

2025 Annual Compliance Report

Liddell Future Land Use and Enabling Works Project



Document revision history

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Glossary and Terms

Term	Definition
ACHMP	Aboriginal Cultural Heritage Management Plan
ACM	Asbestos Containing Material
AGLM	AGL Macquarie (Proponent)
AMP	Asbestos Management Sub-Plan
ANCOLD	Australian National Committee on Large Dams
AS 2601	Australian Standard 2601 <i>Demolition of Structures</i>
BDAR	Biodiversity Development Assessment Report
BCT	Biodiversity Conservation Trust
BMP	Biodiversity Management Plan (Stage 1)
Blast MP	Blast Management Sub-Plan
BPS	Bayswater Power Station
CCC	Community Consultative Committee
CMA	CMA Contracting (Principal Contractor)
CPeng	Chartered Professional Engineer
CPHR	Conservation Programs, Heritage & Regulation Group
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEC (2007)	Approved Methods for Sampling & Analysis of Air Pollutants in NSW
DEMP	Demolition Environmental Management Plan
DMSP	Dust Management Sub-Plan
DPHI	Department of Planning, Housing and Infrastructure (NSW)
EIS	Environmental Impact Statement
EMM	EMM Consulting (Environmental Consultant)

EMS	Environmental Management Strategy
EPL	Environment Protection Licence
ESCP	Erosion & Sediment Control Plan
FSC	Fauna Spotter-Catcher
GHD	GHD Pty Ltd (engineering/design consultant)
GDVA	Ground & Vegetation Disturbance Approval
HV Delma	Hunter Valley Delma (Delma vescolineata)
HVGTs	Hunter Valley Gas Turbines
IAPAR	Independent Audit Post-Approval Requirements (2020)
IEA	Independent Environmental Audit
LAD	Liddell Ash Dam
LPS	Liddell Power Station
ML	Megalitre (water measurement)
MSC	Muswellbrook Shire Council
NEPM	National Environment Protection Measure
NHVR	National Heavy Vehicle Regulator
NPW Act	National Parks and Wildlife Act (NSW)
NVMP	Noise and Vibration Management Plan
OoHP	Out-of-Hours Procedure
OSOM	Oversize and/or Overmass (transport permits)
PCT	Plant Community Type
PFAS	Per- and Polyfluoroalkyl Substances
RAP(s)	Registered Aboriginal Parties
RMP	Rehabilitation Management Plan
SAQP	Sampling & Analysis Quality Plan



SES	Stakeholder Engagement Strategy
SSD	State Significant Development
SWMSP	Soil & Water Management Sub-Plan
TARP	Trigger Action Response Plan
TCP	Traffic Control Plan
TEC	Threatened Ecological Community
TMP	Traffic Management Plan
UST	Underground Storage Tank
VOC	Verification of Competency
WMP	Water Management Plan Stage 1

Executive Summary

The Liddell Future Land Use and Enabling Works Project (the Development) was approved by the Department of Planning, Housing and Infrastructure (DPHI) on 31 January 2025 as State Significant Development (SSD), operating under development consent SSD-24937520. Development commenced in March 2025, and construction / demolition commenced in July 2025.

This Compliance Report has been developed in accordance with Part D, Conditions D2 and D3 of SSD-24937520 and the Post Approval Requirements: Compliance Reporting (Department of Planning and Environment 2020), (Compliance PAR).

This Compliance Report covers the period of 28 March 2025 to 31 December 2025, and must be submitted to the DPHI Planning Secretary by 31 March 2026.

AGL Macquarie (AGLM) undertook a review of the Liddell Future Land Use and Enabling Works development to determine compliance during the reporting period. Of the 378 conditions and sub conditions identified within SSD 24937520, 267 were assessed as relevant and triggered for the current operations. Of those, 189 (95%) were found to be compliant with SSD-24937520, while 10 (5%) were found non-compliant.

While the identified non-compliances are generally low risk and largely administrative in nature, addressing them through improvements to plans, processes, and management actions will strengthen the Development's overall environmental compliance and performance. AGLM is committed to following up corrective actions to address the identified non-compliances and improve the development's future environmental compliance performance.

1. Introduction

1.1. Development Overview

The AGL Macquarie (AGLM) Liddell Future Land Use and Enabling Works Project (the Development) was approved as a State Significant Development (SSD) under development consent SSD-24937520 on 31 January 2025 by the Department of Planning, Housing and Infrastructure (DPHI).

The Liddell Power Station (LPS) was commissioned in 1971 and prior to closure operated as part of an integrated power generation complex located approximately 25 kilometres (km) north-west of Singleton, 15 km south-east of Muswellbrook and 165 km northwest of Sydney. Refer to **Figure 1** for site locality. The complex also incorporates the Bayswater Power Station (BPS) which was commissioned in 1985, Hunter Valley Gas Turbines (HVGTS) and a range of supporting water supply, water management, coal ash management, coal supply, power supply and control system infrastructure (see **Figure 2**).

LPS, including the HVGTS, ceased power generation operation on 28 April 2023 as part of AGLs transition towards a low-carbon future and commitment to the closure of its coal fired power stations at the end of their operating life.

The Development is being undertaken in three main stages. AGLM therefore obtained approval from the DPHI on 4 April 2025 to prepare staged management plans in accordance with Part A Conditions A19, A20 and A21 of SSD-24937520.

The works referenced in this compliance report relate solely to Stage 1.

Stage 1:

- Demolition of LPS and redundant associated infrastructure;
- Demolition of the HVGTS and any associated transmission infrastructure;
- Construction and use of asbestos disposal facility containment cells, including access road;
- Construction and use of a borrow pit for the extraction of up to 1.5 million m³ including establishment of the access road and associated water management controls;
- Rock crushing associated with LAD capping works; and
- Rerouting of the existing dual water supply pipeline from the Tinkers Creek area along the existing ash pipeline corridor to the LAD to supply water for dust suppression and rehabilitation works.

Future stages will include the following:

Stage 2:

- Rehabilitation works on the Skimmer Dam;
- Reprofilling of the Liddell Ash Dam (LAD) Liddell Ash Levee (LAL);
- Surface Water and Seepage Management – West of LAD and LAL, and Seepage Ponds 2–5; and
- Stabilisation of the LAL toe and installation of a liner to prevent water ingress from Seepage Pond 1 to the LAD.

Stage 3:

- Remediation (as required), recontouring and final landform works;
- LPS: Following completion of the demolition works the site will be prepared for ongoing industrial use;
- Borrow pit area and asbestos disposal facility: The borrow pit area and asbestos disposal facility will be rehabilitated to a safe, stable and non-polluting landform;
- Additional works associated with extraction from the Borrow Pit (up to a total of 13.5 million m³); and
- Works associated with the LAD to maintain the structural integrity of the ash retaining structures.

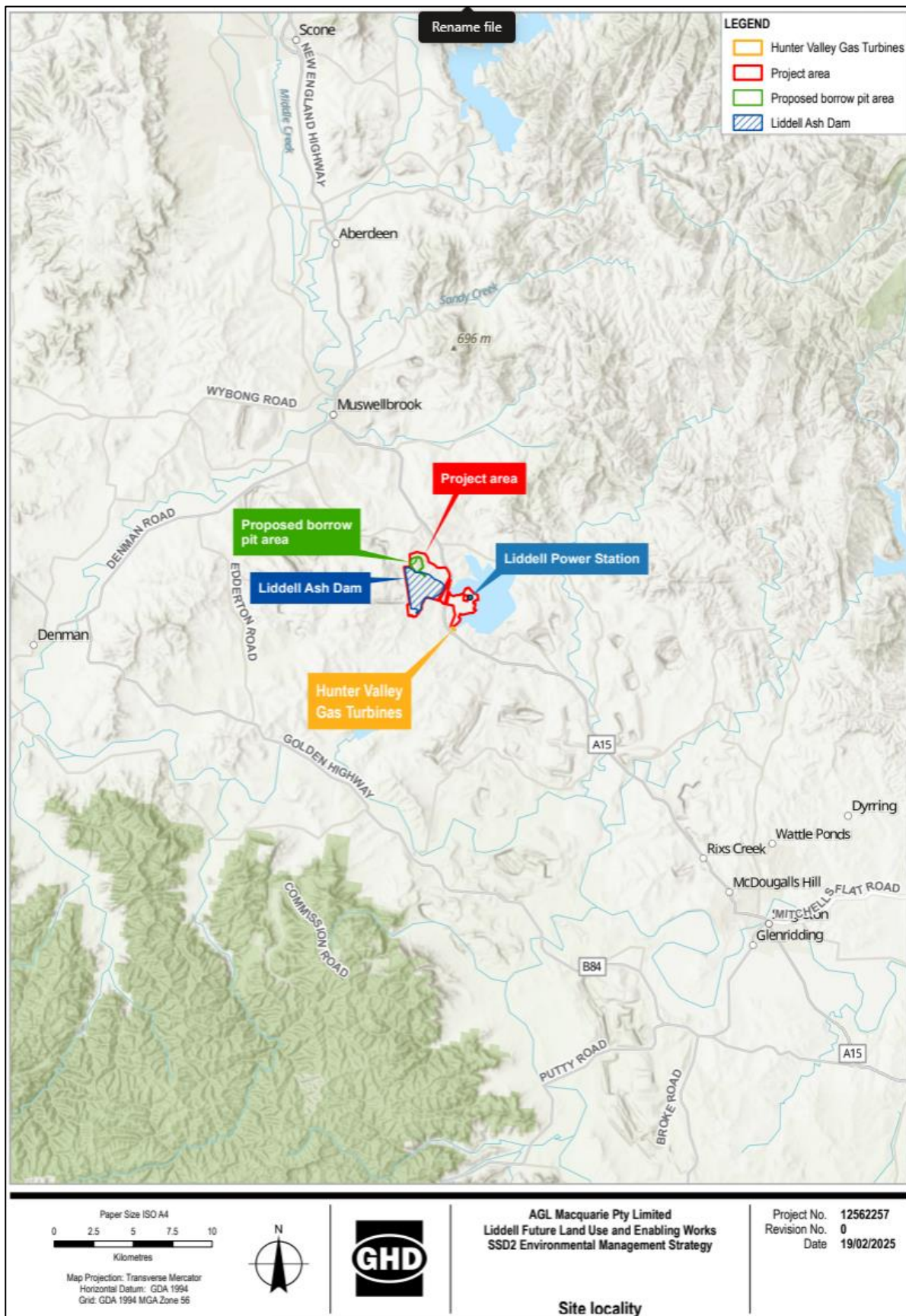


Figure 1 Site Locality

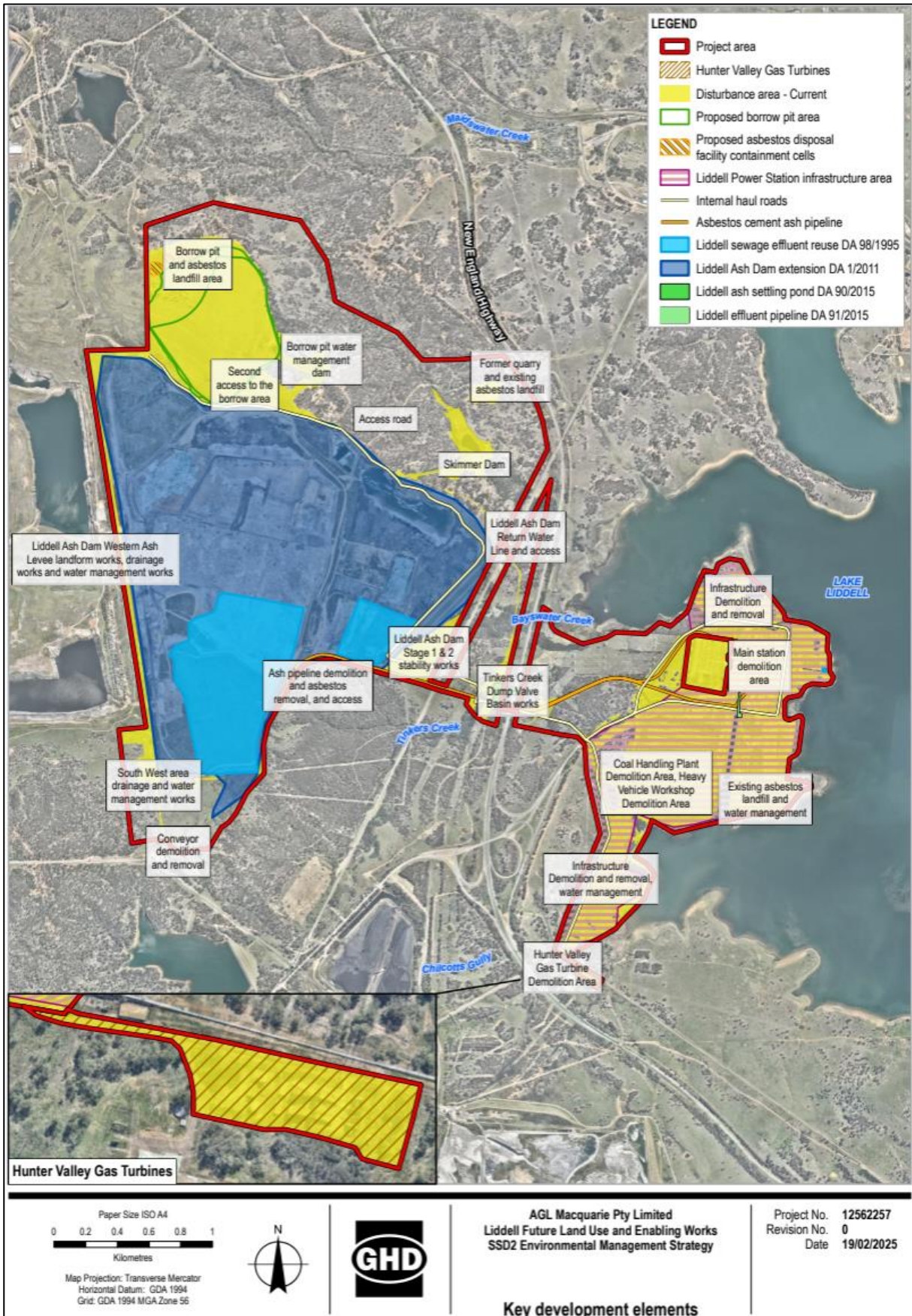


Figure 2 Key Development Elements

1.2. Compliance Reporting Phase and Period

Development commenced on 28 March 2025, this compliance report is therefore for the period 28 March 2025 to 31 December 2025.

This initial Compliance Report is due to be submitted to the DPHI Planning Secretary by 31 March 2026.

1.3. Compliance Report Scope

The scope of this compliance report includes the assessment of compliance for works completed during the reporting period. This includes the preliminary works and works associated with Stage 1. The assessment focuses on activities undertaken within the period and evaluates the compliance with the conditions of approval and other applicable regulatory requirements.

The compliance status was determined through site interviews with key personnel, field inspections and a structured review of key approval documents governing site activities, supported by a desktop assessment of relevant plans, strategies, programs, monitoring data, and correspondence applicable to the reporting period.

1.4. Compliance Report Criteria

Condition D2 of SSD-24937520 states:

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.

Condition D3 of SSD-24937520 also requires the compliance report to:

- *Identify any trends in the monitoring data over the life of the development.*
- *Identify any discrepancies between the predicted and actual impacts of the development and analyse the potential cause of any significant discrepancies.*
- *Describe what measures will be implemented over the next year to improve the environmental performance of the development.*

Refer to **Section 6**.

1.5. Development Activities

Activities that occurred during the reporting period included Stage 1 demolition and construction works which comprised of:

- Commencement of demolition works at the LPS, targeting redundant infrastructure.
- Commencement of construction of the asbestos disposal facility containment cells, including access road.
- Commencement of construction with topsoil stripping for the sediment basin and drains.
- Sediment removal from the oil and grit trap.
- Excavation of the new overflow weir and channel for the oil and grit trap structure was completed.

- Asbestos containing material (ACM) and hazardous material removal including ACM removal from Turbine Hall Levels 1 and 2, and Boiler 3 Lower Downcomer.
- A temporary asbestos storage facility was established for recovered ACM.
- Scaffold installation at the Southern Chimney Stack southern gas inlet duct to facilitate ACM removal.
- Additional ACM removal works across minor support infrastructure.
- Independent Environmental Audit (IEA).

1.6. Key Personnel

While CMA are the Principal Contractor for the demolition, the primary AGLM contacts who are responsible for the environmental/compliance management for the development is outlined in Table 1.

Table 1 Key Personnel

Name	Role	Company	Contact Details
James Coventry	Site Manager Liddell Transition	AGL	jcoventry@agl.com.au
Matthew Parkinson	Senior Environment Manager Transition and Construction	AGL	Matthew.parkinson@agl.com.au

2. Previous Report Actions

As this is the initial Compliance Review Report for the development, there are no previous report actions.

3. Compliance Status Summary

3.1. Compliance Status Summary

Appendix A of this report presents the detailed assessment of compliance against the conditions of SSD-24937520. A summary of compliance against the conditions of SSD-24937520 is presented in Table 3. In alignment with the Compliance PARs, the terms used in this Compliance Report to describe compliance of the site with the relevant approval documentation are outlined in **Table 2**. Note that the total number of conditions in **Table 3** is calculated based on the number of individual subsets to each condition, which aligns with the compliance reporting requirements at per Item 3, Section 3.1.6 of the Compliance PAR.

Of the 378 conditions and sub conditions identified within SSD-24937520, 268 were assessed as relevant and triggered for the reporting period and 168 were not triggered. Of those, 189 (95%) were found to be compliant with SSD-24937520, while 10 (5%) were found non-compliant.

Recommendations relating to the non-compliances are included in **Table 4** and in the Action Status Table presented in Appendix B.

Table 2 Compliance Status Descriptors as per PAR, May 2020

Compliance Status	Description
Compliant	The proponent has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with.
Non-compliant	The proponent has identified a non-compliance with one or more elements of the requirement.
Not Triggered	A requirement has an activation or timing trigger that had not been met at the phase of the development when the compliance assessment is undertaken, therefore an assessment of compliance is not relevant.
Note only	A statement or fact, where no assessment of compliance is required.

Table 3. Summary of Compliance

Document	Compliant	Non-Compliant	Not Triggered (NT)	Note only	Total
SSD-24937520	120	7	142	11	269
SSD-24937520 Statement of Commitments (SoC)	69	3	26	0	98

Table 4 sets out the compliance status summary for identified non-compliances with one or more subset of a compliance requirements of SSD-24937520. Note that Table 4 should be read in conjunction with the Action Status Summary table presented in Appendix B.

Table 4. Non-Compliance Summary

Condition of Consent Number	Compliance Requirement	Details of non-compliance	Reporting Agency	Formal Enforcement Action	Proponent's Response
Non-Compliances					
Schedule 2, Condition A2 (a)	The Applicant may only carry out the development: a) in compliance with the conditions of this consent;	Non-compliances (NC) with SSD 24937520 conditions were identified during this IEA. No action required.	DPHI	Nil	Not applicable (N/A)
Schedule 2, Condition B13	The development must comply with the performance measures in Table 3.	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. Recommendations: (1) Inspect chemical storage pods at the temporary asbestos facility and ensure all pods have self-bunding. (2) Deliver a Toolbox Talk that communicates spill containment and cleanup requirements to Project.	DPHI	Nil	(1) Inspection to be completed by AGL/CMA - chemical storage pods removed from temporary asbestos facility (2) AGLM will work with CMA to communicate contamination risks and spill prevention/response.
Schedule 2, Condition 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.	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 Development Application Guidelines – Applying SEPP 33. Recommendation: AGLM to 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 Development Application Guidelines – Applying SEPP 33.	DPHI	Nil	AGL will work with CMA to update chemical register to include maximum quantities/ volumes.

Schedule 2, Condition B34	The biodiversity management plan, as approved by the Planning Secretary, must be implemented for the development.	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. Recommendation: AGLM to conduct regular toolbox talks with contractors to reinforce the importance of adhering to flagged 'No-go' zones. These sessions should be scheduled regularly to ensure all new starters receive this training.	DPHI	A warning letter was issued to the principal contractor from DPHI.	AGL will work to reinforce the importance of "No Go Zones" and update site induction to implement this.
Schedule 2, Condition 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.	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. Recommendation: AGLM to review the Project's compliance tracking mechanisms to ensure that future notifications to the Department occur in accordance with consent condition timeframes, and records are maintained.	DPHI	Nil	AGLM will review and implement compliance tracking through internal system SAP. AGLM will continue to review and update Compliance Checklists and Actions Register. AGLM will review and implement compliance tracking through internal system SAP. AGLM will continue to review and update Compliance Checklists and Actions Register.
Schedule 2, Condition D7 (e)	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.	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. Recommendation: AGLM to review the Project's compliance tracking mechanisms to ensure that future notifications to the Department occur in accordance with consent condition timeframes, and records are maintained.	DPHI	Nil	

Schedule 2 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:	Overflow of stormwater from the CHP Sediment Basin on 26 November 2025 with total suspended solids above the discharge criteria was not report as an incident under Condition D5 of the consent. The event was report as a non-compliance with condition C21. Recommendation: AGLM are to upgrade the CHP Sediment Basin to contain a storm event of 77.8 mm in accordance with the SWMSP and site EPL.	DPHI	Nil	CHP sediment basin is currently being upgraded with works planned for completion by end of April 2026.
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.	The BMP S1 doesn't contain a commitment that the population of Pine Donkey Orchids will be resurveyed during subsequent flowering periods, and no evidence was available at the time of the audit that Pine Donkey Orchards identified were fenced prior to commencement of the demolition / construction. Recommendations: AGLM to: (1) Identify Pine Donkey Orchids within and nearby (within 10 metres) the 'Project Footprint' of SSD 24937520 and install exclusion fencing with 'No Go' zone signs attached. (2) Update the BMP S1 to include a commitment to resurvey the population of Pine Donkey Orchids identified in 'Biodiversity Development Assessment Report Liddell Future Land Use and Enabling Works Project' (Kleinfelder, 2023).	DPHI	Nil	(1) AGLM will ensure Fencing and signage is installed. (2) AGLM have completed this action 16/12/2025. Refer to Section 1.8.2 and 2.1.2.
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-discharge confirmation of compliance with water quality performance criteria able to be analysed in real time.	There is no commitment within the Soil and Water Management Sub Plan (SWMSP) to use 'amphibian friendly' flocculants during dewatering. Recommendation: AGLM to update the Soil and Water Management Sub Plan to outline AGLM commitments in relation to using 'amphibian friendly' flocculants in Project sediment basins.	DPHI	Nil	AGLM is in the process of reviewing and updating the Soil & Water Management Plan to reflect this

	› The methodology for dewatering including use of amphibian friendly flocculants and pH balancing agents as required.				
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 › 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	The Stakeholder Engagement Strategy (SES) does not include procedures for communication of housing demand to Project stakeholders. Recommendation: AGLM update the SES to outline measures for communicating with stakeholders regarding housing demand.	DPHI	Nil	SES updates completed

4. Incidents

One environmental incident reportable under SSD-24937520 was recorded during the reporting period. This was related to a discharge from the Coal Handling Plant sediment basin on 26 November 2026 with water quality that exceeded the discharge criteria for total suspended solids. AGLM proactively reported two events that occurred during pre-clearing activities to DPHI. Both reports were reviewed by DPHI and found to not meet the definition of an incident under SSD-24937520.

5. Complaints

Table 5 shows one community complaints were received regarding Development activities during the reporting period.

Table 5. Complaints

Total No. of Complaints received	No. of Complainants	Location of complaint	Nature of Complaint	Mitigation Measure
1	1	Muswellbrook	A member of the general public phoned Muswellbrook Shire Council (MSC) to advise them that a piece of waste material had left a skip bin, which was being transported on a Principal Contractor (PC) truck, to the MSC Waste Depot. MSC then called the PC Project Manager to inform him of the phone call.	n/a The driver was called by the Project Manager at which time the truck was stopped, and the load was inspected, additional safeguards were then installed. The truck was then returned to site. The Site QSE assessed the road for signs of waste but no waste or damage was identified. A Safety Alert was communicated by the Principal Contractor to workers on site and to the PC State Manager.

6. Environmental Performance

As this is the initial compliance report, trends in monitoring data will be reported in subsequent reports.

6.1. Environmental Management Plans

AGLM operates in accordance with the procedures and systems required under SSD 24937520.

Management plans and strategies applicable to the reporting period included:

- Environmental Management Strategy Stage 1 (EMS S1) including
 - Noise and Vibration Management Plan (NVMP)
 - Traffic Management Plan (TMP)
- Water Management Plan Stage 1A (WMP S1A)
- Biodiversity Management Plan Stage 1 (BMP S1)
- Demolition Environmental Management Plan (DEMP) including
 - Asbestos Management Sub-Plan (AMP)
 - Dust Management Sub-Plan (DMP)
 - Soil & Water Management Sub-Plan (SWMP).

Preparation of the Rehabilitation Management Plan (RMP) and the DEMP Blast Management Sub-Plan (Blast MP) was not required during the reporting period.

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

6.2. Water

The Water Management Plan Stage 1A (WMP S1A) and Soil and Water Management Sub-Plan (SWMSP) was implemented throughout the reporting period and largely compliant. Surface water and Groundwater quality monitoring was undertaken during the reporting period in accordance with EPL 2122 and SWMP S1A with appropriate response mechanisms in place. TARPs for surface water and groundwater impacts have been incorporated into the WMP S1A and SWMSP that define performance measures trigger levels, monitoring and reporting requirements and corrective actions for exceedances.

Water movement permits confirmed that contractors utilised excess water from sediment basins for dust suppression, reducing reliance on clean water sources. Recycled water usage was documented in principal contractor monthly reports.

6.3. Waste

The approved EMS and DEMP outlines the waste management measures. Both the EMS and DEMP identify the waste management measures undertaken in relation to storage, tracking, disposal, reuse,

recycling, as well as the training of site personnel. The EMS and DEMP were implemented during the reporting period.

During the reporting period, waste management was generally compliant and effective. Active construction and demolition areas were well maintained, with only minor housekeeping issues observed. Waste materials were contained within designated work boundaries, and segregation bins were available and used appropriately. Waste generated continued to be removed by licensed waste contractors and transported to approved facilities. Waste movements were recorded in the waste register, and disposal dockets were retained in accordance with compliance requirements.

The asbestos disposal facility remained under construction and at the end of the reporting period, was not yet commissioned; therefore, no asbestos disposal activities occurred during the reporting period.

6.4. Erosion and Sediment Control

The Stage 1A Water Management Plan (WMP S1A), and the SWMP, was implemented throughout the reporting period.

Various Erosion and Sediment Control Plans (ESCPs) were prepared during the reporting period. AGLM designed the containment cells to divert clean water around the facility via diversion drains, directing flows to sediment basins that ultimately discharge to the Borrow Pit sediment dam. Construction works to enlarge the existing oil and grit trap overflow basin were completed, and two diversion drains were installed to manage surface water runoff with appropriate erosion and sediment controls.

6.5. 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.

Site personnel completed inductions which include content on the safe operation of plant and equipment. Plant and equipment are appropriately assessed prior to mobilisation to site. Daily inspections of equipment and regular maintenance actions were being completed. Equipment was operated effectively to minimise dust emissions.

6.6. Air Quality

The EMS, DMSP and the AMP within the DEMP was approved and implemented during the reporting period.

Generation of dust from Development equipment and exposed areas was adequately managed during the audit site inspection through watercart use and watering down of active work areas. Weather conditions were monitored and site works adjusted to suit inclement conditions. SiteHive dust monitoring for PM₁₀ and PM_{2.5} was implemented during the reporting period. No complaints in relation to air quality impacts from the Development were received during the reporting period.

6.7. Biodiversity

The BMP was approved and implemented during the reporting period. The disturbance boundary was clearly delineated and inspections were undertaken to confirm implementation of biodiversity controls, including pre-clearing inspections and monitoring.

During the reporting period, a contractor tracked machinery through a flagged 'No Go' zone. The 'No Go' exclusion flagging was reinstated following the incident, and the requirements around 'No Go' zones were tool boxed with the work crew.

Inductions include content on biodiversity management requirements.

6.8. Visual Amenity and Lighting

During the reporting period, demolition and construction works were undertaken during daylight hours only, with outdoor lighting only used for the Development carpark and offices. The colour and layouts of the temporary site offices and construction laydown areas were generally nonintrusive and located in an area that is not readily visible to private receptors.

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

6.9. Noise

The NVMP, an appendix to the EMS, was approved and implemented during the reporting period. AGLM operated noise monitors in accordance with the NVMP during the reporting period. AGLM employees and contractors undertake site inductions which includes content on noise management considerations. Noise monitoring was undertaken during December 2025.

6.10. Aboriginal Heritage

No Aboriginal heritage items were salvaged during the reporting period. There was no disturbance to Aboriginal heritage items during the reporting period. The induction discusses Aboriginal heritage obligations and response procedures for unexpected finds.

Aboriginal heritage is managed in accordance with the AGLM ACHMP (AECOM, 2026).

6.11. Non-Aboriginal Heritage

Section 5.9 of the EMS outlines the unexpected finds protocol for heritage items and was implemented during the reporting period. The Liddell Power Station Transition Photographic Archival Recording includes photographs of the fence posts and associated structures, with provision of historical background information that was archived during the reporting period.

6.12. Rehabilitation

No rehabilitation activities were undertaken during the reporting period.



6.13. Bushfire Management

AGLM manage bushfire risks in accordance with the AGLM Bushfire Management Plan (AGLM, 2025).

6.14. Contamination

A NSW Environment Protection Authority (EPA) Accredited Site Auditor has been engaged for the Development. A formal contamination audit commenced in the reporting period. Several interim audit advice letters have been issued by the Site Auditor during the reporting period.

The asbestos disposal facility was under construction during the reporting period, and the temporary asbestos storage facility at the LPS site is being used in the interim.



7. APPENDICES

Appendix A – Compliance Table

Appendix B – Action Status Table

Appendix C – Site Photo's

Appendix D – Compliance Report Declaration Form



Appendix A – Compliance Table

Condition of Consent	Compliance Requirement	Development Phase	Evidence and Comments	Compliance Status
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.	At all times	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.	Compliant
Terms of consent				
A2	The Applicant may only carry out the development: (a) in compliance with the conditions of this consent;	At all times	Some non-compliances were identified as outlined in this checklist and report. However, these are not considered to represent material issues that would prevent a compliant finding against Condition A2 being made. Therefore, based upon the available information, it is considered that the development generally complies with requirements of Condition A2. Non-compliances (NC) with SSD 24937520 conditions were identified during the IEA (see below).	Non-compliant
A2(b)	in accordance with all written directions of the Planning Secretary;	At all times	Correspondence from Department of Planning, Housing and Infrastructure (DPHI) regarding SSD 24937520 documents are noted against the relevant conditions below.	Compliant
A2(c)	generally in accordance with the EIS; and	At all times	A review of AGLM documentation found that the Project is being carried out generally in accordance with the EIS.	Compliant
A2(d)	generally in accordance with the Development Layout in Appendix 1.	At all times	The site layout is generally consistent with that shown in Appendix 1 of SSD 24937520.	Compliant
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	At all times	Noted. Directions from DPHI on SSD 8889679 documentation are noted against the relevant conditions below.	Compliant
A3(b)	the implementation of any actions or measures contained in any such document referred to in condition A3(a).	At all times	Noted. Directions from DPHI on SSD 8889679 documentation are noted against the relevant conditions below.	Compliant
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.	At all times	Personnel interviews confirmed that inconsistencies were not identified during the audit period.	Compliant
Limits of consent				
A5	Development activities may be carried out within the approved development	At all times	Date not yet reached	Not triggered

	area, until 31 December 2044.															
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 the Site auditor, may be disposed of at the asbestos disposal facility, unless otherwise agreed by the Planning Secretary.	Demolition & Construction	Personnel interviews confirmed that the asbestos disposal facility is not yet fully constructed or commissioned for use, and disposal has not commenced. Site inspection confirmed construction is progressing but not completed (see Plate 1).	Not triggered												
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.	Demolition & Construction	Personnel interviews confirmed that AGLM has not started extracting material from the Borrow Pit and is using material from the western ash levee instead. 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.	Not triggered												
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.	Demolition & Construction	Personnel interviews confirmed that AGLM has not commenced rock crushing at the Borrow Pit Area or Liddell Ash Dam and is instead focusing on the beneficial reuse of available rock.	Not triggered												
Development hours																
A9	The development may only be undertaken during the hours set out in Table 1. Table 1 – Operating hours <table><tr><th>Activity</th><th>Permissible Hours</th></tr><tr><td>Development activities- other than as identified separately in this table.</td><td> 7 am to 6 pm Monday to Friday 8 am to 6 pm Saturday - At no time on Sundays or public holidays </td></tr><tr><td>Blasting</td><td> 9 am to 5 pm Monday to Saturday - No blasting on public holidays </td></tr><tr><td>Maintenance, security, office work, cleaning, etc</td><td>May be conducted at any time, provided that these activities are not audible at any residence on privately-owned land</td></tr><tr><td>Delivery or dispatch of materials as requested by Police or other public authorities</td><td rowspan="3">At any time, only after notifying the Department</td></tr><tr><td>Emergency work to avoid the loss of lives, property or to prevent environmental harm</td></tr><tr><td>Delivery of oversized plant or structures</td></tr></table>	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	At any time, only after notifying the Department	Emergency work to avoid the loss of lives, property or to prevent environmental harm	Delivery of oversized plant or structures	Demolition & Construction	Sighted ‘Liddell Power Station Environmental Induction’ PowerPoint presentation which contains a slide informing the hours of operation in accordance with Table 1 of SSD 24937520. Personnel interviews confirmed that CMA [Project Contractor] 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 CMA Daily Pre-Start Forms for 25/09/25, 26/09/25, 22/09/25 and 23/09/25 which state that the time of the pre-start was 6:30am. Sighted completed CMA Daily Site Diary Form dated 02/09 which state that ‘Works to be performed between council approved hours for the site being 7am to 5pm Monday to Saturday’. Personnel interviews confirmed that that no blasting has occurred to date and expects blasting would not be required until Q1 2026. Personnel interviews 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. It was advised that only ecological monitoring work such as bat surveys has occurred out of hours.	Compliant
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	At any time, only after notifying the Department															
Emergency work to avoid the loss of lives, property or to prevent environmental harm																
Delivery of oversized plant or structures																
Notification of commencement																

A10	The Department must be notified, in writing, of the date of commencement of each of the following phases of the development: (a) commencement of development under the consent;	Pre-commencement	Sighted letter to DPHI dated 13/03/25 notifying that development under SSD 24937520 is scheduled to commence on 28/03/25. DPHI responded on 18/03/25 acknowledging the notification	Compliant
A10(b)	commencement of construction under the consent;	Pre-commencement	Sighted letter to DPHI dated 08/07/2025 notifying the commencement of construction and commencement of demolition under SSD 24937520 is scheduled to commence on 23/07/25. DPHI responded on 09/07/25 acknowledging the notification.	Compliant
A10(c)	commencement of demolition under the consent; and	Pre-commencement	See Schedule 2, Condition A10 b) above.	Compliant
A10(d)	cessation of operations.	Pre-commencement	See Schedule 2, Condition A10 a). Operations did not commence during the reporting period.	Not triggered
Note	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.	Pre-commencement	See Schedule 2, Condition A10 a) and b) above.	Compliant
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.	Pre-commencement	Personnel interview confirmed that AGLM has not required phases of Project development to be further staged, and no relevant notifications to DPHI have been made during the audit period.	Not triggered
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;	Post-commencement	Confirmed AGLM has not surrendered any of the Council Developments as listed under Schedule 2 Condition A12.	Not triggered
A12(b)	DA98/1995;	Post-commencement	As above (See Schedule 2, Condition A12(a)).	Not triggered
A12(c)	DA90/2015;	Post-commencement	As above (See Schedule 2, Condition A12(a)).	Not triggered
A12(d)	DA91/2015; and	Post-commencement	As above (See Schedule 2, Condition A12(a)).	Not triggered
A12(e)	DA51/86.	Post-commencement	As above (See Schedule 2, Condition A12(a)).	Not triggered
Note	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.	Post-commencement	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	Post-commencement	Confirmed that the Project is operating under SSD 24937520 conditions and no existing consents have been surrendered.	Compliant

	approvals.			
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.	Post-commencement	Confirmed that the Project is operating under environmental management documents required under SSD 24937520 conditions.	Not triggered
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.	At all times	Confirmed that DPHI have not requested payment of costs incurred for the review of any environmental management document required under SSD 24937520.	Not triggered
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;	Pre-commencement	'Demolition Environmental Management Plan' (DEMP) dated 03/07/25 and DPHI approval of the DEMP on 08/07/25. The DEMP required consultation with SafeWork NSW and the Site Auditor. Appendix B contains a tabulated summary of consultation for SafeWork NSW and the Site Auditor (Jason Clay – NSW EPA Accredited Site Auditor). The tabulated summary contains relevant dates, party's response, summary of issues raised and AGLM's response. The summary contains dates of the consultation with the identified party, copies of the identified party's response, and a summary of how AGLM has addressed the issues raised. 'Biodiversity Management Plan – Stage 1' (BMP S1) dated 18/07/25. The BMP S1 was approved by DPHI on 23/07/25. The BMP S1 requires consultation with the Conservation Programs, Heritage & Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW). Appendix A of the BMP S1 contains a tabulated summary of the consultation with CPHR. The summary contains dates of the consultation with the identified party, copies of the identified party's response, and a summary of how AGLM has addressed the issues raised. 'Water Management Plan – Stage 1A' (WMP S1A) dated 03/07/25. The WMP S1A was approved by DPHI on 07/07/25. The WMP S1A requires consultation with NSW EPA. AGL is also required to consult with DCCEEW Water Group regarding the water licencing strategy. Appendix A contains a tabulated summary of consultation with NSW EPA and DPHI. The summary contains dates of the consultation with the identified party, copies of the identified party's response, and a summary of how AGLM has addressed the issues raised. It is noted that DPHI stated '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.' DPHI further stated 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.' Therefore consultation with DCCEEW Water Group has not been triggered yet. Personnel interviews confirmed that the water licencing strategy is not relevant to Stage 1, hence AGLM sought approval for staging of the management plan (refer to Schedule 2, Condition A19).	Compliant
A16(b)	the outcome of that consultation, including how the issues have been addressed in the subject document; and	Pre-commencement	As above (See Schedule 2, Condition A16 (a)).	Compliant
A16(c)	details of any disagreement remaining between the party consulted and the Applicant, and how the Applicant has addressed the matters not resolved.	Pre-commencement	As above (See Schedule 2, Condition A16 (a)).	Compliant
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.	At all times	Note only	Not triggered

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.	At all times	Confirmed that no directions have been received from DPPI requiring compliance with an updated guideline, protocol, Standard or policy, or a replacement of them.	Not triggered
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.	Pre-commencement	Sighted AGLM letter dated 27/03/25 to DPPI requesting approval to stage management plans. The letter included a clear description of the trigger for staging, related to each of the three stages of development. AGLM proposed to initially prepare the Environmental Management Strategy (EMS), Water Management Plan (WMP), Biodiversity Management Plan (BMP), DEMP, Asbestos Management Sub Plan (AMSP), Blast Management Sub Plan (BMSP), Soil and Water Management Sub Plan (SWMSP) and Dust Management Sub Plan (DMSP) for Stage 1 works only. AGLM proposed that an individual EMS, WMP, and BMP would be developed for Stage 2 and Stage 3 works. Further to this, AGLM sought approval to stage the submission of the BMSP, requesting to develop individual BMSPs for each of the four anticipated blast events for the Project. DPPI approved AGLM's request for staging the relevant management plans on 03/04/25.	Compliant
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.	Pre-commencement	As above (See Schedule 2, Condition A19).	Compliant
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	Pre-commencement	Personnel interview confirmed that AGLM has not requested any environmental management document be staged or updated without consultation being undertaken with all parties required (See Schedule 2, Condition A16 (a)). Relevant parties were consulted with for the BMP S1 and WMP S1A.	Not triggered
A21(b)	addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	Pre-commencement	As above (See Schedule 2, Condition A21).	Not triggered
A22	Any request to combine environmental management documents must demonstrate a clear relationship between the nominated documents.	At all times	Personnel confirmed that AGLM has not requested any environmental management documents be combined within the audit period.	Not triggered
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	Demolition & Construction	Personnel interview confirmed that repairs to public infrastructure have not been required during the audit period.	Not triggered
A23(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.	Demolition & Construction	As above (See Schedule 2, Condition A23).	Not triggered
Operation of plant and equipment				

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	Demolition & Construction	Sighted examples of maintenance records and site procedures including: › A 'Daily Work Record and Plant Inspection Record for Cat 263' dated 08/10/25; › CMA 'Plant and Equipment Induction to Site Compliance Checklist' dated 25/08/25 for Plant ID TBHV003. › CMA 'Plant and Equipment Induction to Site Compliance Checklist' dated 03/08/25 for Plant ID WT139. › Sighted SiteHive dust monitoring records for the period 31 July 2025 to 21 October, stating that monitoring points LD01 and LD02 were calibrated 30 July 2025 and 14 April 2025, respectively; and › Delta Group Mobile Procedure which states that 'All Powered Mobile Plant must be fully serviced, maintained in safe and adequate condition and be fit for purpose' and outlines the inspection process; and › Delta Scheduled 1000 hour Maintenance Report for 9150LIEB dated 14 August 2025; › Benchmark Monitoring 3 Monthly Maintenance Form for AGL3 E-Sampler dated 04/09/2025; and › Benchmark Monitoring calibration certificate for wind-sensor on weather station dated 12/10/2025.	Compliant
A24(b)	operated in a proper and efficient manner.	Demolition & Construction	Sighted the following documents demonstrating operator competency: › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11 dated 22/05/2025; › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11A dated 22/05/2025; › Completed Verification of Competency for Demo Saw VOC 7 dated 01/08; › Completed Verification of Competency for Water Truck VOC 50 dated 01/08/25; and › 'Liddell Power Station Environmental Induction' powerpoint presentation; › My Rapid – Induction Register with list of general contractors and status showing that contractors have completed their relevant site induction. Plant and equipment in operation during the audit site inspection were observed to be operating in a proper and efficient manner.	Compliant
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;	Pre-commencement	Viewed letter to DPHI dated 08/07/2025 notifying the Department that commencement of construction and demolition under SSD 24937520 is scheduled to commence on 23/07/25. The EMS was approved by DPHI on 23/05/25 via letter, two months prior to commencing construction.	Compliant
B1(b)	describe the environmental management context and outline the scope of the strategy, including:	Pre-commencement	Section 3 of the EMS includes a summary of the environmental management framework for the Project and Table 1 outlines the associated environmental management plans.	Compliant
B1b(i)	the relationship of the strategy to other environmental management documents;	Pre-commencement	As above	Compliant
B1b(ii)	relevant statutory criteria, performance measures or operational requirements including conditions of consent and other legislative or regulatory licences, guidelines, policies or standards;	Pre-commencement	Table 4 and Table 5 of the EMS contains the relevant consent conditions. Table 10 of the EMS outlines objectives and performance criteria. Section 3.3 of the EMS outlines the relevant licences and approvals.	Compliant
B1b(iii)	sensitive receivers;	Pre-commencement	Sensitive receptors are described in Section 4 and shown on Figure 4-1 of the EMS.	Compliant

B1b(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	Pre-commencement	Section 4.5 outlines the consultation requirements for individual environmental management plans.	Compliant
B1b(v)	detailed plans of the development location and development, sensitive receivers and environmental monitoring locations;	Pre-commencement	Figure 5 of the EMS shows the monitoring locations.	Compliant
B1(c)	list the role and responsibility of all key personnel and contractors involved in the environmental management of the development;	Pre-commencement	Section 4 of the EMS outlines the roles and responsibilities of key personnel.	Compliant
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.	Pre-commencement		Note only
B1(d)	include an environmental risk assessment of the development activities and specific risk management controls and mitigations to:	Pre-commencement	The Project risk assessment is included as Appendix 3 of the EMS.	Compliant
B1d(i)	comply with statutory requirements, limits or performance measures and criteria;	Pre-commencement	As above	Compliant
B1d(ii)	manage the predicted impacts identified in the documents listed in condition A2(c); and	Pre-commencement	As above	Compliant
B1d(iii)	manage any other environmental risk or impact that has been subsequently identified after the documents in condition A2(c) were submitted;	Pre-commencement	As above	Compliant
B1(e)	include processes to review the environmental risk assessment annually and determine whether the measures implemented to manage the risks are effective;	Pre-commencement	Section 4.2.3 of the EMS outlines that the risk assessment will be reviewed annually.	Compliant
B1(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;	Pre-commencement	Section 7.5 of the EMS outlines the adaptive management process.	Compliant
B1(g)	include a clear plan depicting all the monitoring to be carried out under the conditions of this consent;	Pre-commencement	Figure 5 of the EMS shows the monitoring locations.	Compliant
B1(h)	include processes to report and review environmental performance that:	Pre-commencement	Section 4.2.3 of the EMS outlines that the risk assessment will be reviewed annually in consideration of evaluation findings.	Compliant
B1h(i)	provides for an annual review of the environmental risk assessment with consideration of the evaluation findings;	Pre-commencement	As above	Compliant
B1h(ii)	respond to any non-compliance and/or incident;	Pre-commencement	Section 7.1.3 of the EMS outlines the process for non-compliance and incident reporting.	Compliant
B1h(iii)	address the findings of any audit undertaken for the development;	Pre-commencement	Section 7.3 of the EMS outlines the process for addressing the findings of any audit.	Compliant
B1h(iv)	provide for adaptive management mechanisms that enable continuous improvement; and	Pre-commencement	Section 7.5 of the EMS outlines the adaptive management process.	Compliant
B1h(v)	keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Pre-commencement	Section 4.8 of the EMS describes overall community and stakeholder engagement processes.	Compliant
B1(i)	include procedures to:	Pre-commencement	Section 7.2 of the EMS outlines the enquiry, complaint and dispute management process.	Compliant

B1i(i)	receive record, handle and respond to complaints;	Pre-commencement	As above	Compliant
B1i(ii)	resolve any disputes that may arise during the course of the development; and	Pre-commencement	As above	Compliant
B1i(iii)	respond to emergencies.	Pre-commencement	As above	Compliant
B2	Construction must not commence until the environmental management strategy is approved by the Planning Secretary.	Pre-commencement	See Schedule 2, Condition B1 (a).	Compliant
B3	The environmental management strategy, as approved by the Planning Secretary, must be implemented for the development.	Demolition & Construction	A review of the following documents found that AGLM were generally implementing the EMS during the audit period: › Sighted SiteHive dust monitoring records (Particulate Matter ≤ 10 Microns / Particulate Matter ≤ 2.5 Microns) for the period 31 July 2025 to 21 October 2025; › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11 dated 22/05/2025; › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11A dated 22/05/2025; › Sighted Preclearance Survey of the Haul Road and Landfill Cells dated August 2025 (EMM, 2025); › Sighted EMM Preclearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025); › Sighted AGL groundwater monitoring records for the period October 2024 to July 2025; › Sighted SiteHive noise monitoring records for the period 1 August 2025 to 21 October 2025; › Sighted surface water monitoring records for the period January 2020 to September 2025; › Sighted AGLM Complaints Register for 2025. There were no complaints during the audit period against the Project. AGLM undertake weekly environmental inspections with CMA personnel. Sighted AGLM HSE Site Inspection Checklists dated 16/07/25 (LPS area), 07/10/25 (containment cell area), 08/10/25 (LPS area). Also sighted CMA Weekly Environmental AGL Audits dated 31/07/25. AGLM use 'myHSE' system to track and record the progress against actions raised during inspections. Sighted myHSE actions raised along with completion status, for the period 17/07/25 to 24/10/25. Site inspection undertaken during the audit demonstrated that the general layout of the site was in accordance with SSD 24937520 and EMS Personnel advised that the Project is discussed regularly at the AGLM Community Consultative Committee (CCC) meetings. Viewed minutes of the AGLM Hunter CCC from August 2025, which note that an update on the Project was provided by the Project Manager. It was confirmed that environmental incidents are recorded in the 'myHSE' system and that two incidents were proactively reported to DPHI as a precautionary measure. Please refer to Schedule 2, Condition D5 for summaries of the incidents.	Compliant
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.	Demolition & Construction	Personnel interview confirmed that no new heritage items were identified during the audit period and no known heritage sites were impacted.	Compliant

B5	Prior to carrying out any development that could directly or indirectly harm the Aboriginal objects AHIMS 37-2-6561 and 37-2-6284, the Applicant must salvage the Aboriginal objects via surface collection and relocate the items that would be impacted to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.	Demolition & Construction	Personnel interview confirmed that there has been no proposed works in the vicinity of 37-2-6561 and 37-2-6284 and that the salvage has not been required yet.	Compliant
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.	Demolition & Construction	CMA interview via comms confirmed that CMA have 2 large watercarts and 2 smaller units on site for dust suppression. Generation of dust from Project equipment and exposed areas was adequately managed during the audit site inspection through watercart use and watering down of active work areas. The following supporting documentation was sighted: › CMA Site Diary dated 1 August 2025, with an assessment of weather conditions; › CMA Day Works Authorisation dated 19 September 2025 with two listed watercarts scheduled for operation; and › Delta Group Monthly Report August 2025 with period total of 'Significant Dust Events' and 'Total to Date' which was reported. It was 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 (see Plate 8). During the audit site inspection, operators at the asbestos facility construction were observed to be operating competently and maintaining low drop heights (see Plate 1).	Compliant
B7	All reasonable and feasible avoidance and mitigation measures must be implemented to minimise greenhouse gas emissions from the development.	Demolition & Construction	Refer to commitments GG1 to GG8 in Table 2.	Compliant
Noise				
B8	The operational noise generated by the development must not exceed 40 dB LAeq(15min) during daytime hours at residential receivers R21 and R28 shown on Figure 3 in Appendix 3.	Demolition & Construction	Not triggered. As defined in SSD 24937520, 'operation' refers to "The carrying out of the asbestos facility and borrow pit authorised by this consent upon completion of the associated construction works". The asbestos facility is currently being constructed and not in operation, and confirmed that AGLM has not started extracting material from the Borrow Pit. Appendix 4 of the EMS contains a Noise and Vibration Management Plan (NVMP) which outlines this requirement. Section 8.4 of the NVMP outlines that attended noise monitoring will be undertaken as required throughout the development, however it is not done at regular intervals and has not been done since Project commencement. It was stated that attended noise monitoring had not been undertaken to date. Sighted SiteHive noise monitoring records for the period 1 August 2025 to 21 October 2025. Monitoring Station LD01 is representative of receivers R21 and R28. The NVMP states that the predicted construction noise and operational noise pertaining to the Project were assessed as being well below the limit for daytime hours (40 dB(A) LAeq 15-minute) established by condition B8.	Not triggered

B9	The noise limit set out in condition B8 apply under the meteorological conditions defined in Table 2. Table 2 – Meteorological conditions <table><tr><th colspan="2">Location</th><th>Day LAeq(15min)</th></tr><tr><th>Assessment Period</th><th colspan="2">Meteorological Conditions</th></tr><tr><td rowspan="2">Day</td><td colspan="2">Stability Categories A, B, C and D with wind speeds up to and including 3 m/s at 10m above ground level from the ESE wind direction.</td></tr><tr><td colspan="2">Stability Categories A, B, C and D with wind speeds up to and including 0.5 m/s at 10m above ground level from all other wind directions.</td></tr></table>	Location		Day LAeq(15min)	Assessment Period	Meteorological Conditions		Day	Stability Categories A, B, C and D with wind speeds up to and including 3 m/s at 10m above ground level from the ESE wind direction.		Stability Categories A, B, C and D with wind speeds up to and including 0.5 m/s at 10m above ground level from all other wind directions.		Demolition & Construction	Section 5.1 of the NVMP outlines the meteorological conditions which the noise limits apply to. Sighted SiteHive noise monitoring records for the period 1 August 2025 to 21 October 2025 which reports weather graphs, including windspeed.	Compliant
Location		Day LAeq(15min)													
Assessment Period	Meteorological Conditions														
Day	Stability Categories A, B, C and D with wind speeds up to and including 3 m/s at 10m above ground level from the ESE wind direction.														
	Stability Categories A, B, C and D with wind speeds up to and including 0.5 m/s at 10m above ground level from all other wind directions.														
B10	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.	Demolition & Construction	See Schedule 2, Condition B8. Refer to Schedule 2, Condition B22 for meteorological station compliance status.	Compliant											
B11	The development may only occur outside of the hours listed in Table 1 if: (a) noise levels are no more than 5 dB LAeq(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	Demolition & Construction	See Schedule 2, Condition A9.	Not triggered											
B11(b)	works are implemented in accordance with an out-of-hours work protocol detailed in condition B12 and as approved by the Planning Secretary.	Demolition & Construction	As above	Not triggered											
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;	Demolition & Construction	See Schedule 2, Condition A9.	Not triggered											
B12(b)	identify a process for the consideration and management of construction which is outside the hours defined in Table 1;	Demolition & Construction	As above	Not triggered											
B12(c)	be consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009) (or its latest or final version);	Demolition & Construction	As above	Not triggered											
B12(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);	Demolition & Construction	As above	Not triggered											

B12(e)	identify low, medium and high-risk out-of-hours work, proposed mitigation and management measures; and	Demolition & Construction	As above	Not triggered																		
B12(f)	include written notification arrangements for affected residences for approved out of-hours work.	Demolition & Construction	As above	Not triggered																		
Water																						
B13	The development must comply with the performance measures in Table 3. Table 3 – Water management performance measures <table><tr><th>Feature</th><th>Performance measure</th></tr><tr><td>Water management – general</td><td> • Maintain separation between clean and dirty water management systems • Minimise the use of clean and potable water by the development • Maximise water recycling, reuse and sharing opportunities • Design, install, operate and maintain water management systems in a proper and efficient manner </td></tr><tr><th>Feature</th><th>Performance measure</th></tr><tr><td>Erosion and sediment control</td><td> • Design, install and maintain erosion and sediment controls generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including Volume 1: <i>Blue Book</i> (Landcom, 2004), Volume 2A: <i>Installation of Services</i> (DECC, 2008), Volume 2C: <i>Unsealed Roads</i> (DECC,2008), Volume 2D: <i>Main Road Construction</i> (DECC, 2008) and Volume 2E: <i>Mines and Quarries</i> (DECC, 2008) • Design, install and maintain sediment dams generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> (Landcom, 2004) and 2E <i>Mines and Quarries</i> (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 <i>Controlled Activities on Waterfront Land</i> (DPE, 2022) • Minimise disturbance of banks and implement appropriate stabilisation mitigation </td></tr></table>	Feature	Performance measure	Water management – general	• 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	Feature	Performance measure	Erosion and sediment control	• Design, install and maintain erosion and sediment controls generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including Volume 1: <i>Blue Book</i> (Landcom, 2004), Volume 2A: <i>Installation of Services</i> (DECC, 2008), Volume 2C: <i>Unsealed Roads</i> (DECC,2008), Volume 2D: <i>Main Road Construction</i> (DECC, 2008) and Volume 2E: <i>Mines and Quarries</i> (DECC, 2008) • Design, install and maintain sediment dams generally in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> (Landcom, 2004) and 2E <i>Mines and Quarries</i> (DECC, 2008)	Water diversion and storage	• Maximise the diversion of clean water around disturbed areas within the approved development area, except where clean water is captured for use by the development • Design, install and maintain water storage infrastructure to avoid unlicensed or uncontrolled discharge of water	Chemical and hydrocarbon storage	• Chemical and hydrocarbon products stored in bunded areas in accordance with the relevant Australian Standard	Aquatic and riparian ecosystems	• Negligible environmental consequences beyond those predicted in the documents listed in condition A2(c)	Alluvial aquifers	• 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	Works on waterfront land	• All works within waterfront land is managed in accordance with the guidance series for <i>Controlled Activities on Waterfront Land</i> (DPE, 2022) • Minimise disturbance of banks and implement appropriate stabilisation mitigation	Demolition & Construction	Table 1 of the Water Management Plan – Stage 1A (WMP S1A) S1A outlines the performance measures in Table 3 and outlines where they are addressed within the WMP S1A. Table 2-2 of the Soil and Water Management Sub Plan (SWMSP) outlines the performance measures in Table 3 and outlines where they are addressed within the SWMSP. Sighted Liddell Ash Dam Modification Haul Road Erosion and Sediment Control Plan (ESCP) dated 31/07/25, written by GHD. Also sighted AGLM Liddell Ash Dam Closure Containment Cell Design Sediment and Erosion Control Plan (ESCP) (GHD, 2025) showing the use of drainage paths moving around the containment cells. AGLM have designed the containment cells at the asbestos storage facility to separate and exclude as much clean water as practical through diversion drains around the cells, which is then pumped through sediment basins which ultimately report to the Borrow Pit sediment dam. During audit site inspection, observed initial trial use of geofabric liner which will be used to prevent long-term erosion for planned drains. AGLM are currently in construction works to enlarge the existing Liddell Power Station oil and grit trap overflow basin to increase its size (see Plate 2) and have built two diversion drains to manage the surface water run-off. During the inspection, erosion and sediment controls were observed to be in place for the works. Viewed Ramboll presentation to AGLM dated 23 July 2025 on the concept designs for Project sediment basins for the ‘Main Block Catchment Area’. The presentation confirms Project design criteria, existing environmental controls and provides concept designs for the area occupied by the Liddell Power Station catchment. Personnel advised that these construction works are within waterfront land. As observed during the audit site inspection recent topsoil stockpiles in the works area have been shaped to allow for reduced dust and are scheduled for hydroseeding in the weeks following the audit site inspection (see Plate 8). AGLM utilises clean water for general uses such as in offices and kitchens and minimises the use of clean water through reusing water for dust suppression. Water reused is primarily sourced from run-off water in sediment basins. Sighted Delta Monthly Report August 2025 stating the reported ‘Recycled Water Usage’ for the period, and ‘Total to Date’. Also sighted Water Movement Permit dated 29/08/25 authorising the reuse of 2.5 Mega litres (ML	Non-compliant
Feature	Performance measure																					
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Works on waterfront land	• All works within waterfront land is managed in accordance with the guidance series for <i>Controlled Activities on Waterfront Land</i> (DPE, 2022) • Minimise disturbance of banks and implement appropriate stabilisation mitigation																					

			) for dust suppression. AGLM undertake weekly inspections with CMA personnel. Sighted AGLM HSE Site Inspection Checklists dated 16/07/25 (LPS area), 07/10/25 (containment cell area), 08/10/25 (LPS area) which include checks of erosion and sediment controls, diversions, sediment dams, waterways and run-off. Also sighted myHSE safety observations dated 12/08/25 and 11/90/25 entered by SB, for inspections of the containment cell erosion and sediment controls after a significant rainfall event and in relation to silt fence installation. AGLM use 'myHSE' system to track and record the progress against actions raised during inspections. Sighted myHSE actions raised along with completion status, for the period 17/07/25 to 24/10/25. Chemicals and hydrocarbons were found to be stored in bunded areas during the audit site inspection, including stand alone bunds and self-bunded dangerous goods containers, with spill kits in place at key locations. 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. Reviewed AGL groundwater monitoring records for the period October 2024 to July 2025, noting no discernible change to groundwater depth or quality. It is recommended that AGLM: › Inspect chemical storage pods at the temporary asbestos facility and ensure all pods have selfbunding. › Deliver a Tool Box Talk that communicates spill containment and cleanup requirements to Project.	
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.	Demolition & Construction	AGLM interview (pers comms) confirmed that no additional earthmoving works will be undertaken for landforms that previously been constructed and approved under previous consents.	Compliant
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: (a) be submitted to the Planning Secretary for approval prior to the commencement of construction;	Pre-commencement	Letter from AGLM to DPHI dated 08/07/2025 notifying the commencement of construction and commencement of demolition under SSD 24937520 is scheduled to commence on 23/07/25. Water Management Plan – Stage 1A (WMP S1A) dated 03/07/25. The WMP S1A was approved by DPHI on 07/07/25. The WMP S1A as approved is marked as 'DRAFT' on the top of each page and there is an endorsement letter in Appendix A for the BMP S1. OFI: It is recommended that AGLM updates the Water Management Plan Stage 1A to document it as a 'final' version and to include the correct endorsement letter in Appendix A.	Compliant

B15(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;	Pre-commencement	Sighted DPHI letter dated 26/03/2025 endorsing Kelly Mulhearn and Greg Matthews as authors for the WMP S1. The WMP S1A has an endorsement letter for the BMP. WMP S1 refers to a letter dated 26 March 2025 (under stakeholder consultation). Appendix A of the WMP S1A contains a tabulated summary of consultation with NSW EPA. The summary contains dates of the consultation with the identified party, copies of the identified party's response, and a summary of how AGLM has addressed the issues raised. See action against Schedule 2, Condition B15.	Compliant
B15(c)	include a development water balance;	Pre-commencement	Section 6 of the WMP S1A includes the water balance.	Compliant
B15(d)	include a review of the water licensing strategy for the development in consultation with DCCEEW Water Group;	Pre-commencement	See Schedule 2, Condition A16 (a).	Not triggered
B15(e)	ensure all works carried out as part of the development comply with the performance measures detailed in Table 3;	Pre-commencement	See Schedule 2, Condition B13.	Compliant
B15(f)	address the risks identified in the environmental risk assessment undertaken in accordance with condition B1;	Pre-commencement	Section 1.6 of the WMP S1A lists the risk identified in the environmental risk assessment, being unauthorised discharge to surface water, unauthorised discharge to groundwater, and authorised discharges exceeding criteria. Table 3 of the WMP S1A then describes how AGLM manages those risks. One of the key risk management measures was to remove unnecessary chemicals and hydrocarbons from site (to de-risk). See Schedule, Condition B13 which assesses compliance status of storing chemicals in bunded areas.	Compliant
B15(g)	support the implementation of the relevant mitigation measures identified in the documents listed in condition A2(c);	Pre-commencement	Table 15 of the WMP S1A currently identifies the relevant mitigation measures from the EIS and lists roles and responsibilities.	Compliant
B15(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;	Pre-commencement	Section 8 of the WMP S1A outlines the monitoring program, Section 9 outlines how relevant performance measures are being addressed,	Compliant
B15(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	Pre-commencement	Section 11 of the WMP S1A contains a Trigger Action Response Plan (TARP) to respond to exceedances and Section 13 outlines the reporting requirements.	Compliant
B15(j)	include processes to review the plan, including responding to non-compliances, incidents or complaints.	Pre-commencement	Section 13 of the WMP S1A outlines the reporting requirements and addresses how complaints are managed.	Compliant
B16	Construction other than demolition must not commence until the water management plan is approved by the Planning Secretary.	Pre-commencement	Letter to DPHI dated 08/07/25 notifying the commencement of construction and commencement of demolition under SSD 24937520 is scheduled to commence on 23/07/25. Water Management Plan – Stage 1A (WMP S1A) dated 03/07/25. The WMP S1A was approved by DPHI on 07/07/25.	Compliant

B17	The water management plan, as approved by the Planning Secretary, must be implemented for the development.	Demolition & Construction	See Schedule 2, Condition B13.	Compliant
Dangerous goods				
B18	The quantities of dangerous goods stored and handled by the development must be below the threshold quantities listed in the Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Demolition & Construction	Table 6.1 of Liddell Future Land Use and Enabling Works Project Preliminary Hazard Analysis (GHD, 2023) outlines the indicative hazardous chemicals and quantities that will be used during the Project. All dangerous goods storages previously used for the operation of the Liddell Power Station were excluded from analysis as they will be evacuated and considered empty in preparation for demolition. The following items have thresholds under SEPP 33: › Oxygen › LPG › Acetylene › Paint (spray cans) › Diesel › Cleaning Agents › Gearbox Oil/grease/hydraulic fluid › Explosives During the audit site inspection, it was observed that the bulk hydrocarbon tanks had been emptied and the tanks decommissioned. Chemical and hydrocarbon storage areas including diesel and oil storage were also inspected. Sighted 'Delta Group Dangerous / Hazardous Substance Register' which lists the dangerous and hazardous goods allowed on site and the quantity. Within the Register, diesel, oxygen, LPG, acetylene and some oils are listed as having a quantity of 'As required only', without a current maximum quantity listed and it is undetermined what the current quantities are on site. As such, it is unable to be determined whether the quantities of dangerous goods stored and handled by the development are below the threshold quantities listed in the DPHI Hazardous and Offensive Development Application Guidelines – Applying SEPP 33. It is recommended that AGLM update the 'Hazardous Substance Register' to list the current quantities of all hazardous and dangerous goods stored on site, and state the maximum quantities allowed to be stored in a register, as per the DPHI Hazardous and Offensive Development Application Guidelines – Applying SEPP 33.	Non-compliant
B19	Dangerous goods must be stored and handled strictly in accordance with: (a) all relevant Australian Standards; and	Demolition & Construction	See Schedule 2, Condition B13.	Compliant
B19(b)	for liquids, the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.	Demolition & Construction	As above	Compliant
Note	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.	Demolition & Construction		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.	Demolition & Construction	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 › Adherence to designated haulage routes and heavy vehicle noise. Sighted: › CMA QSE Weekly Toolbox Talk for Liddell Power Station dated 25/07/2025 (and sign-off sheet). The monthly safety commitment focussed on was 'Safe Driving & Plant Operation' and included an overview of a truck incident at a NSW coal mine and discussed the responsibilities that equipment operators have on site; › Delta Group Safety Notice – Driver Fatigue which was distributed on site to communicate the risks associated with driver fatigue; › CMA Contracting Safety Commitments signage displayed at the entry of the site offices stating 'Safe driving and plant operations' and 'Be fit for work'. During the audit site inspection, safety signage and a speed tracker was observed to be in place	Compliant
B21	All mine overburden material excavated from the Borrow Pit must be transported using private haul roads.	Demolition & Construction	See Schedule 2, Condition A7.	Not triggered
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);	Pre-commencement	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. Sighted Benchmark Monitoring Reports for July, August, September and October containing the raw data for the AGLM AGL08 meteorological station. The report lists the parameters measured, date of last maintenance (29/05/25), model serial numbers and applicable Australian Standards. Sighted calibration certificates 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; and › Ambient temperature, dated 18/10/25.	Compliant
B22(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	Pre-commencement	See Schedule 2, Condition B22 (a).	Compliant
B22(c)	unless a suitable alternative is approved by the Planning Secretary following consultation with the EPA.	Pre-commencement	Approval of an alternative method has not been sought.	Not triggered
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.	Demolition & Construction	Section 5.8.15 of the EMS states that all waste generated throughout the Development will be classified for disposal in accordance with the NSW EPA Waste Classification Guidelines and disposed of at and appropriately licenced facility. Confirmed that Project waste is managed under contract. Viewed CMA Waste Tracking Register for July to September 2025 and examples of waste transport dockets for the Project dated 30/07, 21/08/25, and 04/09/25. Waste is classified by scheduled type, in accordance with EPA guidelines.	Compliant
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.	Demolition & Construction	Personnel interview (per comms) confirmed that Liddell Power Station receives organics for rehabilitation as approved under EPL 2122.	Compliant
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.	Demolition & Construction	Segregated waste bins were in place at key locations within the Stage 2 area at the time of inspection	Compliant
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.	Demolition & Construction	Personnel advised that AGLM will have the first concrete batch tested next week. As such, this has not been triggered to date. No hits for PCB in concrete testing during the reporting period.	Not triggered
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.	Demolition & Construction	See Schedule 2, Condition A7.	Not triggered
Biodiversity				
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	Pre-commencement	Sighted Biodiversity Conservation Trust (BCT) 'Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation' (Statement) for Sighted Biodiversity Conservation Trust (BCT) 'Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation' (Statement) for SSD 24937520 dated 03/07/25 (prior to commencement). Credits have been retired for Stage 1 and Stage 2, with the exception of species credits for the Hunter Valley Delma (see Schedule 2, Condition B29). Sighted Major Projects Portal submission record showing submission of the Statement confirming retirement of Stage 1 and 2 biodiversity credits to DPHI.	Compliant

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

	Table 5 – Biodiversity credit requirements – species credits <table> <tr> <th>Threatened Species</th><th>Stage 1</th><th>Stage 2</th><th>Stage 3</th><th>Total</th></tr> <tr> <td></td><td>Credits</td><td>Credits</td><td>Credits</td><td>Credits</td></tr> <tr> <td>Hunter Valley Delma (<i>Delma vescolineata</i>)</td><td>198</td><td>216</td><td>334</td><td>748</td></tr> <tr> <td>Southern Myotis (<i>Myotis macropus</i>)</td><td>35</td><td>129</td><td>149</td><td>313</td></tr> <tr> <td>Squirrel Glider (<i>Petaurus norfolcensis</i>)</td><td>75</td><td>47</td><td>154</td><td>276</td></tr> <tr> <td>Brush-tailed Phascogale (<i>Phascogale tapoatafa</i>)</td><td>55</td><td>33</td><td>94</td><td>182</td></tr> </table>	Threatened Species	Stage 1	Stage 2	Stage 3	Total		Credits	Credits	Credits	Credits	Hunter Valley Delma (<i>Delma vescolineata</i>)	198	216	334	748	Southern Myotis (<i>Myotis macropus</i>)	35	129	149	313	Squirrel Glider (<i>Petaurus norfolcensis</i>)	75	47	154	276	Brush-tailed Phascogale (<i>Phascogale tapoatafa</i>)	55	33	94	182			
Threatened Species	Stage 1	Stage 2	Stage 3	Total																														
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Brush-tailed Phascogale (<i>Phascogale tapoatafa</i>)	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;	Pre-commencement	See Schedule 2, Condition B28.	Compliant																														
B29(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	Pre-commencement	Personnel interview confirmed Stage 2 works and Stage 3 works have not commenced.	Not triggered																														
B29(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.	Pre-commencement	See Schedule 2, Condition B29(b).	Not triggered																														
B30	With the agreement of the Planning Secretary, the retirement of credits for the Hunter Valley Delma (<i>Delma vescolineata</i>) as listed in Table 5 may be carried out in an alternative timeframe to the timing specified in condition B29.	Pre-commencement	Sighted DPHI letter to AGLM approving AGLM's retirement of credits for the Hunter Valley Delma for Stage 1 and Stage 2 by 28/11/25.	Not triggered																														
Note	The option for an alternate timeframe is provided given the recent listing of the species under the Biodiversity Conservation Act 2016.			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;	Pre-commencement - Stage 3	Not triggered by AGLM.	Not triggered																														
B31(b)	be in writing and addressed to the Planning Secretary; and	Pre-commencement - Stage 3	See Schedule 2, Condition B31(a).	Not triggered																														
B31(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.	Pre-commencement - Stage 3	See Schedule 2, Condition B31(a).	Not triggered																														

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;	Pre-commencement	Letter to DPHI dated 08/07/25, notifying the Department that construction and demolition under SSD 24937520 is scheduled to commence on 23/07/25. Biodiversity Management Plan – Stage 1 (BMP S1) dated 18/07/25. AGLM submitted the BMP S1 for DPHI approval on 09/05/25 and it was approved on 23/07/25.	Compliant
B32(b)	be prepared: (i) by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; (ii) in consultation with CPHR; (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) with reference to any relevant biodiversity management plan guidance material provided by CPHR;	Pre-commencement	Appendix B of the BMP S1 contains a copy of DPHI letter dated 26/03/25 which provides endorsement to prepare the BMP. Appendix A of the BMP S1 contains a tabulated summary of the consultation with CPHR. The summary contains dates of the consultation with the identified party, copies of the identified party's response, and a summary of how AGLM has addressed the issues raised. The BMPs references the BAM and Section 1.4 of the BMP S1 outlines the avoidance and minimisation of impacts as per the approved BDAR. The tabulated summary of consultation with CPHR in Appendix A contains CPHR's guidance and feedback on the BMP S1, and a summary of how AGLM has addressed the issues raised.	Compliant
B32(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;	Pre-commencement	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	Compliant
B32(d)	implement measures to minimise the use of pesticides and herbicides within the approved development area;	Pre-commencement	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 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. Sighted 'Weekly Works Summary – AGL Liddell Ash Dam 28/07/25 to 01/08/25' (Global Soils, 2025) providing weed maintenance summary of works.	Compliant

B32(e)	support the integrity of habitat for insectivorous bat and amphibian species;	Pre-commencement	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; › 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 areas. The 'No Go' zones delineate the Project footprint.	Compliant
B32(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;	Pre-commencement	Section 2.2.5.7 of the BMP S1 states that this requirement will be managed by the Rehabilitation Management Plan (RMP) which is not yet developed. The RMP requires development within 12 months of commencement of the SSD-24937520 (see Schedule 2, Condition B38).	Not triggered
B32(g)	include a description of measures and timeframes that would be implemented to:	Pre-commencement	Section 1.4 of the BMP S1 outlines the measures proposed by AGLM to avoid and minimise ecological impacts, which is largely through Project design and revision. Section 1.5.1 outlines the development stages.	Compliant
B32g(i)	minimise clearing and avoiding unnecessary disturbance of vegetation by the development;	Pre-commencement	As above	Compliant
B32g(ii)	minimise impacts on fauna, and implementing fauna recovery and management protocols;	Pre-commencement	See Schedule 2, Condition B32 e).	Compliant
B32g(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;	Pre-commencement	See Schedule 2, Condition B32 e).	Compliant
B32g(iv)	control weeds, feral pests, and pathogens;	Pre-commencement	Section 2.2.1 of the BMP S1 outlines the controls for weeds and pathogens. Section 2.2.2 lists the known pest species and management measures.	Compliant
B32g(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	Pre-commencement	Section 3.5 of the BMP S1 outlines the unexpected threatened species finds protocol, which lists steps to be taken in the event of an unexpected threatened species being found within the development footprint.	Compliant

B32g(vi)	retain, rehabilitate or restore vegetation connectivity and provide habitat for threatened species such as the squirrel glider.	Pre-commencement	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. Personnel interview (pers) comms) confirmed that no hollows had been salvaged during pre-clearance surveys to date, therefore no artificial hollows (nest-boxes) have been installed. This is supported by the following sighted Pre-Clearance Surveys: › Sighted Pre-Clearance Survey of the Haul Road and Landfill Cells dated August 2025 (EMM, 2025); › Sighted EMM Pre-Clearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025). Regarding rehabilitation, Section 3.4 of the BMP S1 states that the RMP will include a description of measures and timeframes that would be implemented to rehabilitate or restore vegetation connectivity and provide habitat for threatened species such as the squirrel glider. The RMP requires development within 12 months of commencement of the SSD-24937520 (see Schedule 2, Condition B38) and personnel interview (pers comms) confirmed the document has not been prepared at the time of audit.	Not triggered
B33	Construction must not commence until the biodiversity management plan is approved by the Planning Secretary.	Pre-commencement	See Schedule 2, Condition B32.	Compliant
B34	The biodiversity management plan, as approved by the Planning Secretary, must be implemented for the development.	Demolition & Construction	A review of the following documents found that AGLM were generally implementing the BMP S1 during the audit period: › Sighted Preclearance Survey of the Haul Road and Landfill Cells dated August 2025 (EMM, 2025); › Sighted EMM Preclearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025); › Sighted 'Weekly Works Summary – AGL Liddell Ash Dam 28/07/25 to 01/08/25' (Global Soils, 2025) providing weed maintenance summary of works; › Ground and Vegetation Disturbance Approval (GVDA) – Application Form for Construction of the overflow weir in the eastern wall of the existing O&G trap and the overflow channel discharging to Lake Liddell, including localized bun works and erosion protection, as per the approved final design' (GVDA) dated 22/09/25; › GVDA – Application Form for 'Clear and grub the haul road phase one to install stormwater pipe in existing drainage channel' dated 31/07/25; › GVDA – Application Form for 'removal of vegetation encroaching on sediment lagoons, connecting drain and coal stockpile surface' dated 10/06/25; and › GVDA – Application Form for 'Install new Project signage around the Liddell perimeter and entries attached plan set (Gate 1 CMA authorized access; Gate 2 authorized Project vehicle car park; Gate 3 visitor car park; Gate 4 site access; muster points A–C; directional/site map board). Sign content and locations per the "Site Signs_R1.pptx"', dated 29/09/25. During the audit site inspection 'No Go' zones were observed across construction areas. Frog exclusion zone fencing was also observed. 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 noncompliance with the BMP requirements. The 'No go' area was immediately inspected for any injured fauna. No injured fauna was identified during the inspection. There was some disturbance to the groundcover, no	Non-compliant

			native vegetation was impacted. The 'No Go' exclusion flagging was reinstated following the incident, and the requirements around 'No Go' zones were tool boxed with the work crew. Sighted DPHI response to AGLM's notification dated 09/10/25, which notes that DPHI reviewed the notification and considers it to generally satisfy Schedule 2, Condition D4 of the consent. It is recommended that AGLM conduct regular toolbox talks with contractors to reinforce the importance of adhering to flagged 'No-go' zones. These sessions should be scheduled regularly to ensure all new starters receive this training.	
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.	Demolition & Construction	See Schedule 2, Condition B6.	Compliant
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.	Demolition & Construction	See Schedule 2, Condition B6.	Not triggered

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 to 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 earthworks are required for the establishment of a stable, non-polluting and freedraining landform.	Demolition & Construction	See Schedule 2, Condition B6. Rehabilitation has not commenced. Not triggered.	Not triggered
Rehabilitation management plan				
B38	A rehabilitation management plan must be prepared for the approved development area, excluding the Liddell Ash Dam. The plan must: (a) be submitted to the Planning Secretary for approval within 12 months of commencing the development;	Rehabilitation	Letter to DPHI dated 13/03/25 notifying the commencement of development under SSD 24937520 is scheduled to commence on 28/03/25. MP (pers comms) confirmed that the RMP has not yet been prepared.	Not triggered

B38(b)	be prepared:	Rehabilitation	See Schedule 2, Condition B38.	Not triggered
B38b(i)	by suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; and	Rehabilitation	As above	Not triggered
B38b(ii)	in consultation with the Site auditor, Department, Council, CPHR and the NSW EPA;	Rehabilitation	As above	Not triggered
B38(c)	describe how rehabilitation will be integrated with other development activities occurring concurrently with rehabilitation;	Rehabilitation	As above	Not triggered
B38(d)	provide an overview of the risks to achieving successful rehabilitation and the strategies to be implemented to address the identified risks;	Rehabilitation	As above	Not triggered
B38(e)	include a strategic plan for the refinement and improvement of the final landform over time;	Rehabilitation	As above	Not triggered
B38(f)	align with the rehabilitation strategy included in the documents listed in condition A2(c);	Rehabilitation	As above	Not triggered
B38(g)	describe how the rehabilitation measures would be integrated with:	Rehabilitation	As above	Not triggered
B38g(i)	the measures in the biodiversity management plan referred to in condition B32;	Rehabilitation	As above	Not triggered
B38g(ii)	the management of contaminated land required by conditions C1 to C13; and	Rehabilitation	As above	Not triggered
B38g(iii)	the Liddell Ash Dam Closure and Rehabilitation Plan required by condition C30;	Rehabilitation	As above	Not triggered
B38(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;	Rehabilitation	As above	Not triggered
B38(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:	Rehabilitation	As above	Not triggered
B38i(i)	describe the measures to be implemented within the approved development area to achieve the completion criteria; and	Rehabilitation	As above	Not triggered
B38i(ii)	the performance indicators to be implemented to ensure compliance with each completion criteria and the rehabilitation objectives in Table 6;	Rehabilitation	As above	Not triggered
B38(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;	Rehabilitation	As above	Not triggered
B38(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;	Rehabilitation	As above	Not triggered
B38(l)	include a program to review and update the plan every five years;	Rehabilitation	As above	Not triggered
B38(m)	include details of who would be responsible for monitoring, reviewing and implementing the plan.	Rehabilitation	As above	Not triggered

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.	Rehabilitation	See Schedule 2, Condition B38.	Not triggered
Part C - Specific Environmental Conditions				
Contamination - Site audit process				
C1	A multi-stage site audit must be undertaken for the development. The audit must: (a) be undertaken by a Site auditor;	Demolition & Construction	Appendix B of the DEMP contains a tabulated summary of consultation for SafeWork NSW and confirms that Site Auditor has been engaged as the NSW Environment Protection Authority (EPA) Accredited Site Auditor. Confirmed the site audit has not occurred, however preliminary work on the audit is occurring. Sighted the following documents: › Letter from Site Auditor titled 'Interim Audit Advice #48: Review – Liddell Ash Dam Groundwater and Surface Water Monitoring Program SAQP' dated 20/06/25. This advice provided comments in review of the Sampling and Analysis Quality Plan (SAQP) Revision 2, for the LAD Groundwater and Surface Water Monitoring Program; › Letter from Site Auditor titled 'Interim Audit Advice #59: Review of Concrete Beneficial Re-Use Assessment - Sampling, Analysis and Quality Plan (Final)' dated 07/08/25; and › Letter from Site Auditor titled 'Interim Audit Advice #59: Review of Concrete Beneficial Re-Use Assessment - Sampling, Analysis and Quality Plan (Final)' dated 07/08/25 which provided comments in review of the of the SAQP developed as part of the first stage of the concrete suitability assessment, so that the stockpiles of crushed concrete generated during the demolition process is properly handled and managed for potential re-use or contained in containment facility onsite, or off-site disposal; and › Letter from Site Auditor titled 'Interim Audit Advice #62: Asbestos Containment Cells – Construction Quality Assurance' dated 23/09/25 to clarify the auditor's construction approvals during construction of the asbestos containment cells . A Section A1 or Section A2 audit statement has not been provided from the Site Auditor at the time of this IEA.	Compliant
C1(b)	be undertaken in accordance with the Contaminated Land Guidelines;	Demolition & Construction	Sighted Letter from Site Auditor titled 'Interim Audit Advice #62: Asbestos Containment Cells – Construction Quality Assurance' dated 23/09/25 which states that he accredited under the Contaminated Land Management Act CLM Act) 1997 for Liddell Power Station.	Compliant
C1(c)	include the provision of interim audit advice by the Site auditor in relation to (as applicable):	Demolition & Construction	See Schedule 2, Condition C1(a).	Compliant
C1c(i)	sampling analysis and quality plans;	Demolition & Construction	As above	Compliant
C1c(ii)	detailed site investigation reports;	Demolition & Construction	As above	Compliant
C1c(iii)	human health and ecological risk assessment reports;	Demolition & Construction	As above	Compliant

C1c(iv)	remediation action plan;	Demolition & Construction	As above	Compliant
C1c(v)	site validation reports; and	Demolition & Construction	As above	Compliant
C1c(vi)	long-term environmental management plans;	Demolition & Construction	As above	Compliant
C1(d)	conclude with the Site auditor issuing either a Section A1 or Section A2 audit statement for the development.	Demolition & Construction	As above	Not triggered
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;	Demolition & Construction	This has not been triggered. There have been no additional investigations proposed by the Site Auditor to the date of this IEA. See Schedule 2 Condition C1 a).	Not triggered
C2(b)	be prepared:	Demolition & Construction	As above	Not triggered
C2b(i)	in accordance with the Contaminated Land Guidelines;	Demolition & Construction	As above	Not triggered
C2b(ii)	before sampling for contamination investigations is conducted;	Demolition & Construction	As above	Not triggered
C2(c)	address additional investigations identified by the Stage 2 detailed site investigation, for the proposed Stage 3 investigations and any unexpected finds;	Demolition & Construction	As above	Not triggered
C2(d)	be accompanied by interim audit advice from the Site auditor; and	Demolition & Construction	As above	Not triggered
C2(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.	Demolition & Construction	As above	Not triggered

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;	Demolition & Construction	Personnel interview (pers comms) advised that AGLM will have the first concrete batch tested next week. Please provide the SAQP. Sighted letter from Site Auditor titled 'Interim Audit Advice #59: Review of Concrete Beneficial Re-Use Assessment - Sampling, Analysis and Quality Plan (Final)' dated 07/08/25 which provides comments in review of the of the SAQP developed as part of the first stage of the concrete suitability assessment, so that the stockpiles of crushed concrete generated during the demolition process is properly handled and managed for potential re-use or contained in containment facility on-site, or off-site disposal. The SAQP developed is titled 'Liddell Power Station - Concrete Beneficial Re-Use Assessment, Sampling and Analysis Quality Plan'. Site Auditor stated 'The auditor considers that the SAQP has adequately addressed the comments provided in previous IAAs and can be considered as a final document.'	Compliant
C3(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;	Demolition & Construction	See Schedule 2, Condition C1(a).	Compliant
C3(c)	be accompanied by interim audit advice from the Site auditor.	Demolition & Construction	See Schedule 2, Condition C1(a).	Compliant
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;	Demolition & Construction	As per Schedule 2, Condition C5, the detailed site investigation must commence within 12 months after the completion of demolition. Demolition has not been completed during the audit period.	Not triggered
C4(b)	be prepared in accordance with the relevant Contaminated Land Guidelines;	Demolition & Construction	See Schedule 2, Condition C4.	Not triggered
C4(c)	be accompanied by interim audit advice from the Site auditor confirming the investigation report is satisfactory;	Demolition & Construction	See Schedule 2, Condition C4.	Not triggered
C4(d)	include, but not limited to, the following:	Demolition & Construction	See Schedule 2, Condition C4.	Not triggered
C4d(i)	all works outlined by Stage 3 detailed investigation scope included in the EIS;	Demolition & Construction	As above	Not triggered
C4d(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;	Demolition & Construction	As above	Not triggered
C4d(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;	Demolition & Construction	As above	Not triggered

C4d(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;	Demolition & Construction	As above	Not triggered
C4d(v)	assessment of off-site migration of contaminants in accordance with the Guidelines for the NSW Site Auditor Scheme;	Demolition & Construction	As above	Not triggered
C4d(vi)	an updated conceptual site model and a discussion on contamination migration offsite and impacts to both onsite and offsite receptors; and	Demolition & Construction	As above	Not triggered
C4d(vii)	any other matter raised by the Site auditor;	Demolition & Construction	As above	Not triggered
C4(e)	include the EPL premises on all relevant plans; and	Demolition & Construction	As above	Not triggered
C4(f)	be provided to the Planning Secretary and NSW EPA for information. Note: The detailed site investigation is required to assess areas that were inaccessible prior to the determination of the application.	Demolition & Construction	See Schedule 2, Condition C4(a). Note only.	Not triggered
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.	Demolition Completion	See Schedule 2, Condition C4(a).	Not triggered
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:	Demolition & Construction	Confirmed that this has not been triggered.	Not triggered
C6(a)	be prepared, or reviewed and approved, by consultants certified under either the Demolition(SC) or CPSS CSAM scheme;	Demolition & Construction	See Schedule 2, Condition C6(a).	Not triggered
C6(b)	be prepared in accordance with the Contaminated Land Guidelines;	Demolition & Construction	As above	Not triggered
C6(c)	be accompanied by interim audit advice from the Site auditor confirming the assessment is satisfactory;	Demolition & Construction	As above	Not triggered
C6(d)	address the contamination assessment findings detailed in the EIS;	Demolition & Construction	As above	Not triggered
C6(e)	assess the onsite and offsite environmental and human health risks associated with chemical contamination;	Demolition & Construction	As above	Not triggered
C6(f)	assess the onsite and offsite environmental and human health risks associated with chemical contamination;	Demolition & Construction	As above	Not triggered

C6(g)	include a strategy detailing the actions to be taken based on the findings of the assessment; and	Demolition & Construction	As above	Not triggered
C6(h)	be provided to the Planning Secretary and NSW EPA for information. Note: The human health and ecological risk assessment is required consider areas that were inaccessible prior to the determination of the application.	Demolition & Construction	As above Note only.	Not triggered
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.	Demolition & Construction	See Schedule 2, Condition C6(a).	Not triggered
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:	Demolition & Construction	Confirmed that this has not been triggered.	Not triggered
C8(a)	be prepared, or reviewed and approved, by consultants certified under either the CEnvP(SC) or CPSS CSAM scheme.	Demolition & Construction	See Schedule 2, Condition C8(a).	Not triggered
C8(b)	be prepared in accordance with the Contaminated Land Guidelines;	Demolition & Construction	As above	Not triggered
C8(c)	include a remedial options assessment and provide the rationale for the selected remediation strategy;	Demolition & Construction	As above	Not triggered
C8(d)	as a minimum, unless otherwise agreed by the Site auditor, include:	Demolition & Construction	As above	Not triggered
C8d(i)	an assessment of the suitability of the borrow pit material as remediation capping material	Demolition & Construction	As above	Not triggered
C8d(ii)	information on the leachability of contaminants in soils and assess if there is potential for contaminants to leach into groundwater;	Demolition & Construction	As above	Not triggered
C8d(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;	Demolition & Construction	As above	Not triggered
C8d(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	Demolition & Construction	As above	Not triggered
C8d(v)	the remediation of previously unvalidated areas including, the former USTs in Key Area 3 and the former UST in Key Area 5.	Demolition & Construction	As above	Not triggered

C9	A remedial action plan must be prepared for all remediation undertaken as part of development. The remedial action plan/s must:	Demolition & Construction	As above	Not triggered
C9(a)	be prepared prior to commencing the remediation identified in the plan;	Demolition & Construction	As above	Not triggered
C9(b)	be submitted to the Planning Secretary and NSW EPA for information; and	Demolition & Construction	As above	Not triggered
C9(c)	be accompanied by a Section B2 or B5 Site Audit Statement;	Demolition & Construction	As above	Not triggered
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;	Demolition & Construction	See Schedule 2, Condition C8(a).	Not triggered
C10(b)	be prepared in accordance with the Contaminated Land Guidelines;	Demolition & Construction	As Above	Not triggered
C10(c)	be accompanied by interim audit advice from the Site auditor confirming the report is satisfactory;	Demolition & Construction	As Above	Not triggered
C10(d)	include the validation of the former UST pits in Key Area 3 and the former UST in Key Area 5; and	Demolition & Construction	As Above	Not triggered
C10(e)	be provided to the Planning Secretary and NSW EPA for information.	Demolition & Construction	As Above	Not triggered
Long-term environmental management plan				
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;	Demolition Completion	AGLM Confirmed that this has not been triggered.	Not triggered
C11(b)	be prepared in accordance with the with the Contaminated Land Guidelines;	Demolition Completion	See Schedule 2, Condition C11(a).	Not triggered
C11(c)	be accompanied by interim audit advice from the Site auditor confirming the plan is satisfactory;	Demolition Completion	As above	Not triggered
C11(d)	address the risks to human health and environment (onsite and offsite);	Demolition Completion	As above	Not triggered

C11(e)	Include the asbestos disposal facility and other existing asbestos landfills within the approved development area;	Demolition Completion	As above	Not triggered
C11(f)	any other issue the Site auditor considers necessary; and	Demolition Completion	As above	Not triggered
C11(g)	be provided to the Planning Secretary and NSW EPA for information.	Demolition Completion	As above	Not triggered
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.	Demolition Completion	As above	Not triggered
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	Demolition Completion	See Schedule 2, Condition C1(a).	Not triggered
C13(b)	be submitted to the Planning Secretary within 12 months of completing remediation and no later than one month prior to any post-remediation land use within the approved development area subject to the site audit statement.	Demolition Completion	As above	Not triggered
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.	Demolition Completion	As above	Not triggered
Demolition				
C14	All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures.	Demolition & Construction	See Schedule 2, Condition C16.	Compliant
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.	Pre-commencement	Sighted the following clearance certificates: › Switchroom (Coal Bunkering), Liddell Power Station Muswellbrook NSW 2333 – Interim Asbestos Clearance Certificate (Prensa) dated 13/03/25; › TH1 Ground Level Switchrooms, Liddell Power Station, Muswellbrook NSW 2330 – Interim Asbestos Clearance Certificate (Prensa) dated 30/05/25; › TH1 and TH2 Basement Floor Switchboards – Interim Asbestos Clearance Certificate (Prensa) dated 11/06/25; and › TH2 Ground Level Switchrooms, Liddell Power Station, Muswellbrook NSW 2333 – Interim Asbestos Clearance Certificate (Prensa) dated 26/05/25. Sighted letter to DPHI dated 08/07/2025 notifying the Department that commencement of construction and demolition under SSD 24937520 is scheduled to commence on 23/07/25. Sighted Major Protect Portal submission record, showing that AGLM submitted the clearance certificates to DPHI in accordance with Schedule 2, C15. The record is not dated, and evidence was not available at the time of the audit to demonstrate that the clearance certificates were submitted to DPHI prior to 23/07/25.	Non-compliant

			It is recommended that AGLM review the Project's compliance tracking mechanisms to ensure that future notifications to the Department occur in accordance with consent condition timeframes, and records are maintained.	
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;	Pre-commencement	Sighted letter to DPHI dated 08/07/2025 notifying the Department that commencement of construction and demolition under SSD 24937520 is scheduled to commence on 23/07/25. Sighted the Demolition Environmental Management Plan (DEMP) dated 03/07/25 and DPHI approval of the DEMP on 08/07/25.	Compliant
C16(b)	be prepared in consultation with SafeWork NSW and the Site auditor;	Pre-commencement	Appendix B of the DEMP contains a tabulated summary of consultation for SafeWork NSW and the Site Auditor (EPA Accredited Site Auditor). The tabulated summary contains relevant dates, party's response, summary of issues raised and AGLM's response. The summary contains dates of the consultation with the identified party, copies of the identified party's response, and a summary of how AGLM has addressed the issues raised.	Compliant
C16(c)	include a description and schedule of activities to be undertaken during demolition;	Pre-commencement	Section 2.2 of the DEMP contains a description of activities to be undertaken during Stage 1 demolition works, which includes: › Demolition of LPS and redundant associated infrastructure. › Demolition of the HVGTs and any associated transmission infrastructure. › Construction and use of the onsite asbestos disposal facility, including access road. Table 1 of the DEMP provides a high level indicative schedule for activities, with indicative start and finish dates.	Compliant
C16(d)	include a risk assessment;	Pre-commencement	Appendix A of the DEMP contains an Environmental Risk Assessment.	Compliant
C16(e)	addresses the commitments detailed in the documents listed in condition A2(c);	Pre-commencement	Table 3 and Table 4 of the DEMP outline the conditions and commitments relevant to the DEMP, and where they are addressed within the plan.	Compliant
C16(f)	include the sub-plans detailed in conditions C19 to C22; and	Pre-commencement	See Schedule 2, Conditions C19 to C22.	Compliant
C16(g)	include the sub-plans detailed in conditions C19 to C22; and Note: The health and safety risks associated with demolition are regulated by the Work Health and Safety Regulation 2017.	Pre-commencement	Appendix D (SWMSP) and Appendix E (DMSP) within the DEMP contain Trigger Action Response Procedures. Note only.	Compliant
C17	Demolition must not commence until the demolition environmental management plan is approved by the Planning Secretary.	Pre-commencement	See Schedule 2, Condition C16 a).	Compliant

C18	The demolition environmental management plan, as approved by the Planning Secretary, must be implemented for the duration of demolition.	Pre-commencement	A review of the following documents found that AGLM were generally implementing the DEMP during the audit period: › CMA WMS015.1 Mechanical Strip-Out (Turbine Hall & Auxiliary Bay) Work Method Statement dated 15/10/25 which describes the methods and sequence of works required to safely complete the tasks in accordance with AS2601, Demolition Code of Practice & AGL's requirements; › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11 dated 22/05/2025; › Completed Verification of Competency – Excavator Evidentiary Exam for Excavator VOC 11A dated 22/05/2025; › Completed Verification of Competency for Demo Saw VOC 7 dated 01/08; › Completed Verification of Competency for Manual Handling VOC 24 dated 01/08/25; › Friable Asbestos Removal Licence issued to Delta Pty Ltd – period 07/02/2014 to 06/02/2029; and › My Rapid – Induction Register with list of general contractors and status showing that contractors have completed their relevant site induction. › SafeWork NSW Notice of intent to remove friable asbestos dated 08/04/25 (Notification number: 943R-00435291-01); › SafeWork NSW Notice of intent to remove friable asbestos dated 08/04/25 (Notification number: 943R-00435291-02); › Email from SafeWork NSW to CMA Contracting dated 25/11/25 confirming Notification (943R-00435291-02) for Class A asbestos removal licence is acknowledged. MP advised (pers comms) that demolition works at the Liddell Power Station has been focussed on preliminary works such as stripping out buildings and doing non-structural demolition. 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 under construction › Demolition stripping out works is occurring at the Liddell Power Station; › Work areas are being well maintained and dust is being managed; › Work Permits and Procedures pertaining to specific demolition tasks are being implemented; › Safety signage was present around the demolition work area; and › A temporary storage facility with restricted access to personnel has been established for asbestos containing material. Sighted letter from SafeWork NSW dated 19/09/25 confirming AGLM's request to temporarily store asbestos wastes on-site at Liddell Power Station.	Compliant
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;	Pre-commencement	Asbestos Management Sub Plan (AMSP)(approved by DPHI on 18/06/25). The AMSP is a sub-plan within the DEMP (Appendix C). Section 2.1.2 states that prepared in accordance with the SafeWork NSW 2022 Code of practice: How to safely remove asbestos, SafeWork: guidance on managing asbestos in soil, Schedule B2 of the NEPM and requirements of the Site auditor. The DEMP required consultation with SafeWork NSW and the Site Auditor. Appendix B contains a tabulated summary of consultation for SafeWork NSW and the Site Auditor (Jason Clay – NSW EPA Accredited Site Auditor). The tabulated summary contains relevant dates, party's response, summary of issues raised and AGLM's response.	Compliant

C19(b)	identify any known or potential areas of concern within the approved development area for asbestos containing materials and synthetic mineral fibre;	Pre-commencement	Section 7.2 of the AMSP states that an intrusive Asbestos Audit was completed by Prensa in 2024 (Destructive Hazardous Building Materials Assessment, Liddell Power Station, Muswellbrook, NSW prepared by Prensa for CMA Contracting Pty Ltd, dated November 2024). The audit found that friable and non-friable asbestos containing material (ACM) is currently either enclosed or deemed to be in a condition that does not pose a risk provided the materials are not disturbed.	Compliant
C19(c)	include:	Pre-commencement	Section 3 of the AMSP outlines the indicative schedule of activities including demolition zones and start/finish dates for ACM removal. Appendix C of the AMSP also contains an example of an asbestos removal control plan. Section 8 outlines synthetic fibre management and strategy. Section 7.14.1 of the AMSP outlines onsite transport, disposal and tracking of asbestos. The AMSP states that once the construction of the onsite asbestos disposal facility is completed, all ACM waste deemed suitable, will be disposed of permanently within the onsite asbestos disposal facility. The ASMP also states that a tracking system will be implemented to track the ACM waste from the source location to the onsite disposal facility. Table 4.2.1 of the AMSP lists the consent conditions relevant to the AMSP and where they are addressed within the AMSP.	Compliant
C19c(i)	procedures for identifying, handling and disposing of asbestos waste, asbestos containing materials and synthetic mineral fibre;	Pre-commencement	As above	Compliant
C19c(ii)	procedures for identifying, handling and disposing of asbestos waste, asbestos containing materials and synthetic mineral fibre;	Pre-commencement	As above	Compliant
C19c(iii)	procedures for identifying, handling and disposing of asbestos waste, asbestos containing materials and synthetic mineral fibre;	Pre-commencement	As above	Compliant
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;	Pre-commencement	AGLM sought approval to substage the submission of the BMSP, requesting to develop individual BMSPs for each of the four anticipated blast events for the Project. DPHI approved AGLM's request for staging the relevant management plans on 03/04/25. Refer to Schedule 2, Condition A17 The Blast Management Plan for the 1 st Test Blast was approved by DPHI 2/12/2025, the plan was produced by Wellanbah Industrial Blast Management Experts.	Compliant
C20b(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;	Pre-commencement	Included in plan	Compliant
C20b(ii)	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;	Pre-commencement	Included in plan	Compliant
C20b(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);	Pre-commencement	N/a test blast only	Not triggered
C20(c)	describe the mitigation measures that will be implemented to:	Pre-commencement	N/a test blast only	Not triggered
C20c(i)	comply with the conditions of this consent;	Pre-commencement	N/a test blast only	Not triggered
C20c(ii)	manage the risks identified in the environmental risk assessment required by condition B1; and	Pre-commencement	N/a test blast only	Not triggered

C20c(iii)	manage blast generated dust and fumes, protect public safety and manage road closures;	Pre-commencement	N/a test blast only	Not triggered
C20(d)	include a monitoring, evaluation and reporting program that uses an approach that is consistent with the environmental management strategy required by condition B1.	Pre-commencement	N/a test blast only	Not triggered
C21	A soil and water 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;	Pre-commencement	Soil and Water Management Plan prepared in accordance to section Schedule 2, Condition C21 and approved by DPHI.	Compliant
C21(b)	identify the clean and dirty water management system;	Pre-commencement	As Above	Compliant
C21(c)	describe the mitigation measures that will be implemented to:	Pre-commencement	As Above	Compliant
C21c(i)	comply with the conditions of this consent, including the relevant performance measures identified in Table 3;	Pre-commencement	As Above	Compliant
C21c(ii)	manage the risks identified in the environmental risk assessment required by condition B1; and	Pre-commencement	As Above	Compliant
C21c(iii)	implement the commitments detailed in the documents listed in condition A2(c);	Pre-commencement	As Above	Compliant
C21(d)	include a monitoring, evaluation and reporting program that uses an approach that is consistent with the environmental management strategy required by condition B1.	Pre-commencement	As Above	Compliant
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;	Pre-commencement	Dust Management Sub Plan (DMSP) (approved on 23/05/25). The AMSP is a sub-plan within the DEMP (Appendix E). Section 1.5 of the DMSP states that it was prepared by Luke Spencer, who is a member of CASANZ and Chartered Professional Engineer (CPEng), with more than 16 years' experience in air quality impact assessment and management and Sam Putland, who is a Certified Air Quality Practitioner (CAQP) with the Clean Air Society of Australia and New Zealand (CASANZ) with more than 10 years' experience. Appendix A of the DSMP contains Luke's Curriculum Vitae.	Compliant
C22(b)	describe the mitigation measures that will be implemented to: (i) comply with the conditions of this consent; and (ii) manage the risks identified in the environmental risk assessment required by condition B1;	Pre-commencement	Section 3.2 of the DMSP outlines the relevant consent conditions and where in the DMSP they are addressed. Section 7.2 of the DMSP outlines the emission sources and management measures proposed to prevent generation of dust during Stage 1 demolition activities, and Table 7-2 outlines the GHG management measures.	Compliant
C22(c)	include a monitoring, evaluation and reporting program that uses an approach that is consistent with the environmental management strategy required by condition B1.	Pre-commencement	Section 8 of the DMSP outlines inspections, training, monitoring, reporting, and how enquiries and complaints are managed. The DMSP states that workers and visitors are required to undergo training and awareness programs regarding environmental management requirements, including dust management, and the importance adhering to related requirements during activities. Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which content on general air quality management obligations.	Compliant

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.	Pre-commencement	See Schedule 2, Condition C1(a).	Compliant
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;	Pre-commencement	Sighted 'Liddell Ash Dam Closure Containment Area Detailed Design Report' (GHD) dated 04/09/25. Sighted letter from Jason Clay (Site Auditor) titled 'Interim Audit Advice #62: Asbestos Containment Cells – Construction Quality Assurance' dated 23/09/25 to clarify the auditor's construction approvals during construction of the asbestos containment cells. The Site Auditor advised that he had undertaken a review of the following documents: › Liddell Ash Dam closure – Containment Cells Detailed Design Report; › Combined Detailed Design Drawings Set; › Liddell Ash Dam Closure – Technical Specification – Containment Area; and › Liddell Ash Dam Closure – Construction Quality Assurance Plan. The Site Auditor listed several hold points to occur during the construction process.	Compliant
C24(b)	be prepared in consultation with the NSW EPA;	Pre-commencement	Sighted letter from NSW EPA dated 17/07/25 in response to a request from AGLM to review and comment on the 'Liddell Ash Dam Closure - Containment Area Detailed Design Report' (Design Report), dated 23/05/25, prepared by GHD. The EPA noted that a site auditor (Jason Clay) has provided interim audit advice on the Design Report, and that the proponent is currently addressing the auditor's comments. Accordingly, the EPA has not undertaken a comprehensive review of the Design Report.	Compliant
C24(c)	be submitted to the Planning Secretary for approval prior to the commencement of construction of the asbestos disposal facility; and	Pre-commencement	Sighted letter from DPHI to AGLM dated 11/09/25 advising that DPHI approves the Asbestos Final Design in accordance with Schedule 2, Condition C24. DPH also acknowledged AGLM's response to the DPHI's review comments and request for additional information.	Compliant
C24(d)	be implemented, as approved, by the Planning Secretary.	Pre-commencement	Site inspection undertaken during the audit demonstrated that the asbestos storage facility is currently being constructed in accordance with the 'Liddell Ash Dam Closure Containment Area Detailed Design Report' (GHD) dated 04/09/25 (Plate 1). AGLM have designed the containment cells at the asbestos storage facility to separate and exclude as much clean water as practical through diversion drains around the cells, which is then pumped through sediment basins which ultimately report to the Borrow Pit sediment dam. Sighted AGLM Liddell Ash Dam Closure Containment Cell Design Sediment and Erosion Control Plan (GHD, 2025) showing the use of drainage paths moving around the containment cells. During audit site inspection, the initial trial use of geofabric liner which will be used to prevent long-term erosion for planned drains at the Liddell Ash Dam was observed.	Compliant

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	Pre-commencement	Sighted 'Liddell Ash Dam Closure Construction Quality Assurance Plan – Containment Area' (GHD) dated 01/08/25.	Compliant
C25(b)	be prepared in accordance with the relevant requirements of the NSW EPA Environmental Guidelines Solid Waste Landfills (2016).	Pre-commencement	Sighted letter from EPA to AGLM dated 17/07/25 thanking AGLM for requesting advice from the NSW EPA to review and comment on the (GHD) dated 22/05/25. The EPA noted that a site auditor has provided interim audit advice on the plan and that the proponent is currently addressing the auditor's comments.	Compliant
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	Pre-commencement	CQA prepared and provided to EPA for review. EPA review comments received 13 January 2026.	Compliant
C26(b)	be prepared in accordance with NSW EPA Environmental Guidelines Solid Waste Landfills (2016) 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.	Pre-commencement	See Schedule 2, Condition C26.	Compliant
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:	Demolition & Construction	Appendix D outlines relevant consultation undertaken for the DEMP preparation. Appendix D states AGLM's comments 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 action.	Not triggered
C27a(i)	by a suitably qualified and experienced person/s; and	Demolition & Construction	See Schedule 2, Condition C27(a).	Not triggered
C27a(ii)	within 2 years of the date of commencement of development under this consent, unless otherwise agreed by the Planning Secretary;	Demolition & Construction	As above	Not triggered
C27(b)	within 2 years of the date of commencement of development under this consent, unless otherwise agreed by the Planning Secretary;	Demolition & Construction	As above	Not triggered
C27(c)	be accompanied by interim advice from the Site auditor; and	Demolition & Construction	As above	Not triggered
C27(d)	include any recommendations to supplement the existing capping in required by the Site auditor and an implementation plan for the recommendations.	Demolition & Construction	As above	Not triggered

C28	The recommendations required by the Site auditor must be implemented as outlined in the assessment required by condition C27.	Demolition & Construction	See Schedule 2, Condition C27(a).	Not triggered
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.	Demolition & Construction	Personnel interview (pers comms) confirmed that no rehabilitation work has been completed for the Project.	Not triggered
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;	Demolition & Construction	Personnel interview (pers comms) confirmed that no rehabilitation work has been completed for the Project.	Not triggered
C30(b)	be prepared:	Demolition & Construction	See Schedule 2, Condition C30(a).	Not triggered
C30b(i)	by suitably qualified and experienced person/s;	Demolition & Construction	As above	Not triggered
C30b(ii)	in consultation with the Site auditor, NSW EPA, DS NSW and Council; and	Demolition & Construction	As above	Not triggered
C30b(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:	Demolition & Construction	As above	Not triggered
C30(c)	include a stakeholder consultation strategy to guide rehabilitation closure planning processes and outcomes;	Demolition & Construction	As above	Not triggered
C30(d)	include detailed completion criteria for the relevant rehabilitation objectives included in Table 6;	Demolition & Construction	As above	Not triggered
C30(e)	describe the measures to be implemented for the Liddell Ash Dam to achieve the completion criteria;	Demolition & Construction	As above	Not triggered
C30(f)	include an overview of the risks to achieving successful rehabilitation and the strategies to be implemented to address the identified risks;	Demolition & Construction	As above	Not triggered
C30(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;	Demolition & Construction	As above	Not triggered
C30(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;	Demolition & Construction	As above	Not triggered

C30(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;	Demolition & Construction	As above	Not triggered
C30(j)	include details of who would be responsible for monitoring, reviewing and implementing the plan;	Demolition & Construction	As above	Not triggered
C30(k)	include a process to characterise, monitor and evaluate groundwater seepage from the Liddell Ash Dam;	Demolition & Construction	As above	Not triggered
C30(l)	include an air quality management sub-plan that:	Demolition & Construction	As above	Not triggered
C30(i)	is prepared in accordance with the NSW EPA's best practice guidance;	Demolition & Construction	As above	Not triggered
C30(ii)	ensures compliance with the conditions of this consent;	Demolition & Construction	As above	Not triggered
C30(iii)	implements all reasonable and feasible mitigation measures to minimise dust emissions from the dam;	Demolition & Construction	As above	Not triggered
C30(iv)	implements all reasonable and feasible mitigation measures to minimise dust emissions from the dam;	Demolition & Construction	As above	Not triggered
C30(v)	incorporates a TARP for dust emissions.	Demolition & Construction	As above	Not triggered
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.	Demolition & Construction	See Schedule 2, Condition C30(a).	Not triggered
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.	Demolition & Construction	Under the Independent Audit Post Approval Requirements (2020) (IAPAR), an initial independent audit must be completed within 12 weeks of the commencement of construction. Development under SSD 24937520 commenced on 23/07/25. The site inspection for the IEA occurred on 14/10/25 (within 12 weeks of commencement).	Compliant
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.	Demolition & Construction	Sighted letter to DPHI dated 13/03/25 notifying that the commencement of development under SSD 24937520 is scheduled to commence on 28/03/25. Therefore, the first Compliance Report for the Project will be required by the end of March 2026.	Not triggered

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;	Demolition & Construction	See Schedule 2, Condition D2.	Not triggered
D3(b)	identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and	Demolition & Construction	As above	Not triggered
D3(c)	describe what measures will be implemented over the next year to improve the environmental performance of the development.	Demolition & Construction	As above	Not triggered
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;	Demolition & Construction	Sighted Notification of Non-Compliance Report dated 03/10/25 from AGLM to DPHI, in relation to a contractor tracking machinery through a flagged 'No-go' zone which is a non-compliance with the BMP requirements. The incident occurred on 27/09/25. The 'No-go' area was immediately inspected for any injured fauna. No injured fauna was identified during the inspection. There was some disturbance to the groundcover, no native vegetation was impacted. The notification letter met the relevant following SSD 24937520 requirements: ›It was submitted via the DPHI Major Projects Portal; ›The development number and name were stated at the top of the letter; ›The letter identifies that AGLM has been non-compliant with Condition B34 of SSD 24937520 and provides explanation as to why and the reasons the non-compliance has occurred; and ›The letter outlines the actions taken to address the non-compliance. Sighted DPHI response to AGLM dated 09/10/25 stating that 'NSW Planning has reviewed the notification and considers it to generally satisfy Schedule 2, Condition D4 of the consent'. Sighted email from AGLM to DPHI dated 27 June 2025 advising that a large tree within the Project footprint has been cut down, potentially by an illegal trespasser. The tree had been mapped in the Project Biodiversity Development Assessment Report as a habitat tree with a number of hollows. Sighted letter from DPHI to AGLM in response to notification submitted to DPHI on 2 July 2025 regarding the unauthorised felling. DPHI determined there has been no breach of the consent, as the tree felling was not associated with the activities approved under the consent. DPHI also noted that they reviewed the notification and considered it to generally satisfy the conditions of consent in relation to non-compliance reporting.	Compliant
D4(b)	submitted via the NSW planning portal (Major Projects);	Demolition & Construction	See Schedule 2, Condition D4(a).	Compliant
D4(c)	identify the development (including the development application number and name);	Demolition & Construction	As above	Compliant

D4(d)	set out the condition of this consent that the development is non-compliant with;	Demolition & Construction	As above	Compliant
D4(e)	why it does not comply;	Demolition & Construction	As above	Compliant
D4(f)	the reasons for the non-compliance (if known); and	Demolition & Construction	As above	Compliant
D4(g)	what actions have been undertaken, or will be undertaken; and when, to address the non-compliance. Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Demolition & Construction	As above Note only.	Compliant
Note	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Demolition & Construction		Note Only
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;	Demolition & Construction	An overflow of the Coal Handling Plant Sediment Basin occurred following a rainfall event on 26 November 2025. Testing confirmed that the water discharged from the CHP basin exceeded the total suspended solids criteria. AGLM reported this under D4 of the consent as a non-compliant with condition C18 of the consent as the Soil and Water Management Sub Plan had not been implemented. Response from DPHI advised that this event should be reported as an incident under condition D5 of the consent.	Non-compliant
D5(b)	a brief description of what occurred and why it has been classified as an incident;	Demolition & Construction	See Schedule 2, Condition D5(a).	Not triggered
D5(c)	a brief description of what occurred and why it has been classified as an incident;	Demolition & Construction	As above	Not triggered
D5(d)	identifying a contact person for further communication regarding the incident.	Demolition & Construction	As above	Not triggered
D6	The Applicant must provide the Department with a subsequent incident report in accordance with Appendix 6 (Incident Notification and Reporting Requirements).	Demolition & Construction	As above	Not triggered
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;	Demolition & Construction	See Schedule 2, Condition D5 a). The submission of incident reports to DPHI were not required during the audit period.	Not triggered
D7(b)	the submission of a compliance report under condition D3;	Demolition & Construction	See Schedule 2, Condition D2.	Not triggered
D7(c)	the submission of an Independent Environmental Audit under condition D1;	Demolition & Construction	See Schedule 2, Condition D1.	Not triggered
D7(d)	the approval of any modification of the conditions of this consent (unless the conditions require otherwise); or	Demolition & Construction	Not triggered.	Not triggered
D7(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. 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.	Demolition & Construction	See Schedule 2, Condition A10 above. AGLM notified DPHI on 08/07/25 that commencement of construction and demolition was to start on 23/07/25. Therefore AGLM must have completed a review of the existing approved management plans by 08/10/25 (3 months after notification of a phase change was to occur). Evidence was not available at the time of the audit that AGLM had completed a review of existing environmental management documents within three months of notifying DPHI of a change in phase from commencement to construction and demolition. Existing approved management plans at that time notification occurred included the Environmental Management Strategy (approved 23/05/25), Asbestos Management Sub Plan (approved 18/06/25), Dust Management Sub Plan (approved 23/05/25). Refer to action under Schedule 2, Condition C15.	Non-compliant
Access to information				
D8	Within 12 months of the commencement of development under this consent until the completion of all rehabilitation required under this consent, the following information and documents must be publicly available on the development website as they are obtained, approved or as otherwise stipulated within the conditions of this consent: (a) the documents listed in condition A2(c) of this consent;	Demolition & Construction	Development under SSD 24937520 commenced on 28/03/25 (see Schedule 2, Condition A10). Therefore, the documents are required to be publicly available by 28/03/26. The documents listed in Schedule 2, Condition A2(c) and Schedule 2, Condition D8 were not available on AGLM's public website at the time of audit.	Not triggered
D8(b)	all current statutory approvals for the development;	Demolition & Construction	See Schedule 2, Condition D8(a).	Not triggered
D8(c)	all approved environmental management documents required under the conditions of this consent;	Demolition & Construction	As above	Not triggered
D8(d)	the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;	Demolition & Construction	As above	Not triggered

D8(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;	Demolition & Construction	As above	Not triggered
D8(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;	Demolition & Construction	As above	Not triggered
D8(g)	a summary of the current phase and progress of the development;	Demolition & Construction	As above	Not triggered
D8(h)	a summary of the current phase and progress of the development;	Demolition & Construction	As above	Not triggered
D8(During project)	complaints register, updated monthly;	Demolition & Construction	As above	Not triggered
D8(j)	the Compliance Reporting of the development in accordance with the Compliance Reporting Post Approval Requirements (May 2020);	Demolition & Construction	As above	Not triggered
D8(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;	Demolition & Construction	As above	Not triggered
D8(l)	any other matter required by the Planning Secretary; and	Demolition & Construction	As above	Not triggered
D8(m)	kept such information up to date.	Demolition & Construction	As above	Not triggered
SSD 24937520 EIS Statement of Commitments (GHD 2024)				
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	Demolition & Construction	See Schedule 2, Condition B32(c) regarding minimising clearing impacts. During the audit site inspection 'No Go' zones were observed across construction areas. The 'No Go' zones delineate the Project footprint. During the audit site inspection designated vehicle parking areas were observed. Stockpile areas were observed within the disturbance boundary (as delineated). Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which contains a slide for 'Land Management including Bushfire and Biodiversity'. The induction has a slide showing threatened species and no-go zone areas, which are flagged for delineation.	Compliant

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).	Demolition & Construction	See Schedule 2, Condition B32(e). Sighted the following examples of Pre-Clearance Surveys: › Sighted Pre-Clearance Survey of the Haul Road and Landfill Cells dated August 2025 (EMM, 2025); › Sighted EMM Pre-Clearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025). › Sighted letter to AGLM from EMM confirming that EMM qualified fauna spotter / catcher Joshua Smart attended site on 16/10/25 to conducted a pre-clearance survey. BMP S1. Section 2.2.3.3 states that all habitat features must be felled or otherwise disturbed in the presence of a Fauna Spotter Catcher (FSC) who will be an appropriately qualified and experienced Ecologist. Sighted letter dated 05/09/25 from AGLM to DPHI, in relation to the death of a Hunter Valley Delma. In the letter, AGLM states that 'In compliance with the requirements of the BMP, AGLM engaged a suitably qualified ecologist to act as a FSC and be present during clearing activities.' AGLM confirmed with DPHI that clearing procedures had been undertaken in accordance with the approved BMP S1, despite the death of the Hunter Valley Delma. During the audit site inspection 'No Go' zones were observed across construction areas. The 'No Go' zones delineate the Project footprint.	Compliant
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. › Limit the use of pesticides in the project footprint where possible to avoid contamination of nearby watercourses/wetland areas.	Demolition & Construction	During audit site inspection: › Observed initial trial use of geofabric liner which will be used to prevent long-term erosion for planned drains within the Liddell Ash Dam area. › Erosion and sediment controls including sediment fencing in place for the works. › Dedicated refuelling and storage places were constructed away from watercourses, with spill kits in place at key locations . CMA Personnel (pers comms) confirmed that site-based vehicles carry spill kits. See Schedule 2, Condition B32 d) regarding minimising use of pesticides.	Compliant
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.	At all times	During the audit site inspection safety signage, 40 kilometre speed sign and a speed tracker was observed	Compliant
BIO5	› Vehicles and construction plant must be cleaned appropriately before arrival on site to help prevent the spread of the fungal pathogens <i>Phytophthora cinnamomi</i> and Myrtle Rust (<i>Puccinia psidii</i>). › As most of the site contains exotic species, including some high-threat weeds, excavated topsoil from areas with high threat weed infestations must be stockpiled appropriately to limit the risk of transferring invasive species into surrounding vegetation. High-threat weed infestations should be mapped during pre-clearance surveys.	Demolition & Construction	Section 2.2.4 of the BMP S1 states that all plant and equipment coming on to site must be declared free of organic matter including mud, vegetation, seeds etc., via a documented inspection. Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which contains a slide stating that 'vehicles and equipment coming and going from site must be free of mud, vegetation and seeds'. Also sighted CMA Plant and Equipment Induction dated 05/09/25 which has a tick box which confirmed that plant and equipment coming on to site is free of organic matter including mud, vegetation, seeds etc. Sighted EMM Pre-Clearance Survey – Borrow Pit and Cricket Pitch (EMM, 2025) which describes the vegetation and weeds present. Recent topsoil stockpiles in the oil and grit trap works area have been shaped to allow for reduced dust and are scheduled for hydroseeding by GSS in the upcoming weeks	Compliant

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. › 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.	Demolition & Construction	Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which contains a slide for 'Land Management including Bushfire and Biodiversity'. The induction has a slide outlining waste requirements, and states 'no waste produced offsite is allowed to be brought onto the EPL boundary for disposal, unless it is compliant to EPL requirements'. During the audit site inspection, it was observed that public access to the Project is restricted by a manned security entry and boom gate. See SoC BIO1 for observed 'no go' zones during inspection. Levels of lighting that accompany the access road are minimal because no out of hours construction or maintenance (cleaning etc.) has occurred outside of work hours (as confirmed by LT (pers comms)). See Schedule 2, Condition B8 for evidence of noise minimisation practices. See Schedule 2, Condition B6 for evidence of dust control measures.	Compliant
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.	Demolition & Construction	See Schedule 2, Condition B32(g).	Compliant
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).	Demolition & Construction	Refer to Schedule 2, Condition B32 (g and iv).	Not triggered

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.	Demolition & Construction	Refer to SoC BIO1 for evidence that 'no-go' zones are implemented on site. Sighted Notification of Non-Compliance Report dated 03/10/25 from AGLM to DPHI, in relation to a contractor tracking machinery through a flagged 'No Go' zone which is a non-compliance with the BMP requirements. Despite the machinery tracking through a 'No-Go zone', no fauna was injured and no vegetation was cleared, only some disturbance to groundcover occurred. Refer to Schedule 2, Condition D4 for further details. Section 7 of the Microbat Management Plan (Appendix C of the BMP S1) outlines that work will be scheduled where possible to avoid sensitive periods. During the audit site inspection designated vehicle parking areas were observed OFI : Refer to action under Schedule 2, Condition B34	Compliant
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.	At all times	Section 2.2.1 of the BMP S1 states that 'One threatened species, Diuris tricolor (Pine Donkey Orchid), was recorded outside the revised Development Site alongside an existing unsealed track to the north of the LAD'. Section 2.2.3.1 of the BMP S1 states that 'Populations or individuals of Diuris tricolor within 10m of the Development Site must be identified and exclusion fencing/bunting and no-go signage installed to avoid any indirect impacts.' The BMP S1 doesn't contain a commitment that the population of Pine Donkey Orchids will be resurveyed during subsequent flowering periods, and no evidence was available at the time of the audit that Pine Donkey Orchards identified were fenced prior to commencement of the demolition / construction. It is recommended that AGLM: › Identify Pine Donkey Orchids within and nearby (within 10 metres) the 'Project Footprint' of SSD 24937520 and install exclusion fencing with 'No Go' zone signs attached. › Update the 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).	Non-compliant
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	Pre-commencement	Sighted the Soil and Water Management Sub Plan (SWMSP) (approved by DPHI on 22/05/25) which is the sub-plan within the DEMP. Erosion and sediment controls are described in Section 7 of the SWMSP. Also sighted the WMP S1A which outlines the Key Performance Indicators (KPIs) relevant	Compliant

	controls and environmental inspection requirements. The SWMP will include an Erosion and Sediment Control Plan (ESCP) which will be prepared in accordance with the Blue Book -Managing Urban Stormwater: Soils and Construction Volume 1 (4th edition), (Landcom, 2004) and Volume 2 (DECC, 2008). 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 in Erosion and Sediment Control (CPESC)) as a coordinated sub plan to the SWMP.		to erosion and sediment control works and references the 'Blue Book'. Refer to Schedule 2, Condition B13 for evidence of ESCP implementation.	
SC2	Erosion and sediment controls will be established prior to works commencing.	Pre-commencement	See Schedule 2, Condition B13.	Compliant
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 & Construction	It was noted that no progressive rehabilitation has been completed, however recent topsoil stockpiles in the oil and grit trap works area have been shaped to allow for reduced dust and are scheduled for hydroseeding by GSS in the upcoming weeks (see Plate 8).	Compliant
SC4	Rehabilitation Management Plan for the borrow pit and landfill areas will be developed by AGLM.	Demolition & Construction	See Schedule 2, Condition B38.	Not triggered
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 & Construction	See Schedule 2 Condition A7.	Compliant

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 & Construction	See Schedule 2, Condition A7.	Not triggered
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.	Demolition & Construction	Personnel (pers comms) confirmed that no spontaneous combustion events have occurred to date.	Not triggered
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, 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.	Demolition Completion	See Schedule 2, Condition C4.	Not triggered
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 & Construction	Section 5.11.4 of the DEMP outlines the spill management procedure.	Compliant

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 & Construction	Section 5.9 of the EMS outlines the unexpected finds protocol.	Compliant
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 & Construction	Not triggered. TB (pers comms) confirmed no unexpected contaminated soils have been identified to date for the Project.	Not triggered
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.	Pre-commencement	See Schedule 2, Condition B5.	Not triggered
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.	Pre-commencement	See Schedule 2, Condition B5.	Not triggered
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.	Demolition & Construction	See Schedule 2, Condition B4.	Compliant
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. An unexpected archaeological finds procedure should be included in relevant project documentation such as the Construction/Demolition Environmental Management Plan.	Demolition & Construction	Section 5.9 of the EMS outlines the unexpected finds protocol for heritage items. See Schedule 2, Condition B4.	Compliant
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 & Construction	Sighted 'Liddell Power Station Transition Photographic Archival Recording' (EMM, 2025). The Archival Report included photographs of the fence posts and associated structures, with provision of historical background information.	Compliant
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	Section 5.8.15 of the EMS states that recycling and resource recovery activities will be managed by a licenced service provider. The EMS states that CMA is the Principal Contractor and licenced demolition contractor and has the overall management and control of the Site. CMA holds a current Friable Asbestos Removal Licence (Licence Number WUA166). See Schedule 2, Condition C19 for the AMSP and Condition C19(b) for Hazardous Material surveys.	Compliant
DM2	- Complete Hazardous Material Survey - Develop removal and handling plan	Pre-Demolition	See Schedule 2, Condition C19(b). Appendix C of the AMSP within the DEMP contains an Asbestos Removal Control Plan	Compliant
DM3	- Complete contamination assessment - Develop plans to control impact of contamination and demolition activities	Pre-Demolition	Table 4-3 of the SWMSP within the DEMP states that a baseline Contamination Assessment Report (BCAR) (Kleinfelder, 2024) was prepared for the Project. See Schedule 2, Condition C19 for the AMSP.	Compliant
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	The EMS states that as per SoC DM4, AGLM have confirmed monitoring well locations and those that are impacted by the development have been decommissioned by a suitably qualified consultant. Kleinfelder was engaged to decommission the monitoring wells. Sighted 'Power Block SSD2 Groundwater Monitoring Event (GME) Factual Report (Kleinfelder Project: 26000344.001A. The report states that 'It is considered that the objectives of this GME and well-decommissioning were successfully met'.	Compliant
DM5	Dust management measures will be included in the PEMS, and implemented during demolition.	Pre-Demolition and During Demolition	See Schedule 2, Condition C22. Schedule 2, Condition B6 for evidence of dust control measures.	Compliant
DM6	Inspect roads prior to mobilising heavy equipment to site.	Pre-Demolition	Sighted 'Dilapidation Report – September 2025: CO269 Liddell Power Station via Singleton & Muswellbrook Off Ramps' dated 03/09/25 which demonstrates that AGLM are inspecting roads.	Compliant
DM7	Identify any critical infrastructure that may be damaged by vibration and develop monitoring plan to be included in the PEMS.	Pre-Demolition	See Schedule 2, Condition C20.	Not triggered
DM8	Compliance with Australian Standards for storage and handling of flammable and combustible liquids and hazardous materials.	Pre-Demolition	See Schedule 2, Condition B19.	Compliant
DM9	Develop a construction environmental management plan which includes a designated processing area.	Pre-Demolition	See Schedule 2, Condition B25.	Compliant
DM10	Develop a construction environmental management plan including specific stormwater and dirty water management plan.	Pre-Demolition	See Schedule 2, Condition B13.	Compliant
DM11	- Develop and implement fire management and emergency response plan - Implement Hot works permitting and controls	Pre-Demolition	See SoC HR8.	Compliant
REHABILITATION				
RH1	AGLM will prepare a Rehabilitation Management Plan for relevant areas of the site to detail the Rehabilitation objectives, methods to be implemented, indicative schedule, adaptive management measures and quality assurance measures, monitoring program and completion criteria.	12 months after issue of consent	See Schedule 2, Condition B38.	Not triggered

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)	During and post-completion	See Schedule 2, Condition B38.	Compliant
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.	Pre-commencement	See Schedule 2, Condition B15.	Compliant
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. 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.	Pre-commencement	Sighted the Soil and Water Management Sub Plan (SWMSP) (approved by DPHI on 22/05/25) which is the sub-plan within the DEMP. Erosion and sediment controls are described in Section 7 of the SWMSP. Also sighted the WMP S1A which outlines the Key Performance Indicators (KPIs) relevant to erosion and sediment control works and references the 'Blue Book'. Refer to Schedule 2, Condition B13 for evidence of ESCP implementation	Compliant

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.	Pre-commencement	Table 7-1 of the SWMSP outlines the measures to manage soils and surface, which includes location considerations, waste segregation, stockpile controls and drainage controls.	Compliant
WQ4	The PEMS will include processes for dewatering of water that has accumulated on site and from sediment basins, including relevant discharge criteria.	Pre-commencement	Appendix 2 of the SWMSP outlines the water discharge plan which provides the procedures for dewatering. The discharge criteria is based on criteria set in EPL 2122, and is outlined in Table 6-1.	Compliant
WQ5	The PEMS will include details of surface water and groundwater quality monitoring to be undertaken prior to, throughout, and following construction.	Pre-commencement	Section 8 of the WMP S1A outlines the water monitoring program for surface and groundwater. Appendix 4 of the SWMSP outlines the water monitoring plan associated with demolition activities. Appendix 4 of the SWMSP is specific to water quality monitoring within the sediment basin and surface water in Lake Liddell.	Compliant
WQ6	The PEMS will include details of exclusion zones that will be established for construction plant and equipment.	Pre-commencement	Table 7-1 of the SWMSP outlines the requirement to establish exclusion zones, including for access points and roadways / paths for machinery and vehicles.	Compliant
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.	Pre-commencement	See SoC SC9.	Compliant
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.	Pre-commencement	Appendix 3 of the SWMSP outlines the current water reuse strategy to manage the reuse of water onsite for purposes such as dust suppression or vehicle wash down, during the demolition works. Section 4 of Appendix 3 (SWMSP) outlines the water reuse opportunities and scenarios investigated. See Schedule 2, Condition D7 regarding revision of management plans.	Compliant

WQ9	Works within waterfront land will be managed in accordance with the relevant guideline as deemed appropriate.	Demolition & Construction	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. TB (pers comms) noted that works on waterfront land did not occur during the audit period. AGLM undertake weekly environmental inspections with CMA personnel. Sighted AGLM HSE Site Inspection Checklists dated 16/07/25 (LPS area), 07/10/25 (containment cell area), 08/10/25 (LPS area). Also sighted CMA Weekly Environmental AGL Audits dated 31/07/25. AGLM inspections have a checklist of items to ensure soil and water is being management correctly and clean and dirty water separated.	Not triggered
WQ10	Implementing practices to minimise disturbance of banks and undertaken bank stabilisation.	Demolition & Construction	See Schedule 2, Condition B13.	Compliant
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 and During Demolition	See Schedule 2, Condition B13.	Compliant
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 & Construction	Table 15 of the WMP S1A outlines the requirements relevant to WQ2, including ceasing work and seeking review by a hydrogeologist. Personnel interview (pers comms) confirmed that there have been no unexpected interactions with groundwater to date.	Compliant
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 and During Demolition	See Schedule 2, Condition C23.	Compliant
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-discharge confirmation of compliance with water quality performance criteria able to be analysed in real time. › The methodology for dewatering including use of amphibian friendly flocculants and pH balancing agents as required.	Pre-Demolition and During Demolition	Appendix 2 of the SWMSP outlines the water discharge plan which provides the procedures for dewatering. The discharge criteria is based on criteria set in EPL 2122, and is outlined in Table 6-1. There is no commitment within the SWMSP to use 'amphibian friendly' flocculants during dewatering. It is recommended that AGLM update the Soil and Water Management Sub Plan to outline AGLM commitments in relation to using amphibian friendly flocculants in Project sediment basins.	Non-compliant
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. 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.	Pre-Demolition and During Demolition	Table 11 of the WMP S1A outlines the monitoring locations for the S1 works. Table 16 of the WMP S1A outlines the TARP to be followed in the event of an exceedance, and Section 13.4 outlines the incident procedure. Personnel interview (pers comms) confirmed that AGLM undertakes environmental reporting and exceedance notifications in accordance with EPL 2122. No exceedances of pH or Oil and Grease occurred during the audit period, however AGLM notified the NSW EPA of a Total Suspended Solids	Compliant

	› 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		(TSS) exceedance on 04/09/25. Sighted letter from AGLM to NSW EPA dated 04/09/25. The letter notified of an exceedance of the concentration limit for Total Suspended Solids at EPL Point 17. AGLM stated 'During a significant rainfall event of 91 mm that occurred between 30 July 2025 and 5 August 2025, the Oil and Grit Trap reached capacity and began to overtop and discharge over the weir to Lake Liddell. Sampling conducted on the 4 August 2025 returned a result for TSS concentration of 57 milligrams per litre (mg/L) for EPL Point 17 which is a slight exceedance of the concentration limit of 50 mg/L specified in Condition L2.4 of EPL 2122. It is considered that there was no potential for environmental harm given the significant dilution from the high rainfall event.' Also sighted 'Monthly Data Summary AGL Macquarie – Liddell Power Station Environmental Protection Licence: EPL2122' (AGLM, 2025).	
AIR QUALITY				
AQ1	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. › The name and contact details of the person(s) accountable for air quality and dust issues. › Procedure for receipt of complaints. › Regular pre-wetting and watering requirements. › When to adjust works (including site inspections and watering) due to increased emission risk (e.g. during dry windy conditions). › 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.	Prior to work commencing and during works	Refer to Schedule 2, Condition C22.	Compliant
AQ2	Preparation of a Blast Management Plan and Asbestos Control Plan, which would include 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 and During Demolition	The BMSP has not been developed yet. See Schedule 2, Condition C20.	Not triggered
NOISE				

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.	Pre-commencement	Personnel interview (pers comms) confirmed that no demolition works triggering this requirement had commenced at the time of the audit. The NVMP (Appendix 4 of EMS) advises SoC NV1 is addressed in Section 7. Section 7 has Table 7-1 which lists all of the noise management measures. However, consideration of Commitment NV1 is not included in the list of measures included in the NVMP. Specifically, the commitment to notify is not addressed. With regard to working out of hours, please refer to Schedule 2, Condition B11. Sighted SiteHive noise monitoring records for the period 1 August 2025 to 21 October 2025. AGLM advised (pers comms) that the Project is discussed regularly at the AGLM Community Consultative Committee (CCC) meetings. Viewed minutes of the AGLM Hunter CCC from February 2025, which note that an update on the Project was provided by the Project Manager. OFI: It is recommended that AGLM update the Noise and Vibration Management Plan to include the commitment to notify relevant stakeholders a minimum of seven calendar days prior to the start of works and should include information such as total building time, what works are expected to be noisy, their duration, what is being done to minimise noise and when respite periods will occur.	Not triggered
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	Pre-commencement	Section 6 of the NVMP outlines the predicted noise associated with the three stages of Project work, including construction noise, operational noise, construction traffic noise and vibration. Section 2.4 of the NVMP outlines the construction activities relevant to the NVMP. Section 8.4 of the NVMP outlines the noise monitoring procedure, which includes noise monitoring. 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. With regard to the out of hours work procedure, please refer to Schedule 2, Condition B11. With regard to equipment being maintained, refer back to Schedule 2, Condition A24(a).	Compliant

	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 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. 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.	Demolition & Construction	See Schedule 2, Condition B20.	Compliant
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 & Construction	Table 3-2 of the TMP (within the EMS) references this commitment as a management measure. Sighted 'Liddell Power Station Internal Movement, Site Carpark and Loading Zones Site Map', dated 07/08/25. The Site Map clearly details the laydown area of unloading, within the Liddell Power Station work area.	Compliant
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 & Construction	See Schedule 2, Condition A23.	Not triggered
TT4	Truck deliveries to and from the site will be scheduled outside peak hours where possible.	Demolition & Construction	CMA interview (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.	Not triggered
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 & Construction	Sighted GVDA – Application Form for 'Install new project signage around the Liddell perimeter and entries', with attached plan set (Gate 1 CMA authorized access; Gate 2 authorized project vehicle car park; Gate 3 visitor car park; Gate 4 site access; muster points A–C; directional/site map board). Sign content and locations per the 'Site Signs_R1.pptx', dated 29/09/25. The list of signs included signage directing heavy vehicle and light vehicle travel directions and authorised access points. Also observed safety signage during audit site inspection	Compliant
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 & Construction	During the audit site inspection, it was observed that the internal access roads were being maintained.	Compliant
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 & Construction	Sighted 'Liddell Power Station Internal Movement, Site Carpark and Loading Zones Site Map', dated 07/08/25. The Site Map clearly details the carpark within the Liddell Power Station work area. Sighted GVDA – Application Form for 'Install new project signage around the Liddell perimeter and entries attached plan set (Gate 1 CMA authorized access; Gate 2 authorized project vehicle car park; Gate 3 visitor car park; Gate 4 site access; muster points A–C; directional/site map board). Sign content and locations per the "Site Signs_R1.pptx"', dated 29/09/25. The list of signs included carpark signage. Also observed carpark signage during audit site inspection	Compliant
TT8	All staff and contractors will be informed that animals often cross the New England Highway and to take necessary precautions when driving.	Demolition & Construction	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 '.	Compliant

TT9	Traffic controllers should be present where OSOM are required to make right-turning movements along the haulage route to the project site.	Demolition & Construction	Table 3-2 of the TMP (within the EMS) references this commitment as a management measure. Site Manager (pers comms) confirmed that this has not been triggered yet.	Not triggered
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	Table 3-2 of the TMP (within the EMS) references this commitment as a management measure. Sighted email from Oliver Easingwood (Delta Group) to Todd Solomon (CMA) dated 17/11/25 outline details of a site walk undertaken to confirm that the proposed route of an OSOM had no overhead obstructions, the road condition, and chosen route was suitable for transport.	Compliant
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	Table 3-2 of the TMP (within the EMS) references this commitment as a management measure. Sighted Oversize and/or Over mass (OSOM) Mass or Dimension Exemption Permit issued to Goldsprings Earthmoving and Heavy Haulage Pty Ltd dated 17/08/25 for Prime mover towing OS/OM/OSOM load and Prime Move, Dolly and Low Loader. The Permit start period is from 14/04/25 to 17/08/25 (Permit Number 552438V9).	Compliant
LANDSCAPE AND VISUAL				
LC1	Existing large trees and vegetation will be maintained and protected wherever possible.	Demolition & Construction	Section 5.8.6 of the EMS states that existing large trees and vegetation will be maintained and protected wherever possible. This will be achieved through the implementation of the AGLM Ground and Vegetation Disturbance Approval (GVDA). See Schedule 2, Condition B34 for examples of GVDA's completed during the audit period that were reviewed as part of this IEA.	Compliant
LC2	Revegetation will be undertaken in accordance with the Rehabilitation Management Plan.	Progressive throughout project	See Schedule 2, Condition B38.	Not triggered
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.	Progressive throughout project	As above	Not triggered
LC4	Unnatural features such as drainage contour banks are removed or minimised to reduce visual amenity impacts.	Progressive throughout project	As above	Not triggered
LC5	Any lighting during nighttime 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.	At all times	See Schedule 2, Condition A9.	Not triggered
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 › Managing project perceptions › Provide updates on ongoing industrial uses and other beneficial uses to be located at the LPS	At all times	'Sighted Community and Stakeholder Engagement Strategy – Liddell Future Land Use and Enabling Works' (SES) (AGLM, 2025). Section 6.5 of the SES provides a 'Communication Management Plan' which outlines the stakeholders, relevant issues, and frequency for consultation. However, the SES does not include procedures for communication of housing demand to Project stakeholders. It is recommended that AGLM update the Stakeholder Engagement Strategy (SES) to outline	Non-compliant

	› Measures for communicating with stakeholders regarding housing demand		measures for communicating with stakeholders regarding housing demand.	
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	Pre-Demolition	Section 6.5 of the SES provides a 'Communication Management Plan' which outlines the stakeholders, relevant issues, and frequency for consultation.	Compliant
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. 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.	At all times	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 project tenders over \$10 million. CD (pers comms) confirmed that first nations targets are included in the Demolition Contract and Key Performance Indicators (KPIs) are reported on monthly. Sighted Tax Invoice dated 21/11/25 from Wonnarua Mine Rehabilitation Pty Ltd to CMA. Also sighted Tax Invoice dated 22/09/25 from Borger Cranes to CMA.	Compliant
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.	At all times	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 August 2025, which note that an update on community support provided by community relations manager. Site manager (pers comms) confirmed that timelapse cameras have been installed on-site to capture footage of the demolition from November 2025, and previous photographs have been undertaken. Sighted a marketing advertisement for Liddell Works stating that '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.' Personnel interview (pers comms) confirmed that AGLM are donating some components to the Muswellbrook museum.	Compliant
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	Pre-Demolition and During Demolition	Section 5.8.15 of the EMS describes the waste management plan for the Project. See Schedule 2, Condition B25 for evidence of implementation.	Compliant

WM2	Awareness of waste minimisation practices will be included in the project induction.	Pre-Demolition and During Demolition	Sighted 'Liddell Power Station Environmental Induction' powerpoint presentation which contains relevant waste management training.	Compliant
WM3	Waste will be classified, managed and disposed of in accordance with the Waste Classification Guidelines (EPA, 2014).	Pre-Demolition and During Demolition	See Schedule 2, Condition B23.	Compliant
WM4	Waste streams will continue to be managed in accordance with EPL 2122	Pre-Demolition and During Demolition	See Schedule 2, Condition B23.	Compliant
WM5	Recycling and resource recovery activities will continue to be managed by a licenced service provider.	Pre-Demolition and During Demolition	See SoC DM1.	Compliant
GREENHOUSE GAS				
GG1	Sustainable procurement practices will be adopted where feasible.	Pre-Demolition and During Demolition	See Schedule 2, Condition B.	Compliant
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 and During Demolition	See Schedule 2 Condition A7.	Compliant
GG3	Investigate the use of biodiesel for trucks and equipment, where suitable.	Demolition & Construction	Section 5.8 of the DEMP states that AGLM will investigate the use of biodiesel where suitable. Personnel interview confirmed that AGLM historically investigated (prior to commencement of SSD 24937520) the use of biodiesel in their equipment fleet and determined that this was not suitable for their business. Given that AGLM has determined that the use of biodiesel is not suitable and no further investigation is proposed, it is recommended that AGLM update the DEMP to outline that this has been investigated, and determined that biodiesel is not suitable for Project equipment. OFI: 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.	Compliant
GG4	All plant and equipment used during the project shall be regularly maintained to reduce emissions and comply with the relevant exhaust emissions guidelines.	At all times	See Schedule 2 Condition A24.	Compliant
GG5	Plant and equipment will be switched off when not in constant use and not left idling.	At all times	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	Compliant

GG6	The project will be planned to ensure minimal movement of plant and equipment where practical.	Prior to work commencing and during works	Section 5.8 of the DEMP states that AGLM plan the project so there is minimal movement of plant and equipment, where practical. Sighted 'Liddell Power Station Site Access Traffic Control Plan' dated 20/08/25 which is a plan devised to outline the most efficient route for machines to move around the oil and grit trap works area. MP (pers comms) explained that the route in the abovementioned Traffic Control Plan had been revised and shortened to go through the location of the social club (now demolished), rather than around it on other road ways.	Compliant
GG7	Maximise the beneficial reuse of the carbon removed in vegetation, such as mulching and composting, will be included in management plans, where feasible.	At all times	See Schedule 2, Condition B32 e).	Compliant
GG8	Maximise the reuse/recycling of demolition waste materials will be investigated and included in demolition management plans, where feasible.	At all times	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 August 2025 CMA Monthly Coordination Meeting stating that 'Waste' was a focus for the month, and question asking 'Are there plant and equipment resources under utilised/wasted?'.	Compliant
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 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.	Demolition & Construction	The BMSP Schedule 2, Condition C20 developed for the first test blast.	Compliant

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 & Construction	Addressed within the BMSP for the first test blast. See Schedule 2, Condition C20.	Compliant
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 & Construction	Addressed within the BMSP for the first test blast. See Schedule 2, Condition C20.	Compliant
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 & Construction	Addressed within the BMSP for the first test blast. See Schedule 2, Condition C20.	Compliant
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 & Construction	Addressed within the BMSP for the first test blast. See Schedule 2, Condition C20.	Compliant
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	See Schedule 2, Conditions (a) to (c). Section 5 outlines responsibilities and contact details. Sections 7 to 8 outline the identification of asbestos and ACM, and procedures for management of asbestos and synthetic mineral fibre. Section 9 outlines the procedure for managing incidents and Section 10 outlines the emergency procedure.	Compliant

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. › Provide a copy of the HAZMAT Audit Report to the contractor carrying out the demolition or refurbishment work. › Ensure asbestos or ACM that is likely to be disturbed is identified and so far, as is reasonably practicable, removed before the demolition or refurbishment commences. Where this may not be possible e.g., in the stacks, an alternative control will be implemented. Where asbestos cannot be safely removed an asbestos removal control plan will be developed.	Pre -Demolition	Refer to Schedule 2, Condition C1.	Compliant
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.	At all times	Sighted 'Liddell Ash Dam Bushfire Management Plan' (LAD BMP) (AGLM, 2025). The LAD BMP was updated 25/06/25. Section 8.1 of the LAD BMP addresses hot works management measures and equipment use in long grass. Attachment 1 of the LAD BMP addresses smoking restrictions and risk controls for the storage of combustible materials on site.	Compliant
HR9	Implement the demolition management measures identified in the Demolition Impact Assessment Report (GHD, 2022c).	Demolition & Construction	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.	Compliant
CUMULATIVE				
C11	The PEMS will include a process to review and update management measures if any other development commences in proximity to the project.	Pre-Demolition	See Schedule 2 Conditions B1 (d) and (e).	Compliant



Appendix B – Action Status Table

Source	Condition of Consent No.	Action Proposed	Proposed Completion Date	Status	Action Completed
IEA Dec 2025 (This compliance report)	Condition A2 (a)	No action required.	N/A	N/A	N/A
IEA Dec 2025 (This compliance report)	Condition B13	(1) Inspect chemical storage pods at the temporary asbestos facility and ensure all pods have self-bunding. (2) Deliver a Toolbox Talk that communicates spill containment and cleanup requirements to Project.	06/03/2026	Completed	(1) Chemical storage pods at temporary asbestos facility inspected and confirmed that storage pods have been removed. (2) Toolbox talks from CMA and Ramboll have been communicated to outline contamination and spill response prevention and clean up requirements.
IEA Dec 2025 (This compliance report)	Condition B15 (a)	AGLM to update 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.	31/03/2026	In Progress	AGLM have been working with AECOM to update the WMP 1A, once updates are made a final version will be submitted.
IEA Dec 2025 (This compliance report)	Condition B18	AGLM to 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	28/02/2026	Completed	CMA/AGL have completed a review of hazardous/dangerous goods stored and reflected on site, the Hazardous Substance Register has been updated accordingly.

		be stored in a register, as per the DPHI Hazardous and Offensive Development Application Guidelines – Applying SEPP 33.			
IEA Dec 2025 (This compliance report)	Condition B34	AGLM to conduct regular toolbox talks with contractors to reinforce the importance of adhering to flagged 'No-go' zones. These sessions should be scheduled regularly to ensure all new starters receive this training.	31/01/2026	Completed	A new environmental induction to include "No-go zones" has been implemented and is now an ongoing process for new starters and current employees to complete.
IEA Dec 2025 (This compliance report)	Condition C15	AGLM to review the Project's compliance tracking mechanisms to ensure that future notifications to the Department occur in accordance with consent condition timeframes, and records are maintained.	31/01/2026	In Progress	AGLM have reviewed and updated compliance matrix and actions tracker. Compliance tracking implemented through internal system SAP in progress.
IEA Dec 2025 (This compliance report)	Condition D7 (e)	AGLM to review the Project's compliance tracking mechanisms to ensure that future notifications to the Department occur in accordance with consent condition timeframes, and records are maintained.	31/01/2026	In Progress	

This compliance report	D5	AGLM are to upgrade the CHP Sediment Basin to contain a storm event of 77.8 mm in accordance with the SWMSP and site EPL.	30/04/2026	In Progress	The sediment basin works are progressing well and on track for completion by the end of April 2026.
IEA Dec 2025 (This compliance report)	BIO10	AGLM to: (1) Identify Pine Donkey Orchids within and nearby (within 10 metres) the 'Project Footprint' of SSD 24937520 and install exclusion fencing with 'No Go' zone signs attached. (2) Update the BMP S1 to include a commitment to resurvey the population of Pine Donkey Orchids identified in 'Biodiversity Development Assessment Report Liddell Future Land Use and Enabling Works Project' (Kleinfelder, 2023).	30/04/2026	In Progress	(1) The orchids were identified during the initial BDAR survey in 2021. Fencing and signage to be installed by 30/04/2026 (2) Completed, Refer to Section 1.8.2 and 2.1.2

IEA Dec 2025 (This compliance report)	WQ14	AGLM to update the Soil and Water Management Sub Plan to outline AGLM commitments in relation to using 'amphibian friendly' flocculants in Project sediment basins.	28/02/2026	In Progress	AGLM have been working with Ramboll to update the Soil and Water Management Sub Plan.
IEA Dec 2025 (This compliance report)	NV1	AGLM to update the Noise and Vibration Management Plan to include the commitment to notify relevant stakeholders a minimum of seven calendar days prior to the start of works and should include information such as total building time, what works are expected to be noisy, their duration, what is being done to minimise noise and when respite periods will occur.	28/02/2026	Completed	NVMP updated to include the notification to stakeholders a minimum of seven calendar days prior to the start of works.
IEA Dec 2025 (This compliance report)	SE1	AGLM to update the SES to outline measures for communicating with stakeholders regarding housing demand.	28/02/2026	Completed	SES updated to outline measures for communicating with stakeholders regarding housing demand.
IEA Dec 2025 (This compliance report)	GG3	AGLM 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.	15/03/2026	Completed	DEMP updated to outline the use of biodiesel has been investigated.



Appendix C – Site Photos

Site Inspection 14th October 2025

Photo 1 - Asbestos disposal facility currently under construction



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



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

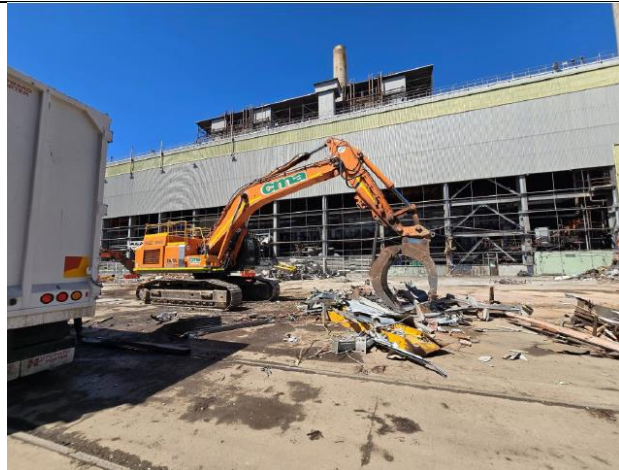


Photo 4 - Watercart in operation around the Liddell Power Station demolition works area



Photo 5 - Watercart in operation around the asbestos disposal facility construction works



Photo 6 - Demolition area being kept watered down



Photo 7 - Fill point in place on the haul road to the asbestos disposal facility construction



Photo 8 - Stockpiles within Stage 1 works area being shaped in preparation for hydroseeding



Photo 9 - Concrete stockpiling for reuse



Photo 10 - Hardwood stockpiling for reuse



Photo 11 - Fuel cart switched off when not in use



Photo 12 - Geofabric lining for drains to exclude clean water from asbestos disposal facility



Photo 13 - Fuel cart switched off when not in use



Photo 14 - Geofabric lining for drains to exclude clean water from asbestos disposal facility



Photo 14 - Plastic lining for wet dump used for desilting sludge from oil and grit trap material



Photo 15 - Bunded chemicals and fire fighting equipment in store area of Liddell Power Station



Photo 16 - Self-bunded chemical storage area at Liddell Power Station



Photo 18 - Spill kit next to fuel storage tank



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



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



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



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



Photo 23 – Decommissioned bulk hydrocarbon storage tanks



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



Photo 25 – Speed tracker on Liddell Ash Dam access road



Photo 26 – Waste segregation at offices area



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

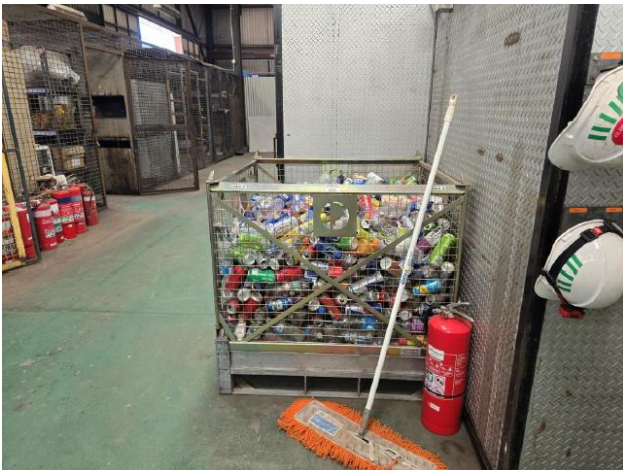


Photo 28 – Waste segregation at Liddell Power Station demolition area



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



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



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



Photo 32 – Safety signage going into demolition work area



Photo 33 – Demarcation of restricted area in demolition work area

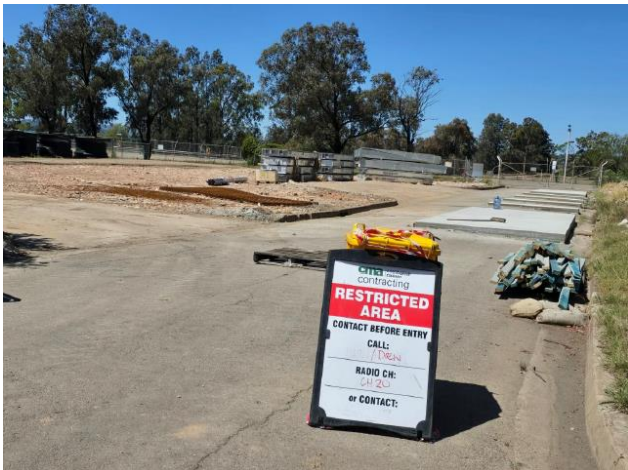


Photo 34 – Stripping out demolition works at Liddell Power Station



Photo 35 – Temporary asbestos storage facility at Liddell Power Station



Photo 36 – Carpark signage on entry point





Appendix D – Compliance Report Declaration Form

Compliance Report Declaration Form	
Project Name	Liddell Future Land Use and Enabling Works
Project Application Number	SSD-24937520
Description of Project	Liddell Future Land Use & Enabling Works Project
Project Address	Liddell Power Station, New England Highway, Muswellbrook NSW 2333
Proponent	AGL Macquarie Pty Limited
Title of Compliance Report	2025 Annual Compliance Report Liddell Future Land Use and Enabling Works Project
Date	31/03/2026
I declare that I have reviewed the contents of the attached Compliance Report and to the best of my knowledge: i. the Compliance Report has been prepared in accordance with all relevant conditions of consent; ii. the Compliance Report has been prepared in accordance with the Compliance Reporting Requirements; iii. the findings of the Compliance Report are reported truthfully, accurately and completely; iv. due diligence and professional judgement have been exercised in preparing the Compliance Report; and v. the Compliance Report is an accurate summary of the compliance status of the development.	
Notes: • 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) 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 • 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 Authorised Reporting Officer	Matthew Parkison
Title	Senior Environment Manager Transition and Construction
Signature	
Qualification	Bachelor of Environmental Science and Management
Company	AGL Macquarie Pty Limited
Company Address	New England Highway, Muswellbrook NSW 2333