Independent Audit Report

Liddell Future Land Use & Enabling Works Project
AGL Macquarie Pty Limited
July 2026

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Document issue approval			
Title	Independent Audit Report		
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Approvals				
	Name	**Position**	**Signature**	**Date**
Prepared by	CC	Senior Environmental Scientist		06/07/2026
Reviewed by	DW	Principal Environmental Scientist		07/07/2026
Approved by	DW	Principal Environmental Scientist		15/07/2026

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

1. INTRODUCTION

1.1 Background

Xenith has been commissioned by AGL Macquarie Pty Limited (AGLM) to conduct the second Independent Environmental Audit (IEA) for the Liddell Future Land Use & Enabling Works Project (SSD 24937520) (the Project). This IEA represents the second required construction audit and first operational phase audit.

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. LPS is located within the Muswellbrook Shire Council Local Government Area (LGA), in an area characterised by established mining and electricity 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 m^3 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 m^3); 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 DPHI '*Independent Audit Post Approval Requirements March 2026*' (IEA Guidelines).

1.2 Audit Team

The IEA was completed by Dorian Walsh (Certified Auditor Certificate Number: 201881) and Chaka Chirozva 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 15 October 2025 (day after date of site visit for the previous IEA) to 5 May 2026 (the day of the site visit for this IEA).

Table 1 IEA Guideline Requirements

<table>
<tr><th>Requirement</th><th>Report Section</th></tr>
<tr><td>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</td><td>This IEA report</td></tr>
<tr><td>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</td><td>Appendix A</td></tr>
<tr><td>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</td><td>N/A;
No direction has been made by DPHI for an additional audit</td></tr>
<tr><td>Audit Frequency:<table><tr><th>Phase</th><th>Initial Independent Audit</th><th>Ongoing Independent Audit Intervals</th></tr><tr><td>Construction</td><td>Within 4 to 12 weeks of the commencement of construction</td><td>At intervals no greater than 26 weeks, or as otherwise agreed to, or directed by, the Planning Secretary.</td></tr><tr><td>Operation</td><td>Within 12 to 26 weeks of the commencement of operation</td><td>At intervals no greater than 3 years, or as otherwise agreed to or directed by, the Planning 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 to, or directed by, the Planning Secretary.</td></tr></table></td><td>Section 2.4
DPHI approved AGLM's request on 04/05/26 (submitted 20/04/26) to combine the construction and operational IEAs. The combined second construction audit (due 14/04/26) and initial operational audit (due 12/09/26) were required to be completed by 14/05/26. This IEA was completed on 05/05/26.</td></tr>
<tr><td>A recommended action must be proposed to address each non-compliance and/or incident identified by the auditor.</td><td>Section 4</td></tr>
<tr><td>The proponent must submit their response to the audit findings to the Department in a separate document to the final Independent Audit Report.</td><td>N/A;
AGLM to complete</td></tr>
<tr><td>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.</td><td>N/A;
AGLM to complete</td></tr>
</table>

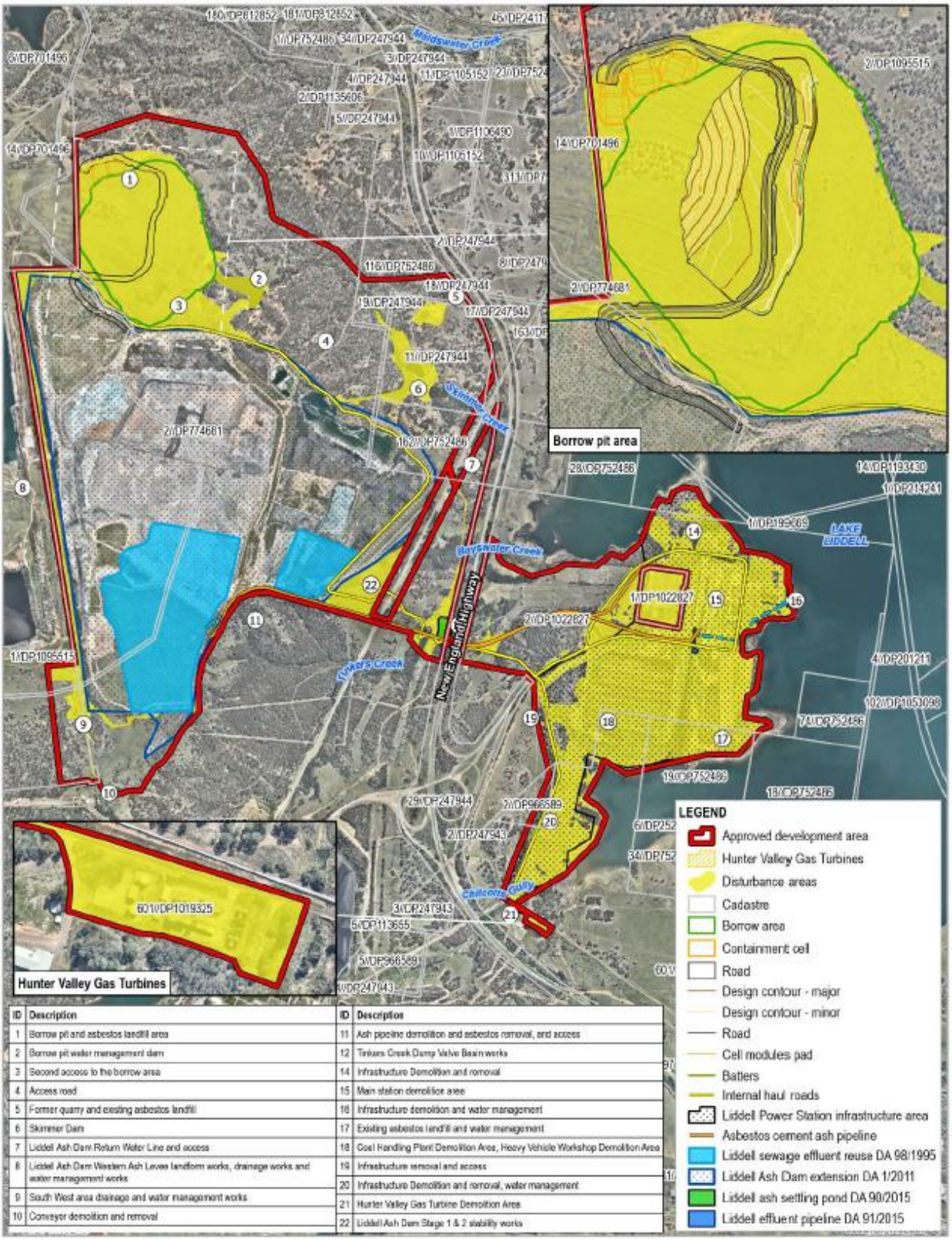

Figure 1 SSD 24937520 Development Layout and Disturbance Areas

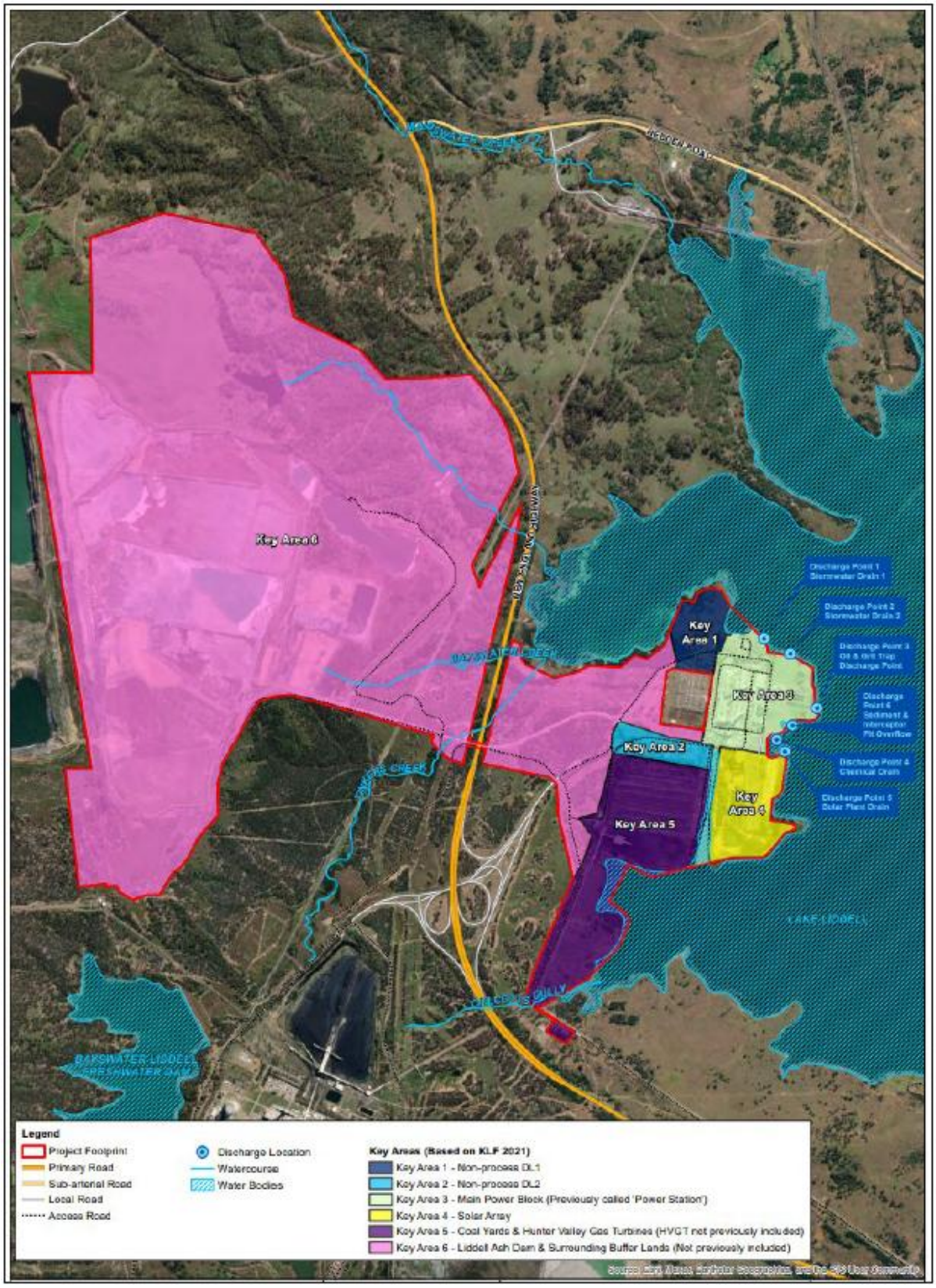

Figure 2 **SSD 24937520 Key Areas**

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;
- 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;
- Preliminary discussions were held with key AGLM personnel regarding the scope of the Xenith site inspection component of the IEA; 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 5 May 2025 and undertaken to review environmental management and performance of active Project works. At the time of the audit, AGLM had progressed a broad range of Stage 1 works, with activities spanning asbestos removal, demolition, civil construction, environmental controls, material handling and supporting site infrastructure. These works were generally found to be carried out under the relevant AGLM permitting, environment and quality controls, with ongoing co-ordination between CMA, AGLM, Ramboll, hygienists, subcontractors and other technical specialists.

Overall, the period since the previous audit has involved substantial progression of Stage 1 works across demolition, asbestos removal, civil construction, chimney blast preparation, environmental controls, and waste and material management at LPS and the emplacement of asbestos material at the asbestos disposal facility.

2.4.1 Opening Meeting

The IEA site inspection completed by Xenith commenced with an opening meeting. Attendees included Dorian Walsh (Xenith), Chaka Chirozva (Xenith), Matthew Parkinson (AGLM Manager Environment and Approvals), Trescinda Brown (AGLM Advisor Environment (Contractor)), Simon Bradley (Closure Superintendent), Kathleen Coy (AGLM Environment Advisor), Tenille Cook (AGLM Environment Advisor). Ruan Zaayman (CMA Project Manager), Lincoln Tucker (CMA QSE Manager) and Rebecca Connell (CMA QSE Advisor).

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));
- Lincoln Tucker (CMA QSE Manager); and
- Ruan Zaayman (CMA Project Manager).

2.4.4 Focused Site Inspection

A focused site inspection was conducted on 5 May 2026 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, Chaka Chirozva, Matthew Parkinson, Trescinda Brown, Kathleen Coy, Tenille Cook 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 DCCEEW Water and MSC during the audit process and in response to the IEA report (see **Appendix D**), with comments provided in **Table 2**. NSW EPA did not raise any issues or matters as part of this audit process or its scope. DCCEEW CPHR did not provide any feedback.

Table 2 Feedback received from IEA consultation

Comment	Response
DCCEEW Water Group	
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.	Noted. This IEA report was completed generally in accordance with the *Independent Audit Post Approval Requirements* (2026). Further detail on the assessment of compliance for all conditions of SSD 24937520 is included in **Appendix C**.

Comment	Response
› 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.	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. Detail on AGLM compliance with these management plans is provided in in **Appendix C**. It is noted that AGLM has commenced consultation activities for the development of the Water Management Plan Stage 2 (WMP S2) for the Project. At the time of the audit, the draft WMP S2 remained under review and had not yet been finalised. Evidence of ongoing consultation with regulatory agencies was sighted during the audit.
› 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.	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). Detail on AGLM compliance with these management procedures is provided in in **Appendix C**.
› Water supply availability is clearly defined for the project.	Water supply availability is detailed in the *'Water Impact Assessment Liddell Future Land Use and Enabling Works Project'* (GHD, 2023) [WIA], provided as Appendix J of SSD 24937520 *'Liddell Future Land Use and Enabling Works Environmental Impact Statement'* (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. Water security for the Project was evaluated for key activities, including Borrow Pit operations and

Comment	Response
	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 concluded that no additional water licences or approvals are required 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.	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 (refer to Schedule 2, Condition A19 in **Appendix C**). Sighted letter from DPHI to AGLM dated 10/05/25 stating that '*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.*' Within the letter, DPHI further states that '*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.*'
› 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.	AGLM have the requirement for annual compliance reporting under Schedule 2, Condition D2 of SSD 24937520. This has not been triggered at the time of audit.
Muswellbrook Shire Council	
› We are aware that AGL have constructed the waste deposition site and haul road, so it would be good if you could check on their sediment and erosion control activities, dust management activities and that the area of disturbance matches the approval. › Various buildings on the site have now been demolished, could you also check that they have decommissioned any on-site wastewater management facilities that are no longer required and that they are recording locations that may contain potential soil contaminants.	AGLM has constructed an Asbestos Disposal Facility. Civil works have progressed across the Main Power Station sediment basin, CHP basin, containment cell, and associated drainage areas, including excavation, batter shaping, compaction, borrow material recovery, coal bay cleaning, swale and drainage construction, spillway works, bund construction, rock stabilisation, wheel wash installation, and erosion and sediment controls. The Main Power Station sediment basin is complete, while the CHP basin is at a functional stage, with further works ongoing to increase storage capacity and improve surface water management (see Plate 10 of Appendix F). Competent sediment and erosion control measures were observed to be in place across multiple work

Comment	Response
	areas inspected during the site visit. Dust suppression and management controls were also seen to be being implemented in accordance with the relevant approval requirements (see Plates 3, 6, 25, 27, 28 and 31 of **Appendix F**) Where possible, AGLM has upgraded and retained existing on-site water management infrastructure for the Project, including sediment basins, diversion drains, and associated drainage and erosion controls. No water management infrastructure has been decommissioned to date. AGLM key personnel maintain a register of all contaminated materials removed from site, recording the material type, source, quantity, and disposal location. No unexpected, contaminated soils have been identified during the Project to date.

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 5 May 2026. 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 3.6** and **Appendix C**.

Table 3 Summary of Compliance

Document	C	NC	NT	Note	Total
SSD 24937520	140	11	118	11	280
SSD 24937520 Statement of Commitments (SoC)	76	0	25	0	101

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

AGLM has completed several of the recommendations identified during the initial SSD 24937520 IEA. These completed items are presented in **Table 4**.

Table 4 Actions from the previous IEA

Ref	Non-Compliance	Action	Due Date
SSD 24937520			
Schedule 2, Condition A2	Non-compliances (NC) with SSD 24937520 conditions were identified during this IEA (see below).	No action required.	N/A, see below.
Schedule 2, Condition B13	Two chemical pods were observed to be not on bunds in the temporary asbestos storage facility 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.	Inspect chemical storage pods at the temporary asbestos facility and ensure all pods have self-bunding. Deliver a Toolbox Talk that communicates spill containment and cleanup requirements to Project.	Completed on 31/01/2026.
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.	AGLM correctly marked the Stage 1A WMP document to a "final version". The updated version is published on Project website.	Completed on 19/02/2026.
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 *DPHI Hazardous and Offensive*	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 Hazardous and Offensive	Completed on 28/02/2026.

Ref	Non-Compliance	Action	Due Date
	Development Application Guidelines – Applying SEPP 33.	Development Application Guidelines – Applying SEPP 33.	
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.	AGLM is conducting regular toolbox talks with contractors to reinforce the importance of adhering to flagged 'No-go' zones. These sessions are scheduled regularly to ensure all new starters receive this training.	Completed. This is ongoing and is part of the induction package process for new starters.
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.	AGLM reviewed 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. The Compliance tracker clearly shows reports/notifications and when they are due to the Secretary.	Completed on 31/01/2026.
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.	Refer to action under Schedule 2, Condition C15.	Refer to action under Schedule 2, Condition C15.
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	Identify Pine Donkey Orchids within and nearby (within 10 metres) the 'Project Footprint' of SSD 24937520 and install	The orchids were identified during the initial BDAR survey in 2021 and subsequently flagged by EMM ecologists in early

Ref	Non-Compliance	Action	Due Date
	time of the audit that Pine Donkey Orchards identified were fenced prior to commencement of the demolition/ construction.	exclusion fencing with 'No Go' zone signs attached.	2026. Fencing and signage, originally scheduled for 30/04/2026, will now be installed once all required approvals for works at the identified locations have been obtained.
BIO10		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).	The BMP was updated in December 2025, with relevant information included in Sections 1.8.2 and 2.1.2. The BMP Revision History table should be updated accordingly to reflect this amendment.
WQ14	There is no commitment within the Soil and Water Management Sub Plan (SWMSP) to use 'amphibian friendly' flocculants during dewatering.	AGLM updated the Soil and Water Management Sub Plan to outline AGLM commitments in relation to using amphibian friendly flocculants in Project sediment basins. A copy of the Liddell Power Station Soil and Water Management Plan (Version 2.0), dated 07/04/2026, was sighted during the audit.	Completed on 07/04/2026.
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	AGLM updated the NVMP to include the notification to stakeholders a minimum of seven calendar days prior to the start of works.	Completed on 03/02/2026.

Ref	Non-Compliance	Action	Due Date
	are expected to be noisy, their duration, what is being done to minimise noise and when respite periods will occur.		
SE1	The Stakeholder Engagement Strategy (SES) does not include procedures for communication of housing demand to Project stakeholders.	AGLM has completed an update of the Stakeholder Engagement Strategy (SES) to outline measures for communicating with stakeholders regarding housing demand.	Completed on 16/12/2025.
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.	AGLM completed the recommendation to update 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. Sighted DEMP dated 13/03/2026; Section 3.3.3 and Section 5.8 of the DEMP were updated.	Completed on 13/03/2026.

3.6 Non-Compliances During the Audit Period

Table 5 lists the non-compliances identifies 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 5 IEA Non-Compliances

Ref	Non-Compliance
SSD 24937520	
Schedule 2, Condition A2	Non-compliances (NC) with SSD 24937520 conditions were identified during this IEA.
Schedule 2, Condition A12(a) – A12(e)	Evidence was not available to indicate that AGLM surrendered the nominated Council development consents within 12 months of commencement of the development (i.e. by 29 March 2026) as required by Condition A12.
Schedule 2, Condition B13, Condition C18	A non-compliance with surface water quality criteria for Total Suspended Solids (TSS) occurred on 26 November 2025 when the Coal Handling Plant (CHP) Sediment Basin overtopped following a rainfall event of approximately 40.4 mm, resulting in a discharge to Lake Liddell via the licensed discharge point.
Schedule 2, Condition B30	AGLM sought an extension of time to retire the credits for Hunter Valley Delma on 27/10/25. Sighted letter from DPHI dated 01/12/25 to AGLM granting an extension of time to retire for the HV Delma credits until 30/01/26. AGLM did not retire the Hunter Valley Delma were not retired prior to the 30/01/26 as approved by the Secretary.
Schedule 2, Condition D7	AGLM updated selected environmental management plans in response to recommendations from the previous Independent Environmental Audit (IEA) and following the surface water criteria exceedance recorded in November 2025. However, the revision tables for the DEMP, EMS S1, BMP, SWMSP, WMP S1, and DSMP published on the Project website do not record the specific minor amendments made in response to the IEA and the water quality exceedance incident.
Schedule 2, Condition D8	
SSD 24937520 EIS Commitments	
None recorded during this audit period	

3.7 Environmental Performance

3.7.1 Site Inspection Summary

The site inspection of 5 May 2026 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, 30 of **Appendix F**). The boundaries of approved disturbance areas for the Project were clearly marked in the field at the time of audit (see Plates 13, 24, 29 and 30 of **Appendix F**) and evidence that regular inspections of these controls are carried out by the Project contractor was available.

Evidence provided by AGLM and the Project contractor (CMA) also demonstrated 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 Stage 1 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), Blast Management Sub-Plan and SWMSP.

Non-compliances and recommendations identified in relation to Project management plans are listed in **Table 5** and **Table 6** respectively.

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 segregated waste stockpiles sighted at site. 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 7, 8, 9, 15, 22, 23, 26, 30 and 32 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 monthly waste register and removal dockets from the AGLM-appointed waste contractor are being retained.

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 LAD 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 erosion and sediment controls were in place around stockpiles and the perimeter of the Stage 1 disturbance footprint at the time of audit (see Plates 3, 6, 10 and 25 of Appendix F). AGLM has designed the asbestos storage facility containment cells to exclude as much clean water as practicable and constructed diversion drains around the cells, with captured water directed to sediment basins and ultimately to the Borrow Pit sediment dam. During site inspection, concrete matting and rock armouring was seen to have been installed on drains to support long-term erosion protection (see Plate 3 of Appendix F). Audit evidence reviewed comprised Erosion and Sediment Control reports dated 12 November 2025, 19 January 2026, 9 February 2026, and 26 February 2026; the Fundamentals of Erosion and Sediment Control Ponds for Asbestos Disposal Facility (16 February 2026); and the AGLM Liddell Ash Dam Closure Containment Cell Design Sediment and Erosion Control Plan (GHD, 2025).

Collectively, this documentation establishes a structured approach to erosion and sediment management, including the implementation of sediment dams, earthen bunding, diversion drains, geofabric erosion protection, and defined drainage pathways surrounding containment cells. Documents provided indicate that Project erosion and sediment control works are generally carried out in accordance with Landcom (2004), the SWMP, and the ESCP.

During the audit period, AGLM reported to the NSW EPA an exceedance of the surface water concentration limit for TSS at EPL 2122 Point 17 which occurred on 26-27 November 2025 (see **Table 5** and **Appendix C**).

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.

Plant and equipment operating at the LPS site were found to be generally maintained and operated in a safe, serviceable and efficient condition, as evidenced by both documentation review and site observations. Records sighted during the audit demonstrated a structured and systematic approach to plant inspection, maintenance, and monitoring. This included a current Plant and Equipment Register (LPS V1, dated 13/03/2026) detailing inspection schedules, along with numerous completed daily plant inspection records across a range of equipment, including bobcats, hook trucks, bin trucks, and excavators, indicating routine pre-operational checks were being undertaken. Supporting procedures, such as the Delta Group Mobile Plant Procedure, clearly outline requirements for all powered mobile plant to be maintained in a safe and fit-for-purpose condition and provide guidance on inspection processes. Additional documentation, including scheduled maintenance reports (e.g. 1,000-hour service records), environmental monitoring data, and calibration certificates for dust monitoring units and weather station instrumentation, further confirmed that maintenance and monitoring activities are implemented in accordance with established requirements.

Operator competency was also substantiated through a comprehensive set of training, authorisation, and verification records. These included site authorisations and verified competencies (VOCs) for a range of plant and operational activities such as excavator operation, skid steer use, and oxy-acetylene cutting, as well as completion of mandatory training modules covering lead awareness, asbestos awareness, demolition, environmental management, and general site induction. Contractor compliance with induction requirements was supported by the MyRapid induction register, and work practices were further evidenced by task observation reporting, including scaffolding activities observed to be undertaken appropriately. During the site inspection, plant and equipment in operation were observed to be functioning effectively, with no visible defects or non-conformances identified. Overall, the evidence indicates that the site has implemented and is maintaining an effective framework for plant maintenance, inspection, and operator competency management.

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 27 and 28 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, 27 and 28 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. Aircheck air sampling equipment were also installed in the perimeter of the asbestos disposal facility (see Plate 2 of **Appendix F**).

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 Stage 1 disturbance boundary is clearly delineated in the field, with weekly inspections undertaken to verify that environmental controls from Stage 1 Biodiversity Management Plan (BMP S1) are being implemented, including evidence of pre-clearing biodiversity inspections and monitoring. Pre-clearance works were undertaken with a Fauna Spotter-Catcher present. Fauna encountered during clearing were either safely relocated or allowed to disperse into adjacent suitable habitat in accordance with the BMP.

AGLM reinforces 'no-go' exclusion zones through toolbox talks, environmental walks and contractor inductions. At the time of inspection, flagging and signage delineating 'no-go' zones were observed around active disturbance areas (see Plates 22, 23 and 26, **Appendix F**), and site communications included biodiversity reminders such as the LPS demolition contractor pre-start notice stating: "Watch out for wildlife on all roads".

Discussions with AGLM key personnel confirmed that during the audit period, an EMM ecologist surveyed Donkey Orchid (*Diuris tricolor*) locations and temporarily delineated exclusion areas using purple flagging tape (see Plate 24, **Appendix F**). Under the BMP, *Diuris tricolor* individuals within 10 m of the Development Site are required to be protected through exclusion fencing and 'no-go' signage; however, permanent fencing and signage had not yet been installed at the time of audit, indicating that BMP measures were not fully implemented. AGLM key personnel confirmed that no disturbance or works were expected to occur within the exclusion areas, and that fencing and signage were scheduled for installation the week following 15/05/2026. All *Diuris tricolor* individuals are located outside the Project disturbance footprint but within the broader Project Area, except for the northern population within the Stage 3 disturbance footprint, where works have not commenced and will not proceed until relevant approvals for subsequent Project stages are obtained.

3.7.8 Visual Amenity and Lighting

Discussions with key AGLM personnel confirmed that Project construction and demolition 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 inspection.

The colour and layouts of the 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). GHD completed attended noise monitoring on 4 December 2025. Monitoring results show that LPS was complying with the noise limits at the time, with no noise discernible at locations R21 and R28.

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) had been developed prior to the commencement of works. 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. At the time of audit, AGLM had not prepared a Rehabilitation Management Plan. On 27 March 2026, DPHI acknowledged AGLM's request for an extension of time to submit the Liddell Ash Dam Closure and Rehabilitation Plan and Rehabilitation Management Plan under Conditions 30 and 38 of SSD-24937520, which were due on 28 March 2026. DPHI acknowledged the need for additional consultation with NSW Government agencies due to site contamination complexities and noted the proposed revised submission date of 28 September 2026.

Discussions with AGLM confirmed that no progressive rehabilitation has been undertaken. However, topsoil stockpiles from Stage 1 construction areas were being reshaped and were scheduled for hydroseeding following the audit site inspection to minimise the potential for dust generation.

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.

3.7.13 Contamination

Contamination was assessed through a combination of desktop review, site inspection and interviews with personnel. The desktop review confirmed that NSW Environment Protection Authority (EPA) Accredited Site Auditor Jason Clay (Site Auditor) has continued to be engaged for the Project, as documented in the DEMP. During the audit period, the Site Auditor reviewed key contamination materials documentation and prepared advice including *Stockpile Coal Bay 7 Assessment – Sampling and Analysis Quality Plan (SAQP), Revision 4.0;* Technical Specification and Construction Quality Assurance (CQA) Report – Asbestos Containment Cell 3; Ramboll Concrete Sampling Trial – Sampling, Analysis and Quality Plan (Draft); Technical Specification and CQA Report – Asbestos Containment Cell 3 (Final).

The review also considered specialist inputs such as waste classification by Ramboll, noise monitoring by GHD Pty Ltd, and regulatory review comments from the NSW EPA and DPHI.

Evidence provided indicates that AGLM is generally implemented effective contamination controls including asbestos and waste management procedures, waste tracking, segregation of waste streams, soil classification, bunded chemical storage, spill response, erosion and sediment controls; and reuse of site water for dust suppression. Examples of controls viewed during the site inspection are included in Plates 1, 4, 6, 11, 12, 14 and Plate 27 of **Appendix F**.

However, residual risks remain associated with hazardous materials, water management and waste classification Monitoring data indicated exceedances of EPL 2122 limit conditions at the Coal Handling Plant (EPA Monitoring Point 17) sediment basin for suspended solids, chromium, chlorine, chloride and pH. AGLM should continue to closely monitor contamination risks at the site to ensure they do not exceed licensed limits.

Overall, contamination management systems were considered broadly effective and largely compliant.

3.7.14 Environmental Incidents

Discussions with key AGLM personnel confirmed there was one incident reportable under SSD 24937520. This involved an exceedance of the surface water quality TSS discharge limits from the Coal Handling Plant Sediment Basin on 26 - 27 November 2025. Heavy rainfall caused the basin to overtop prior to completion of planned capacity upgrades, resulting in a TSS concentration of 176 mg/L, exceeding the allowable limit of 50mg/L. At the time, the basin had not been enlarged in accordance with the Soil and Water Management Sub Plan, and the DEMP had not been fully implemented. AGLM proactively reported the TSS as a non-compliance, and DPHI subsequently determined that the event constituted an incident under Schedule 2, Condition D5 of SSD 24937520.

3.7.15 Environmental Complaints

Discussions with key AGLM personnel and a review of the publicly available Complaints Register 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 5**. 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 6**.

Table 6 IEA Recommendations

Ref	Recommendation Description
SSD 24937520	
Schedule 2, Condition A9	It is recommended that the CMA Daily Pre-Start Forms are updated to record the time of each pre-start meeting.
Schedule 2, Condition A12	It is recommended that AGLM continue to consult with MSC regarding the surrender of existing development consents referred to in Schedule 2, Condition A12 of SSD 24937520.
Schedule 2, Condition A12 Schedule 2, Condition B1	It is recommended that AGLM publish the Stage 2 EMS on the Project website.
Schedule 2, Condition B13 Schedule 2, Condition C18	It is recommended that AGLM continue to complete and document all pre- and post-rainfall inspections of erosion and water management control structures, as described in the approved SWMP.
Schedule 2, Condition B18	It is recommended that AGLM regularly review the 'Hazardous Substance Register' to note the approximate quantities of all potentially hazardous materials present on site, or AGML thresholds for not recording these quantities.
Schedule 2, Condition B30	It is recommended that AGLM maintain its 'Compliance Register' and ensure timely notification is provided to the Secretary where a compliance obligation is unlikely to be met and a further extension may be required.
Schedule 2, Condition D5	It is recommended that AGLM review incident reporting procedures for the Project, to ensure that these align with the requirements of Schedule 2, Condition D5 and the definition of an 'Incident' under SSD 24937520.
Schedule 2, Condition D7	It is recommended that the 'SSD2 Management Plan Version Tracker' is updated to record: › The dates when internal and external reviews of each SSD 24937520 management document are completed; and › The date at which each document version is published on the Project website, including the applicable publication date, and/or provide a clear reference to the location where the latest copy is retained.

Ref	Recommendation Description
Schedule 2, Condition D8(i)	It is recommended that the AGLM 'Liddell Future land Use and Enabling Works' webpage includes a link to the consolidated 'AGLM Macquarie Complaints Register 2026'.
Schedule 2, Condition D8(m)	It is recommended that AGLM update the documents on the Project website to capture minor reviews completed and ensure the latest versions are published.
SSD 24937520 EIS Commitments	
SC3	It is recommended that AGML record the date and application details for hydroseeding application in the Project stockpile register.
WQ14	It is recommended that AGLM publish the latest version of the SWMP on the Project website.
GG3	It is recommended that AGLM publish the revised DEMP on the Project website

Appendix A Endorsement of IEA Team

Department of Planning, Housing and Infrastructure

Reference: SSD-24937520-PA-56

Matthew Parkinson
Senior Manager Environment – Transition and Construction
AGL Energy Ltd
05/05/2026

Sent via the Major Projects Portal only

Subject: Liddell Future Landuse Project - Independent Auditor Proposal

Dear Mr Parkinson

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an independent audit of the Liddell Future Landuse Project, submitted to NSW Department of Planning, Housing and Infrastructure on 1 May 2026 as required by Schedule 2, Condition D1 of development consent SSD-24937520.

The Department 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.

As nominee of the Planning Secretary, I endorse the following independent audit team:

- Dorian Walsh (Lead Auditor)
- Chaka Chirozva (Assistant Auditor)

The above audit team is approved for the duration of construction and concurrent operational phases of the development. However, the Department 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 Independent Audit must be prepared, undertaken, and finalised in accordance with the consent and the Department's *Independent Audit Post Approval Requirements* (2026). Failure to meet these requirements will require revision and resubmission.

The Lead Auditor must attend the site inspection component of the audit.

The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

This correspondence must be appended to the Independent Audit Report.

Should you wish to discuss this matter, please contact Jennifer Sage, Senior Compliance Officer on 02 6575 3420 or email compliance@planning.nsw.gov.au

Yours sincerely

Heidi Watters
Team Leader - Hunter
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.	C	Audit period is within the approved limit of consent.	
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	C	Waste disposal was occurring at the facility during the audit period. The facility is fenced off and only authorised personnel are permitted access (see	

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.		**Plate 1**). Sighted Waste Transport Register for period 12/03/2026 to 20/04/2026 tracking the movement and disposal of loads of hazardous materials, specifically Asbestos and SMF (Synthetic Mineral Fibre) waste from Project demolition and remediation activities. A total of 796.6 tonnes was recorded in the register as being deposited within that period.	
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 Liddell Ash Dam 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 during the audit period 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	TB (pers comms) confirmed no construction, or maintenance has	

Cond	Condition Text	Status	Evidence	Recommendations
	Table 1 – Operating hours **Activity** / **Permissible Hours** Development activities- other than as identified separately in this table. — • 7 am to 6 pm Monday to Friday • 8 am to 6 pm Saturday • At no time on Sundays or public holidays Blasting — • 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		occurred outside of work hours, and development of an Out of Hours Procedure (OoHP) has not been triggered. Sighted 'Liddell Power Station Demolition Induction' module required to be completed by the project workforce, which contains a page informing the hours of operation in accordance with Table 1 of SSD 24937520. The standard operating hours are noted as 7am - 3:30pm from Monday to Friday, 7am -to 3:30pm on Saturday, with the site closed on Sundays. MP (pers comms) confirmed that CMA [Project Contractor] typically undertake a team pre-start at 6:30am, followed by a Daily Site Diary which contractors are required to fill out prior to work commencing at 7:00am. Sighted completed board in Maintenance Workshop showing weather information, permits issued, their duration, contractors on sight (see **Plate 1**). Sighted examples of completed CMA Daily Pre-Start Forms for the following dates: 05/01/26, 06/01/26, 07/01/26, 08/01/26 10/01/26, 12/01/26, 13/01/26, 14/01/26, 15/01/26, 16/01/26, 17/01/26, 19/01/26, 20/01/26, 21/01/26, 22/01/26 27/01/26, 29/01/26, 30/01/26, 31/01/26.	**It is recommended that the CMA Daily Pre-Start Forms are updated to record the time of each pre-start meeting.**
NOTIFICATION OF COMMENCEMENT				

Cond	Condition Text	Status	Evidence	Recommendations
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	Deemed compliant in previous IEA.	
	b) commencement of construction under the consent;	C	See Schedule 2, Condition A10 (a) above.	
	c) commencement of demolition under the consent; and	C	See Schedule 2, Condition A10 (a) 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) 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 no requests for staging were made during this 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: a) DA1/2011;	**NC**	**AGLM did not surrender the nominated Council development consents within 12 months of commencement of the development (i.e. by 29 March 2026) as required by Condition A12.** Viewed letter from AGLM to Muswellbrook Shire Council (MSC) dated 11 May 2026, providing a status report on the five existing development consents referred to in Condition A12 of SSD 24937520 and formally requesting the surrender of each. The AGLM letter of May 2026 also requested written confirmation from MSC once the surrender process had been	**It is recommended that AGLM continue to consult with MSC regarding the surrender of existing development consents referred to in Schedule 2, Condition A12 of SSD 24937520.**

Cond	Condition Text	Status	Evidence	Recommendations
			completed, to demonstrate compliance with this condition.	
	b) DA98/1995;	**NC**	See Schedule 2, Condition A12(a).	
	c) DA90/2015;	**NC**	See Schedule 2, Condition A12(a).	
	d) DA91/2015; and	**NC**	See Schedule 2, Condition A12(a).	
	e) DA51/86.	**NC**	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 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.*	Note	Note only.	
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.	C	MP (pers comms) confirmed that the Project is operating under SSD 24937520 conditions.	
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	TB (pers comms) confirmed 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	

Cond	Condition Text	Status	Evidence	Recommendations
			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	Viewed letters received from regulatory agencies in response to draft Project management documents submitted during the reporting period, including: › DPHI letter dated 02/12/25 confirming approval of the Test Blast Sub-plan (TBSP) submitted by AGLM in accordance with Schedule 2, Condition C20 of SSD 24937520; › DPHI letter dated 12/01/26 confirming approval of the Chimney Stack Blast Sub-plan (CSBSP) submitted by AGLM in accordance with Schedule 2, Condition 20 of SSD 24937520. The DPHI letter notes that EPA were consulted during the preparation of this plan; › DPHI letter dated 15/02/26 confirming approval of the revised 'Test Blast Sub-plan' (Test Shot #2) submitted by AGLM in accordance with Schedule 2, Condition C20 of SSD 24937520. This Plan is an updated version of the TBSP referred to above; › DPHI letter dated 05/03/26 confirming approval of the Environmental Management Strategy Stage 2 (EMS S2) submitted by AGLM in accordance	

Cond	Condition Text	Status	Evidence	Recommendations
			with Schedule 2, Condition B1 of SSD 24937520; › EPA letter to DPHI dated 22/04/26 providing review comments on the Draft Water Management Plan - Stage 2 (WMP S2) for the Project. TB (pers. comm) confirmed that the draft WMP S2 has been provided to the relevant agencies via the Major Projects Portal for consultation and will be submitted to DPHI once all agency feedback has been incorporated. At the time of the audit, only the EPA had provided feedback, identifying the need to update water management arrangements and obtain relevant EPL approvals for proposed water reuse and discharge pathways, supported by a Skimmer Dam Discharge Assessment addressing discharge characteristics, potential impacts and monitoring requirements. The EPA also highlighted the need to maintain effective water containment, manage altered drainage patterns and implement measures to minimise the risk of uncontrolled discharges. AGLM will address this feedback in the revised WMP S2.	
	b) the outcome of that consultation, including how the issues have been addressed in the subject document; and	C	AGLM consulted with relevant stakeholders during the preparation of all management plans developed and/or approved during the audit period. Relevant details are as follows:	

Cond	Condition Text	Status	Evidence	Recommendations
			For the TBSP, consultation was undertaken with the DPHI and SafeWork NSW during development and finalisation of the sub-plan. Records of consultation are provided in Appendix N of the TBSP. The CSBSP requires consultation with relevant landowners or infrastructure owners where blasting is predicted to impact sensitive receivers. Section 7.26 of the CSBSP notes that the environmental effects assessment (Section 7.18) predicted blast noise and vibration levels would remain below applicable criteria at all sensitive receivers due to the substantial buffer distance surrounding the power station. Accordingly, consultation with off-site receivers was not required. Notwithstanding this, consultation and notification activities would be undertaken prior to the blast event. During site inspection, RZ (pers. comm.) confirmed that consultation activities were underway for the blast scheduled in late May 2026. A Client Pre-Blast Checklist included in Appendix R of the CSBSP identifies stakeholders to be notified and the notification methods to be used prior to the blast. The Test Blast Sub-plan (Test Shot #2), dated January 2026, was prepared by a suitably qualified and experienced person and includes a requirement for consultation with relevant landowners or infrastructure owners where assessments predict impacts to sensitive receivers.	

Cond	Condition Text	Status	Evidence	Recommendations
			This requirement was not triggered, as assessments confirmed minimal potential for off-site impacts. A DPHI approval letter dated 15 January 2026 was provided for the Test Blast Sub-plan (Test Shot #2). The sub-plan was also sighted, confirming that the test blast sub-plan contained the information required by the conditions of approval. It was noted that for the EMS S2, AGLM submitted the draft plan to DPHI and undertook consultation with relevant government agencies during its preparation. Evidence sighted included correspondence from DPHI acknowledging receipt of the draft EMS S2 and their letter of approval of the EMS S2 of 05/03/2026. At the time of audit, the approved EMS S2 had not been published on AGLM's website, indicating a failure to ensure timely public availability of the approved EMS documentation (See Schedule 2, B1). During the audit period, the EPA reviewed the draft WMP Stage 2 and provided comments seeking additional information to be included in the plan around proposed controlled discharges, runoff management, mitigation of uncontrolled discharge risks, maintenance of freeboard levels, contingency planning for rainfall events, and any required amendments to EPL 2122. AGLM subsequently revised the	

Cond	Condition Text	Status	Evidence	Recommendations
			WMP to address the EPA's comments prior to finalisation.	
	c) details of any disagreement remaining between the party consulted and the Applicant, and how the Applicant has addressed the matters not resolved.	C	Consultation with relevant agencies was completed, with no objections or disagreements being raised. See Schedule 2, Condition A16 (b).	
APPLICABILITY OF GUIDELINES				
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	TB (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	The TBSP was updated during the audit period in consultation with DPHI and approved on 15/02/26 as TBSP (Test Shot #2). The EMS Stage 2 was prepared and approved during the reporting period, and consultation commenced for WMP Stage 2. This is consistent with Schedule 2, Condition A19(a), which permits environmental management documents required under the consent to be staged, combined, or updated subject to the approval of the Planning Secretary.	

Cond	Condition Text	Status	Evidence	Recommendations
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: a) consultation being undertaken with all parties required to be consulted in the relevant condition in this consent; and/or	NT	TB (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)).	
	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: 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 Project-related damage to public infrastructure has not occurred during the audit period.	
	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				

Cond	Condition Text	Status	Evidence	Recommendations
A24.	All plant and equipment used by the development, or to monitor the performance of the development must be: a) maintained in a proper and efficient condition; and	C	Sighted examples of maintenance records for Project plant and equipment during the audit period, including: › Plant and Equipment Induction dated 03/11/25 for Plant ID CRM-0540-MC-9 – Pulveriser › Plant and Equipment Induction dated 10/11/25 for Plant ID Wt016 Watercart noting current hours 936 and next service as 1000hrs › Operator Daily Induction Plant Inspection dated 08/12/25 for Plant ID 3839 Plant ID 3839 Bobcat T40.180 Telehandler showing hours of previous service as 3000hrs and upcoming service as 3500hrs Operation Daily Induction Plant Inspection dated 08/12/25 for › Operator Daily Plant Inspection Record for Bobcat dated 15/12/25; › Operator Daily Induction Plant Inspection dated 12/01/26 for Isuzu Bin Truck Plant ID XU54WQ › Operator Daily Induction Plant Inspection dated 13/01/26 for Volvo Hook truck Plant ID XN36NS. › Operator Daily Induction Plant Inspection dated 19/01/26 for Isuzu Bin Truck Plant ID XU54WQ › Operator Daily Induction Plant Inspection dated 19/01/26 for Hitachi Digger Plant ID 32340.	

Cond	Condition Text	Status	Evidence	Recommendations
			› Operator Daily Induction Plant Inspection dated 21/01/26 for Volvo Hook truck Plant ID XN36NS[DW3.1]. › Operator Daily Induction Plant Inspection dated 27/01/26 for Isuzu Bin Truck Plant ID XU54WQ › Plant Induction dated 30/01/26 for Plant Unit173.C 12 Tonne Forklift with 5072 hours › Operator Daily Induction Plant Inspection dated 02/02/26 for Volvo Hook truck Plant ID XN36NS. › Operator Daily Induction Plant Inspection dated 02/02/26 for Isuzu Bin Truck Plant ID XU54WQ › Scheduled (500 hours) maintenance Report dated 25/02/26 for Plant CRO77 Trommel › Scheduled (1000 hours) Maintenance Report dated 09/03/26 for Plant 32384 8T Yanmah Excavator › Scheduled (500 hours) Maintenance Report dated 10/03/26 for Plant 3158 CAT Backhoe › A 'Plant and Equipment Register LPS V1 dated 13/03/2026' showing equipment inspection schedules.	
	b) operated in a proper and efficient manner.	C	Sighted the following example documents demonstrating operator training and competency: › Sighted Site Induction Module from Rapidglobal dated 03/03/2026;	

Cond	Condition Text	Status	Evidence	Recommendations
			› 'Liddell Power Station Lead Awareness Training Module 1 from Rapidglobal dated 03/03/2026; › Liddell Power Station Asbestos Awareness Module 1 from Rapidglobal dated 03/03/2026; › Liddell Power Station Demolition Induction Module 1 from Rapidglobal dated 03/03/2026 › Liddell Power Station Environmental Induction Module 1 from Rapidglobal dated 03/03/2026; › My Rapid – Induction Register with list of general contractors and status showing that contractors have completed their relevant site inductions. › Sighted AUDR-2887 - Task Observation Report for Scaffolding dated 12/02/26. Scaffolding was being erected in a proper manner. › Completed Verification of competency (VOC) and completed evidentiary exam for Skid Steer dated 17/02/26; › Completed Working at Heights Verification of Competency for CMA worker dated 24/02/26; › Completed Verification of Competency and evidentiary exam for Scissor Lift dated 24/02/26; › Completed Verification of Competency and Evidentiary Exam for Oxy	

Cond	Condition Text	Status	Evidence	Recommendations
			Acetylene Cutting for a CMA worker dated 24/02/26; › Completed Verification of Competency and evidentiary exam for Elevated Work Platform 10 for a CMA Worker dated 24/02/26; › Completed Verification of Competency and evidentiary exam for Forklift for a CMA Worker dated 24/02/26; › Statement of Attainment for a CMA worker for the Unit RIIMPO323E Conduct Civil construction dozer operations issued on 16/09/2020 by Tahbony Training and Assessment Pty Ltd, which is a registered Training Provider (No: 91762). AGLM maintains records in Rapidglobal demonstrating that personnel have completed all required site inductions. Plant and equipment in operation during the audit site inspection were observed to be operating in a proper and efficient manner (see **Plate 21**, **Plate 12** and **Plate 27**).	
SCHEDULE 2: PART B – GENERAL ENVIRONMENTAL CONDITIONS				
ENVIRONMENTAL MANAGEMENT STRATEGY				
B1.	An **environmental management strategy** must be prepared for the development. The strategy must: a) be submitted for approval to the Planning Secretary prior to the commencement of construction;	C	Deemed compliant at last Audit. The EMS for Stage 1 was approved by DPHI on 23/05/25 via letter, two months prior to commencing construction. During this audit period, AGLM has also prepared	**It is recommended that the Stage 2 EMS is published on the Project website.**

Cond	Condition Text	Status	Evidence	Recommendations
			Stage 2 Environmental Management (Rev. 3; February 2026) (EMS S2) which was approved by DPHI on 05/03/2026.	
	b) describe the environmental management context and outline the scope of the strategy, including: i. the relationship of the strategy to other environmental management documents;	C	Section 3 of the EMS S2 addresses this requirement. Table 1 of the EMS S2 outlines the relevant environmental management plans and Statement of Commitments addressing water management, biodiversity, noise and vibration, and traffic management.	
	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 3 and Table 4 of the EMS 2 contains the relevant consent conditions. Table 8 of the EMS S2 outlines objectives and performance criteria. Section 3.3 of the EMS S2 outlines the relevant licences and approvals.	
	iii. sensitive receivers;	C	Sensitive receptors are described in Section 2.2.2 and shown on Figure 4 of the EMS 2 and Figure 4 of EMS S2.	
	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	Appendix 2 of the EMS S2 shows the consultation completed with the DPHI. Approval letter of the EMS 2 is included in Appendix 2.	
	v. detailed plans of the development location and development, sensitive receivers and environmental monitoring locations;	C	Figure 5 of the EMS S2 shows the monitoring locations.	
	c. list the role and responsibility of all key personnel and contractors involved in the environmental management of the development;	C	Table 7 of the EMS S2 outlines the roles and responsibilities of key personnel.	

Cond	Condition Text	Status	Evidence	Recommendations
	d. include an environmental risk assessment of the development activities and specific risk management controls and mitigations to: 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 in Table 8 of the EMS S2.	
	Note: *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.*	Note	Note only.	
	e. include processes to review the environmental risk assessment annually and determine whether the measures implemented to manage the risks are effective;	C	Section 4.5 of the EMS S2 states that the risk assessment will be reviewed annually.	
	f. 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 S2 outlines the adaptive management process.	
	g. include a clear plan depicting all the monitoring to be carried out under the conditions of this consent;	C	Figure 5 of the EMS S2 shows Project monitoring locations.	
	h. include processes to report and review environmental performance that: i. provides for an annual review of the environmental risk assessment with consideration of the evaluation findings;	C	Section 4.5 of the EMS S2 outlines that the risk assessment will be reviewed annually in consideration of evaluation findings.	
	ii. respond to any non-compliance and/or incident;	C	Section 7 of the EMS S2 outlines the process for non-compliance and incident reporting.	

Cond	Condition Text	Status	Evidence	Recommendations
	iii. address the findings of any audit undertaken for the development;	C	Section 7.3 of the EMS S2 outlines the process for addressing the findings of any audit.	
	iv. provide for adaptive management mechanisms that enable continuous improvement; and	C	Section 7.3 of the EMS S2 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 S2 describes overall community and stakeholder engagement processes.	
	i. include procedures to: 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 S2 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 Stage 1 during the audit period: › Sighted SiteHive dust monitoring records (Particulate Matter ≤ 10 Microns / Particulate Matter ≤ 2.5 Microns) for the periods: 01 January to 17 April 2026 and 01 October 2025 to 31 December 2025.The air quality criteria in EMS Stage 1 were met, with no dust or air quality complaints recorded during the reporting period; › Sighted Erosion and Sediment Control reports prepared by Grant Feltcher	

Cond	Condition Text	Status	Evidence	Recommendations
			(Certified Erosion and Sediment Control Practitioner), SOS Environmental Pty Ltd, dated 12/11/25, 19/01/26, 09/02/26, and 26/02/26. The reports assessed the adequacy of erosion and sediment controls at Work Area 8 and confirmed that key measures, including stockpile bunding, rock check dams, catch drains, pit protection and stabilisation works were in place and generally effective. Issues identified during earlier inspections were addressed in reports for subsequent inspections, demonstrating ongoing review of management measures and improvement of controls. › Sighted Water Movement Register which shows water testing prior to use for dust suppression at LPS. Water drawn from Water Movement Permits (WMP007, WMP017, WMP011, WMP015, WMP017, WMP018) was used for dust suppression during the audit period. › Liddell Power Station Demolition Induction Module 1 from Rapidglobal dated 03/03/2026; › Sighted Site Induction Module from Rapidglobal dated 03/03/2026; › Sighted AGLM 2025 Noise Monitoring Reported dated 5 May 2026 prepared by GHD Pty Ltd. It shows monitoring results for Ravensworth Mine and	

Cond	Condition Text	Status	Evidence	Recommendations
			Liddell Power Station. Table 5.3 of the report shows the development was complying with the noise limits with no noise discernible at locations R21 and R28. › Sighted Onsite Material Tracking register which shows about 62 000m^3 material (including sludge, clay, bricks, coal, vegetation, trees, unsuitable material) excavated from different work areas. The register indicates whether the material was tested, its temporary storage and final placement location. During site visit, sighted some decommissioned bulk hydrocarbon storage tanks near the LPS demolition area (**Plate 15**); › Sighted AGLM Complaints Register for 2025 and for January -May 2026. There were no complaints recorded against the Project during this period. LT (pers comms) confirmed AGLM undertake weekly environmental inspections/site walks with CMA personnel. Sighted the following Weekly Environmental Walk Audit Reports (AUDR): › AUDR-2934 dated 14/01/2026; › AUDR-2934 dated 18/02/2026; › AUDR-2957 dated 25/02/2026. These Audit Reports covers general work site conditions, PPE and Prescribed Occupations, risks of falls/items fall from	

Cond	Condition Text	Status	Evidence	Recommendations
			height, Plant Equipment and Tools, Hazardous Materials, Electrical Safety and Compliance, Hot Work, and notes Observations during work. AGLM also use 'myHSE' system to track and record the progress against actions raised during inspections. MP (pers comms) confirmed that environmental incidents are recorded in the 'myHSE' system. Sighted AGLM MyHSE Incident ID 20174315, entered on 26/11/2025, documenting a Total Suspended Solids (TSS) exceedance of 176 mg/L at the CHP Sediment Basin against the 50 mg/L limit in EPL 2122. The incident was recorded in the AGLM MyHSE incident tracking system and reported to DPHI (see Schedule 2, Conditions B13 and D4 below for further detail). Sighted AGLM MyHSE record 201777051, dated 04/03/2026, confirming Project erosion and sediment controls were inspected and maintained following a rainfall event. Sighted examples of AGLM Environmental Inspection Checklists dated 18/12/25 and 04/02/26. These checklists document the review of environmental controls (including water management, disturbance management and general housekeeping) and identify several corrective and improvement actions. These checklists indicate that ongoing	

Cond	Condition Text	Status	Evidence	Recommendations
			environmental inspections are being undertaken, deficiencies are identified, and corrective actions are implemented to minimise the risk of environmental harm. Site inspections undertaken during the audit demonstrated that the general layout of the site was in accordance with SSD 24937520 and EMS Stage 1 (see **Appendix C**). MP advised (pers comms) that the Project is discussed regularly at the AGLM Community Consultative Committee (CCC) meetings. Minutes of the AGLM Hunter CCC dated 20 November 2025 were reviewed and confirm that a "Liddell Transition" update was provided. The minutes also include the 2026 meeting schedule, with meetings scheduled for 26 February, 28 May, and 27 November 2026.	
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.	
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	NT	TB (pers comms) confirmed that no works were undertaken in the vicinity of 37-2-6561 and 37-2-6284 and that the salvage has not been required yet. This is required for Project Stage 3.	

Cond	Condition Text	Status	Evidence	Recommendations
	with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010), or its latest version.			
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	Sighted water carts available for dust suppression at the Asbestos Disposal Facility and at the Liddell Power Station area. Generation of dust from project equipment and exposed areas was observed to be adequately managed during the audit site inspection through the use of water carts and regular watering of active work areas. A designated water fill point was also observed to be in operation within the Liddell demolition area, supporting ongoing dust suppression activities (see **Plate 5**, **Plate 27** and **Plate 28**). 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 in the weeks following the audit site inspection. During the audit site inspection, the Asbestos Landfill Facility was observed to be secured, with mandatory safety signage information posted at the entrance. Site inductions note the requirement that personnel working in the Asbestos Landfill Facility are required to wear appropriate PPE and following site procedures (see **Plate 1**). Air quality	

Cond	Condition Text	Status	Evidence	Recommendations
			monitoring stations have been established along the perimeter of the asbestos facility (see **Plate 2**).	
B7.	All reasonable and feasible avoidance and mitigation measures must be implemented to minimise greenhouse gas emissions from the development.	C	Project records and the site inspection found that AGLM is generally complying with air quality and dust management requirements for the Project. The following controls were observed and confirmed to be in place: › Water carts are used on unsealed roads and dust-generating areas; › Exposed surfaces and stockpiles are minimised through stabilisation, covering and rehabilitation where practicable; › Weather conditions are monitored, with demolition and dust-generating activities modified during adverse conditions (e.g. high winds); › Site speed limits and designated tracks at the site are used to reduce dust generation; › All plant and heavy vehicles are inspected before leaving site to ensure loads are secure and free of loose material; › Stabilised entry and exit points are maintained where required. › Water is applied during demolition and stripping activities as needed for dust suppression;	

Cond	Condition Text	Status	Evidence	Recommendations
			› Within the asbestos disposal facility, exposed areas are minimised and stabilised, and daily cover is applied to emplaced asbestos to prevent dust generation.	
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.	C	Appendix 4 of the Stage 1 EMS contains a Noise and Vibration Management Plan (NVMP) for the Project. Section 8.4 of the NVMP notes that attended noise monitoring will be undertaken as required throughout the development. Attended noise monitoring was completed during this audit period on 04/12/25, as documented in the AGLM 2025 Noise Monitoring Report dated 05/05/26 prepared by GHD Pty Ltd (GHD). Results presented in Table 5.3 of the GHD report show that Liddell Power Station was complying with the operational noise limits, with no noise discernible at locations R21 and R28. These results are consistent with the NVMP, which states that the construction noise and operational noise pertaining to the Project were predicted as being well below the noise limit for daytime hours (40 dB(A) LAeq 15-minute).	
B9.	The noise limit set out in condition B8 apply under the meteorological conditions defined in Table 2.	C	Section 5.1 of the NVMP outlines the meteorological conditions which the noise limits apply. Sighted AGLM 2025 Noise Monitoring Report dated 05/05/26	

Cond	Condition Text	Status	Evidence	Recommendations
	Table 2 – Meteorological conditions Location: Day $L_{Aeq(15min)}$ Assessment Period: Day Meteorological Conditions: 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.		prepared by GHD, to document the results of monitoring completed 04/12/25. The report outlines typical weather conditions measured using a handheld weather station. Intermittent wind gusts of up to 2.5m/s were recorded, which is within the conditions required for day time monitoring.	
B10.	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.	C	See Schedule 2, Condition B8. Refer to Schedule 2, Condition B22 for meteorological station compliance status.	
B11.	The development may only occur outside of the hours listed in Table 1 if: 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 *Interim Construction Noise Guideline* (DECC, 2009) for sensitive receivers other than residences; or	NT	See Schedule 2, Condition A9.	
	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: 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;	NT	See Schedule 2, Condition A9.	

Cond	Condition Text	Status	Evidence	Recommendations
	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 *Interim Construction Noise Guideline* (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				
B13.	The development must comply with the performance measures in Table 3. **Table 3 – Water management performance measures** Feature: Water management – general Performance measure: • 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**	**A non-compliance occurred on 26 November 2025 when the Coal Handling Plant (CHP) Sediment Basin overtopped following a rainfall event of approximately 40.4 mm**, resulting in a discharge to Lake Liddell via the licensed discharge point. The discharge recorded Total Suspended Solids (TSS) of 176 mg/L, exceeding the applicable discharge criterion of 50 mg/L under the SWMP and EPL 2122. The exceedance occurred as the CHP Basin had not yet been upgraded in accordance with SWMSP commitments, meaning the DEMP and SWMSP were not fully implemented at the time of the event. The non-compliance was reported DPHI on 8 December 2025.	**It is recommended that AGLM continue to complete and document all pre and post-rainfall inspections of erosion and water management control structures, as described in the approved SWMP.**

Cond	Condition Text	Status	Evidence	Recommendations
	<table><tr><td>Erosion and sediment control</td><td>• Design, install and maintain erosion and sediment controls generally in accordance with the guidance series *Managing Urban Stormwater: Soils and Construction including Volume 1: Blue Book* (Landcom, 2004), *Volume 2A: Installation of Services* (DECC, 2008), *Volume 2C: Unsealed Roads* (DECC,2008), *Volume 2D: Main Road Construction* (DECC, 2008) and *Volume 2E: Mines and Quarries* (DECC, 2008) • Design, install and maintain sediment dams generally in accordance with the guidance series Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom, 2004) and 2E Mines and Quarries (DECC, 2008)</td></tr><tr><td>Water diversion and storage</td><td>• 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>• 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>• Negligible environmental consequences beyond those predicted in the documents listed in condition A2(c)</td></tr><tr><td>Alluvial aquifers</td><td>• 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: ○ 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>• All works within waterfront land is managed in accordance with the guidance series for Controlled Activities on Waterfront Land (DPE, 2022) • Minimise disturbance of banks and implement appropriate stabilisation mitigation</td></tr></table>		Apart from this incident, AGLM are generally complying with the water management performance measures for the Project, as outlined below. Sighted WMP S1A which was updated on 19/02/26. Table 1 of the Liddell Future Land Use and Enabling Works Water Management Plan – Stage 1A (WMP S1A) outlines the performance measures in Table 3 and identifies where they are addressed within the WMP S1A. Water management is also addressed in Table 2-2 of the Soil and Water Management Sub Plan (SWMSP), which similarly maps the performance measures in Table 3 and outlines where they are addressed within the SWMSP. Overall, AGLM is implementing erosion and sediment controls across the site as evidenced by the following: › 'Liddell Power Station Demolition Project ESCP' certified by Grant Fletcher, a Certified Erosion and Sediment Control Practitioner on 20/03/26. This ESCP shows clean water and dirty water separation, including diversion drains designed to exclude clean water from disturbed areas and direct flows to sediment basins. This is a standalone document covering 10 Work Areas at LPS and clearly shows dirty water and clean water flow and specifies that all existing drainage pits within work areas to be geofabric lined and	

Cond	Condition Text	Status	Evidence	Recommendations
			sandbags or steel plates/converter belt underlined with Geofabric used to control flow of sediments to Sediment Basin Discharge Point 17. It also states that spill kits are to be located next to hazardous substances/dangerous goods storage. The ESCP notes all erosion and sediment controls are to be installed in accordance with the *Landcom Managing Urban Stormwater: Soils and Construction - Soils and Construction – Volume 1 – 4th Edition, March 2004 (Bluebook).* › Erosion and Sediment Control reports for Work Area 8 prepared by Grant Feltcher (Certified Erosion and Sediment Control Practitioner), SOS Environmental Pty Ltd, dated 12/11/2025, 19/01/2026, 09/02/2026, 26/02/2026. The reports provide details on the adequacy and competency of erosion and sediment control measures implemented at Work Area 8. The inspection reports indicate that AGL has implemented a comprehensive suite of erosion and sediment controls across Work Area 8. Most controls are functioning effectively, particularly stockpile bunding, rock check dams, catch drains, pit protection measures and stabilisation works. The reports show a positive trend, with issues identified in earlier inspections generally being rectified by subsequent inspections.	

Cond	Condition Text	Status	Evidence	Recommendations
			› Concept Plan for Main Power Block and Coal Handling Plant Catchment dated 17/11/25 prepared by Ramboll, identifying sediment basins for the Main Block and Coal Handling Plant catchments and confirming design criteria, existing controls, and drainage arrangements for the Liddell Power Station catchment; › AGLM Ground and Vegetation Disturbance Approval Application dated 24/11/25, outlining contouring to direct flows to drainage features and minimise impacts; › Fundamentals of Erosion and Sediment Control Ponds for Asbestos Disposal Facility dated 16/02/2026, Hassan Tahir, identifying sediment dam locations, bunding, and diversion drains consistent with Landcom (2004), SWMP, and ESCP requirements. › Observed erosion and sediment controls implemented across the site including at the Asbestos Disposal Facility (**Plate 3**, **Plate 6**); MP (pers comms) advised Weekly Environmental Walk Audits are completed, as evidenced by sighted example reports AUDR-2934 (dated 14/01/26), AUDR-2934 (dated 18/02/26); and AUDR-2957 (dated 25/02/26). These inspections identify erosion, water management, and contamination risks, with actions implemented in a timely	

Cond	Condition Text	Status	Evidence	Recommendations
			manner. For example, AUDR-2957 25/02/26 identified the need for water socks in certain areas, confirmed pre- and post-rainfall inspections were being undertaken, and noted maintenance required on the drain opposite the Denim Tank. This demonstrates that environmental issues are being identified and addressed in a timely manner. AGLM also undertakes routine inspections of water storage and erosion and sediment controls, including HSE Site Inspection Checklists and post-rainfall inspections recorded in myHSE. Environmental actions are tracked and closed out where required. During the site inspection, erosion and sediment controls were observed to be in place, including at the Asbestos Disposal Facility (**Plate 6**). Chemicals and hydrocarbons were appropriately stored within bunded areas, including self-bunded dangerous goods containers, with spill kits available at site (**Plate 12, Plate 13, Plate 14, Plate 30**). Environmental monitoring records were reviewed for applicable EPL 2122 discharge monitoring results. Monitoring data for EPL Monitoring Points 16 and 17 has been reviewed against the weekly concentration limits specified under EPL 2122 for the reporting period. At EPL Monitoring Point 16 (Coal Handling Plant Sediment Basin outlet to Lake	

Cond	Condition Text	Status	Evidence	Recommendations
			Liddell), a Total Suspended Solids (TSS) concentration of 176 mg/L, exceeding the applicable weekly limit of 50 mg/L was recorded. This was reported as an incident to DPHI (See Schedule 2, Condition D4). Additional monitoring results for EPL 16 recorded TSS concentrations of 91 mg/L (November mean), 72 mg/L (December 2025 highest value), and 103.25 mg/L (January 2026 mean with a maximum of 317 mg/L), all exceeding the weekly limit of 50 mg/L. Sighted AGLM groundwater monitoring results tracking register recording water level depths and water quality for sampling points at the Landfill and groundwater quality results for Q3 2025, Q4 2025 and Q1 2026. At EPL Monitoring Point 17 (discharge from oil and grit trap weir overflow to Lake Liddell), the following exceedances of EPL 2122 weekly limits were recorded: › Chloride (limit 0.2 mg/L): ▪ 211 mg/L (October 2025) ▪ 10 wh2 mg/L (November 2025) › pH (limit 6.5–9.0): ▪ 9.5 (October 2025) ▪ 9.3 (November 2025) › Electrical conductivity (limit 3000 µS/cm): ▪ 3211 µS/cm (November 2025) › Suspended solids (limit 50 mg/L): ▪ 75 mg/L (mean value, November 2025)	

Cond	Condition Text	Status	Evidence	Recommendations
			▪ 109 mg/L (Highest value, November 2025) ▪ 59 mg/L (December 2025) › Lead (limit 0.0056 mg/L): ▪ 0.013 mg/L (Highest value, November 2025) ▪ 0.0075mg/L (Mean Value November 2025) › Cobalt (limit 0.0014 mg/L): ▪ 0.004 mg/L Highest value November 2025) ▪ 0.00225mg/L (Mean value November 2025) › Vanadium (limit 0.006 mg/L): ▪ 0.020 mg/L (Highest value November 2025) › Molybdenum (limit 0.034 mg/L): ▪ 0.042 mg/L (Highest value November 2025) All values listed above are based solely on recorded monitoring results and applicable EPL 2122 weekly concentration limits provided for the reporting period. Sighted Certificate of Analysis for the LD Oil/Grit Trap dated 09 February 2026, which demonstrates that AGLM is tracking and verifying discharges in accordance with requirements. Sighted AGLM monthly data summaries data summaries published on the AGL website for licensed discharge points under EPL 2122, covering the reporting period October 2025 to March 2026.	

Cond	Condition Text	Status	Evidence	Recommendations
			AGLM has also implemented water reuse measures, with sediment basin runoff authorised and used for dust suppression. Additional observations included evidence of the construction of diversion drains, enlargement of the oil and grit trap overflow basin and stabilisation of stockpiles (see **Plate 7**, **Plate 10**). AGLM has an existing Pollution Study and Reduction Program under EPL 2122, including the commissioning and upgrade of the Oil and Grit Trap and increasing the capacity of the existing Coal Handling Plant associated with the Project. Continued monitoring of the water management infrastructure following rainfall events is recommended to verify the effectiveness of these upgrades and ensure the system continues to perform as designed.	
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 have previously been constructed and approved under previous consents.	
B15.	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:	C	Water Management Plan – Stage 1A (WMP S1A), dated 03/07/2025, was approved by DPHI on 07/07/2025; however, the approved version was	

Cond	Condition Text	Status	Evidence	Recommendations
	a) be submitted to the Planning Secretary for approval prior to the commencement of construction;		marked as draft and included an incorrect approval letter at the time of the last audit. As of 19/02/26, AGLM had actioned the recommendation from the last IEA by identifying WMP S1A as final and including the correct DPHI endorsement letter. This revised version was sighted on the AGLM website and no other updates to the plan occurred during the audit period. It is noted that AGLM has commenced consultation activities for the development of the Water Management Plan Stage 2 (WMP S2) for the Project. At the time of the audit, the draft WMP S2 remained under review and had not yet been finalised or approved. Evidence of ongoing consultation and plan development was sighted during the audit.	
	b) be prepared: 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	See Schedule 2, Condition B15(a).	
	c) include a development water balance;	C	See Schedule 2, Condition B15(a).	
	d) include a review of the water licensing strategy for the development in consultation with DCCEEW Water Group;	NT	No changes to the current water licensing strategy are required for Stage 1A, as water is sourced from onsite sediment basins and water reuse is maximised. Further details on water licencing requirements, timing and the proposed strategy will be provided in WMP S2,	

Cond	Condition Text	Status	Evidence	Recommendations
			which remains under regulatory review at the time of audit. See Schedule 2, Condition B15(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	See Schedule 2, Condition B15(a).	
	g) support the implementation of the relevant mitigation measures identified in the documents listed in condition A2(c);	C	See Schedule 2, Condition B15(a).	
	h) include a monitoring and evaluation program to: 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	See Schedule 2, Condition B15(a).	
	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	See Schedule 2, Condition B15(a).	
	j) include processes to review the plan, including responding to non-compliances, incidents or complaints.	C	See Schedule 2, Condition B15(a).	
B16.	Construction other than demolition must not commence until the water management plan is approved by the Planning Secretary.	C	Deemed compliant in previous IEA.	
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				

Cond	Condition Text	Status	Evidence	Recommendations
B18.	The quantities of dangerous goods stored and handled by the development must be below the threshold quantities listed in the Department's *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33* at all times.	C	AGLM completed an update of '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. This was a recommendation from the last IEA (December 2025). Sighted a completed Dangerous Goods/Hazardous Substance Register dated 20 February 2026. Table 6.1 is an extract from the Preliminary Hazard Register, which was part of the EIS for the project. However, **within the Hazardous Substance Register, diesel, oxygen, LPG, acetylene and some oils are still listed has having a quantity of 'As required only', without a current maximum quantity listed. As such, the volumes of some potentially hazardous substances were not able to be determined at the time of audit.** During the site inspection, a self-bunded above ground diesel tank which holds about 35 000L of diesel was sighted (see **Plate 12**). LT (pers comms) confirmed that they have adopted a maximum operating volume (MOV) of 20 000L for this tank. Controls are in place include a MAX Fill – 20 000L line market on the tank shell and a corresponding calibrated contents chart. Signage at the tank clearly states, "MAXIMUM AUTHORISED CONTENTS: 20,000 L (Diesel –	**It is recommended that the 'Hazardous Substance Register' is regularly reviewed to note the approximate quantities of all potentially hazardous materials present on site, or AGML thresholds for not recording these quantities.**

Cond	Condition Text	Status	Evidence	Recommendations
			Combustible Liquid C1)" "DO NOT FILL ABOVE RED LINE". It was observed that the existing bulk hydrocarbon tanks for the Liddell Power Station had been emptied and the tanks decommissioned (see **Plate 15**). Chemical and hydrocarbon storage areas including diesel and oil storage were also inspected (see **Plate 11**, **Plate 30**).	
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 *NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.*		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: › General requirements, including site induction requirements; › Travelling speeds and safe driving practices; › Fatigue management; and	

Cond	Condition Text	Status	Evidence	Recommendations
			› Adherence to designated haulage routes and heavy vehicle noise. Sighted: › CMA Contracting Safety Commitments signage displayed at the entry of the site offices stating, 'Safe driving and plant operations' and 'Be fit for work'. During the audit site inspection, safety signage was observed around the site (see **Plate 17**, **Plate 19** and **Plate 20**).	
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.	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: a) complies with the requirements in the *Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales* (DEC, 2007);	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 station is a requirement of Condition M5.1 of EPL 2122. AWS calibrations were completed for meteorological station AGL08 for: › 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; › Ambient temperature, dated 18/10/25. The calibration dates were still within date during the audit period, with the	

Cond	Condition Text	Status	Evidence	Recommendations
			next scheduled annual calibration due in September 2026 for the solar radiation sensor and October 2026 for the wind sensor, relative humidity sensor, tipping bucket rain gauge, and ambient temperature sensor.	
	b) is capable of measuring meteorological conditions in accordance with the *NSW Industrial Noise Policy* (EPA, 2000) or *NSW Noise Policy for Industry* (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 *Waste Classification Guidelines* (EPA, 2014) and disposed of at appropriately licensed waste facilities unless subject to condition B27 unless otherwise permitted by an EPL.	C	Section 5.6.14 of the EMS S2 states that all waste generated throughout the Development will be classified for disposal in accordance with the NSW EPA Waste Classification Guidelines Part 1: Classifying waste November 2014 and disposed of at and appropriately licenced facility. Waste at LPS is classified by scheduled type, in accordance with EPA guidelines (see **Plate 7, Plate 8**, **Plate 9**, **Plate 30, Plate 32**). TB (pers comms) confirmed that Project waste is managed under contract. Viewed CMA Waste Tracking Register covering periods: October to December 2025 and January 2026 to February 2026. The Register shows approximately General Solid Waste was disposed of at Central Waster Kurri Kurri, Muswellbrook Waste and Recycling Facility while	

Cond	Condition Text	Status	Evidence	Recommendations
			Asbestos waste and solid matter and fines was disposed at Veolia Facility (Raymond Terrace). All waste movements were recorded in the CMA Waste Tracking Register. The entries reviewed record the removal and disposal of waste generated during demolition, strip-out and asbestos removal activities, providing traceability from the point of generation through transport to final disposal. Examples of entries include: › Docket No. 6326 (Merchant Number C0269), dated 2 February 2026, records 4.96 tonnes of Special Waste (Asbestos), transported by vehicle XV54GQ to Veolia – Raymond Terrace. › Docket No. 254 (Merchant Number C0269), dated 2 February 2026, records 2 tonnes of General Solid Waste (GSW) from Turbine Hall strip-out works were transported by vehicle XN36NS to the Muswellbrook Waste & Recycling Facility. › Docket No. 6327 (Merchant Number C0269), dated 2 February 2026, records 5.34 tonnes of Special Waste (Asbestos) transported by vehicle XV54GQ to Veolia – Raymond Terrace. › Docket No. 6345 (Merchant Number C0269), dated 19 February 2026, records 6.54 tonnes of Special Waste (Asbestos) transported by vehicle XV54GQ to Veolia – Raymond Terrace.	

Cond	Condition Text	Status	Evidence	Recommendations
			The register provides an auditable record of waste movements, ensuring full traceability from the point of generation through to transport and final disposal	
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 *Protection of the Environment Operations (Waste) Regulation 2014.*	C	No other waste apart from organics for use in rehabilitation as approved under EPL 2122 has been received at the site.	
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 16)**.	
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.	C	Sighted Ramboll Assessment AGLM Former Liddell Power Station Waste Classification Letter for Stockpile TY_SPO1_F which classifies as Restricted Soil waste which has a concentration of TRH (C10 – C36 Fraction).	
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.	C	See Schedule 2, Condition A6.	
BIODIVERSITY				

Cond	Condition Text	Status	Evidence	Recommendations
B28.	The biodiversity credits specified in Table 4 and Table 5 must be retired in accordance with the Biodiversity Offset Scheme of the *Biodiversity Conservation Act 2016*, including the application of any ancillary rules published under Section 6.5 of the *Biodiversity Conservation Regulation 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.	C	At the end of the previous IEA period, all credits but those for the Hunter Valley Delma (HV Delma) were retired (see Schedule 2, Condition B30 below).	

Table 4 – Biodiversity credit requirements – ecosystem credits

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
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
	Table 5 – Biodiversity credit requirements – species credits Threatened Species / Stage 1 / Stage 2 / Stage 3 / Total Credits / Credits / Credits / Credits Hunter Valley Delma (*Delma vescolineata*) 198 216 334 748 Southern Myotis (*Myotis macropus*) 35 129 149 313 Squirrel Glider (*Petaurus norfolcensis*) 75 47 154 276 Brush-tailed Phascogale (*Phascogale tapoatafa*) 55 33 94 182			
B29.	Prior to undertaking construction or operations within the: 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 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	MP (pers comms) confirmed Stage 2 works and Stage 3 works have not commenced.	
B30.	With the agreement of the Planning Secretary, the retirement of credits for the Hunter Valley Delma (Delma vescolineata) as listed in Table 5 may be carried out in an alternative timeframe to the timing specified in condition B29.	**NC**	AGLM sought an extension of time to retire the credits for HV Delma on 27/10/25. Sighted letter from DPHI dated 01/12/25 to AGLM granting an extension of time to retire for the HV Delma credits until 30/01/26. Sighted Charge Quote Statement Q00799 for Species Credit (HV Delma) for Stages 1, 2, and 3 of the development submitted to the Biodiversity Conservation Fund dated 18/11/2025. Sighted NSW BCT Invoice #400000391 dated 13/02/26. **Credits for the Hunter Valley Delma were not retired prior**	**It is recommended that AGLM maintain its Compliance Register, and ensure timely notification to the Secretary where a compliance obligation is unlikely to be met and a further extension may be required.**

Cond	Condition Text	Status	Evidence	Recommendations
			to the 30/01/26 as approved by the Secretary.	
	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 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;	NT	TB (pers comms) confirmed that AGLM has not sought to reduce biodiversity credit requirements.	
	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 *Biodiversity Conservation Act 2016.*	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	Deemed compliant in previous IEA. Implementation of management measures from the approved Biodiversity Management Plan Stage 1 (BMP S1) during the audit period are described against the relevant sub-conditions below.	
	b) be prepared: 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;	C	See Schedule 2, Condition B32(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	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) support the enhancement and composition of any threatened ecological community found within the approved development area including, the Central Hunter Grey Box – Ironbark Woodland;	C	See Schedule 2, Condition B32(a).	
	d) implement measures to minimise the use of pesticides and herbicides within the approved development area;	C	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 19** and **Plate 20**. Section 2.2.1 of the BMP S1 states management controls to minimise the use of pesticides and herbicides, including: › 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 buffer to manage edge effects will be used to inform initial weed control	

Cond	Condition Text	Status	Evidence	Recommendations
			works and one follow up treatment prior to the commencement of construction as required, dependent on the outcomes of surveys. › 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.	
	e) support the integrity of habitat for insectivorous bat and amphibian species;	C	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. Controls to prevent impacts of clearing are outlined in Section 2.2.3 of the BMP S1 which include: › Delineation of the development site; › Pre-clearance surveys 4 weeks prior to clearing;	

Cond	Condition Text	Status	Evidence	Recommendations
			› 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°. During the audit site inspection 'No Go' zones were observed across construction and vegetation areas as shown in **Plate 22** and **Plate 23**. The 'No Go' zones delineate the Project footprint.	
	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;	NT	See Schedule 2, Condition B38. Rehabilitation work for the Liddell Ash Dam has not commenced.	
	g) include a description of measures and timeframes that would be implemented to: i. minimise clearing and avoiding unnecessary disturbance of vegetation by the development;	C	A review of AGLM documentation indicates that measures to minimise vegetation clearing and avoid unnecessary disturbance of native vegetation associated with the development. Controls include the completion of Ground Disturbance and Vegetation Assessments (GDVAs) and the use of pre-clearance permit processes to identify environmental constraints and ensure disturbance is appropriately authorised and managed prior to works commencing.	

Cond	Condition Text	Status	Evidence	Recommendations
			Sighted GDVA – Application Form dated 14/11/2025, which notes Southern Myotis and Hunter Valley Delma habitat within the proposed disturbance area. The form records that an Environmental Team member inspected the site prior to clearing, demonstrating that due diligence procedures were followed. The form also notes that an Ecologist completed a pre-clearance inspection prior to works commencing. Sighted GDVA – Application Form dated 24/11/2025, which reports that an EMM Ecologist confirmed no additional inspections or FSC requirements were necessary for trees located within the infrastructure area. Sighted GDVA – Application Form dated 04/03/2026. The approved works included excavation of a new sediment basin, vegetation clearing, construction of an overflow channel, and placement of rock lining for erosion control. The assessment identified no biodiversity impacts associated with the works. Sighted GDVA l – Application Form dated 26/02/2026 covering tree removal and associated vegetation clearing for the planned chimney collapse. The GVDA specifies that Environmental No-Go Zones will not be entered, disturbed, damaged, or otherwise impacted, with personnel restricted to the approved work area. The attached map clearly identifies the activity	

Cond	Condition Text	Status	Evidence	Recommendations
			boundary, and confirms that no plant, personnel, stockpiling, tracking, trimming, or clearing will occur within No-Go Zones, which were clearly flagged and marked onsite.	
	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	Deemed complaint at last Audit.	
	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	Deemed complaint at last Audit.	
	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
			This is supported by the following sighted Pre-Clearance Surveys: › Sighted Preclearance checks of the Liddell Ash Dam access verge dated 23 January 2026 (EMM, 2026); › Sighted Preclearance checks of the Borrow Pit dated February 2026 (EMM, 2026); › Sighted Pre-clearing for the associated works for the additional sediment basin dated January 2026 (EMM, 2026); Pre-clearance reports show that a Fauna Spotter-Catcher (FSC) was present on site during all pre-clearance works that could affect native vegetation or the HV Delma, ensuring compliance with the BMP and the safe management of fauna. Sighted Ground and Vegetation Disturbance Approval - Application Form dated 24/11/2025 which mentions construction of contour to drain into dish adjacent to the adjacent road. Measures were included in the GDVA to minimise impact on drainage lines; 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. TB (pers comms) noted that this will be included in copy of RMP still under	

Cond	Condition Text	Status	Evidence	Recommendations
			development. Sighted Letter from DPHI to AGLM dated 27/03/2026 granting extension of time to prepare the Liddell Ash and Closure Rehabilitation Plan (LADCRP) and Rehabilitation Plan by 28 September 2026.	
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.	C	AGLM implemented the recommendation from the previous audit by conducting regular toolbox talks with contractors to reinforce the importance of adhering to flagged 'no-go' zones. MP (pers comms) confirmed these sessions are scheduled on a recurring basis to ensure all new starters receive this training. During site inspection, personnel were observed to be working in the approved work areas and flagged areas were out of bounds. A review of the following documents found that AGLM were generally implementing the BMP S1 during the audit period: › Sighted Preclearance checks of the Liddell Ash Dam access verge dated 23 January 2026 (EMM, 2026); › Sighted Preclearance checks of the Borrow Pit dated February 2026 (EMM, 2026); › Sighted Pre-clearing for the associated works for the additional sediment	

Cond	Condition Text	Status	Evidence	Recommendations
			basin dated January 2026 (EMM, 2026); › Sighted CMA QSE Toolbox Talk dated 9 January 2026 › MP (pers comms) confirmed that the site is manned by personnel who have been consistently part of the demolition and are made aware of all site procedures and SSD 24937520 obligations.	
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 areas prone to dust generation, soil erosion and weed incursion that are not yet rehabilitated.	C	See Schedule 2, Condition B6. No permanent rehabilitation areas were established during the audit period.	
B36.	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.	NT	See Schedule 2, Condition B36.	

Cond	Condition Text	Status	Evidence	Recommendations
	Table 6 - Rehabilitation Objectives **Feature** / **Objective** All areas of the approved development area affected by the development: • 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: • 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: • Rehabilitated areas only requires maintenance consistent with intended post-closure land use/s Crushed concrete: • Crushed concrete used as stabilisation material does not contain PCB above acceptable levels determined by the Site auditor Asbestos wastes: • 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: • Landfill capping completed generally in accordance with *NSW EPA Environmental Guidelines Solid Waste Landfills* (2016) requirements for special wastes Borrow Pit and landfill area: • 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: • 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: • Areas of land at risk of erosion due inactivity, grade or any other reason are stabilised with temporary groundcover or vegetation Water quality: • Negligible changes in groundwater quality as a result of the development beyond those predicted in the documents listed in condition A2(c) Community: • Ensure public safety			
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	NT	See Schedule 2, Condition B6. Permanent rehabilitation for the Project has not commenced.	

Cond	Condition Text	Status	Evidence	Recommendations
	earthworks are required for the establishment of a stable, non-polluting and free-draining landform.			
REHABILITATION MANAGEMENT PLAN				
B38.	A **rehabilitation management plan** must be prepared for the approved development area, excluding the Liddell Ash Dam. The plan must: a) be submitted to the Planning Secretary for approval within 12 months of commencing the development;	NT	Sighted Letter from DPHI to AGLM dated 27/03/26 granting extension of time to prepare the Liddell Ash and Closure Rehabilitation Plan (LADCRP) and Rehabilitation Plan to 28/09/26.	
	b) be prepared: 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;	NT	See Schedule 2, Condition B38(a).	
	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: 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;	NT	See Schedule 2, Condition B38(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	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: 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).	
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				

Cond	Condition Text	Status	Evidence	Recommendations
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 Demolition Environmental Management Plan (DEMP) contains a tabulated summary of consultation for SafeWork NSW and confirms that Site Auditor Jason Clay has been engaged as the NSW EPA Accredited Site Auditor. During the audit period, the Accredit Site Auditor has continued to review relevant Project documents prepared for contaminated materials management. Sighted the following example documents prepared by the Site Auditor: › Letter from Jason Clay titled 'Interim Audit Advice #65: Review of Stockpile Coal Bay 7 Assessment, SAQP [Sampling and Analysis Quality Plan]' (Revision 4.0) dated 31/10/25 to Asbestos Containment Cells – Construction Quality Assurance' dated 23/09/25, which provides a review of the revised SAQP prepared for the assessment of stockpiled material within the Coal Bay F; › Letter from Jason Clay titled 'IAA #68: Review of Technical Specification and Construction Quality Assurance (CQA) Report – Containment Cell 3 dated 12/12/25, which provides a review of technical specification for the construction of the asbestos containment cell 3. For the Technical	

Cond	Condition Text	Status	Evidence	Recommendations
			Specification, the Site Auditor required confirmation of temporary erosion and sediment control prior to asbestos placement, verification evidence to determine integrity of compacted layer, photographic evidence and commentary regarding placement of material. The Site Auditor also confirmed that the site was to be trafficable during placement which is a matter captured for the CQA review; › Sighted Interim Audit Advice #69: Review of Ramboll Concrete Sampling Trial -Sampling, Analysis and Quality Plan (Draft) dated 4/02/26; and › Sighted IAA #70: Review of Technical Specification and CQA Report – Containment Cell 3 (Final) where the Site Auditor notes that the Containment Cell 3 Technical Specification and CQA report have been adequately updated, and that the comments raised in previous IAA #68 have been satisfactorily addressed. Accordingly, the documentation may be considered final.	
	b) be undertaken in accordance with the Contaminated Land Guidelines;	C	Deemed compliant in previous IEA.	
	c) include the provision of interim audit advice by the Site auditor in relation to (as applicable): i. sampling analysis and quality plans; ii. detailed site investigation reports; iii. human health and ecological risk assessment reports;	C	See Schedule 2, Condition C1(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	iv. remediation action plan; v. site validation reports; and vi. long-term environmental management plans;			
	d) conclude with the Site auditor issuing either a Section A1 or Section A2 audit statement for the development.	NT	A Section A1 or Section A2 audit statement has not been provided from the Site Auditor at the time of this IEA.	
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: a) be prepared, or reviewed and approved, by consultants certified under either the CEnvP(SC) or the CPSS CSAM scheme;	C	Several sampling plans were prepared for contaminated sites at Liddell Power Station during the audit period that relate to the Project. These were reviewed and approved by Kirsty Greenfield (CEnvP no SC401104), a certified practitioner for site contamination. Sighted the following: › 'Sampling and Analysis Quality Plan Stockpile Coal Bay F Assessment, Liddell Power Station, Muswellbrook, NSW' dated 03/11/25; › 'Sampling and Analysis Quality Plan Concrete Sampling Trial, Liddell Power Station, Muswellbrook, NSW' dated 17/03/26; › 'Interim Audit Advice #69: Review of Ramboll Concrete Sampling Trial - Sampling, Analysis and Quality Plan (Draft)' dated 04/02/26; › 'Interim Audit Advice #73: Review of Updated Concrete Sampling Trial – SAQP (Rev 3) and Tech Memo: Concrete Reuse Framework Amendments (Draft 2)' dated	

Cond	Condition Text	Status	Evidence	Recommendations
			06/03/26 by Jason Clay, NSW EPA Accredited Site Auditor; › 'Interim Audit Advice #74: Review of Updated Concrete Sampling Trial – SAQP (Rev 4)' dated 16/03/26 by Jason Clay, NSW EPA Accredited Site Auditor.	
	b) be prepared: i. in accordance with the Contaminated Land Guidelines; ii. before sampling for contamination investigations is conducted;	C	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	C	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).	
C3.	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: a) be prepared, or reviewed and approved, by consultants certified under either the CEnvP(SC) or the CPSS CSAM scheme;	C	Deemed compliant in previous IEA. The SAQP titled 'Liddell Power Station - Concrete Beneficial Re-Use Assessment, Sampling and Analysis Quality Plan' was reviewed by the endorsed Site Auditor on 07/08/25 and considered as final document.'	
	b) be prepared: 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).	

Cond	Condition Text	Status	Evidence	Recommendations
	c) be accompanied by interim audit advice from the Site auditor.	C	See Schedule 2, Condition C1(a).	
DETAILED SITE INVESTIGATIONS				
C4.	A **detailed site investigation** must be undertaken for the development. The investigation report must: a) be prepared, or reviewed and approved, by consultants certified under either the CEnvP(SC) or CPSS CSAM scheme;	NT	As per Schedule 2, Condition C5, the detailed site investigation must commence within 12 months after the completion of demolition. Demolition was not completed during the audit period.	
	b) be prepared in accordance with the relevant Contaminated Land Guidelines;	NT	See Schedule 2, Condition C4(a).	
	c) be accompanied by interim audit advice from the Site auditor confirming the investigation report is satisfactory;	NT	See Schedule 2, Condition C4(a).	
	d) include, but not limited to, the following: 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;	NT	See Schedule 2, Condition C4(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	vi. an updated conceptual site model and a discussion on contamination migration offsite and impacts to both onsite and offsite receptors; and 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(a).	
	f) be provided to the Planning Secretary and NSW EPA for information.	NT	See Schedule 2, Condition C4(a).	
	Note: *The detailed site investigation is required to assess areas that were inaccessible prior to the determination of the application.*	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: 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 a human health and ecological risk assessment has not been required.	
	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).	

Cond	Condition Text	Status	Evidence	Recommendations
	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).	
	h) be provided to the Planning Secretary and NSW EPA for information.	NT	See Schedule 2, Condition C6(a).	
	Note: *The human health and ecological risk assessment is required consider areas that were inaccessible prior to the determination of the application.*	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: 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 a Remedial Action Plan has not been required.	
	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: 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;	NT	See Schedule 2, Condition C8(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	iv. an investigation of PFAS (including within Lake Liddell) to be undertaken concurrently with the remedial action plans to address 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: a) be prepared prior to commencing the remediation identified in the plan;	NT	See Schedule 2, Condition C8(a).	
	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: 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;	NT	See Schedule 2, Condition C8(a).	
	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: a) be prepared, or reviewed and approved, by consultants certified under CEnvP(SC) or CPSS CSAM scheme;	NT	TB (pers comms) confirmed that this requirement has not been triggered.	
	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: a) certify that the site is suitable for an intended land use; and	NT	See Schedule 2, Condition C1(a).	
	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.	C	AGLM has updated Project's compliance tracking mechanisms in response to a recommendation from the previous IEA (December 2025), to ensure that future notifications to the Department occur in accordance with consent condition timeframes. › Sighted SSD Liddell Transition Checklist Updated, reviewed 01/12/2025, which shows all the report/notifications due to the Planning Secretary and their timing as required under SSD 24937520 conditions. MP (AGLM) notified DPHI on 8 July 2025 that construction and demolition activities under SSD 24937520 would commence on 23 July 2025 and provided interim asbestos clearance certificates. A staged asbestos removal program was completed at the site using approved asbestos management methods. All asbestos-	

Cond	Condition Text	Status	Evidence	Recommendations
			containing materials and associated waste were appropriately contained and continue to be disposed of at the approved Asbestos Disposal facility. Prensa's final clearance inspection on 15 April 2026 confirmed that asbestos remediation works had been satisfactorily completed, with no visible asbestos or asbestos residue remaining within the Work Area. Based on clearance inspections and air monitoring results, Prensa concluded that the works were completed to a satisfactory standard in accordance with relevant regulatory requirements. During the audit, Major Projects Portal records sighted confirmed that MP (AGLM) submitted the required asbestos clearance certificates to DPHI in accordance with Schedule 2, Condition C15 on 29 April 2026. Certificates submitted included: › Asbestos Clearance Certificate – Building 11 (Main Store), Liddell Power Station, Muswellbrook NSW, prepared by Jack Wayne (Licensed Asbestos Assessor, Prensa Pty Ltd) dated 15 April 2026; and › Asbestos Clearance Certificate - Building 41 - Transformer Oil Storage, Liddell Power Station, Muswellbrook NSW 2333, prepared by Jack Wayne (Licensed Asbestos Assessor, Prensa Pty Ltd) dated 15 April 2026.	

Cond	Condition Text	Status	Evidence	Recommendations
C16.	A **demolition environmental 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 demolition;	C	Deemed compliant in previous IEA.	
	b) be prepared in consultation with SafeWork NSW and the Site auditor;	C	Deemed compliant in previous IEA.	
	c) include a description and schedule of activities to be undertaken during demolition;	C	Deemed compliant in previous IEA.	
	d) include a risk assessment;	C	Deemed compliant in previous IEA.	
	e) addresses the commitments detailed in the documents listed in condition A2(c);	C	Deemed compliant in previous IEA.	
	f) include the sub-plans detailed in conditions C19 to C22; and	C	Deemed compliant in previous IEA.	
	g) include a TARP to respond to any exceedances of the relevant performance measures, objectives or performance indicators.	C	Deemed compliant in previous IEA.	
	Note: *The health and safety risks associated with demolition are regulated by the Work Health and Safety Regulation 2017.*	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).	
C18.	The demolition environmental management plan, as approved by the Planning Secretary, must be implemented for the duration of demolition.	**NC**	**A non-compliance with surface water quality criteria for Total Suspended Solids occurring during a discharge event on 26-27 November 2025.** This constitutes a non-compliance with the DEMP as confirmed by DPHI on 12/12/2025 and details are provided in Schedule 2, D4 below.	**See recommendations made against Schedule 2, Conditions B13.**

Cond	Condition Text	Status	Evidence	Recommendations
			Apart from this incident, a review of the following documents found that AGLM were generally implementing the DEMP during the audit period: › Examples of plant and equipment maintenance records and appropriate training and competencies for Project operators (see Schedule 2, Condition A24); and › Completion of Asbestos Clearance Certificates (see Schedule 2, Condition C15). MP advised (pers comms) that demolition has progressed across the Main Power Station and associated infrastructure, including fabric filters, Turbine Hall mechanical strip-out, turbine train dismantling, salvage recovery, chimney inlet duct demolition, Fabric Filter demolition, Ash & Dust Plant demolition, Administration Building demolition, Main Workshop demolition and South Dust Plant works. Materials have been progressively processed, segregated and stockpiled to support recycling, off-site disposal, SAQP testing and reuse pathways. Site inspection undertaken during the audit demonstrated that the general layout of the site was in accordance with SSD 24937520 and DEMP. Observations noted include: › The asbestos storage facility is currently in use (see **Plate 1**);	

Cond	Condition Text	Status	Evidence	Recommendations
			› Demolition stripping out works is occurring at the Liddell Power Station (see **Plate 29**); › Work areas are being well maintained and dust is being managed (see **Plate 31**); › Work Permits and Procedures pertaining to specific demolition tasks are being implemented. The Project noticeboard displayed site information, including contractor details, site maps, permit information, and the prevailing weather outlook, providing personnel with access to key operational and safety information (see **Plate 18** and **Plate 33**); › Safety signage was present around the demolition work area (see **Plate 17**, **Plate 19**, **Plate 20**).	
C19.	An **asbestos management sub-plan** must be prepared as part of the demolition environmental management plan. The plan must: a) be prepared in accordance with the *SafeWork NSW 2022 Code of practice: How to safely remove asbestos, SafeWork: guidance on managing asbestos in soil*, Schedule B2 of the NEPM and any requirements of the Site auditor;	C	Deemed compliant in previous IEA.	
	b) identify any known or potential areas of concern within the approved development area for asbestos containing materials and synthetic mineral fibre;	C	Deemed compliant in previous IEA.	
	c) include: vi. procedures for identifying, handling and disposing of asbestos waste, asbestos containing materials and synthetic mineral fibre;	C	Deemed compliant in previous IEA.	

Cond	Condition Text	Status	Evidence	Recommendations
	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.			
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;	C	AGLM sought approval to substage the submission of the Blast Management sub-plan (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. A Blast Management Subplan was subsequently prepared by a suitably qualified and experienced (SQE) person. Details of the SQE are provided in Appendix E of the BMSP. The BSMP is published on AGLM website. Sighted the following approval letters for the subplans: › 'Chimney Stack Blast Sub-plan (Rev 2, November 2025)' approval letter dated 12/01/2026; › 'Test Blast Sub-plan' (Rev 03, November 2025) approval dated 02/12/2025; and › 'Test Blast Sub-plan (Test Shot #2)' approval letter, dated 15/01/2026.	
	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;	C	Section 7.18 of the BMSP covers environmental assessments for airblast overpressure, ground vibration, fly and dust.	

Cond	Condition Text	Status	Evidence	Recommendations
	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);		Section 7.26 provides details of notification to owners and occupiers of structures, and providers of services adjacent to blast. Monitoring to be completed in accordance with a monitoring plan a provided in 7.20 of this BMSP. Environmental effect to be managed by delays in detonation sequence, covering charges, distance to receivers, with dust control measures as detailed within BMSP Sections 7.19, 7.20 and Appendix H.	
	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;	C	Aspects relating to compliance with conditions of the consent relating to blasting are addressed in Section 1.1 of BMSP. Environmental risks and control measures are outlines in Section 7.18, 7.19, 7.20, Section 8, Appendix C and Appendix G of BMSP, while measures to manage dust are outlines in Section 7.18, 7.35 and 7.23 of BMSP.	
	d) include a monitoring, evaluation and reporting program that uses an approach that is consistent with the environmental management strategy required by condition B1.	C	Sections 7.18, 7.19 and 7.20 of BMSP. The specific monitoring locations have been provided within the monitoring plan included as Appendix H of the BSMP.	
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	Deemed compliant in previous IEA.	
	b) describe the mitigation measures that will be implemented to: i. comply with the conditions of this consent; and	C	Deemed compliant in previous IEA.	

Cond	Condition Text	Status	Evidence	Recommendations
	ii. manage the risks identified in the environmental risk assessment required by condition B1;			
	c) include a monitoring, evaluation and reporting program that uses an approach that is consistent with the environmental management strategy required by condition B1.	C	Deemed compliant in previous IEA.	
ASBESTOS DISPOSAL FACILITY				
C23.	The asbestos disposal facility must be designed and constructed in accordance with the relevant requirements of the *NSW EPA Environmental Guidelines Solid Waste Landfills (2016)*, 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	Deemed compliant in previous IEA.	
	b) be prepared in consultation with the NSW EPA;	C	Deemed compliant in previous IEA.	
	c) be submitted to the Planning Secretary for approval prior to the commencement of construction of the asbestos disposal facility; and	C	Deemed compliant in previous IEA.	
	d) be implemented, as approved, by the Planning Secretary.	C	Site inspection undertaken during the audit demonstrated that the Asbestos storage facility is operational. Observations indicate that the Facility was constructed generally in accordance with the 'Liddell Ash Dam Closure Containment Area Detailed Design Report' (GHD) dated 04/09/25 (see **Plate 1).** 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	

Cond	Condition Text	Status	Evidence	Recommendations
			pumped through sediment basins which ultimately report to the Borrow Pit sediment dam (see **Plate 2**). 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, concrete matting liner was in use at the Facility and water is diverted to a sediment dam below the Asbestos storage facility. Rock armouring was also used for erosion control and to provide greater stability at points within the diversion drains (see **Plate 3**, **Plate 6**).	
C25.	A **construction quality assurance plan** must be prepared for the asbestos disposal facility. The plan must: a) be provided to the NSW EPA for review prior to the commencement of the construction of the asbestos disposal facility; and	C	Deemed compliant in previous IEA.	
	b) be prepared in accordance with the relevant requirements of the NSW EPA *Environmental Guidelines Solid Waste Landfills* (2016).	C	Deemed compliant in previous IEA.	
C26.	A **construction quality assurance report** must be prepared for the asbestos disposal facility. The report must: a) be provided to the NSW EPA for review prior to the commencement of the operation of the asbestos disposal facility; and	C	A Construction Quality Assurance (CQA) Report was prepared by GHD Pty Ltd. The 'CQA Report Liddell Power Station Containment Cell 3 Base and Walls', dated 5/12/2025, was sighted. AGLM provided a copy to the NSW EPA for review. In a letter dated 13/01/2026, the EPA noted that a Site Auditor had provided interim audit advice on the CQA Report and that the proponent had incorporated this	

Cond	Condition Text	Status	Evidence	Recommendations
			interim audit advice into the report. Accordingly, the EPA did not undertake a comprehensive review of the CQA Report and provided no further comment.	
	b) be prepared in accordance with *NSW EPA Environmental Guidelines Solid Waste Landfills* (2016).	C	Section 1.2 of the CQA Report Liddell Power Station Containment Cell 3 Base and Walls' notes the preparation of the report was in accordance with the NSW EPA (2016) *Environmental Guidelines: Solid Waste Landfills, Second Edition*.	
	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 of the DEMP outlines relevant consultation undertaken during preparation of the document. Appendix D states that '*…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.*' DPHI did not make any comment in relation to AGLM's statement or request further verification during the audit period.	

Cond	Condition Text	Status	Evidence	Recommendations
	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).	
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	A **closure and rehabilitation plan** must be prepared for the Liddell Ash Dam. The plan must: a) be submitted to the Planning Secretary for approval within twelve months of commencing development under this consent;	NT	See Schedule 2, Condition B38(a).	
	b) be prepared: i. by suitably qualified and experienced person/s; ii. in consultation with the Site auditor, NSW EPA, DS NSW and Council; and iii. generally in accordance with the *Australian National Committee on Large Dams (ANCOLD) Guidelines on Tailing Dams* (ANCOLD, 2019a), to the satisfaction of the Secretary:	NT	See Schedule 2, Condition B38(a).	
	c) include a stakeholder consultation strategy to guide rehabilitation closure planning processes and outcomes;	NT	See Schedule 2, Condition B38(a).	
	d) include detailed completion criteria for the relevant rehabilitation objectives included in Table 6;	NT	See Schedule 2, Condition B38(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	e) describe the measures to be implemented for the Liddell Ash Dam to achieve the completion criteria;	NT	See Schedule 2, Condition B38(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 B38(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 B38(a).	
	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 B38(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 B38(a).	
	j) include details of who would be responsible for monitoring, reviewing and implementing the plan;	NT	See Schedule 2, Condition B38(a).	
	k) include a process to characterise, monitor and evaluate groundwater seepage from the Liddell Ash Dam;	NT	See Schedule 2, Condition B38(a).	
	l) include an air quality management sub-plan that: 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 *Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales* (DEC, 2007) to collect data that can be used to	NT	See Schedule 2, Condition B38(a).	

Cond	Condition Text	Status	Evidence	Recommendations
	evaluate the effectiveness of the air quality mitigation measures outlined in the sub-plan; and v. incorporates a TARP for dust emissions.			
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 B38(a).	
SCHEDULE 2: PART D – REPORTING AND AUDITING				
AUDITING				
D1.	Independent Environmental Audits of the development must be conducted and carried out in accordance with *the Independent Audit Post Approval Requirements* (2020), or its latest version published on the Department's website.	C	Sighted DPHI approval dated 04/05/26 of AGLM's request, submitted via the MP Portal on 20 April 2026, to combine the IEAs for the construction and operational phases of the Project. The initial construction audit was completed on 14/10/25, with the second construction audit due by 14/04/26, and the initial operational audit due by 12/09/26. DPHI approved combining the initial operational audit with the second construction audit, to be completed no later than 14/05/26. Subsequent construction and operational audits are to be undertaken at intervals not exceeding 26 weeks.	
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	The NSW DPHI (2026) *Compliance Reporting Post Approvals Requirements* document does not require reporting during the construction phase of SSD projects.	

Cond	Condition Text	Status	Evidence	Recommendations
D3.	Compliance Reports must be prepared in accordance with the *Compliance Reporting Post Approval Requirements* (Department of Planning, Industry and Environment, 2020) or its latest version published on the Department's website and must also: a) identify any trends in the monitoring data over the life of the development;	NT	See Schedule 2, Condition D2.	
	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				
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: a) be in writing;	C	Sighted email from MP to DPHI dated 02/12/25 advising of exceedance of discharge TSS criteria which occurred from 25-26 November 2025. A Notification of Non-Compliance Report dated 08/12/25 was subsequently submitted from AGLM to DPHI, in relation to Condition C18 involving exceedance of the discharge criteria for Total Suspended Solids (TSS) from the Coal Handling Plant Sediment Basin (CHP Basin) that occurred on 26 November 2025. During an unexpected rainfall event of approximately 40.4 millimetres (mm) that occurred between 25 November 2025 and 26 November 2025, the existing CHP Basin reached capacity and began to overtop and discharge to Lake Liddell via	

Cond	Condition Text	Status	Evidence	Recommendations
			the Licensed Discharge Point included in EPL 2122 for Liddell Power Station. As the size of the CHP Basin had not yet been increased in line with the SWMSP commitments, the DEMP including the SWMSP had not been implemented in full and the discharge criteria was exceeded as the TSS of the stormwater discharge was 176 mg/L which is greater than the discharge criteria of 50 mg/L included in the SWMSP and EPL. Condition C18 of the consent requires that the DEMP, including the SWMSP, be implemented for the duration of demolition. The incident notification letter was provided to DPHI within seven days of becoming aware of the non-compliance. The notification met the other relevant following SSD 24937520 requirements, being: › 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 C18 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. Sighted DPHI letter to AGLM of 12/12/25 stating regarding the incident, which	

Cond	Condition Text	Status	Evidence	Recommendations
			notes that '*…NSW Planning has reviewed the CHP basin discharge TSS exceedance and considers that it should be recorded as an incident in accordance with Schedule 2, Condition D5 of the consent'*.	
	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	In response to the non-compliance noted against Schedule 2, Condition D4 (a) above, AGLM installed a silt curtain and boom between the CHP Sediment Basin outlet and Lake Liddell to minimise sediment migration. Following the incident, basin water was also treated with flocculant to reduce TSS concentrations and enable controlled discharge via EPL 2122 Monitoring Point 16, restoring storage capacity. AGLM subsequently upgraded the CHP Sediment Basin in accordance with EPL 2122 Condition U1 and installed additional erosion and sediment controls. The associated ESCP was reviewed and endorsed by Grant Fletcher, a Certified	

Cond	Condition Text	Status	Evidence	Recommendations
			Erosion and Sediment Control Practitioner on 20/03/26. Further preventative measures included ongoing water quality monitoring, maintenance of pre-rainfall inspections, application of flocculants as required, controlled discharge of treated water where discharge criteria are met, and maximising water reuse onsite. AGLM has continued to implement major water management works across the site during the audit period. Civil works progressed across the Main Power Station sediment basin, CHP basin, containment cell, and associated drainage areas, including excavation, batter shaping, compaction, borrow material recovery, coal bay cleaning, swale and drainage construction, spillway and bund installation, rock stabilisation, wheel wash establishment, and erosion and sediment control measures. The Main Power Station sediment basin is complete, while the CHP basin is operational with further works ongoing to enhance storage capacity and surface water management (see **Plate 10)**. The site is equipped to manage high rainfall events, with water management infrastructure and controls in place to support runoff conveyance, storage, and controlled discharge during intense rainfall condition.	
	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.	

Cond	Condition Text	Status	Evidence	Recommendations
INCIDENT NOTIFICATION				
D5.	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: a) date, time and location;	C	AGLM submitted a non-compliance notification to DPHI via email on 02/12/25 and via letter through the Major Projects Portal on 08/12/25 regarding the CHP basin discharge TSS exceedance that occurred on 26 November 2025 (see Schedule 2, Condition D4 above). The AGLM non-compliance notification letter for the TSS exceedance was: › Submitted via the DPHI Major Projects Portal on 08/12/25 as a non-compliance notification. Accordingly, AGLM were of the view that the 24-hour notification timeframe specified under Schedule 2, Condition D5 was not applicable**;** › In accordance with Major Projects reporting guidelines the date, time and location were defined; › The letter identifies failure to implement the DEMP, including the SWMSP for the duration of the demolition. AGLM notified DPHI that commencement of demolition and construction would commence on 23/07/25; › The letter outlines immediate steps and a contact person (MP) for the incident; › Sampling was undertaken on 27/11/25 returning a TSS result above the	**It is recommended that AGLM review incident reporting procedures for the Project, to ensure that these align with the requirements of Schedule 2, Condition D5 and the definition of an 'Incident' under SSD 24937520.**

Cond	Condition Text	Status	Evidence	Recommendations
			discharge criteria. Following the results, treatment of the CHP Sediment Basin with flocculant was carried out to lower TSS level within allowable criteria to enable discharge of the water via EPL Point 16 to return the basin to capacity; and › To prevent future exceedances of a similar nature, AGLM commenced preliminary works such as installing flagging and additional erosion and sediment controls ahead of bulk earth works in early January 2026, to upgrade the CHP Basin as required under condition U1 of EPL 2122. Sighted DPHI response to AGLM of 12/12/25 stating that '…*NSW Planning has reviewed the CHP basin discharge TSS exceedance and considers that it should be recorded as an incident in accordance with Schedule 2, Condition D5 of the consent'.*	
	b) a brief description of what occurred and why it has been classified as an incident;	C	See Schedule 2, Condition D5(a).	
	c) a description of what immediate steps were taken in relation to the incident; and	C	See Schedule 2, Condition D5(a).	
	d) identifying a contact person for further communication regarding the incident.	C	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).	C	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: a) the submission of an incident report under conditions D5 or D6;	**NC**	Sighted a register titled 'SSD2 Management Plan Version Tracker" dated 07/04/2026. The register notes that: › The DEMP was reviewed between 12/12/2025 and 13/03/2026 following the submission of the previous IEA (see Schedule 2, Condition D7) and elevated TSS water discharge incident (see Schedule 2, Condition D7); › The EMS S1 was reviewed following the IEA and elevated TSS water discharge incident, with the risk assessment and references updated; › The BMP was also updated on 18/12/2025 following the IEA and TSS incident, additional information regarding the Hunter Valley Delma; › The Soil and Water Management Sub Plan (SWMSP) was reviewed between 12/12/2025 and 4/7/2026 following the IEA and TSS incident; › The Water Management Plan Stage 1 (WMP S1) was reviewed between 12/12/2025 and 19/02/26 following the IEA and TSS incident; › The Dust Management Sub Plan (DMSP) was reviewed between 12/12/2025 and 30/01/26 following the IEA and TSS incident. However, it is noted that **the revision tables of DEMP, EMS S1, BMP,**	**It is recommended that the 'SSD2 Management Plan Version Tracker' is updated to record:** › **The dates when internal and external reviews of each SSD 24937520 management document are completed; and** › **The date at which each document version is published on the Project website, including the applicable publication date, and/or provide a clear reference to the location where the latest copy is retained.**

Cond	Condition Text	Status	Evidence	Recommendations
			SWMSP, WMP S1, and DSMP published on the website do not include corresponding details of the minor changes made in response to the previous IEA and water discharge incident.	
	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.	C	Effective 31 January 2026, AGLM implemented the last IEA recommendation to review Project's tracking mechanisms to ensure future notifications occur in accordance with the consent condition timeframes and records are maintained. Refer to action under Schedule 2, Condition D7.	
	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.*	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:	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.	

Cond	Condition Text	Status	Evidence	Recommendations
	a) the documents listed in condition A2(c) of this consent;		Documents listed in Schedule 2, Condition A2(c) and Schedule 2, Condition D8 were available on AGLM's public website at the time of audit.	
	b) all current statutory approvals for the development;	C	See Schedule 2, D8(a).	
	c) all approved environmental management documents required under the conditions of this consent;	C	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;	C	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 conditions of this consent, or any approved environmental management documents;	NT	See Schedule 2, Condition D8(a).	
	g) a summary of the current phase and progress of the development;	C	Viewed AGLM website which provides timeframes for current phases and progress of development.	
	h) contact details to enquire about the development or to make a complaint;	C	Viewed AGLM website which provides the following details for community enquiries and complaints: › Complaints Enquiries Hotline; › Email for questions and feedback; and › Postal details.	
	i) complaints register, updated monthly;	C	A link to a Complaints Register for AGLM developments is available on the AGLM	**It is recommended that the AGLM**

Cond	Condition Text	Status	Evidence	Recommendations
			'AGL in the Hunter Region' website. While the 'Liddell Future land Use and Enabling Works' webpage includes contact details for community complaints to be made, a link to the AGLM Complaints Register is not provided.	**'Liddell Future land Use and Enabling Works' webpage includes a link to the consolidated 'AGLM Macquarie Complaints Register 2026'.**
	j) the Compliance Reporting of the development in accordance with the Compliance Reporting Post Approval Requirements (May 2020);	NT	See Schedule 2, Condition D2.	
	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;	C	The previous IEA Report and AGLM's Response titled 'AGL Macquarie Liddell Future Land Use and Enabling Works Project – 12-week Independent Environmental Audit Action Plan' is available on the Project website. Sighted SSD-24937520-PA-41 record from the DPHI portal, showing that AGLM submitted their response to the previous IEA on 16/12/2025.	
	l) any other matter required by the Planning Secretary; and	NT	TB (pers comms) confirmed that the Secretary has not directed AGLM to publish any other matters on their website.	
	m) kept such information up to date.	**NC**	See Schedule 2, Condition D7(a) above. **It is noted that the revision tables of DEMP, EMS S1 and BMP published on the website do not include corresponding details of the minor changes made in response to the**	**It is recommended that AGLM update the documents on the Project website to capture minor reviews completed and**

Cond	Condition Text	Status	Evidence	Recommendations
			previous IEA and water discharge incident.	**ensure the latest versions are published.**

Table 2 EIS Statement of Commitments (GHD 2024)

Ref	Management Measure	Timing	Status	Evidence	Recommendations
BIODIVERSITY					
BIO1	› 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	See Schedule 2, Condition B32(c) regarding minimising clearing impacts. During the audit site inspection, 'No Go' zones were observed to be delineated across construction areas as shown in **Plate 22** and **Plate 23**. During the audit site inspection, designated vehicle parking areas were observed as shown in **Plate 21.** Stockpile areas were observed to be recorded and located within the Project disturbance boundary (as delineated). Refer to **Plate 4**, **Plate 7**, **Plate 9**). Sighted Erosion and Sediment Control Report dated 19/01/26 which recommends addition additional bunds to ensure runoff is controlled at site. Sighted Erosion and Sediment Control Report dated 09/02/26 Sighted Ground and Vegetation Disturbance Approval dated 06/11/25 which restricts activity to occur	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				only within the clearing areas nominated in the permit.	
BIO2	› 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: ▪ 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	See Schedule 2, Condition B32(e). Sighted the following examples of Pre-Clearance Surveys: › Sighted Preclearance checks of the Liddell Ash Dam access verge dated 23 January 2026 (EMM, 2026); › Sighted Preclearance checks of the Borrow Pit dated February 2026 (EMM, 2026); › Sighted Pre-clearing for the associated works for the additional sediment basin dated January 2026 (EMM, 2026); › Pre-clearance reports show that a FSC was present on site during all pre-clearance works that could affect native vegetation or the Hunter Valley Delma (*Delma vescolineata*), ensuring compliance with the BMP and the safe management of fauna. › Preclearance checks for the borrow pit dated 06/02/26 records three Spotted	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				Marsh Frogs were captured during the checks and relocated to the other side of the dam away from the work area. › Sighted a letter entitled "Pre-clearing for the associated works for the he additional sediment basin' prepared EMM Consulting (EMM), who also acted as the qualified fauna spotter/catcher during assessments undertaken on 12–13 January 2026. The letter notes the following fauna were observed EMM ecologists, but could not be captured: two Eastern Striped Skinks, three juvenile Water Dragons and one adult Water Dragon. The Eastern Striped Skinks were expected to disperse into retained vegetation. The juvenile Water Dragons were expected to remain along the pond edges, where suitable habitat was available. The adult Water Dragon was expected to relocate to suitable refuge habitat.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				› Sighted Ground and Vegetation Disturbance Approval - Application Form dated 14/11/25, which notes Southern Myotis and Hunter Valley Delma Habitat in areas proposed to be disturbed and that an Environmental team member had inspected the site for the works, prior to clearing. This demonstrates that due diligence procedures were being followed for the work/ › Sighted Ground and Vegetation Disturbance Approval - Application Form dated 24/11/25, which reports an EMM Ecologist had confirmed no inspections or FSC were required for tree within the infrastructure area.	
BIO3	› 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.	During vegetation clearing, Demolition, recontouring and stabilisation works	C	During audit site inspection: › Observed application of concrete matting in diversion drains to prevent long-term erosion near the Asbestos Facility (see **Plate 3**). › Erosion and sediment controls including sediment	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	› Limit the use of pesticides in the project footprint where possible to avoid contamination of nearby watercourses/wetland areas.			fencing in place for the works (see **Plate 6**); › Dedicated refuelling and storage places were constructed away from watercourses (see **Plate 12** and **Plate 13**), with spill kits available at key locations. LT (pers comms) confirmed that site-based vehicles also carry spill kits. Sighted portable spill kits at the Project maintenance shed (**Plate 14**); › Sighted Erosion and Sediment Control Plan -Main Store (Work Area 10) dated 06/01/2026. The Plan has a pictorial representation of dirty water, clean water and sediment discharge system. The Plan states all erosion, and sediment will be managed in accordance with sound environmental practices (Landcom, 2004) Bluebook) to prevent sediment laden water from entering any drainage or natural waterway. The Sediment Control Plans has control measures that are clearly outlined for all work areas.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				› Sighted Erosion and Sediment Control Report dated 19/01/26 which recommends addition additional bunds to ensure runoff is controlled at site. › Sighted Erosion and Sediment Control Report dated 09/02/26 which recommends controls at LAD Containment Cell and addition of bund to protect the batters on the stockpiles. The reports show AGLM has generally been implementing the required controls throughout the construction works.	
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 signage was observed.	
BIO5	› Vehicles and construction plant must be cleaned appropriately before arrival on site to help prevent the spread of the fungal pathogens *Phytophthora cinnamomi* and Myrtle Rust *(Puccinia psidii).* › 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	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				'vehicles and equipment coming and going from site must be free of mud, vegetation and seeds'. Sighted examples of Plant and Equipment Induction records dated 03/11/25 (Plant ID CRM-0540-MC-9 – Pulveriser) and 18/11/25 (AY27ZB Tilt Tray), confirming plant entering the Project site was inspected and verified as free of organic matter, including mud, vegetation and seeds. AGLM mandates this inspection as part of the plant and equipment onboarding process, with checks completed prior to approval for equipment entry to site.	
BIO6	Measures to mitigate impacts on flora and fauna from noise, vibration, waste, light and air pollution such as: › 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.	During project	C	Sighted 'Liddell Power Station Environmental Induction' Module 1 dated 03/03/26, which contains a slide for 'Land Management including Bushfire and Biodiversity'. The induction has a slide outlining waste management requirement, and states 'no waste produced offsite is allowed to be brought onto the EPL boundary for disposal, unless it is compliant to EPL requirements '.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	› Lighting should comply with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting. › Noise minimisation practices in accordance with DPE recommendations. › 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.			During the audit site inspection, it was observed that public access to the Project is restricted by a manned security entry and boom gate. All personnel and visitors to site are required to completed mandatory inductions. See SoC BIO1 for observed 'no go' zones during inspection. Levels of lighting that accompany the access road are minimal because there is no out of hours construction or equipment maintenance has occurred outside of day time period work hours (as confirmed by LT (pers comms)). See Schedule 2, Condition B8 for evidence of noise minimisation practices. See Schedule 2, Condition B6 for evidence of dust control measures. During site inspection, dust control measures were observed at the demolition site (refer to Plate Dust Suppression). Water carts were also sighted at the premises during the site inspection.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
BIO7	Detailed design will ensure that impacts to habitat for the Hunter Valley Delma *(Delma vescolineata)* / Striped Legless Lizard *(Delma impar)* are minimised to the fullest extent practical.	Prior to any clearing	C	See Schedule 2, Condition B32(g).	
BIO8	› 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).	
BIO9	› 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	Refer to SoC BIO1 for evidence that 'No-Go' zones are implemented on site. MP (pers comms) confirmed that no clearing has occurred outside of the approved project disturbance boundary during the audit period. Sighted Preclearance survey of Signage Installation Locations-Future land use & enabling works project dated 16 October 2025. EMM qualified fauna spotter/catcher attended the Liddell Power Station site on 16th October 2025 to complete a preclearance survey of the designated areas. Sighted GDVA - Application Form dated 14/11/2025. The	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				form noted an Ecologist had completed preclearance on 14/04/2026 for area where work was to occur. Sighted GDVA- Application Form dated 04/03/2026. Works included excavation of a new sediment basin, and clearing vegetation, clearing an overflow channel and lining of rocks to control erosion. There was no biodiversity impacted by the work. Sighted GDVA - Application Form dated 26/02/2026 which covered tree removal and associated vegetation clearing for the planned chimney collapse. The GVDA clearly states that at no time will Environmental No-Go Zones be entered, disturbed, damaged, or otherwise impacted. Personnel are restricted to the approved work area. The attached map clearly outlines the Site boundary for the activity. No plant, personnel, stockpiling, tracking, trimming, or clearing will occur within No-Go Zones. The "No-Go Zones" are clearly flagged and marked (see	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				Plate 22, **Plate 23**, **Plate 26**). Sighted GVDA dated 15/04/26 which states all vegetation /tree clearing is to cease if temperatures exceed 35 degrees Celsius. Weather should be monitored throughout the day. Sighted an Information Board in the Maintenance Shed summarizing weather conditions of the day and approved activities (refer to Plate).	
BIO10	› 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 briefed to work in proximity to the Pine Donkey Orchids for management or monitoring activities. The population identified in this BDAR shall be resurveyed during subsequent flowering periods and if necessary, the no-go area will be expanded.	Prior to and during the Project	C	AGLM has updated the BMP to include a commitment to resurvey the population of Pine Donkey Orchids, in accordance with the recommendation from the previous IEA. This commitment is included in BMP S1, Section 1.8.2, *Meeting Relevant Biodiversity Commitments of the BDAR*. Evidence was also provided that the species population has been flagged to prevent impacts (see **Plate 24**). Sighted GVDA Form dated 04/03/2026, which requires a toolbox talk for all personnel to ensure that orange and no-	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				go flagging zones, as identified on the Vegetation Clearing Signage, are observed. No personnel, machinery or disturbance is permitted outside the approved work areas. Imogen Waters (AGLM) advised that known populations and individuals of *Diuris tricolor* occur outside the disturbance footprint of the Project to date, except for one population located within the Stage 3 disturbance footprint. There is currently no construction or clearing activities occurring in the Stage 3 area, and none will take place until the relevant staged approvals have been obtained. As such, these populations remain undisturbed. All identified areas have been appropriately flagged by ecologists from EMM (see **Plate 24**).	
SOIL AND CONTAMINATION					
SC1	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)	Prior to works commencing	NT	It is noted that AGLM has an established system for managing soil and water impacts. Prior to the commencement of	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	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). 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). The ESCP must include the following: › 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. › Provide clean water diversions around disturbed areas. › Provide procedures for how any sediment laden water will be treated prior to leaving the project area. 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			construction and demolition works, a site-specific Soil and Water Management Plan (SWMP) was prepared, incorporating arrangements for wet weather management, erosion and sediment controls, traffic controls, and environmental inspection requirements. Evidence provided by AGLM indicates that environmental inspections and weekly site audits continue to be undertaken to proactively identify issues and implement corrective actions. It is noted also DPHI originally approved the SWMP (Rev. 1.0, May 2025) on 22 May 2025. The previous IEA recommended that the SWMP be updated to document AGLM's commitment to the use of amphibian-friendly flocculants in project sediment basins. Review of the revised SWMP prepared by Ramboll dated 07/04/26 confirmed that Project flocculant requirements are described in the plan and will be implemented in accordance with AGLM's response to the previous IEA.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	in Erosion and Sediment Control (CPESC)) as a coordinated sub plan to the SWMP.			A copy of the '*Liddell Power Station Soil and Water Management Plan* (Final 2.0)', dated 07/04/2026, was sighted during the audit. This document states: "*… This SWMP and associated sub-plans were updated in April 2026 following completion of the first Independent Environmental Audit (IEA) in December 2025. This version of the SWMP is F02 and supersedes F01 dated 2 May 2025.*" However, at the time of the audit, this version had not been uploaded to the AGLM website.	
SC2	Erosion and sediment controls will be established prior to works commencing.	Prior to work commencing	C	See Schedule 2, Condition B13.	
SC3	Temporary stabilisation of working areas as necessary in periods of inactivity which potentially may occur between stages. 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.	Demolition	C	MP (pers comms) confirmed no permanent 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 erosion potential and were scheduled for hydroseeding at the time of audit.	**It is recommended that AGML record the date and application details for hydroseeding application in the Project stockpile register.**

Ref	Management Measure	Timing	Status	Evidence	Recommendations
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	NT	See Schedule 2 Condition A7.	
SC6	Visual monitoring for spontaneous combustion should still be undertaken during excavation of the borrow area and should involve: › Noting any area of spoil with a high carbonaceous/coal content. › 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.	Demolition	NT	See Schedule 2, Condition A7.	
SC7	If an area of spontaneous combustion is encountered during excavation, the following response process should be actioned: › 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. Sighted Toolbox dated 05/12/25 for works at the CHP reporting temperatures of over 35^0C. Staff were updated on requirement to monitor for combustion in piles.	
SC8	Based on the data gaps identified, further assessment will be undertaken to determine contamination. This will include: › 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,	Post demolition or when	NT	See Schedule 2, Condition C4.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	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 within inaccessible areas, to determine ecological and human health risks. › 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	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. Management of any waste material to be disposed of offsite will be managed in accordance with a separate waste management plan.	Demolition	C	Section 5.9 of the EMS outlines the unexpected finds protocol.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
SC11	Should any unexpected contaminated soils be identified during any ground works, seek advice from a suitably qualified environmental consultant and notify the project manager. 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.	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. 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.	Prior to works commencing	NT	See Schedule 2, Condition B5.	
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 *Heritage Act 1977*.	Demolition	C	Deemed compliant in previous IEA.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	An unexpected archaeological finds procedure should be included in relevant project documentation such as the Construction/Demolition Environmental Management Plan.				
HH2	Undertake archival recording of: › 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	Deemed compliant in previous IEA.	
DEMOLITION					
DM1	Use licenced Asbestos removal contractor -Class A licence. › Implement Asbestos Management Plan. › Complete Hazardous Materials survey. › Remove asbestos from structures in accordance with Division 8.6 of the *NSW Work Health and Safety 2017* Regulation, where not safely possible to remove asbestos a risk assessment will be undertaken.	Pre-demolition	C	Deemed compliant in previous IEA.	
DM2	› Complete Hazardous Material Survey › Develop removal and handling plan	Pre-demolition	C	Deemed compliant in previous IEA.	
DM3	› Complete contamination assessment › Develop plans to control impact of contamination and demolition activities	Pre-demolition	C	Deemed compliant in previous IEA. Sighted examples of contamination assessments completed during the audit period, including: › 'Sampling and Analysis Quality Plan Stockpile Coal Bay F Assessment, Liddell Power Station, Muswellbrook, NSW' dated 03/11/2025; and	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				› Results of Coal Bay F Stockpile characterisation completed by Ramboll dated which shows asbestos was detected at two Stockpiles SP01A/2 and SP01B/2.	
DM4	› 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 '*Liddell Groundwater Monitoring Well Decommissioning'* Report dated 26/01/26, and the '*Liddell Groundwater Monitoring Well Decommission*' Report dated 30/04/26, both prepared by AECOM, were sighted. The January 2026 report confirms that a licensed driller, Jason Tucker, attended the site on 19/11/25 to undertake decommissioning activities. All monitoring wells were successfully decommissioned in accordance with the National Uniform Drillers Licensing Committee (2020), *Minimum Construction Requirements for Water Bores in Australia* (Fourth Edition). The April 2026 report states that 10 of the 16 monitoring wells were successfully decommissioned in accordance with the same guidelines. The	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				remaining six monitoring wells could not be located despite extensive searching and are therefore presumed lost or destroyed. The report recommends that AGLM undertake appropriate decommissioning of these wells should they be located during CHP civil and demolition works at the site.	
DM5	Dust management measures will be included in the PEMS, and implemented during demolition.	Pre-demolition. Demolition	C	See Schedule 2, Condition B6 and C22 above.	
DM6	Inspect roads prior to mobilising heavy equipment to site.	Pre-demolition	C	Deemed compliant in previous IEA.	
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.	
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	› Develop and implement fire management and emergency response plan › Implement Hot works permitting and controls	Pre-demolition	C	See SoC HR8.	
REHABILITATION					

Ref	Management Measure	Timing	Status	Evidence	Recommendations
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 determinatio n	NT	See Schedule 2, Condition B38.	
RH2	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: › 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.	
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	The PEMS will include the following Erosion and Sediment Control measures: › 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.	Prior to work commencing	C	See Schedule 2, Condition B15. AGLM has implemented a system for the regular monitoring erosion and sediment controls. Evidence provided from AGLM indicates	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	The objective of the ESCP is to ensure that appropriate structures and programs of work are in place to: ▪ 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: ▪ 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.			that this system includes routine environmental inspections and weekly site audits, with identified issues actioned and tracked to completion.	
WQ3	The PEMS will include the following stockpile management measures: › 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	AGLM actively segregates waste streams into designated stockpiles across the site. During the audit, stockpiles of clean concrete, contaminated concrete, metals, empty gas bottles, and transformers were observed (see **Plate 4, Plate 7**, **Plate 8, Plate 9** and **Plate 32**). AGLM maintains a register of all stockpiles on site to track and manage material quantities and classifications.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
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	Deemed compliant in previous IEA.	
WQ5	The PEMS will include details of surface water and groundwater quality monitoring to be undertaken prior to, throughout, and following construction.	Prior to wok commencing	C	Deemed compliant in previous IEA.	
WQ6	The PEMS will include details of exclusion zones that will be established for construction plant and equipment.	Prior to work commencing	C	Deemed compliant in previous IEA.	
WQ7	The PEMS will include details of spill management measures to be implemented including: › 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	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.	Prior to work commencing	C	Deemed compliant in previous IEA.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
WQ9	Works within waterfront land will be managed in accordance with the relevant guideline as deemed appropriate.	Demolition	C	Table 7-1 of the SWMSP outlines that works will be undertaken in line with the general guidance provided in the *Controlled Activities on Waterfront Land* (DPE, 2022), and that daily inspections will be taken of waterfront areas and bank stabilisation measures where works are occurring. The Main Power Station sediment basin has been developed, while the Coal Handling Plant (CHP) sediment basin remains operational with additional works underway to improve storage capacity and surface water management, with appropriate erosion and sediment controls in place (see **Plate 6, Plate 25**). No impacts to waterfront land were reported during the audit period as a result of construction activities during the audit period. AGLM undertake weekly environmental inspections with CMA personnel. AGLM inspections have a checklist of items to ensure soil and water is being management correctly	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				and clean and dirty water separated.	
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.	
WQ12	Unexpected interactions with groundwater will include the following actions: › 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. Consideration to undertaking routine monitoring of the monitoring bores in the vicinity of the works.	Demolition	C	Table 15 of the WMP S1A outlines the requirements relevant to WQ2, including ceasing work and seeking review by a hydrogeologist. TB (pers comms) confirmed that there have been no unexpected interactions with groundwater to date.	
WQ13	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.	Pre-demolition, Demolition	C	See Schedule 2, Condition C23.	
WQ14	Dewatering procedures from construction sediment basins will be outlined in the PEMS and will include (but not be limited to): › Routine and pre-discharge sampling and analysis to confirm absence of contaminants exceeding applicable criteria.	Pre-demolition, Demolition	C	The Department of Planning, Housing and Infrastructure (DPHI) originally approved the Soil and Water Management Plan (Rev. 1.0, May 2025) on	**It is recommended that the latest version of the SWMP is published**

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	› 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.			22 May 2025. The previous Independent Environmental Audit (IEA) recommended that the Soil and Water Management sub-plan be updated to document AGLM's commitment to the use of amphibian-friendly flocculants in project sediment basins. This update was completed on 21 February 2026. A copy of the Liddell Power Station Soil and Water Management Plan (Version 2.0), dated 07/04/2026, was sighted during the audit. This document states: "This SWMP and associated sub-plans were updated in April 2026 following completion of the first Independent Environmental Audit (IEA) in December 2025. This version of the SWMP is F02 and supersedes F01 dated 2 May 2025."	**on the AGLM website.**
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	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	

<table>
<tr><th>Ref</th><th>Management Measure</th><th>Timing</th><th>Status</th><th>Evidence</th><th>Recommendations</th></tr>
<tr><td></td><td>
<table>
<tr><th>Parameter</th><th>Units</th><th>Guideline value</th><th>Comments (reference)</th></tr>
<tr><td>pH</td><td>pH units</td><td>6.5-9.0</td><td>EPL 2122 water concentration limit</td></tr>
<tr><td>Oil and Grease</td><td>mg/L</td><td>10</td><td>EPL 2122 water concentration limit</td></tr>
</table>
It is recommended that monitoring is retained at existing EPL 2122 surface water monitoring locations for the activities associated with the project:
› 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.
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.</td><td></td><td></td><td>outlines the incident procedure.
TB (pers comms) confirmed that AGLM undertakes environmental reporting and exceedance notifications in accordance with EPL 2122 and SSD 24937520 requirements. As noted in Schedule 2, Condition D4, an exceedance of the EPL 2122 for TSS from the CHP Basin in November 2025. The incident occurred on 26 November 2025. During an unexpected rainfall event of approximately 40.4 mm that occurred between 25 November 2025 and 26 November 2025, the existing CHP Basin reached capacity and began to overtop and discharge to Lake Liddell via the licensed discharge point included in EPL 2122 for the site. This was reported to the DPHI. See Schedule 2, Condition D4.</td><td></td></tr>
<tr><td colspan="6">AIR QUALITY</td></tr>
<tr><td>AQ1</td><td>Prior to demolition commencing, a Dust Management Plan (DMP) will be prepared which would include details of:
› Frequency of onsite and offsite inspections to monitor compliance with the air quality management strategy.</td><td>Prior to works commencing and during works</td><td>C</td><td>Refer to Schedule 2, Condition C22.</td><td></td></tr>
</table>

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	› The name and contact details of the person(s) accountable for air quality and dust issues. › Procedure for receival 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). › 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	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: › Soft-strip inside buildings before demolition › Pre-watering › Forecasting › Sprinklers 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.	Pre-demolition, demolition, recontouring.	C	See Schedule 2, Condition C20. A Blast Management Subplan was prepared by a suitably qualified and experienced (SQE) person. Details of the SQE are provided in Appendix E of the BMSP. The BMSP and associated subplans are published on AGLM website.	
NOISE					

Ref	Management Measure	Timing	Status	Evidence	Recommendations
NV1	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. As it is proposed that works will be undertaken outside of standard hours on Saturday, it is recommended to inform the closest residents and other sensitive land use occupants within 14 days of commencement of any out of hours works. 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. 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. Maintain good communication between the community and project staff. Consider a regular newsletter with site news, significant project events and timing of different activities. 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.	Prior to works commencing	C	AGLM completed the recommended action from the previous IEA (December 2025) to update the Project NVMP as identified in the previous IEA. Table 7-1 of the NVMP now includes a commitment to notify landholders at least seven calendar days before work starts, including the expected building period, likely noisy works, their duration, noise mitigation measures and any respite periods. Sighted CMA QSE Toolbox Talk dated 9 January 2026 which states that dust suppression, noise control and waste segregation must be actively maintained. With regard to working out of hours, please refer to Schedule 2, Condition B11. Sighted AGLM 2025 Noise Monitoring Reported dated 5 May 2026 prepared by GHD. Table 5.3 of the report shows that the development was complying with the noise limits at the time of monitoring, with no noise discernible at locations R21 and R28. MP (pers comms) advised that the Project is discussed	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				regularly at the AGLM Community Consultative Committee (CCC) meetings. Viewed minutes of the AGLM Hunter CCC from 20/11/25, which note that an update on the Project was provided.	
NV2	A PEMS should be prepared post approval, after the contractor has been engaged and prepared its construction methodology. 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 reasonable work practices and noise mitigation measures to manage sensitive receptors that are predicted to be 'noise affected'. PEMS should also include: › 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 The PEMS must be updated as necessary to account for changes in noise and vibration management issues and strategies. Provide a readily accessible contact point, e.g. through a 24-hour toll-free information and complaints line. Document and maintain a complaints register detailing the following: › Date and time › Complainants' details › Person receiving complaint and person referred to › Description of complaint	Prior to works commencing	C	Deemed compliant in previous IEA. Section 8.4 of the NVMP outlines the noise monitoring procedure, which includes noise monitoring measures. See Schedule 2, Condition D7 which addresses the requirement to review management plans. Section 4.8 of the EMS describes the community consultation strategy and complaints procedure for SSD 24937520. The status of out of hours work procedures are described in Schedule 2, Condition B11. The implementation of lant and equipment maintenance during the audit period are described in Schedule 2, Condition A24(a).	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	Provide quick response to complaints, with complaint handling staff having both a good knowledge of the works and ready to access information. All employees, contractors and subcontractors are to receive an induction. The induction must at least include: › 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 › Site opening/closing times (including deliveries) › Environmental incident procedures 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. 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. 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.				

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	Use quieter and less vibration emitting construction methods where feasible and reasonable. Regularly inspect and maintain equipment to ensure it is in good working order. Also check the condition of mufflers. Equipment must not be operated until it is maintained or repaired, where maintenance or repair will address the character of noise identified. Compliance monitoring should be undertaken to investigate complaints.				
TRAFFIC					
TT1	A Traffic Management Plan (TMP) will be prepared for the project prior to construction commencing. The TMP will address traffic movements associated with the decommission phase of the project, in particular the impact of OSOM vehicles required for the project. 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.	Pre-demolition	C	See Schedule 2, Condition B20.	
TT2	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. Loading vehicles are generally expected to only use internal road network.	Demolition	C	Deemed compliant in previous IEA. During site inspection, all vehicles and work activities were observed to be restricted to the approved designated	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				areas, with 'No-go' zones delineated in the field.	
TT3	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.	Demolition	NT	See Schedule 2, Condition A23.	
TT4	Truck deliveries to and from the site will be scheduled outside peak hours where possible.	Demolition	NT	TB (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. 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	Deemed compliant in previous IEA.	
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, the internal access roads were observed to be well maintained, with road surfaces in good condition and adequate drain provided (refer to **Plate 25**).	
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	Deemed compliant in previous IEA. All parking areas are within the Project Boundary away from public roads.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
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 '.	
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. TB (pers comms) confirmed that no OSOM movements for the Project were required during the audit period.	
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	NT	TB (pers comms) confirmed that no OSOM movements for the Project were required during the audit period.	
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	NT	TB (pers comms) confirmed that no OSOM movements for the Project were required during the audit period.	
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	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				Ground and Vegetation Disturbance Approval (GVDA). See Schedule 2, Condition B34 for examples of GVDA's and associated biodiversity clearance reports 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.	
LC5	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 *AS 4282 – Control of the obtrusive effects of outdoor lighting.* Projects post this one will be subject to their own assessment and mitigation measures.	During the project	NT	See Schedule 2, Condition A9.	
SOCIAL AND ECONOMIC					
SE1	A Community and Stakeholder Engagement Strategy will be developed. The strategy will provide a method for: › Maintaining ongoing, regular and transparent communication with key stakeholders and the community	During the project	C	AGLM addressed the recommendation from last Audit to update the Stakeholder Engagement Strategy (SES) to outline	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	› 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			measures for communicating with stakeholders regarding housing demand in the 'Community and Stakeholder Engagement Strategy – Liddell Future Land Use and Enabling Works' (Rev 2, December 2025). A document outlining Stakeholder groups, communication timing and methods for the Project, is located in Appendix A of the Plan. .	
SE2	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: › 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 › To define the requirements for the complaints management system to be implemented	Prior to commencing Demolition works	C	Appendix A of the SES – Communication Management Plan outlines, the key stakeholders, key concerns, engagement method, frequency and relationship owner.	
SE3	Aligned with AGL's Reconciliation Action Plan (AGL, 2021) AGL has committed to prioritising opportunities for Aboriginal workers and procurement in its projects. 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.	During the project	C	Table 6 of the SES outlines the applicable actions from the AGLM Reconciliation Action Plan. Table 6 outlines a commitment to include requirements for First Nations participation (procurement/employment) in	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	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.			project tenders over $10 million. Sighted summary of CMA [Project Contractor] Social Diversity, Inclusivity and other Engagements update for February 2026. The report states CMA is currently engaging 86.46% local workforce. CMA also participated in a University of Newcastle Expo Day on 18/02/26 to promote future career pathways in demotion, civil works and remediation works. Report also states that about 2,800 Local indigenous hours were completed.	
SE4	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. These opportunities will support local community values, identity, and pride.	During the project	C	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. Sighted minutes of the AGLM Hunter CCC from 20/11/25, which note that a Project update was provided. The minutes of the CCC meeting also note one of the decommissioned Liddell Power Station turbines will be	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				donated to Muswellbrook Shire Council. RZ (pers comms) confirmed there were advanced discussions on community participation and awareness of the planned Liddell Power Station Chimney demolition event planned for end of May 2026. Sighted a marketing advertisement for Liddell Works stating that *'…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.'*	
WASTE					
WM1	A waste management plan for the project will be prepared prior to works commencing. The waste management plan will detail: › 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	Evidence was provided to confirm that a Waste Tracking Register was maintained for the site during the audit period (15/10/25 to 05/05/26), recording 53 waste movements and the removal of 300.10 tonnes of waste. Waste was classified in accordance with the EPA Waste Classification Guidelines and transported to appropriately licensed disposal	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				facilities. General Solid Waste accounted for 182.76 tonnes (60.9%), primarily comprising demolition and construction materials, while Special Waste (Asbestos) accounted for 117.34 tonnes (39.1%) and comprised asbestos-containing materials requiring specialised handling and disposal. Waste was transported to licensed facilities, including Muswellbrook Waste and Recycling Facility and Veolia Raymond Terrace. All waste movements were recorded against unique CMA Docket Numbers and Merchant Ticket Numbers, with records including waste classification, transport details, vehicle registrations, and disposal dates, providing full traceability from generation to final disposal.	
WM2	Awareness of waste minimisation practices will be included in the project induction.	Pre-demolition, Demolition.	C	Sighted 'Liddell Power Station Environmental Induction' Module 1 dated 03/03/26 which states all personnel are to reduce, reuse or recycle materials in preference of disposing them. Personnel are to utilise the correct bins on the site for recycled materials	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				and waste, bins are not to be overfilled.	
WM3	Waste will be classified, managed and disposed of in accordance with the *Waste Classification Guidelines* (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.	C	See Schedule 2, Condition B7.	
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	AGLM completed the recommendation made in the previous IEA to update the DEMP to outline that the use of biodiesel was previously investigated. Sections 3.3.3 and 5.8 of the revised DEMP dated 13/03/26. Section 3.3.3 and Section 5.8 of the DEMP were updated to refer to previous AGLM reviews into	**It is recommended that the revised DEMP is published on the Project website.**

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				potential biodiesel use, which had confirmed that the product was not feasible.	
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	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. 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'. During the audit site inspection, mobile equipment was observed to be switched off when not in use (see **Plate 21**, **Plate 28**).	
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	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				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 roadways.	
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 for the backfilling of voids and ground levelling. It was noted during the audit site inspection that CMA were stockpiling materials for reuse. Sighted recovered steel plates being reused to cover pits at Demolition site.	
HAZARD AND RISK					
HR1	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	Demolition	C	A Blast Management Subplan was prepared by a suitably qualified and experienced (SQE) person. Details of the	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	procedures will ensure the charge is prepared and fired safely. This information includes: › 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.			SQE are provided in Appendix E of the BMSP. The BMSP and associated subplans are published on AGLM website. See Schedule 2, Condition C20.	
HR2	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. 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. The explosives containers should be protected against physical damage and regularly checked for spills and leaks.	Demolition	C	See Schedule 2, Condition C20.	
HR3	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.	Demolition	NT	According to Table 5 of the DEMP, HR3 will be addressed within the BMSP which has not been developed yet. TB (pers comms) confirmed no storage	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
				of explosives was required for during the audit period. See Schedule 2, Condition C20.	
HR4	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.	Demolition	NT	See HR3 above.	
HR5	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).	Demolition	NT	See HR3 above.	
HR6	The asbestos management plan will include information about the following: › 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	See Schedule 2, Conditions (a) to (c).	
HR7	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: › Review the HAZMAT Audit Report—if the register is considered inadequate for the proposed demolition, then it will be revised.	Pre - demolition	C	Refer to Schedule 2, Condition C1.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
	› 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.				
HR8	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: › Hot works resulting in ignition of surrounding vegetation. › Equipment or vehicles being used in long grass. › 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.	During the project	C	Deemed compliant in previous IEA.	
HR9	Implement the demolition management measures identified in the Demolition Impact Assessment Report (GHD, 2022c).	Demolition	C	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. Refer to Schedule 2, Condition C18 for evidence that the DEMP is being implemented.	

Ref	Management Measure	Timing	Status	Evidence	Recommendations
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

NSW Department of Climate Change, Energy, the Environment and Water

Our ref: OUT26/5431

Dorian Walsh
Xenith Consulting

13/05/2026

Subject: Liddell Future Use & Enabling Works Project - Independent Environmental Audit – SSD-24937520

Dear Dorian Walsh,

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. Consideration is also to be given to the relevance of excluded works at the site with reference to the factsheet at the following link: Interpreting excluded works – dams
- 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,

Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

From: Sharon Pope
To: Dorian Walsh
Cc: Chaka Chirozva; Theresa Folpp
Subject: RE: Liddell Future Use & Enabling Works Project SSD-24937520 Independent Audit Consultation
Date: Saturday, 9 May 2026 12:38:02 PM
Attachments: image001.png
image002.png

Hello Dorian

Theresa is pretty busy, so I'll respond for both of us.

We are aware that AGL have constructed the waste deposition site and haul road, so it would be good if you could check on their sediment and erosion control activities, dust management activities and that the area of disturbance matches the approval.

Various buildings on the site have now been demolished, could you also check that they have decommissioned any on-site wastewater management facilities that are no longer required and that they are recording locations that may contain potential soil contaminants.

Regards

Sharon Pope | Director Environment and Planning | PSM
Muswellbrook Shire Council
www.muswellbrook.nsw.gov.au

Campbells Corner 60-82 Bridge Street Muswellbrook NSW 2333

From: Michael Howat
Sent: Monday, 11 May 2026 3:54 PM
To: Dorian Walsh
Subject: RE: Liddell Future Use & Enabling Works Project SSD-24937520 Independent Audit Consultation

Dorian,

Thank you for your email below seeking any comments or matters from the EPA in relation to the Liddell Future Use & Enabling Works IEA.

There are no issues or matters we would like to raise as part of this audit process or its scope.

If you'd like to discuss any of this or have any other questions please contact me on the details below.

Kind regards

Michael Howat
A/Manager – Operations
NSW Environment Protection Authority
www.epa.nsw.gov.au
Report pollution and environmental incidents 131 555

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
5 May 2026

Table 1 Meeting Invitees

Name	Initials	Title	Company
Matthew Parkinson	MP	Manager Environment and Approvals	AGLM
Trescinda Brown	TB	Advisor Environment (Contractor)	AGLM
Kathleen Coy	KC	Advisor Environment	AGLM
Simon Bradley	SB	Closure Superintendent	AGLM
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
8:30am - 9:00am	**Opening Meeting** › Introductions / Housekeeping (MP) › IEA scope and purpose (DW) › Confidentiality arrangements (DW) › IEA process and timing (DW) › Overview of Project activities during the audit period (MP)	Meeting Room	All
9:00am 12:30pm	**Site Inspection** › Review of environmental controls for key areas (including asbestos disposal facility / and LPS demolition areas): ▪ Amenity management ▪ Active construction areas ▪ Water management, erosion and sediment controls ▪ Biodiversity controls ▪ Laydown areas and storages ▪ Waste and materials management	Field	MP, TB, KC, RZ, LT
12:30- 1:00pm	**Lunch**		

Time	Description	Location	Invitees
1:00- 2:30pm	**Compliance Review** › SSD 24937520 conditions and environmental commitments › EA and Management Plan commitments › Site procedures	Meeting Room	All
2:30- 3:00pm (TBC)	**Close Out Meeting** › Overview of preliminary findings › Summary of additional information requirements › Confirmation of process for audit completion and reporting	Meeting Room	All

Appendix F
Site Inspection Plates

Plate 1 - Entry to asbestos disposal facility

Plate 2 – AirCheck air sampling equipment near entrance to asbestos disposal facility

Plate 3– Fenced boundary of the Project area and concrete matting in diversion drains

Plate 4 – Waste stockpiles & signage in the Liddell demolition area

Plate 5 – Fill point in place near the Liddell demolition area

Plate 6 – Sediment control drains and dam downslope of the asbestos disposal facility

Plate 7 – Concrete stockpiling at the Liddell demolition area

Plate 8 – Empty cylinder storage area at the Liddell demolition area

Plate 9 – Tub filled with separated Copper at the Liddell demolition area

Plate 10 – Drainage structure construction near the Coal Handling Plant demolition area

Plate 11 – Self-bunded chemical storage area at Liddell demolition area

Plate 12 – Self bunded diesel storage tank at the Liddell demolition area

Plate 13 – Bunded diesel generator outside the asbestos disposal facility

Plate 14 – Potable spill response kits in Maintenance Shed

Plate 15 – Decommissioned bulk hydrocarbon storage tanks at the Liddell demolition area

Plate 16 – Skip bin at the Liddell demotion area

Plate 17 – Safety sign at the Liddell demolition area

Plate 18 – Permits available at the Liddell demolition muster area

Plate 19 – Safety signage at the entry to the Liddell demolition work area

Plate 20 – Demarcation of restricted area in the Liddell demolition area

Plate 21 – Fuel trailer parked at asbestos disposal facility

Plate 22 – 'No Go' zones demarcated around vegetation adjacent to Liddell demolition area

Plate 23 – 'No Go' zones demarcated around vegetation adjacent to Liddell demolition area

Plate 24– 'Flagging' around Donkey Orchid (*Diuris tricolor*) site (source: AGLM, TB)

Plate 25 – Fencing and concrete matting along access road to asbestos disposal facility

Plate 26 – "No go" fencing to protect sensitive environmental areas around the Liddell demolition area boundary

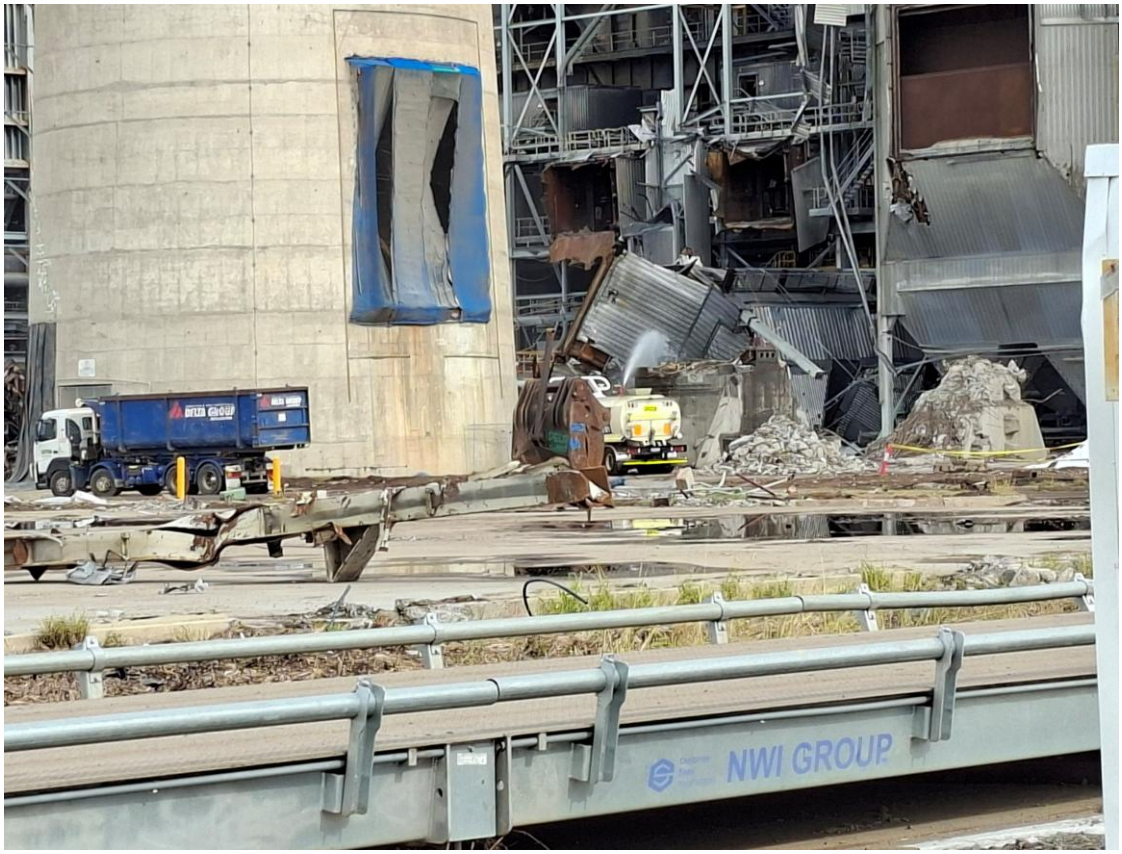

Plate 27 – Water cart in use at the Liddell demolition area

Plate 28 –Water Cart available at the Liddell demolition area

Plate 29 – Active demolition area at the Liddell site

Plate 30 – Waste segregation and control at the Liddell demolition area

Plate 31 Example of covered stockpile to prevent dust

Plate 32 – Segregated metal waste at the Liddell demolition area

Plate 33 – Notice board at Project muster area showing site maps, permits and weather outlook