLM.	12 months after issue of consent	NT	See Schedule 2, Condition B38.	
SC5	Spoil generated by the project will be reused where applicable. Excess spoil not required or able to be reused onsite will be disposed of appropriately as per the EPA's Waste Classification Guidelines (2014).	Demolition	C	See Schedule 2 Condition A7.	
SC6	<p>Visual monitoring for spontaneous combustion should still be undertaken during excavation of the borrow area and should involve:</p> <ul style="list-style-type: none"> › Noting any area of spoil with a high carbonaceous/coal content. 	Demolition	NT	See Schedule 2, Condition A7.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<ul style="list-style-type: none"> › If carbonaceous/coal rich layers are encountered during excavation, blending with non-carbonaceous material to avoid high concentration of combustible materials in the capping. › Looking for visible signs of heat haze, steam/vapour, smoke emissions, and flames or burning coal odour. 				
SC7	<p>If an area of spontaneous combustion is encountered during excavation, the following response process should be actioned:</p> <ul style="list-style-type: none"> › Where possible, isolate the zone of spontaneous combustible material. › If practicable and safe to do so, excavate out the affected area and move to a safe area where the material can be spread out to cool or be saturated with water. 	During Demolition	NT	TB (pers comms) confirmed that no spontaneous combustion events have occurred to date.	
SC8	<p>Based on the data gaps identified, further assessment will be undertaken to determine contamination. This will include:</p> <ul style="list-style-type: none"> › Intrusive soil and groundwater investigations throughout the main power block in inaccessible areas, focusing on primary source areas, e.g., below fuel storage tanks, below transformer bunds, along service corridors and within operational buildings (turbine hall). › Further groundwater investigations for complete characterisation of groundwater throughout Key Areas where large areas of land were inaccessible (predominately Key Area 3). These investigations will be complementary to ongoing groundwater monitoring of PFAS that is required under the NSW EPA PFAS Management Plan for the project area and Lake Liddell. › Collection of additional groundwater and soils from broader background locations to refine the current understanding of ambient conditions regarding heavy metals and low pH; or provide an explanation for their occurrence within the project area. › Soil vapour monitoring and investigations around known USTs and where TRH impacts have been identified and are suspected 	Post demolition or when	NT	See Schedule 2, Condition C4.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<p>within inaccessible areas, to determine ecological and human health risks.</p> <ul style="list-style-type: none"> › Increased sampling density and statistical analysis (possibly by human health and ecological risk assessment of all Key Areas where exceedances of adopted criteria have been identified and source-pathway-receptor linkages are considered to be potentially complete. 				
SC9	A spill management plan will be prepared for demolition activities as part of the PEMS. The spill management plan will detail the requirements for management of potential spills and leaks from operational equipment during demolition activities.	Demolition	C	Section 5.11.4 of the DEMP outlines the spill management procedure.	
SC10	<p>An unexpected finds protocol will be prepared and included in the PEMS for the project. The contamination management plan will detail the requirements for management of potentially contaminated materials demolition activities.</p> <p>Management of any waste material to be disposed of offsite will be managed in accordance with a separate waste management plan.</p>	Demolition	C	Section 5.9 of the EMS outlines the unexpected finds protocol.	
SC11	<p>Should any unexpected contaminated soils be identified during any ground works, seek advice from a suitably qualified environmental consultant and notify the project manager.</p> <p>Complete any additional investigations/abatement in general accordance with guidelines developed or endorsed by NSW EPA. Include contingency plans for unexpected finds protocols for contaminated soils in project management plans.</p>	Demolition	NT	Not triggered. TB (pers comms) confirmed no unexpected contaminated soils have been identified to date for the Project.	
ABORIGINAL HERITAGE					
AH1	An Aboriginal Cultural Heritage Management Plan (ACHMP) will be prepared prior to work commencing. The ACHMP will detail the location of the existing sites, formal management of avoid impacts to these sites and an Unexpected Finds Procedure.	Prior to works commencing	NT	See Schedule 2, Condition B5.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	The Unexpected Finds Protocol will be site specific and prepared in consultation with RAPs. A template for the Unexpected Finds Protocol is provided in Appendix D of the ACHAR.				
AH2	The individual or persons responsible for the management of onsite works will ensure that all site personnel are made aware of the statutory legislation under the NPW Act regarding protection of sites and places of significance.	Prior to works commencing	NT	See Schedule 2, Condition B5.	
AH3	Should any Aboriginal objects be uncovered during works, activities should halt in that location and the Environmental Line contacted on 131 555 to report the discovery.	Clearing works, Demolition recontouring	C	See Schedule 2, Condition B4.	
NON ABORIGINAL HERITAGE					
HH1	In the unlikely event that unexpected historical (non-Aboriginal) archaeological remains are discovered during works they will be managed with reference to the standard protocols and procedures of Section 146 of the <i>Heritage Act 1977</i> . An unexpected archaeological finds procedure should be included in relevant project documentation such as the Construction/Demolition Environmental Management Plan.	Demolition	C	Section 5.9 of the EMS outlines the unexpected finds protocol for heritage items. See Schedule 2, Condition B4.	
HH2	Undertake archival recording of: <ul style="list-style-type: none"> › The fence posts west of the skimmer dam will be recorded. › The structures and associated demolition. To be recorded in full extent including photographs and documentary recording. 	Demolition	C	Sighted 'Liddell Power Station Transition Photographic Archival Recording' (EMM, 2025). The Archival Report included photographs of the fence posts and associated structures, with provision of historical background information.	
DEMOLITION					

Ref	Management Measure	Timing	Status	Evidence	Recommendations
DM1	Use licenced Asbestos removal contractor -Class A licence. <ul style="list-style-type: none"> › Implement Asbestos Management Plan. › Complete Hazardous Materials survey. › Remove asbestos from structures in accordance with Division 8.6 of the <i>NSW Work Health and Safety 2017</i> Regulation, where not safely possible to remove asbestos a risk assessment will be undertaken. 	Pre-demolition	C	Section 5.8.15 of the EMS states that recycling and resource recovery activities will be managed by a licenced service provider. The EMS states that CMA is the Principal Contractor and licenced demolition contractor and has the overall management and control of the Site. CMA holds a current Friable Asbestos Removal Licence (Licence Number WUA166). See Schedule 2, Condition C19 for the AMSP and Condition C19(b) for Hazardous Material surveys.	
DM2	<ul style="list-style-type: none"> › Complete Hazardous Material Survey › Develop removal and handling plan 	Pre-demolition	C	See Schedule 2, Condition C19(b). Appendix C of the AMSP within the DEMP contains an Asbestos Removal Control Plan.	
DM3	<ul style="list-style-type: none"> › Complete contamination assessment › Develop plans to control impact of contamination and demolition activities 	Pre-demolition	C	Table 4-3 of the SWMSP within the DEMP states that a baseline <i>Contamination Assessment Report</i> (BCAR) (Kleinfelder, 2024) was prepared for the Project. See Schedule 2, Condition C19 for the AMSP.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
DM4	<ul style="list-style-type: none"> › Confirm monitoring well locations and regulatory requirements impacted by the project will be decommissioned by a suitably qualified consultant. › Following decommissioning, the consultant will provide AGLM with a decommissioning report. 	Pre-demolition	C	The EMS states that as per SoC DM4, AGLM have confirmed monitoring well locations and those that are impacted by the development have been decommissioned by a suitably qualified consultant. Kleinfelder was engaged to decommission the monitoring wells. Sighted 'Power Block SSD2 Groundwater Monitoring Event (GME) Factual Report (Kleinfelder Project: 26000344.001A. The report states that <i>'It is considered that the objectives of this GME and well-decommissioning were successfully met.'</i>	
DM5	Dust management measures will be included in the PEMS, and implemented during demolition.	Pre-demolition. Demolition	C	See Schedule 2, Condition C22. Schedule 2, Condition B6 for evidence of dust control measures.	
DM6	Inspect roads prior to mobilising heavy equipment to site.	Pre-demolition	C	Sighted 'Dilapidation Report – September 2025: CO269 Liddell Power Station via Singleton & Muswellbrook Off Ramps' dated 03/09/25 which demonstrates that AGLM are inspecting roads.	
DM7	Identify any critical infrastructure that may be damaged by vibration and develop monitoring plan to be included in the PEMS.	Pre-demolition	NT	See Schedule 2, Condition C20.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
DM8	Compliance with Australian Standards for storage and handling of flammable and combustible liquids and hazardous materials.	Demolition	C	See Schedule 2, Condition B19.	
DM9	Develop a construction environmental management plan which includes a designated processing area.	Pre-demolition	C	See Schedule 2, Condition B25.	
DM10	Develop a construction environmental management plan including specific stormwater and dirty water management plan.	Pre-demolition	C	See Schedule 2, Condition B13.	
DM11	<ul style="list-style-type: none"> › Develop and implement fire management and emergency response plan › Implement Hot works permitting and controls 	Pre-demolition	C	See SoC HR8.	
REHABILITATION					
RH1	AGLM will prepare a Rehabilitation Management Plan for relevant areas of the site to detail the Rehabilitation objectives, methods to be implemented, indicative schedule, adaptive management measures and quality assurance measures, monitoring program and completion criteria.	12 months post determination	NT	See Schedule 2, Condition B38.	
RH2	<p>Post closure maintenance activities will be undertaken in response to monitoring outcomes and recommendations, to ensure the establishment of stable landforms development of self-sustaining vegetation. These activities will include the following:</p> <ul style="list-style-type: none"> › Maintenance of water management structures › Maintenance of landform including erosion management and capping (in selected areas) › Repair of uneven settlement › Maintenance and calibration of instruments and equipment › Additional/ supplementary seeding and planting › Assessment of species composition and health in revegetated areas › Invasive species control (weeds and pest animals) 	Progressively and post project	NT	See Schedule 2, Condition B38.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
WATER QUALITY AND HYDROLOGY					
WQ1	A Project Environmental Management Strategy (PEMS), inclusive of a site water management plan, will be prepared for the project with measures to mitigate the impact of soil and water associated with construction works.	Prior to work commencing	C	See Schedule 2, Condition B15.	
WQ2	<p>The PEMS will include the following Erosion and Sediment Control measures:</p> <ul style="list-style-type: none"> › Project erosion and sediment control will be developed in accordance with the erosion and sediment control framework. Any activities that result in ground disturbance associated with the project will have a detailed Erosion and Sediment Control Plan (ESCP) prepared based on specific construction methodologies. The objective of the ESCP is to ensure that appropriate structures and programs of work are in place to: <ul style="list-style-type: none"> ▪ Identify activities that could cause erosion and generate sediment. ▪ Describe the location, function and capacity of erosion and sediment control structures required to minimise soil erosion and the potential for transport of sediment downstream. ▪ Ensure erosion and sediment control structures are appropriately maintained. ▪ Minimise areas of disturbance and ensure that progressive revegetation/stabilisation is undertaken. ▪ Fulfil the statutory conditions of the project approval. › Consider industry standard practice, specifically: <ul style="list-style-type: none"> ▪ Landcom 2004. Managing Urban Stormwater – Soils and Construction, Volume 1, 4th Edition. ▪ Department of Environment and Climate Change (DECC) 2008. Managing Urban Stormwater – Soils and Construction, Volume 2E – Mines and Quarries. 	Prior to work commencing	C	<p>Sighted the Soil and Water Management Sub Plan (SWMSP) (approved by DPHI on 22/05/25) which is the sub-plan within the DEMP. Erosion and sediment controls are described in Section 7 of the SWMSP. Also sighted the WMP S1A which outlines the Key Performance Indicators (KPIs) relevant to erosion and sediment control works and references the 'Blue Book'.</p> <p>Refer to Schedule 2, Condition B13 for evidence of ESCP implementation.</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
WQ3	<p>The PEMS will include the following stockpile management measures:</p> <ul style="list-style-type: none"> › Measures to manage stockpiles including locations, separation of waste types, sediment controls and stabilisation. › Minimising the quantity, lifespan and size of stockpiles. › Stabilising stockpiles, establishing appropriate sediment controls and suppressing dust as required. › Locating stockpiles away from drainage lines, waterways and areas where they may be susceptible to wind erosion. 	Prior to work commencing	C	Table 7-1 of the SWMSP outlines the measures to manage soils and surface, which includes location considerations, waste segregation, stockpile controls and drainage controls.	
WQ4	The PEMS will include processes for dewatering of water that has accumulated on site and from sediment basins, including relevant discharge criteria.	Prior to work commencing	C	Appendix 2 of the SWMSP outlines the water discharge plan which provides the procedures for dewatering. The discharge criteria is based on criteria set in EPL 2122, and is outlined in Table 6-1.	
WQ5	The PEMS will include details of surface water and groundwater quality monitoring to be undertaken prior to, throughout, and following construction.	Prior to work commencing	C	<p>Section 8 of the WMP S1A outlines the water monitoring program for surface and groundwater.</p> <p>Appendix 4 of the SWMSP outlines the water monitoring plan associated with demolition activities. Appendix 4 of the SWMSP is specific to water quality monitoring within the sediment basin and surface water in Lake Liddell.</p>	
WQ6	The PEMS will include details of exclusion zones that will be established for construction plant and equipment.	Prior to work commencing	C	Table 7-1 of the SWMSP outlines the requirement to establish exclusion zones, including for access points and	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				roadways / paths for machinery and vehicles.	
WQ7	<p>The PEMS will include details of spill management measures to be implemented including:</p> <ul style="list-style-type: none"> › Measures to manage accidental spills including the requirement to maintain materials such as spill kits. › Procedures for spill incident management. Containment of spills and leaks shall be in accordance with EPA’s guidelines section ‘Bunding and Spill Management’. › Provision of preventative controls for spills such as alarm systems, regular training and routine inspection of potential contamination sources. › Measures to clean up any contamination sources and where possible removal of the contamination source related to project spills. 	Prior to work commencing	C	See SoC SC9.	
WQ8	<p>The current water reuse strategy will be amended for both construction and operational phases. This strategy will be updated during the detailed design stage and implemented throughout the project and will outline the construction and operational water requirements. Alternative water supply options to potable water will be investigated, with the aim of reusing water using recycled water where feasible. No additional water is deemed to be required for the project outside of AGLM’s Water License Package.</p>	Prior to work commencing	C	<p>Appendix 3 of the SWMSP outlines the current water reuse strategy to manage the reuse of water onsite for purposes such as dust suppression or vehicle wash down, during the demolition works. Section 4 of Appendix 3 (SWMSP) outlines the water reuse opportunities and scenarios investigated.</p> <p>See Schedule 2, Condition D7 regarding revision of management plans.</p>	
WQ9	<p>Works within waterfront land will be managed in accordance with the relevant guideline as deemed appropriate.</p>	Demolition	NT	Table 7-1 of the SWMSP outlines that works will be	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				<p>undertaken in line with the general guidance provided in the <i>Controlled Activities on Waterfront Land</i> (DPE, 2022), and that daily inspections will be taken of waterfront areas and bank stabilisation measures where works are occurring. TB (pers comms) noted that works on waterfront land did not occur during the audit period.</p> <p>AGLM undertake weekly environmental inspections with CMA personnel. Sighted AGLM HSE Site Inspection Checklists dated 16/07/25 (LPS area), 07/10/25 (containment cell area), 08/10/25 (LPS area). Also sighted CMA Weekly Environmental AGL Audits dated 31/07/25. AGLM inspections have a checklist of items to ensure soil and water is being management correctly and clean and dirty water separated.</p>	
WQ10	Implementing practices to minimise disturbance of banks and undertaken bank stabilisation.	Demolition	C	See Schedule 2, Condition B13.	
WQ11	Appropriate drainage features will be incorporated into the design of the project elements by a suitably qualified and experienced professional. All project elements will be designed and constructed in accordance with relevant guidelines.	Pre-demolition, Demolition	C	See Schedule 2, Condition B13.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
WQ12	<p>Unexpected interactions with groundwater will include the following actions:</p> <ul style="list-style-type: none"> › Works will cease in the immediate area and the date, location, level and depth of groundwater interception will be recorded. › Unexpected interactions will be notified to the project hydrogeologist. › The project hydrogeologist will review and determine an appropriate course of action in consultation with AGL Staff. › Consideration is to be given to re-locating excavation work to areas of higher elevation and/or deeper groundwater. <p>Consideration to undertaking routine monitoring of the monitoring bores in the vicinity of the works.</p>	Demolition	C	<p>Table 15 of the WMP S1A outlines the requirements relevant to WQ2, including ceasing work and seeking review by a hydrogeologist.</p> <p>TB (pers comms) confirmed that there has been no unexpected interactions with groundwater to date.</p>	
WQ13	<p>Detailed design of the Landfill will be in accordance with Environmental Guidelines: Solid Waste Landfills EPA (2016) which will be adhered to for operation of the Landfill pertaining to leachate management, water management and monitoring, and cover/capping requirements.</p>	Pre-demolition, Demolition	C	<p>See Schedule 2, Condition C23.</p>	
WQ14	<p>Dewatering procedures from construction sediment basins will be outlined in the PEMS and will include (but not be limited to):</p> <ul style="list-style-type: none"> › Routine and pre-discharge sampling and analysis to confirm absence of contaminants exceeding applicable criteria. › Pre-discharge confirmation of compliance with water quality performance criteria able to be analysed in real time. › The methodology for dewatering including use of amphibian friendly flocculants and pH balancing agents as required. 	Pre-demolition, Demolition	NC	<p>Appendix 2 of the SWMSP outlines the water discharge plan which provides the procedures for dewatering. The discharge criteria is based on criteria set in EPL 2122, and is outlined in Table 6-1.</p> <p>There is no commitment within the SWMSP to use 'amphibian friendly' flocculants during dewatering.</p>	<p>It is recommended that AGLM update the Soil and Water Management Sub Plan to outline AGLM commitments in relation to using amphibian friendly flocculants in Project sediment basins.</p>

Ref	Management Measure	Timing	Status	Evidence	Recommendations			
WQ15	Discharges from the project during construction and operation will occur in accordance with EPL 2122 and project approval along with the required water quality monitoring as specified below.		Pre-demolition, Demolition	C	<p>Table 11 of the WMP S1A outlines the monitoring locations for the S1 works. Table 16 of the WMP S1A outlines the TARP to be followed in the event of an exceedance, and Section 13.4 outlines the incident procedure.</p> <p>TB (pers comms) confirmed that AGLM undertakes environmental reporting and exceedance notifications in accordance with EPL 2122. No exceedances of pH or Oil and Grease occurred during the audit period, however AGLM notified the NSW EPA of a Total Suspended Solids (TSS) exceedance on 04/09/25.</p> <p>Sighted letter from AGLM to NSW EPA dated 04/09/25. The letter notified of an exceedance of the concentration limit for Total Suspended Solids at EPL Point 17. AGLM stated <i>'During a significant rainfall event of 91 mm that occurred between 30 July 2025 and 5 August 2025, the Oil and Grit Trap reached capacity and began to overtop and discharge over the weir to Lake Liddell. Sampling</i></p>			
	Parameter	Units					Guideline value	Comments (reference)
	pH	pH units					6.5-9.0	EPL 2122 water concentration limit
	Oil and Grease	mg/L					10	EPL 2122 water concentration limit
<p>It is recommended that monitoring is retained at existing EPL 2122 surface water monitoring locations for the activities associated with the project:</p> <ul style="list-style-type: none"> › SW28, to monitor potential sedimentation impacts of Borrow Pit area. › SW30, to monitor surface water discharge quality from the LPS main infrastructure area. › SW32, to monitor surface water discharge quality from the LPS Infrastructure Area reporting to the outfall canal coal stockpile area. › SW42, to monitor surface water quality of Lake Liddell as a reference point. <p>Where monitoring indicates a water quality exceedance in discharges off site, an investigation will be undertaken and a notification to the EPA shall be undertaken in accordance with the EPL. Monitoring will continue in accordance with the EPL until the site is suitably stabilised to an acceptable level as agreed with DPE and EPA.</p>								

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				<p><i>conducted on the 4 August 2025 returned a result for TSS concentration of 57 milligrams per litre (mg/L) for EPL Point 17 which is a slight exceedance of the concentration limit of 50 mg/L specified in Condition L2.4 of EPL 2122. It is considered that there was no potential for environmental harm given the significant dilution from the high rainfall event.</i> Also sighted 'Monthly Data Summary AGL Macquarie – Liddell Power Station Environmental Protection Licence: EPL2122' (AGLM, 2025).</p>	
AIR QUALITY					
AQ1	<p>Prior to demolition commencing, a Dust Management Plan (DMP) will be prepared which would include details of:</p> <ul style="list-style-type: none"> › Frequency of onsite and offsite inspections to monitor compliance with the air quality management strategy. › The name and contact details of the person(s) accountable for air quality and dust issues. › Procedure for receipt of complaints. › Regular pre-wetting and watering requirements. › When to adjust works (including site inspections and watering) due to increased emission risk (e.g. during dry windy conditions). 	Prior to works commencing and during works	C	Refer to Schedule 2, Condition C22.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<ul style="list-style-type: none"> › Designated vehicle entries and exits, haulage routes and parking areas. › Other vehicle requirements including minimising idling of vehicles on site and covering loads on trucks transporting materials. › Maintenance and cleaning of equipment used on site. › Stabilisation of stockpiles when not in use and completed areas. › Removal of accumulation of dust before commencing work. › Trigger Action Response Plan. › Monitoring Program. 				
AQ2	<p>Preparation of a Blast Management Plan and Asbestos Control Plan, which would including specific measures for minimising impacts during blasting and handling of ACM, including:</p> <ul style="list-style-type: none"> › Soft-strip inside buildings before demolition › Pre-watering › Forecasting › Sprinklers <p>Due to the potentially high emissions of dust during blasting events, a monitoring plan is recommended. This would include boundary and receptor monitoring. A report after each blasting event summarising the results of the air quality monitoring during and after the event would be prepared.</p>	Pre-demolition, demolition, recontouring.	NT	The BMSP has not been developed yet. See Schedule 2, Condition C20.	
NOISE					
NV1	<p>Notification should be a minimum of 7 calendar days prior to the start of works and should include information such as total building time, what works are expected to be noisy, their duration, what is being done to minimise noise and when respite periods will occur.</p> <p>As it is proposed that works will be undertaken outside of standard hours on Saturday, it is recommended to inform the closest residents</p>	Prior to works commencing	NT	<p>TB (pers comms) confirmed that no demolition works triggering this requirement had commenced at the time of the audit.</p> <p>The NVMP (Appendix 4 of EMS) advises SoC NV1 is addressed in Section 7.</p>	It is recommended that AGLM update the Noise and Vibration Management Plan to include the commitment to notify relevant

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<p>and other sensitive land use occupants within 14 days of commencement of any out of hours works.</p> <p>Provide information to neighbours before and during construction (Particularly for blast activities) through media such as letterbox drops, meetings or individual contact. A website will also be established for the project to provide information.</p> <p>Ensure site managers periodically check the site and nearby residences and other sensitive land uses for noise problems so that solutions can be quickly applied.</p> <p>Maintain good communication between the community and project staff.</p> <p>Consider a regular newsletter with site news, significant project events and timing of different activities.</p> <p>Facilitate contact with people to ensure that everyone can see that the site manager understands potential issues, that a planned approach is in place and that there is an ongoing commitment to minimise noise.</p>			<p>Section 7 has Table 7-1 which lists all of the noise management measures. However, consideration of Commitment NV1 is not included in the list of measures included in the NVMP. Specifically, the commitment to notify is not addressed.</p> <p>With regard to working out of hours, please refer to Schedule 2, Condition B11.</p> <p>Sighted SiteHive noise monitoring records for the period 1 August 2025 to 21 October 2025.</p> <p>MP advised (pers comms) that the Project is discussed regularly at the AGLM Community Consultative Committee (CCC) meetings. Viewed minutes of the AGLM Hunter CCC from February 2025, which note that an update on the Project was provided by James Coventry.</p>	<p>stakeholders a minimum of seven calendar days prior to the start of works and should include information such as total building time, what works are expected to be noisy, their duration, what is being done to minimise noise and when respite periods will occur.</p>
NV2	<p>A PEMS should be prepared post approval, after the contractor has been engaged and prepared its construction methodology.</p> <p>The PEMS should include a review of the construction noise predictions during the environmental impact assessment phase based on the construction contractor’s methodology and revise it accordingly to include a detailed examination of feasible and</p>	Prior to works commencing		<p>Section 6 of the NVMP outlines the predicted noise associated with the three stages of Project work, including construction noise, operational</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<p>reasonable work practices and noise mitigation measures to manage sensitive receptors that are predicted to be 'noise affected'. PEMS should also include:</p> <ul style="list-style-type: none"> › Details of the construction methodology › Feasible and reasonable mitigation measures to be implemented › Updated noise predictions at sensitive receptors if required › A noise monitoring procedure for the duration of works › A community consultation plan to liaise with the noise affected receptors <p>The PEMS must be updated as necessary to account for changes in noise and vibration management issues and strategies.</p> <p>Provide a readily accessible contact point, e.g. through a 24 hour toll-free information and complaints line.</p> <p>Document and maintain a complaints register detailing the following:</p> <ul style="list-style-type: none"> › Date and time › Complainants details › Person receiving complaint and person referred to › Description of complaint <p>Provide quick response to complaints, with complaint handling staff having both a good knowledge of the works and ready to access information.</p> <p>All employees, contractors and subcontractors are to receive an induction. The induction must at least include:</p> <ul style="list-style-type: none"> › All project specific environmental mitigation measures › Relevant licence and approval conditions › Permissible hours of work › Any limitations on high noise generating activities › Location of nearest sensitive receptors › Construction employee parking areas › Designated loading/unloading areas and procedures 			<p>noise, construction traffic noise and vibration.</p> <p>Section 2.4 of the NVMP outlines the construction activities relevant to the NVMP.</p> <p>Section 8.4 of the NVMP outlines the noise monitoring procedure, which includes noise monitoring.</p> <p>See Schedule 2, Condition D7 which addresses the requirement to review management plans.</p> <p>Section 4.8 of the EMS describes the community consultation strategy and complaints procedure for SSD 24937520.</p> <p>With regard to the out of hours work procedure, please refer to Schedule 2, Condition B11.</p> <p>With regard to equipment being maintained, refer back to Schedule 2, Condition A24(a).</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<ul style="list-style-type: none"> › Site opening/closing times (including deliveries) › Environmental incident procedures <p>An out of hours works procedure should be developed as part of the PEMS for the project, if these works are required. This should include a detailed construction noise and vibration assessment for the potential construction activities proposed to occur out of hours.</p> <p>An out of hours works application form for any works outside of the approved working hours for the project will be re required. A description of the works, justification and management measures will also be included as part of the application. It is expected that strong justification and negotiation with the community will be required if these works are to be undertaken during any out of hours periods.</p> <p>Non-tonal reversing beepers (or an equivalent mechanism) must be fitted and used on all construction vehicles and mobile plant regularly used on site and for any out of hours work. Consider the use of ambient sensitive alarms that adjust output relative to the ambient noise level.</p> <p>Use quieter and less vibration emitting construction methods where feasible and reasonable.</p> <p>Regularly inspect and maintain equipment to ensure it is in good working order. Also check the condition of mufflers.</p> <p>Equipment must not be operated until it is maintained or repaired, where maintenance or repair will address the character of noise identified.</p> <p>Compliance monitoring should be undertaken to investigate complaints.</p>				
TRAFFIC					
TT1	A Traffic Management Plan (TMP) will be prepared for the project prior to construction commencing. The TMP will address traffic	Pre-demolition	C	See Schedule 2, Condition B20.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<p>movements associated with the decommission phase of the project, in particular the impact of OSOM vehicles required for the project.</p> <p>The TMP and associated Traffic Control Plans (TCPs) will be prepared by suitably qualified persons and in accordance with the TfNSW Traffic Control at Work Sites Manual. The TMP will consider impacts related to the height of the Liddell overpass bridge as strike risks may be a safety issue for heavy vehicle operators which could also compromise structural integrity. Where road safety concerns are identified at a specific location along the proposed haulage routes, the TIA will be supported by a targeted Road Safety Audit undertaken by suitably qualified persons in accordance with the Austroads Guidelines.</p>				
TT2	<p>All loading and unloading of materials will be limited to specific loading areas within the site. No loading or unloading will occur on public roads.</p> <p>Loading vehicles are generally expected to only use internal road network.</p>	Demolition	C	<p>Table 3-2 of the TMP (within the EMS) references this commitment as a management measure.</p> <p>Sighted 'Liddell Power Station Internal Movement, Site Carpark and Loading Zones Site Map', dated 07/08/25. The Site Map clearly details the laydown area of unloading, within the Liddell Power Station work area.</p>	
TT3	<p>Any public roads deemed to have been damaged by the project will be repaired to an acceptable standard, with all costs borne by AGLM or their appointed contractor.</p>	Demolition	NT	<p>See Schedule 2, Condition A23.</p>	
TT4	<p>Truck deliveries to and from the site will be scheduled outside peak hours where possible.</p>	Demolition	NT	<p>LT (pers comms) confirmed that no out of hours construction or maintenance (cleaning, etc.) has occurred outside of work hours and</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				development of an Out of Hours Procedure (OoHP) has not been triggered. Refer to Schedule 2, Condition A9.	
TT5	To increase awareness of the increased truck volumes and the presence of OSOM vehicles, truck warning signage will be installed where required to notify other road users. Traffic management, warning, and regulatory signs will be installed where appropriate.	Demolition	C	Sighted GVDA – Application Form for ‘Install new project signage around the Liddell perimeter and entries’, with attached plan set (Gate 1 CMA authorized access; Gate 2 authorized project vehicle car park; Gate 3 visitor car park; Gate 4 site access; muster points A–C; directional/site map board). Sign content and locations per the ‘Site Signs_R1.pptx’, dated 29/09/25. The list of signs included signage directing heavy vehicle and light vehicle travel directions and authorised access points. Also observed safety signage during audit site inspection (refer to Plate 24 , Plate 33 and Plate 34).	
TT6	Throughout the project, AGLM will ensure the internal access road providing access to the LPS, the ash dam and the borrow pit area is maintained.	Demolition	C	During the audit site inspection, it was observed that the internal access roads were being maintained. Refer to Plate 5 , Plate 24 and Plate 25 .	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
TT7	All parking will occur within the site boundaries, in dedicated parking areas. All staff and drivers will be instructed not to park on public roads.	Demolition	C	Sighted 'Liddell Power Station Internal Movement, Site Carpark and Loading Zones Site Map', dated 07/08/25. The Site Map clearly details the carpark within the Liddell Power Station work area. Sighted GVDA – Application Form for 'Install new project signage around the Liddell perimeter and entries attached plan set (Gate 1 CMA authorized access; Gate 2 authorized project vehicle car park; Gate 3 visitor car park; Gate 4 site access; muster points A–C; directional/site map board). Sign content and locations per the "Site Signs_R1.pptx", dated 29/09/25. The list of signs included carpark signage. Also observed carpark signage during audit site inspection(refer to Plate 36 and Plate 37).	
TT8	All staff and contractors will be informed that animals often cross the New England Highway and to take necessary precautions when driving.	Demolition	C	During the audit site inspection it was observed on a work notice at the pre-start area for the Liddell Power Station demolition a site reminder to 'Watch out for wildlife on all roads '.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
TT9	Traffic controllers should be present where OSOM are required to make right-turning movements along the haulage route to the project site.	Demolition	NT	Table 3-2 of the TMP (within the EMS) references this commitment as a management measure. Chris Druery (CD) (pers comms) confirmed that this has not been triggered yet.	
TT10	The OSOM vehicle contractor is expected to undertake a pre-route assessment of the proposed routes, to assess the route for any obstructions which they deem necessary to be removed.	Pre-demolition	C	Table 3-2 of the TMP (within the EMS) references this commitment as a management measure. Sighted email from Oliver Easingwood (Delta Group) to Todd Solomon (CMA) dated 17/11/25 outline details of a site walk undertaken to confirm that the proposed route of an OSOM had no overhead obstructions, the road condition, and chosen route was suitable for transport.	
TT11	A permit from the NHVR will be required prior to the undertaking of any OSOM haulage trips. All trips will need to be undertaken in accordance with the permit conditions.	Pre-demolition	C	Table 3-2 of the TMP (within the EMS) references this commitment as a management measure. Sighted Oversize and/or Overmass (OSOM) Mass or Dimension Exemption Permit issued to Goldsprings Earthmoving and Heavy Haulage Pty Ltd dated	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				17/08/25 for Prime mover towing OS/OM/OSOM load and Prime Move, Dolly and Low Loader. The Permit start period is from 14/04/25 to 17/08/25 (Permit Number 552438V9).	
LANDSCAPE AND VISUAL					
LC1	Existing large trees and vegetation will be maintained and protected wherever possible.	During clearing activities. Demolition, recontouring	C	Section 5.8.6 of the EMS states that existing large trees and vegetation will be maintained and protected wherever possible. This will be achieved through the implementation of the AGLM Ground and Vegetation Disturbance Approval (GVDA). See Schedule 2, Condition B34 for examples of GVDA's completed during the audit period that were reviewed as part of this IEA.	
LC2	Revegetation will be undertaken in accordance with the Rehabilitation Management Plan.	Progressively during the Project	NT	See Schedule 2, Condition B38.	
LC3	Existing benches in the landform are considered excessively wide at 12 m to 13 m wide. Adoption of a smaller 4 m bench for the final landform to reduce the visual impact.	Recontouring of the borrow area	NT	See Schedule 2, Condition B38.	
LC4	Unnatural features such as drainage contour banks are removed or minimised to reduce visual amenity impacts.	Recontouring of the borrow area	NT	See Schedule 2, Condition B38.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
LC5	<p>Any lighting during night time activities will be of short duration, will not be directed or spill into any adjoining landholding or dwelling and will be provided in accordance with <i>AS 4282 – Control of the obtrusive effects of outdoor lighting</i>.</p> <p>Projects post this one will be subject to their own assessment and mitigation measures.</p>	During the project	NT	See Schedule 2, Condition A9.	
SOCIAL AND ECONOMIC					
SE1	<p>A Community and Stakeholder Engagement Strategy will be developed. The strategy will provide a method for:</p> <ul style="list-style-type: none"> › Maintaining ongoing, regular and transparent communication with key stakeholders and the community › Managing project perceptions › Provide updates on ongoing industrial uses and other beneficial uses to be located at the LPS › Measures for communicating with stakeholders regarding housing demand 	During the project	NC	<p>'Sighted Community and Stakeholder Engagement Strategy – Liddell Future Land Use and Enabling Works' (SES) (AGLM, 2025).</p> <p>Section 6.5 of the SES provides a 'Communication Management Plan' which outlines the stakeholders, relevant issues, and frequency for consultation. However, the SES does not include procedures for communication of housing demand to Project stakeholders.</p>	<p>It is recommended that AGLM update the Stakeholder Engagement Strategy (SES) to outline measures for communicating with stakeholders regarding housing demand.</p>
SE2	<p>A communication management plan will be developed in accordance with the Community and Stakeholder Engagement Strategy and implemented to define the specific requirements for engagement during delivery of the project with the following objectives:</p> <ul style="list-style-type: none"> › To ensure that residents and stakeholders are notified in a timely manner about works activities and potential for impacts › Ensure accurate information is accessible, and enquiries and complaints are managed in a timely manner 	Prior to commencing Demolition works	C	Section 6.5 of the SES provides a 'Communication Management Plan' which outlines the stakeholders, relevant issues, and frequency for consultation.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	› To define the requirements for the complaints management system to be implemented				
SE3	<p>Aligned with AGL’s Reconciliation Action Plan (AGL, 2021) AGL has committed to prioritising opportunities for Aboriginal workers and procurement in its projects.</p> <p>This includes local and Aboriginal participation commitment in its tender documents which outline the sub-contracting, employment, training, Aboriginal and community contributions that contractors will need to deliver.</p> <p>Continuing engagement of local Aboriginal organisations through the Community Dialogue Group, this has been a successful approach in updating group members about the future of LPS.</p>	During the project	C	<p>Table 6 of the SES outlines the applicable actions from the AGLM Reconciliation Action Plan.</p> <p>Table 6 outlines a commitment to include requirements for First Nations participation (procurement/employment) in project tenders over \$10 million.</p> <p>CD (pers comms) confirmed that first nations targets are included in the Demolition Contract and Key Performance Indicators (KPIs) are reported on monthly. Sighted Tax Invoice dated 21/11/25 from Wonnarua Mine Rehabilitation Pty Ltd to CMA. Also sighted Tax Invoice dated 22/09/25 from Borger Cranes to CMA.</p>	
SE4	<p>AGLM will continue to explore opportunities to deliver local community benefits, including exploring opportunities to memorialise the LPS through interpretation opportunities and photographic documentation of the LPS closure process.</p> <p>These opportunities will support local community values, identity, and pride.</p>	During the project	C	<p>Table 4 of the EMS states that AGLM will explore opportunities to deliver local community benefits consistent with SE4, as per the Community and Stakeholder Engagement Strategy.</p> <p>Sighted minutes of the AGLM Hunter CCC from August 2025, which note that an update on</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				<p>community support provided by Jo Ferguson.</p> <p>CD (pers comms) confirmed that timelapse cameras have been installed on-site to capture footage of the demolition from November 2025, and previous photographs have been undertaken. Sighted a marketing advertisement for Liddell Works stating that <i>'Sixteen artists entered the iconic power station in its last days, to create remarkable work that explores the legacy and transformation of the site and its people.'</i></p> <p>MP (pers comms) confirmed that AGLM are donating some components to the Muswellbrook museum.</p>	
WASTE					
WM1	<p>A waste management plan for the project will be prepared prior to works commencing. The waste management plan will detail:</p> <ul style="list-style-type: none"> › Statutory requirements for waste in NSW › Systems to sort and track the actual types and quantities of waste generated › Measures for waste segregation and minimising cross-contamination of waste streams including the use of coded bins › Options for offsite reuse, reprocessing, recycling and energy recovery 	Prior to works commencing	C	<p>Section 5.8.15 of the EMS describes the waste management plan for the Project.</p> <p>See Schedule 2, Condition B25 for evidence of implementation.</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
WM2	Awareness of waste minimisation practices will be included in the project induction.	Pre-demolition, Demolition.	C	Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which contains relevant waste management training.	
WM3	Waste will be classified, managed and disposed of in accordance with the <i>Waste Classification Guidelines</i> (EPA, 2014).	Pre-demolition, Demolition.	C	See Schedule 2, Condition B23.	
WM4	Waste streams will continue to be managed in accordance with EPL 2122	Pre-demolition, Demolition.	C	See Schedule 2, Condition B23.	
WM5	Recycling and resource recovery activities will continue to be managed by a licenced service provider.	Pre-demolition, Demolition.	C	See SoC DM1.	
GREENHOUSE GAS					
GG1	Sustainable procurement practices will be adopted where feasible.	Pre-demolition, Demolition.		See Schedule 2, Condition B.	
GG2	The project will maximise the reuse of materials won onsite for the backfilling of voids and ground levelling. Any raw materials required would be sourced locally where possible.	Pre-demolition, Demolition.	C	See Schedule 2 Condition A7.	
GG3	Investigate the use of biodiesel for trucks and equipment, where suitable.	Demolition	C	Section 5.8 of the DEMP states that AGLM will investigate the use of biodiesel where suitable. TB (pers comms) confirmed that AGLM historically investigated (prior to	It is recommended that AGLM updates the DEMP to outline that the use of biodiesel has been investigated and it has been determined that

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				<p>commencement of SSD 24937520) the use of biodiesel in their equipment fleet and determined that this was not suitable for their business.</p> <p>Given that AGLM has determined that the use of biodiesel is not suitable and no further investigation is proposed, it is recommended that AGLM update the DEMP to outline that this has been investigated, and determined that biodiesel is not suitable for Project equipment.</p>	biodiesel is not feasible for the Project.
GG4	All plant and equipment used during the project shall be regularly maintained to reduce emissions and comply with the relevant exhaust emissions guidelines.	During the project	C	See Schedule 2 Condition A24.	
GG5	Plant and equipment will be switched off when not in constant use and not left idling.	During the project	C	<p>Section 5.8 of the DEMP states that AGLM will switch off plant and equipment when not in constant use and not leave them idling.</p> <p>Viewed Delta Mobile Plant Procedure. Section 3.9.3 (Fundamentally stable requirements) states that 'The vehicle transmission is placed in gear (or 'park' for automatic transmissions) with the engine switched off'.</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				During the audit site inspection, mobile equipment was observed to be switched off when not in use (see Plate 11).	
GG6	The project will be planned to ensure minimal movement of plant and equipment where practical.	Prior to and during the project	C	Section 5.8 of the DEMP states that AGLM plan the project so there is minimal movement of plant and equipment, where practical. Sighted 'Liddell Power Station Site Access Traffic Control Plan' dated 20/08/25 which is a plan devised to outline the most efficient route for machines to move around the oil and grit trap works area. MP (pers comms) explained that the route in the abovementioned Traffic Control Plan had been revised and shortened to go through the location of the social club (now demolished), rather than around it on other road ways.	
GG7	Maximise the beneficial reuse of the carbon removed in vegetation, such as mulching and composting, will be included in management plans, where feasible.	During the project	C	See Schedule 2, Condition B32 e).	
GG8	Maximise the reuse/recycling of demolition waste materials will be investigated and included in demolition management plans, where feasible.	During the project	C	Section 5.8 of the DEMP states that AGLM will maximise reuse of materials won onsite	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				<p>for the backfilling of voids and ground levelling.</p> <p>It was noted during the audit site inspection that CMA were stockpiling materials for reuse (see Plate 9 and Plate 10).</p> <p>Sighted August 2025 CMA Monthly Coordination Meeting stating that 'Waste' was a focus for the month, and question asking 'Are there plant and equipment resources under utilised/wasted?'.</p>	
HAZARD AND RISK					
HR1	<p>BMP is a risk control plan used to ensure blasts do not harm people in the area and limit damage to the environment. The BMP will describe the design of the blast necessary for the task and what procedures will ensure the charge is prepared and fired safely. This information includes:</p> <ul style="list-style-type: none"> › Layout of the blast including any drilling pattern and hole depth. › Explosives type/quantity, firing equipment and method. › Procedures for loading and charging. › Detonation sequence/effective charge mass per delay (MIC) 'powder factor.' › Misfire procedures including assessment and actions for any foreseeable misfires. This includes any explosive/detonators found during blasted material pile loading by mobile plant. › Details of reports, drawings and records consulted. › Post blast assessment and inspection procedures. › The Blast Management Plan will be prepared. 	Demolition	NT	<p>The BMSP has not been developed at the time of audit. See Schedule 2, Condition C20.</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
HR2	<p>Explosives will be stored in a non-ferrous receptacle clearly marked 'Explosives' that is kept closed and locked (except during use by authorised personnel) and stored in the original containers which are securely sealed.</p> <p>The storage area should be a well-ventilated magazine licenced for Inter-governmental Maritime Consultative Organisation (IMCO) Class 1.1 explosives, which protects the explosives from the weather, contamination, sources of ignition and access from unauthorised individuals. Storage will be isolated from other dangerous good stores and the area free of debris, waste and combustibles.</p> <p>The explosives containers should be protected against physical damage and regularly checked for spills and leaks.</p>	Demolition	NT	<p>According to Table 5 of the DEMP, will be addressed within the BMSP which has not been developed yet.</p> <p>See Schedule 2, Condition C20.</p>	
HR3	<p>Magazines are required to comply with the requirements of AS2187.1 Explosives – Storage, transport and use – Storage which addresses issues with design and location of the magazine, security, inventory and management of the explosives, and safety concerns.</p>	Demolition	NT	<p>According to Table 5 of the DEMP, HR3 will be addressed within the BMSP which has not been developed yet.</p> <p>See Schedule 2, Condition C20.</p>	
HR4	<p>Where more than 2.5 kg of Class 1.1 explosives are stored on a site, every perimeter entrance to the site must be labelled with a 'Hazchem' placard in accordance with the Explosives Regulations. Adequate security needs to be provided for the explosive's storage area, and only those who are authorised for unsupervised access to the area may have means to unlock the explosive storage magazine.</p>	Demolition	NT	<p>According to Table 5 of the DEMP, HR4 will be addressed within the BMSP which has not been developed yet.</p> <p>See Schedule 2, Condition C20.</p>	
HR5	<p>Explosive storage and use areas will be no smoking and not contain naked light, heat or ignition sources. The explosives stock will be rotated to prevent ageing (use on first in-first out basis).</p>	Demolition	NT	<p>According to Table 5 of the DEMP, HR5 will be addressed within the BMSP which has not been developed yet.</p> <p>See Schedule 2, Condition C20.</p>	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
HR6	<p>The asbestos management plan will include information about the following:</p> <ul style="list-style-type: none"> › The identification of asbestos and ACM, for example a reference or link to the Hazmat Audit for the site and locations of signs and labels › Decisions, and reasons for the decisions, safe work procedures and control measures › Procedures for detailing accidents, incidents or emergencies involving asbestos › Workers carrying out work involving asbestos, for example consultation, information and training responsibilities › An Asbestos Management Plan will be prepared 	Prior to removal of asbestos	C	<p>See Schedule 2, Conditions (a) to (c).</p> <p>Section 5 outlines responsibilities and contact details. Sections 7 to 8 outline the identification of asbestos and ACM, and procedures for management of asbestos and synthetic mineral fibre. Section 9 outlines the procedure for managing incidents and Section 10 outlines the emergency procedure.</p>	
HR7	<p>Prior to any demolition or work being carried out that may impact on asbestos, ACM, the responsible individual for management for control of a workplace will:</p> <ul style="list-style-type: none"> › Review the HAZMAT Audit Report—if the register is considered inadequate for the proposed demolition, then it will be revised. › Provide a copy of the HAZMAT Audit Report to the contractor carrying out the demolition or refurbishment work. › Ensure asbestos or ACM that is likely to be disturbed is identified and so far, as is reasonably practicable, removed before the demolition or refurbishment commences. Where this may not be possible e.g., in the stacks, an alternative control will be implemented. Where asbestos cannot be safely removed an asbestos removal control plan will be developed. 	Pre - demolition	C	Refer to Schedule 2, Condition C1.	
HR8	<p>The existing Bushfire Management Plan will be reviewed for adequacy and amended if required to ensure it includes measures to manage onsite fire risks associated with:</p> <ul style="list-style-type: none"> › Hot works resulting in ignition of surrounding vegetation. › Equipment or vehicles being used in long grass. 	During the project	C	Sighted 'Liddell Ash Dam Bushfire Management Plan' (LAD BMP) (AGLM, 2025). The LAD BMP was updated 25/06/25.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	<ul style="list-style-type: none"> › Construction workers smoking or rubbish left at the site. › Storage of combustible materials and liquids on site. › The Bushfire Management Plan will also include measures to manage the potential risk that fire originating offsite close to the projects. 			<p>Section 8.1 of the LAD BMP addresses hot works management measures and equipment use in long grass. Attachment 1 of the LAD BMP addresses smoking restrictions and risk controls for the storage of combustible materials on site.</p>	
HR9	Implement the demolition management measures identified in the Demolition Impact Assessment Report (GHD, 2022c).	Demolition	C	<p>Table 5 of the DEMP contains commitments DM1 to DM11 which represent the relevant demolition management measures identified in the Demolition Impact Assessment Report (GHD, 2022c). Table 5 outlines where the measures are addressed within the DEMP.</p> <p>Refer to Schedule 2, Condition C18 for evidence that the DEMP is being implemented.</p>	
CUMULATIVE					
CI1	The PEMS will include a process to review and update management measures if any other development commences in proximity to the project.	Pre-demolition	C	See Schedule 2 Conditions B1 (d) and (e).	



Appendix D Stakeholder Engagement

From: [Heidi Watters](#)
To: [Sarah Moore](#)
Cc: [Dorian Walsh](#)
Subject: Re: IEA Scoping Request - Liddell Future Use & Enabling Works Project SSD-24937520
Date: Tuesday, 23 September 2025 3:02:28 PM
Attachments: [image185986.png](#)
[Outlook-hq1esuc.png](#)

You don't often get email from heidi.watters@planning.nsw.gov.au. [Learn why this is important](#)

[CAUTION] This email originated from outside of the organisation.

Hi Sarah

Thank you for your email requesting consultation with the scoping for the upcoming IEA.

The IEA must include:

- an assessment of compliance for all conditions of development consent SSD-24937520 (the consent)
- an assessment of the adequacy of each environmental management document required under the consent and
- an assessment of the implementation of each environmental management plan required under the consent.

The following stakeholders are to be contacted for consultation prior to the site inspection:

- NSW Department of Climate Change, Energy, the Environment, and Water
 - Water Group
 - Conservation Programs, Heritage and Regulation (CPHR) Group
- NSW Environment Protection Authority
- Muswellbrook Shire Council

Kind regards

Heidi Watters

Team Leader - North

Compliance - Development Assessment & Sustainability

Department of Planning, Housing and Infrastructure

dphi.nsw.gov.au

516 High St
Maitland NSW 2320



From: [Nirmala Dharmarathne](#)
To: [Sarah Moore](#)
Cc: [Dorian Walsh](#); [Karen Gallagher](#)
Subject: Liddell Future Use & Enabling Works Project SSD-24937520 Independent Audit Consultation
Date: Tuesday, 23 September 2025 2:13:30 PM
Attachments: [image001.png](#)

Some people who received this message don't often get email from nirmala.dharmarathne@epa.nsw.gov.au.
[Learn why this is important](#)

[CAUTION] This email originated from outside of the organisation.

Good afternoon Sarah,

I refer to your email, dated 19 September 2025, to the Environment Protection Authority (EPA) requesting consultation as part of an Independent Environmental Audit for the Liddell Future Use & Enabling Works Project in accordance with Condition D1 of SSD-24937520.

The EPA regulates the Liddell Future Use & Enabling Works Project under Environment Protection Licence's 2122, issued to AGL Macquarie Pty Limited.

The EPA encourages the preparation of audits as useful tools for industry to determine how to meet statutory obligations and identify potential or actual risks towards achieving these obligations.

As a regulatory authority, the EPA administers and regulates statutes for environmental management and protection. As such the EPA is not directly involved in the carrying out of audits to achieve those objectives and does not review or comment on such documents.

As a result, the EPA has no comment to provide for this request but directs you to the EPA's public register at <https://apps.epa.nsw.gov.au/prpoeoapp/> to view the Licences associated notices.

If you have any further questions about this issue, please contact myself on 02 6229 7029 or at info@epa.nsw.gov.au

Kind Regards

Nirmala

Nirmala Dharmarathne, PhD

Operations Officer

Operations

NSW Environment Protection Authority

T 02 6229 7029 | M 0473866941 | www.epa.nsw.gov.au

Working days: Monday to Friday



The EPA acknowledges the Traditional Custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal Elders past and present.

I work on Awabakal Country.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Our ref: OUT25/14299

Sarah Moore
Xenith
Email: sarah.moore@xenith.com.au

5/11/2025

Subject: Liddell Power Station, New England Highway - Independent Environmental Audit – SSD-24937520

Dear Sarah Moore,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, “Independent Audit Post Approval Requirements (2020)” extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.

- Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at water.assessments@dcceew.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alistair Drew".

Alistair Drew
A/ Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water



Appendix E IEA Site Visit Agenda

AGL Macquarie Pty Limited Independent Environmental Audit

Liddell Future Land Use and Enabling Works Project

Agenda for SSD 24937520 Site Inspection 14 October 2025

Table 1 Meeting Invitees

Name	Initials	Title	Company
Matthew Parkinson	MP	Manager Environment and Approvals	AGLM
Imogen Waters	IW	Advisor Environment	AGLM
Andrew Brajliah	AB	Senior Environment Advisor	AGLM
Trescinda Brown	TB	Advisor Environment (Contractor)	AGLM
Chris Druery	CD	Station Closure Manager – Liddell	AGLM
Simon Bradley	SB	Closure Superintendent	AGLM
Ray Wall	RW	Liddell Ash Dam Supervisor	AGLM
Todd Soloman	TS	Director – Major Projects	CMA
Ruan Zaayman	RZ	Project Manager	CMA
Lincoln Tucker	LT	QSE Manager	CMA
Dorian Walsh	DW	Auditor	Xenith
Sarah Moore	SM	Auditor	Xenith

Table 2 Audit Agenda Items

Time	Description	Location	Invitees
9:00am - 9:30am	Opening Meeting <ul style="list-style-type: none"> › Introductions / Housekeeping (MP) › IEA scope and purpose (DW) › Confidentiality arrangements (DW) › IEA process and timing (DW) › Overview of site during the audit period (MP) › Discussion on SSD 24937520 progress to date on construction works (MP) 	Meeting Room	All
9:30am 12:00pm	Compliance Review <ul style="list-style-type: none"> › SSD 24937520 conditions and environmental commitments › EA and Management Plan commitments › Site procedures 	Meeting Room	MP, IW, AB, TB, DW, SM
12:00- 12:30pm	Lunch		

Time	Description	Location	Invitees
12:30- 2:30pm	Site Inspection <ul style="list-style-type: none"> › Review of environmental controls for key areas (including Borrow Pit / HVGT and LPS demolition areas): <ul style="list-style-type: none"> ▪ Amenity management ▪ Active construction areas ▪ Water management, erosion and sediment controls ▪ Biodiversity controls ▪ Laydown areas and storages ▪ Waste and materials management 	Field	MP, IW, AB, DW, SM
2:30- 3:00pm	Compliance Review (continued) <ul style="list-style-type: none"> › Review of any remaining compliance documents › Xenith prepare preliminary findings 	Meeting Room	MP, IW, AB, TB, DW, SM
3:00 - 3:30pm (TBC)	Close Out Meeting <ul style="list-style-type: none"> › Overview of preliminary findings › Confirmation of outstanding information requirements › Confirmation of process for audit completion and reporting 	Meeting Room	All



Appendix F Site Inspection Plates



Plate 1 - Asbestos disposal facility currently under construction



Plate 2 - Excavator desilting the Liddell oil and grit trap within Stage 1 works area



Plate 3 - Demolition stripping out works occurring at the Liddell Power Station



Plate 4 – Watercart in operation around the Liddell Power Station demolition works area



Plate 5 – Watercart in operation around the asbestos disposal facility construction works



Plate 6 – Demolition area being kept watered down



Plate 7 – Fill point in place on the haul road to the asbestos disposal facility construction



Plate 8 – Stockpiles within Stage 1 works area being shaped in preparation for hydroseeding



Plate 9 – Concrete stockpiling for reuse



Plate 10 – Hardwood stockpiling for reuse



Plate 11 – Fuel cart switched off when not in use



Plate 12 – Geofabric lining for drains to exclude clean water from asbestos disposal facility



Plate 13 – Erosion and sediment controls installed for oil and grit trap basin enlargement



Plate 14 – Bund plastic lining to prevent erosion



Plate 15 – Plastic lining for wet dump used for desilting sludge from oil and grit trap material



Plate 16 – Bunded chemicals and fire fighting equipment in store area of Liddell Power Station



Plate 17 – Self-bundled chemical storage area at Liddell Power Station



Plate 18 – Spill kit next to fuel storage tank



Plate 19 – Spill kit in Liddell Power Station demolition work area



Plate 20 – 10,000 L Self bunded diesel storage tank



Plate 21 – Spill kit in Liddell Power Station demolition work area



Plate 22 – Diesel spill at 1,000 L diesel storage tank



Plate 23 – Decommissioned bulk hydrocarbon storage tanks



Plate 24 – Reduce Speed sign on Liddell Power Station access road



Plate 25 – Speed tracker on Liddell Ash Dam access road



Plate 26 – Waste segregation at offices area



Plate 27 – Waste recycling receptacle and fire fighting equipment at workshop area



Plate 28 – Waste segregation at Liddell Power Station demolition area



Plate 29 – Frog exclusion fencing and 'No Go' zones demarcated at Liddell Power Station oil and grit trap works area



Plate 30 – 'No Go' zones demarcated around asbestos disposal facility and haul road construction area



Plate 31 – Work Safety Permits for Liddell Power Station demolition works



Plate 32 – Safety signage going into demolition work area



Plate 33 – Demarcation of restricted area in demolition work area



Plate 34 – Stripping out demolition works at Liddell Power Station



Plate 35 – Temporary asbestos storage facility at Liddell Power Station



Plate 36 – Carpark signage on entry point



Plate 37 – Carpark signage at site offices