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**ADVERTISED  
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**Construction Environmental  
Management Plan  
Baddaginnie Solar Farm**

## Revision History

Version 1.1	R. Craig	23/11//2023	First draft
Version 2.0	R. Craig	08/01/2024	Final Draft

## Disclaimer

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<b>ABBREVIATIONS</b>	
AC	Alternating Current
AHMP	Aboriginal Heritage Management Plan
APZ	Asset Protection Zone
AS	Australian Standards
BoS	Balance of System
BSF	Baddaginnie Solar Farm
CCA	Copper Chrome Arsenate
CEMP	Construction Environmental Management Plan
CFS	Country Fire Service
CoA	Condition of Approval
CSSP	Construction Site Safety Plan
DBYD	Dial Before You Dig
DC	Direct Current
DECCW	Department of Environment, Climate Change and Water
DEMP	Development Environmental Management Plan
DNSP	Distribution Network Service Provider
DEW	Department of Environment and Water
DPTI	Department of Planning, Transport and Infrastructure
EAR	Environmental Assessment Report
EMP	Emergency Management Procedures
EMS	Environmental Management System
EPA	Environmental Protection Authority
EPC	Engineer, Procurement and Construction (SSE Australia)
ER	Environmental Representative
ERP	Emergency Response Plan
ESCP	Erosion and Sediment Control Plan
FFMP	Flora and Fauna Management Plan

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<b>ABBREVIATIONS</b>	
GCMP	Ground Cover Management Plan
GSW(P)	General Solid Waste (putrescible)
GSW(NP)	General Solid Waste (non-putrescible)
Ha	Hectare
HSE	Health, Safety Representative
HTC	High Temperature Creosote
HW	Hazardous Waste
kL	Kilolitre
kV	Kilovolt
LOSP	Light Organic Solvent Preservative
LW	Liquid Waste
m	Metre
mm	Millimetre
MSDS	Material Safety Data Sheet
BSF	Baddaginnie Solar Farm
MV	Medium Voltage
MVS	Medium Voltage Station
MW	Megawatt
MWp	Megawatt Peak
NMP	Noise Management Plan
O&M	Operation and Maintenance
OEH	Office of Environment and Heritage
OEMP	Operation Environment Management Plan
OOHW	Out of Hours Work
PoC	Point of Connection
PV	Photovoltaic
PPE	Personal Protective Equipment
RAV	Restricted Access Vehicle
RST	Restricted Solid Waste
SIR	Service and Installation Rules

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<b>ABBREVIATIONS</b>	
SWMS	Safe Work Method Statement
SoC	Statement of Commitments
SDS	Safety Data Sheet
TMP	Traffic Management Plan
GIS	Geographic Information System
VIVR	Visual Impact Verification Report
VENM	Virgin Excavated Natural Material
WI	Work Instruction

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## 1. Introduction

### 1.1 Baddaginnie Solar Farm Project

The Baddaginnie Solar Farm is a renewable energy development combining solar and Battery Energy Storage System, situated on Baddaginnie-Benalla Road, approximately 8km South-West of the town of Benalla, Victoria and 3km North-West of Baddaginnie township.

The project will have a 4.95MW AC capacity, from a single central inverter station, with around 8MWp of DC, comprising 13,888 solar panels and will have a DC-coupled Battery Energy Storage System (BESS) located near the inverter station. The BESS will be installed with up to 8 containers (~20MWh) to provide baseload energy into the grid during periods of peak demand and support the grid with frequency response services.

The BESS will enable greater utilisation of the renewable energy produced by the proposed plant and provide additional services for the National Electricity Market (NEM).

The project area will include approximately 6.2ha. The facility is to be sited on Lot 1/TP106246 and situated in the North-East end of the property, close to the corner of Baddaginnie-Benalla Rd and Forshaw Rd. The system will connect to the existing Ausnet 22kV (BN11) which runs along Baddaginnie-Benalla Rd via a new pole mounted ACR (Ausnet asset) and a new pad mount HV Kiosk within the project boundary.

The solar panels will be mounted in a fixed-tilt, east-west orientation, which allows the PV array to be more compact in area than other mounting methods such as north tilting or tracking. The A-frame mounting structure allows livestock to graze underneath the solar panels. The solar panels will be grouped in blocks of 4 x 56 panels, with 64 of these blocks in total. The central inverter and BESS units will be located together in a central area on the eastern side of the PV array. The entire facility will be surrounded by security fencing. Main access to the facility will be via Foreshaw Rd, with a new road built inside the property boundary for vehicle access. There will also be a secondary emergency entrance off Foreshore Rd, about 280 meters south of the main entrance.

### 1.2 Overview of the Baddaginnie Solar Farm Site

The location for the Baddaginnie Solar Farm is south of Baddaginnie-Benalla Road, Baddaginnie, on 1/TP106246. The site is approximately 40ha and is bounded by Baddaginnie-Benalla Rd to the north, Foreshore Rd on the east, more paddocks to the south and a public reserve to the west. A creek runs through the public reserve, the creek being approximately 200 meters from the solar farm perimeter at its closest point. The site consists of fenced paddocks which are being used for livestock grazing. The site is located within near level topography and covered in low grasses and scattered tress. The solar farm will be situated over grazing land and would coexist with grazing thereby ensuring helping with vegetation management within the solar farm area.

### 1.3 Function

This Construction Environmental Management Plan (CEMP) has been prepared in order to:

- limit the impact from the construction of the proposed development on adjoining owners and occupiers as well as the surrounding environment;
- Ensure adherence to safe work practices during construction.

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## 1.4 Structure

This CEMP is a living document and from time to time will be amended in order to keep up to date with installation specific requirements.

In general, it comprises the following:

- (a) A description of relevant activities to be undertaken on site prior to, during and after construction, where relevant;
- (b) Identification of the potential for cumulative impacts with other construction activities occurring in the vicinity and how such impacts will be managed;
- (c) Details of any construction and mitigation, monitoring, management and rehabilitation measures specific to the site;
- (d) Statutory and other obligations that the proponent is required to fulfil during construction, including all relevant approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies;
- (e) Evidence of consultation with relevant public authorities required under this condition and how issues raised by the agencies have been addressed;
- (f) A description of the roles and responsibilities for all relevant employees involved in the construction of the project;
- (g) Details of how the environmental performance of construction will be monitored, including actions to be taken to identify potentially adverse environmental impacts;
- (h) The complaints handling procedure during construction;
- (i) Maps or plans which clearly identify the area(s) of the project that have been altered due to mitigating flora and fauna impact;
- (j) A construction risk matrix along with SWMS to be prepared for the anticipated level of risk for each task;
- (k) Have plans in place to monitor and manage soil and water impacts to the project, including control and mitigation measures to be adopted as well as a reporting mechanism;
- (l) Flood management plan for the project including measures for controlling debris from contaminating other waterways/properties;
- (m) Dust management plan for the construction of the project from pre-construction to post construction;
- (n) Emergency response management plan including bushfire mitigation.

The CEMP will be amended from time to time after reviews and/or updated requirements during construction.

Some triggers for an amendment can be:

- When there is a need for improvement;
- As a result of changes to environmental legislation;
- Where SWMS identify a need for change to the CEMP;
- As a result of any incident in order to prevent future incidents.

Modifications to CEMP will require the following process to be followed:

- Proposed change to CEMP to be identified;
- The Quality and Environment Manager will prepare a case and draft amendment and present to the Environmental Representative; and
- Subject to approval gained from Environmental Representative, the CEMP will be updated and a digital copy issued to all stakeholders, as well as updated copies

made available to the construction site and all personnel affected by the changes, including work parties.

The Baddaginnie Solar Farm CEMP will be required to be kept in digital format, inclusive of all sub-plans, and will be provided to the site office and all key sub-contractors.

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## 2. Construction Activity

### 2.1 Requirement

The CEMP rules state that a description of all activities which are to be performed are clearly outlined.

### 2.2 Construction Phases

The Baddaginnie Solar Farm will be broken up into key phases:

- Site mobilisation and the preparation of civil/mechanical works;
- Electrical installation of the array including DC, AC and medium voltage (MV) infrastructure;
- Grid interconnection activities;
- Installation commissioning, usually involving cold, warm and hot commissioning stages; and
- Demobilisation and site restoration.

### 2.3 Construction Activities

The Baddaginnie Solar Farm will undergo the following construction activities:

- Early works including identification of any existing services;
- Permits being granted prior to construction beginning;
- Site preparation prior to erection of site fences;
- Site earthworks including grading, drainage, trenching, piling and road construction;
- Material deliveries, including PV racking (mounting structure) components, solar modules, electrical cables, concrete deliveries, electrical switchgear and site buildings, including permanent infrastructure;
- Installation of the PV racking foundations and mounting structures;
- Module assembly and wiring of string cabling to DC combiner boxes;
- Electrical distribution wiring, buried and in conduits;
- Installation of electrical infrastructure foundations;
- Installation of electrical infrastructure to the foundations;
- Fit-off of all electricals to allow commissioning activities;
- DNSP to erect new assets for interconnection;
- Construction of interconnection assets owned by BSF;
- Grid connection and commissioning activities;
- Site remediation and demobilisation.

### 2.4 Scheduling

The scheduling of detailed work tasks will be developed by the EPC team and it is expected the site works would commence by October 2024 and be completed by March 2025. This includes the DNSP testing and energisation related activities which are to be coordinated with Ausnet. The final construction schedule must account for the recommends included in the Native Vegetation Impact Assessment provided by Confluence Ecology.

### 2.5 Cumulative Impacts

#### 2.5.1 Requirement

The CEMP shall identify any potential for any cumulative impacts with other construction activities occurring within the construction vicinity, and how those impacts will be managed.

## 2.5.2 Impact

There are no other construction activities known in the immediate vicinity of the Baddaginnie Solar Farm. The surrounding area is characterised by grazing pastures, cropping, and grazing of modified pastures on large allotments. There are no known construction activities scheduled along Baddaginnie-Benalla Rd or along the Sydney to Melbourne Railway close by.

## 2.6 Site Compound

### 2.6.1 Requirement

CEMP is to include details of monitoring and mitigation measures specific to the site compound that will be used.

### 2.6.2 Temporary Facilities

The Baddaginnie Solar Farm temporary compound will consist of:

- Site offices;
- Site lunch room;
- Site ablution facilities;
- Site equipment storage containers;
- Fuel storage with bund containment;
- Diesel genset for powering the temporary facilities;
- Parking area for machinery and vehicles;
- Laydown areas for equipment deliveries.

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The site is mostly clear; however, it will require a laying of road base in order to minimise dust to the trafficable areas during the construction phase.

### 2.6.3 Construction Footprints

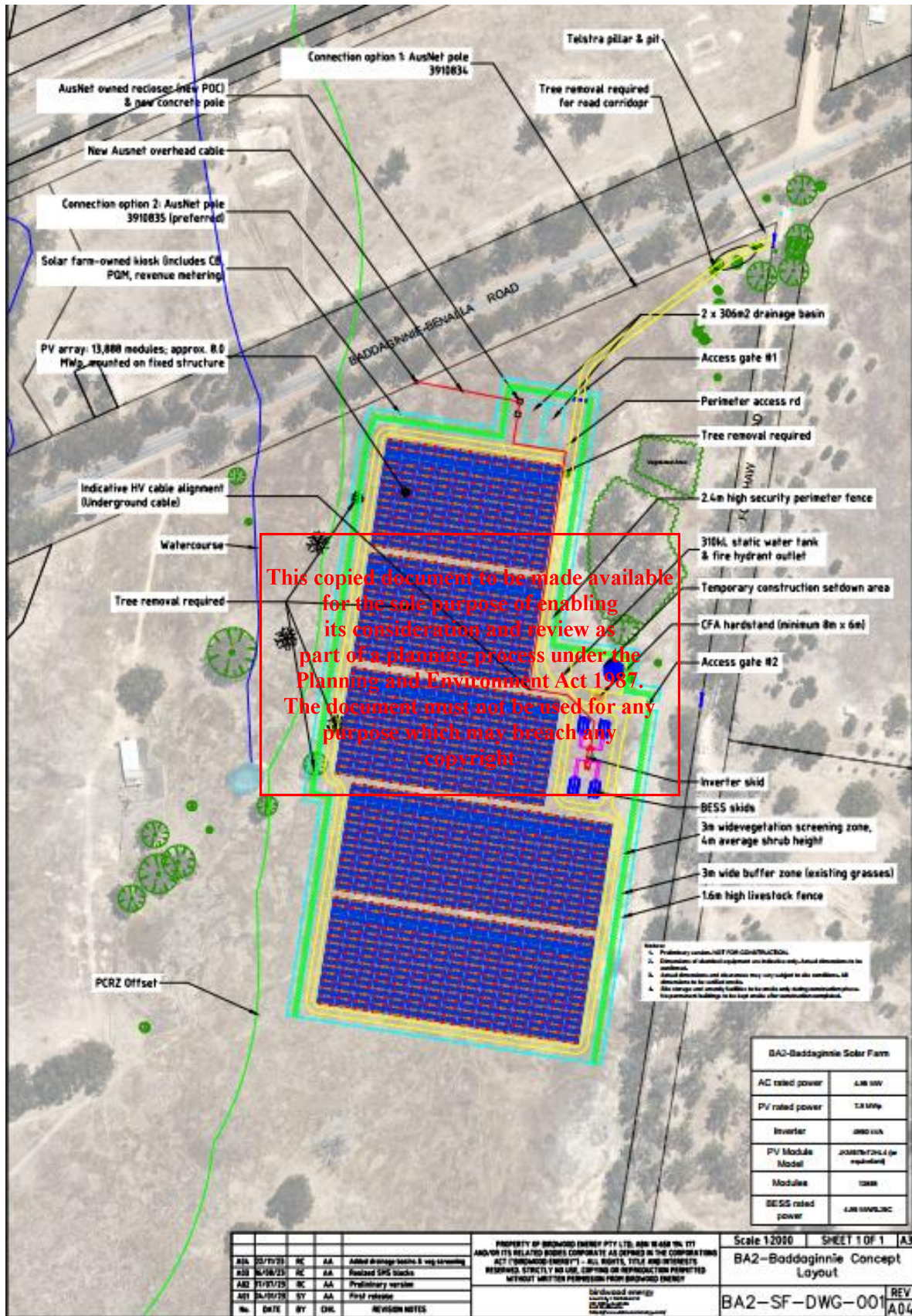
There are several activities to be undertaken at BSF which will require some form of earthworks and they include:

- Entry to site access to be levelled and road base (crushed gravel) to be applied from the Foreshaw Rd boundary of Lot 1\TP106246 to the Solar Farm Access Gate.
- The preparation and construction of temporary and permanent access roads and laydown areas along with the compound;
- Foundation works for the Central Inverter, BESS units and water tank
- Foundation works for the PV mounting system
- Trenches for electrical distribution and earth grading rings for the MV equipment.

The allowed construction footprint is shown in the Baddaginnie Solar Farm Site Layout.

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Drawing 1 – Baddaginnie Solar Farm Site Layout

The erosion and sediment control considerations are included in section 12.2.

#### **2.6.4 Restoration**

There will be site remedial works to be performed at the end of the construction phase, prior to the demobilisation phase. These will include:

- Plantings required for screening purposes;
- Returning all areas disturbed by construction to former or better environmental health, where practicable.

#### **2.6.5 Monitoring**

The EPC contractor will retain the responsibility for construction phase monitoring of the installation. A handover will occur to the Baddaginnie SF O&M contracting party prior to demobilisation occurring.

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## 3. Obligations

### 3.1 Requirement

The CEMP is required to outline all the proponent's obligations that must be met during the construction phase of Baddaginnie SF. This includes any relevant approvals, consultation findings and agreements that are required from authorities, as well as key stakeholders, legislation and policies.

It is the proponent's responsibility to obtain all necessary permits, licences and approvals for the installation to be built and operated. No conditions of this CEMP prevent the proponent meeting their obligations.

It is the proponent's obligation to ensure that all necessary copies of this CEMP, and other key documents, are always kept on site throughout the project construction phase and continuously during the O&M phase.

### 3.2 Development Consent and Approvals

BSF is obliged to meet all conditions placed on the development application consent by the Victorian Department of Transport & Planning.

#### 3.2.1 Approvals

The following are the known approvals required by Baddaginnie Solar Farm:

- BSF is to abide by all findings and conditions placed on the DA by VDTP

### 3.3 Commitments

The Statement of Commitments is specified in Section 7. Statement of Commitments (SoC) within this CEMP. Baddaginnie SF pledges to meet all commitments detailed in the SoC, based on the DA being issued.

### 3.4 Agreements

BSF presented a community consultation paper outlining the proposed development. This was used to highlight any community issues and then to allow the development of plans to mitigate any issues prior to construction.

The Environmental Representative will maintain the CEMP and make it available to members of the public as and when requested to do so.

### 3.5 Easements

There is an Ausnet 22kV easement running along the northern border of Lot1 / TP106246. The BSF development will not encroach on this easement.

### 3.6 Hot Works Permits and Exemptions

If hot weather is forecast the BSF construction will not perform any hot works during elevated Fire Danger Rating periods unless express permission has been given by the CFA.

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### **3.7 Consultation**

BSF has engaged expert consultants to determine the responsibilities that BSF must meet with respect to local ecology, visual impact, glint & glare, noise levels, stormwater & flood, fire risk, local cultural heritage. The recommendations provided by these consultants must be implemented by the EPC during the relevant construction stages.

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## 4. Agency Consultation

### 4.1 Requirement

The CEMP requires the proponent show evidence of any consultation with public and government bodies with relation to the BSF is to meet its obligations.

Below is a list of items BSF has sought guidance on to ensure it is meeting its obligations:

- BYDA
- Native Vegetation Impact Assessment
- Surface Water Assessment
- Glint and Glare Assessment
- Visual Impact Assessment
- Noise Impact Assessment
- Early Consultation with CFA

### 4.2 Public Authorities

The following are the public authorities relevant to the project.

- Victorian Department of Transport and Planning (VDTP)
- Benalla Rural City Council
- Goulburn Broken Catchment Management Authority
- Ausnet Services
- Country Fire Authority (CFA)
- Environmental Protection Agency (EPA)

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## 5. Roles and Responsibilities

### 5.1 Requirement

The roles and responsibilities for all relevant employees in the construction of Baddaginnie Solar Farm are shown in the following chart.

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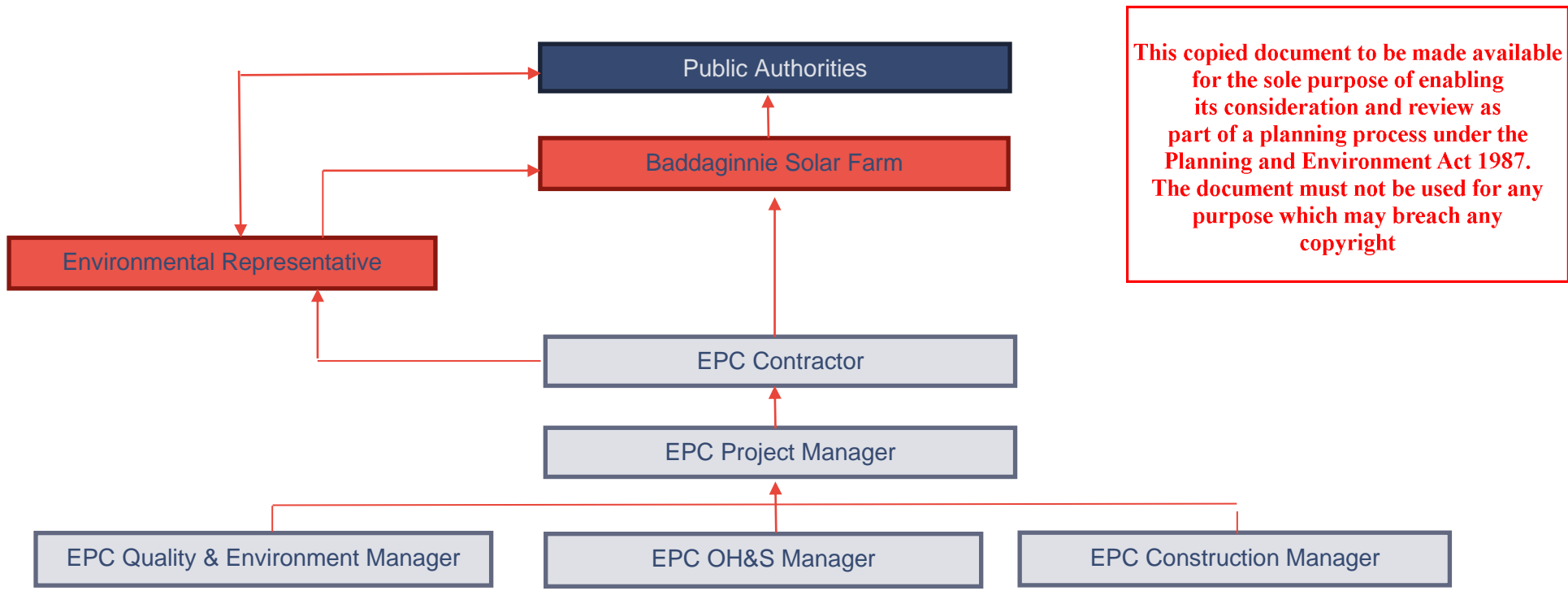


Chart 1 – Baddaginnie Solar Farm Roles and Responsibilities

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## 5.2 Overview

Once the EPC tender has been awarded, the engineering, procurement and construction (EPC) contractor will be responsible for the detailed design and construction of the Baddaginnie Solar Farm. The EPC contractor has the responsibility to ensure it and its sub-contractors are fulfilling all the obligations associated with this CEMP.

The EPC contractor will be required to assign a suitably qualified Environmental Representative (ER) that is independent of the personnel engaged in the design, construction and operation of the project.

## 5.3 Key Personnel

The key personnel for the project are:

- Site Project Manager(s)
- Site Construction Manager
- Site Quality and Environmental Manager
- Site OH&S Manager
- Environmental Representative

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The accountabilities and relationships of the key personnel for the Baddaginnie Solar Farm are detailed in the following sections.

### 5.3.1 Site Project Manager

The role of a Site Project Manager is to ensure the Site Construction Manager and Site Quality and Environment Manager exercise their responsibilities and roles as defined in this CEMP.

### 5.3.2 Site Construction Manager

The role of a Site Construction Manager is to work collaboratively and efficiently with the Quality and Environmental Manager to ensure that all tasks in the construction of Baddaginnie Solar Farm are in accordance with this CEMP.

### 5.3.3 Site Quality and Environmental Manager

The Site Quality and Environmental Manager is responsible for implementing all procedures and processes outlined in this CEMP as well as:

- Ensure all personnel undertaking works on site are familiar with and understand their obligations as outlined in this CEMP;
- Attend the Environmental Due Diligence induction;
- Undertake weekly inspections to ensure All activities are as per this CEMP;
- Undertake regular site audits;
- Provide reports to management team and key stakeholders;
- Keep all documentation as required in this CEMP;
- Ongoing monitoring to ensure the CEMP is being adhered to;
- Undertake investigation into any incidents or complaints which occur during construction;
- Ensure all incident, non-conformance and/or complaint registers are maintained and up to date for reporting;
- Conduct environmental risk inspections of the site;

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- Commission external compliance auditing if necessary.

## 5.4 Work Health and Safety

There will be a Baddaginnie Solar Farm Safety Policy and it will be meet AS ISO 45001:2018. A site OH&S officer will ensure compliance with this maintained during all phases of the construction.

Construction activities will be carried out as per the Construction Site Safety Plan, available as a separate attachment to the CEMP.

The Site PM and Site Construction Manager will ensure daily toolbox meetings are performed and all OH&S relevant topics are discussed. Any items raised for improvement will be discussed and then implemented.

The OH&S officer will ensure all daily toolbox meetings are documented and all workers are signed onto the required SWMS.

All workers must have an industry White Card as a minimum.

All operators of machinery must be holding a valid licence and up to date with training qualifications required to operate the machinery.

## 5.5 Environmental Representative

The Environmental Representative (ER) will monitor all Environmental Plans and any Monitoring Programs which fall under this CEMP.

The ER will monitor outcomes of all plans and programs and advise the proponent of all outcomes.

The ER has responsibility for considering and advising the proponent on any matters which are outlined in this CEMP, as well as all other licences and approvals relating to environmental performance and impacts of this project.

The ER is responsible for undertaking environmental audits which may be required under this CEMP, and reporting to key stakeholders and third parties, if applicable.

## 5.6 Training and Induction

All workers are to attend the site specific Environmental Due Diligence induction.

All workers will be made aware of the requirements of this CEMP, specifically those relating to their respective activities. SWMS will be signed on to by the work parties.

### 5.6.1 Competency Register

There is to be an Environmental Due Diligence Register that will be signed off by all attendees as part of the daily sign in process (see form BSF 01).

## 6. Environmental Performance

### 6.1 Requirement

The Baddaginnie Solar Farm project construction work will be carried out using the environmental protocols shown in the table below, to ensure that the correct measures are taken to address any potentially adverse environmental impacts that may be identified.

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<b>Environmental Compliance</b>	Construction to be undertaken as per BSF Development Consent	100% compliance with Development Consent	Weekly Inspection Checklist BSF 02
		Zero reportable environmental incidents	External Audits  CEMP Audit BSF 03
<b>Legal Compliance</b>	Compliance with all environments legal requirements	100% compliance with all environmental legal requirements	CEMP Audit BSF 03
		Zero reportable environmental incidents	Environmental Incidents Register Form BSF 06
<b>Best practice environmental management</b>	Effective implementation of CEMP to ensure best practice environmental management	100% compliance with measurable management measures outlined in this CEMP	Environmental Incident Form BSF 07 CEMP Audit Form BSF 03
		Zero reportable environmental incidents	Environmental Incidents Register Form BSF 06  Environmental Incident Form BSF 07
<b>Environmental complaints</b>	Minimise environmental complaints and adequately address any environmental complaints in a timely manner	Zero community complaints	Complaints Register Form BSF 04
		100% compliance with complaints response timeframes specified in CEMP	Complaints Record Form BSF 05
<b>Incidents</b>	Minimise, avoid and appropriately manage all environmental incidents	Zero reportable environmental incidents	Environmental incidents Register Form BSF 06

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<b>Non-conformance</b>		100% compliance with incident reporting, investigation and implementation of corrective action timeframes	Environmental Incident Form BSF 07 CEMP Audit BSF 03
	Minimise, avoid and appropriately manage all environmental non-conformances	Zero reportable environmental non-conformances	Weekly Inspection Checklist Form BSF 02
<b>Audit &amp; Inspection</b>		100% compliance with timeframes for the investigation and implementation of corrective actions	CEMP Audit Form BSF 03
	Undertake environmental site audits and inspections in a timely manner	100% compliance with the timeframes for environmental audits and inspections	Weekly Inspection Checklist Form BSF 02
<b>Environmental Due Diligence</b>		100% compliance with the timeframes for implementation of identified corrective actions	External Audits CEMP Audit Form BSF 03
	All persons involved in construction to be aware of their environmental obligations	100% compliance with Environmental Due Diligence induction training	Environmental Due Diligence Induction Register Form BSF 01
		Zero reportable environmental incidents	CEMP Audit Form BSF 03

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Table 1 – Environmental Protocols

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## 6.2 Monitoring

### 6.2.1 Environmental Management System

The Baddaginnie Solar Farm environmental performance will be monitored through the implementation of the BSF Environmental Management System. This will include weekly site inspections and a monthly CEMP compliance audit. The evidence of the BSF monitoring will be the internal documentation and reporting.

Below is a list of the referenced documentation:

BSF 01	Environmental Due Diligence Induction Register
BSF 02	Weekly Inspection Checklist
BSF 03	CEMP Audit
BSF 04	Complaints Register
BSF 05	Complaints Record
BSF 06	Environmental Incidents Register
BSF 07	Environmental Incident Report
BSF 08	Waste Register
BSF 09	Corrective Action Register
BSF 10	Continuous Improvement Notice
BSF 11	Out-of-Hours Works Register
BSF 12	Work Instruction Register
BSF 13	Weed Inspection and Washdown Register

Table 2 – List of BSF Forms

### 6.2.2 Weekly Inspections

Baddaginnie Solar Farm weekly inspections will be conducted by the Quality and Environmental Manager. This will be using form BSF 02.

All site construction areas will be inspected to ensure the environmental controls are adequate.

### 6.2.3 Compliance Audits

The Quality and Environment Manager will conduct monthly compliance audits against the CEMP to ensure all items are being fulfilled.

The audits will cover the following:

- Determine whether the controls, procedures and documentation associated with the CEMP has been effectively implemented and maintained;
- Confirm that all actions listed are being completed and signed off;
- Ensure that reporting requirements, incident investigations and incident close-outs are occurring in accordance with the CEMP; and
- Check that there are no outstanding follow-up actions that are yet to be closed off.

Form BSF 03 will be used for this audit.

### 6.2.4 Compliance Tracking

The EPC will be required to engage a third party to undertake a review of the audits to ensure the systems are compliant.

Prior to commencement of the BSF a Compliance Tracking Program will be developed to track the progress with the requirements of the Development Approval.

The Compliance Tracking Program will ensure that:

- Periodic reporting to the proponent of the BSF status of compliance is occurring;
- There are procedures for rectification of any non-compliance identified during environmental auditing or review of compliance;
- Mechanisms are in place for recording environmental incidents and other actions taken in response to those incidents;
- Provisions exist for ensuring all employees, contractors and sub-contractors are aware of and comply with, the conditions of this CEMP, with regard to their respective activities.

### **6.3 Corrective Actions**

The following corrective action processes will be adopted to identify appropriate actions to be taken to address any identified potential adverse environmental impacts. These processes apply in circumstances where either the required safeguards in this CEMP have not been followed or where it is apparent that the safeguards contained in the CEMP are inadequate in preventing adverse environmental impacts.

#### **6.3.1 Major Non-Conformance**

The Quality and Environmental Manager will have the authority to temporarily stop any work activity that is not being undertaken in accordance with requirements of the CEMP or presents an unacceptable or unanticipated environmental risk.

Any major non-conformance will trigger the issuance of a required corrective action. The corrective action will specify what needs to happen before works can re-commence and will be recorded in the Corrective Actions Register (BSF Form 09).

#### **6.3.2 Continuous Improvement Notice**

In a circumstance where it is apparent that the safeguards contained in the CEMP are being adhered to, but are not adequate to minimise adverse environmental impacts, or can be improved, the Quality and Environment Manager will have authority to temporarily stop that work activity and prepare a Continuous Improvement Notice (BSF Form 10).

The CEMP will be updated as required and the changes to that work activity will be communicated to the relevant persons before work re-commences.

#### **6.3.3 Non-Conformance Close out**

The BSF target date for closing out non-conformance issues will be 14 days.

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## 7. Statement of Commitments

### 7.1 Requirement

This CEMP is to outline the BSF commitments that are in place including:

- BSF proponent is obliged to ensure the construction activities will align with the recommendations provided by the expert consultants and this CEMP outlines the obligations which will be adhered to.
- BSF EPC is to meet all conditions as laid out in the DA and the CEMP. This covers all contractors and sub-contractors.

### 7.2 Compliance

Below is a summary of compliance requirements for the solar farm construction, including an indication of their relevance to the construction phase of Baddaginnie Solar Farm.

Issue	Ref	Commitment	Relevance to Construction	CEMP Reference
<b>Managing Visual Impacts</b>				
Potential adverse visual impact of Solar Farm Structures	V.1	Vegetation screening to be planted along the West, North and East boundaries of the solar farm area.	No	Incorporated in BSF Design
Visual effects of construction stages	V.2	Use appropriate control methods to remove spoil from construction areas	Yes	Site Layout
Visual effects of construction materials and equipment storage	V.3	Use of selected areas for laydown of site materials and ensuring minimum visibility from any residences	Yes	Site Layout
Visual effects of glint & glare from the solar panels	V.4	Temporary screening to be installed until vegetation screening reaches required height		
<b>Managing Potential Noise Effects</b>				
Protection of noise amenity for residential properties – construction stages	N.1	Construction noise mitigation from EPA 1834 section 4.3.3 – 4.3.5 should be followed and no work should be conducted between 8pm to 7am (Monday to Friday); 8pm to 9am on Saturdays, Sundays and public holidays. Work outside of these hours would only occur if: <ul style="list-style-type: none"> <li>• Agreed and approved by the proponent</li> <li>• Activities do not cause a noise nuisance to any neighbouring residential buildings</li> <li>• Emergency work to avoid loss of lives and/or property</li> <li>• Delivery of materials which are outside of hours due to safety reasons and request by police or other authorities</li> </ul>	Yes	
Informing residents about activities	N.2	Development and implementation of a community relations program to inform residents and the community of the progress of activities and potential noise and vibration impacts of each phase of the project.	Yes	

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Protection of noise for residential properties – construction phase	N.3	A noise Management Plan (NMP) will be prepared as a component of this CEMP and will manage construction noise and vibration, and methods to manage impacts. This NMP would be prepared in consultation with approval party and the contractor(s) performing the relevant tasks and address: Selection of plant based on acoustic performance; Noise certification of plant prior to commencement of works phase; Works practices to minimise potential noise and vibration effects; A monitoring program to ensure construction noise and vibration emissions are controlled and that best practice are used; Noise and vibration monitoring shall be conducted in response to community complaints in timeframes outlined in this CEMP	Yes	
<b>Managing Potential Ecological Effects</b>				
Protection of any identified native vegetation within solar farm footprint	E.1	Losses of native vegetation will be offset through a native vegetation Credit or any other form of offset. A qualified ecologist shall be consulted to conduct a pre-clearance survey.	No	Site Layout
Protection of identified native vegetation areas	E.2	The BSF has identified areas of native vegetation and as such has been designed in a way to not use or disturb those areas	Yes	Site Layout
Protection of identified native vegetation areas	E.3	Tree and Vegetation Protection Zones shall be established before construction activity is undertaken	Yes	Site Layout
Protection of identified native vegetation areas	E.4	Planned native vegetation removal should not be undertaken during spring, which is the dominant flora and fauna breeding time	Yes	Site Layout
Protection of identified native vegetation areas	E.5	Heavy and civil construction activities should take place during dryer months (Summer, early Autumn) to reduce the movement of soil and seed from the site	Yes	Site Layout
Protection of waterways	E.6	Silt barriers to be installed downslope of the construction area	Yes	Sediment & Erosion Control Plan
<b>Managing Potential Effects of Aboriginal Cultural Heritage</b>				
Protection of Aboriginal heritage	A.1	Preparation of an Aboriginal Heritage Management Plan to identify any significant overlay in the proposed BSF.	No	
<b>Managing Potential Traffic impacts</b>				
Ensuring traffic safety and efficiency prior to construction stage	T.1	Upgrading the site entry for mobilisation and delivery phase	Yes	Pre-Construction Site Layout
Ensuring safety and efficiency during site construction phase	T.2	Site Traffic Plan Construction phase including implementation of ways to mitigate any potential issues during the works phase: <ul style="list-style-type: none"> <li>• Access roads during construction;</li> </ul>	Yes	Construction Phase Traffic Plan

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<p><b>Traffic Speed Limits</b></p> <p><b>Ensuring structural integrity of road system including internal access roads</b></p>		<ul style="list-style-type: none"> <li>Watering Management Plan to mitigate dust during construction</li> </ul>		
	T.3	An appropriate speed limit in the site will be displayed at entry gates	Yes	Site Plans
	T.4	<p>Preparation of a construction issue roads management/maintenance plan to include:</p> <ul style="list-style-type: none"> <li>Existing road assets and identifying areas of concern prior to construction works;</li> <li>Regular inspections during construction phase to assess any damage or remedial work to be done during construction phase; and</li> <li>Ongoing plan for maintenance of internal and access roads to the BSF</li> </ul>	Yes	Traffic and Site Layout Plan
<p><b>Managing Bushfire Impacts</b></p>				
<p><b>Ensure adequate asset protection</b></p>	B.1	<p>Ensuring an asset management buffer is applied to the asset area, including the DNSP infrastructure and MV equipment zones throughout the BSF installation including:</p> <p>Oil containment bunds to MV transformers; Fuel Bunds for machinery fuel storage during the construction phase and O&amp;M phase for any back up generators if required</p> <p>potential CFA plant to access BSF</p> <p>Ensure adequate egress paths maintained for BSF in case of an incident or natural event</p>	Yes	Site Plans
	<p style="color: red; font-weight: bold; border: 2px solid red; padding: 5px;">This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright</p>			
<p><b>Minimising bushfire risks to on-site buildings</b></p>	B.2	<p>Any buildings to be provided with operational Fire Extinguishers;</p> <p>Any permanent buildings to be fitted with gutter guards and to be flammability index of &lt;5</p> <p>All permanent buildings to be provided with ember attack preventing steel mesh to maintain an aperture of &lt;2mm to all building envelopes;</p> <p>All permanent buildings to be fitted with draught stopper having a flammability index of &lt;5</p>	Yes	MVS Plans
<p><b>Minimising ignition risk from Distribution Line to Connection Kiosk</b></p>	B.3	Maintenance of vegetation around the Ausnet incoming feeder pole to BSF Connection Kiosk to be kept in order with a vegetation plan to be utilised when operation as part of the ongoing O&M package which is to be maintained as part of an ongoing LIVE documents as part of the O&M service providers obligations	Yes	Site Layout and O&M service package
<p><b>Ensuring access design and construction is consistent with proper bushfire risk</b></p>	B.4	The proposed access roads from Foreshaw Rd, entries to the BSF Control Room/Kiosk and MVS throughout the BSF are to comply with section 4,2,7 of Planning for Bushfire Protection 2006	Yes	Site Layout and O&M service package Incorporated

		A perimeter fire trail will be provided within the Asset Protection Zone in accordance with requirements of Planning for Bushfire Protection 2006		into the BSF design
<b>Minimising risk from combustible fencing</b>	B.5	Combustible fencing not to be installed within 10m of a structure	No	Incorporated into BSF design
<b>Ensuring sound risk management planning in the event of an emergency</b>	B.6	A Fire Evacuation Plan will be prepared consistent with CFA guidelines	Yes	Fire Management Plan
<b>Ensuring water supply meets bushfire protection requirements</b>	B.7	A 10,000L Static Water Supply is to be provided to the Site before the commencement of any construction works	Yes	Site Layout Plan
<b>Ensuring site landscaping does not exceed fuel load requirements</b>	B.8	The proponent and O&M Service provider must ensure the BSF is kept under control and excess fuel in the form of dead vegetation is removed from the installations	Yes	Site Layout and O&M service package
<b>Managing Potential Land and Impacts</b>				
<b>Potential for runoff from site to adversely affect local streams</b>	LW.1	Arrangements for all machinery and vehicles onsite, including refuelling and storage to minimise potential for any spills to be documented in the CEMP Preparation of Spill Response Plan as a component for CEMP and the O&M Management Plan	Yes	
<b>Ensuring stormwater and flood impacts are not adversely affected</b>	LW.2	Plan for handling any contaminated waste from the planning process	Yes	
<b>Flooding</b>	LW.3	A flood Management Plan for the BSF will be prepared prior to Construction and incorporated into the CEMP	Yes	CEMP
<b>Managing Potential Decommissioning Risks</b>				
<b>Managing potential decommissioning risks</b>	H.2	Within a timeline of 18 months from BSF ceasing to operate, the site shall be decommissioned and returned as far as practicable to its condition prior to the construction phase. Decommissioning will be in accordance with a Decommissioning Management Plan to be prepared at such time by a suitably qualified third party	No	Operations
<b>Managing potential decommissioning risks</b>	H.3	All materials including piles, panels, cables, pits, MV plant will be disposed/recycled of in a responsible manner. All roads may stay if it doesn't pose any impediment on the sites land use moving forward. (T.B.D)	No	Operations

Table 3 – Statement of Commitments for Baddaginnie Solar Farm

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## 8. Complaints Handling Procedure

### 8.1 Requirement

There is a requirement under this BSF CEMP for there to be a clear and defined method for complaints handling and an obligation to complete responses and resolutions in a timely manner.

As Baddaginnie Solar Farm's proponent and owner of BSF, and in accordance with EPC contractor arrangements, Birdwood Energy will assume responsibility to ensure that the following are available for community complaints for the life of the project:

- A 24-hour telephone number on which complaints may be made about the construction and operational activities;
- A postal address to which written complaints may be made; and
- An email address to which electronic complaints may be registered.

All these items shall be advertised in a circulating newspaper in the vicinity on at least one occasion prior to construction, and at six monthly intervals during and after construction, for a period of two years.

Furthermore, the telephone number and email address must be shown clearly on the site signage, near the entrance, in a clear viewing position for members of the public.

### 8.2 Procedure

Upon receiving any notifications of complaints from Birdwood Energy, The EPC will immediately investigate the cause of the complaint and identify any actions required to avoid a recurrence.

The EPC will report back to the Proponent (Birdwood Energy) within 24 hours with the investigation and report. The EPC will complete all forms and registers as applicable.

The Quality and Environment Manager will be responsible for the investigation and documentation.

In the event that the EPC is alerted to complaints through other means, such as complaints made directly to contractors, the Quality and Environment Manager will notify Birdwood Energy of the complaint immediately and commence proceedings.

#### 8.2.1 Complaints Register

Any complaint received in relation to the BSF will be recorded on the BSF Complaints Register (BSF Form 04). All complaints will be handled using BSF Form 05 and all pertinent details will be added to the register.

Complaints Records (BSF Form 05) will contain:

- The date and time of the complaint;
- The means in which the complaint was made;
- Any personal details of the complainant that were provided, or if no details were provided, a note to that effect;
- The nature of complaint;
- Any actions taken in relation to the complaint, including timeframes for implementing the action; and
- If no action was undertaken in relation to the complaint, the reasons why no action was taken.

A copy of the updated Complaints Register and specific Complaints Record will be provided to BSF Pty Ltd.

### **8.2.2 Complaint Resolution**

The timeframe for resolving a complaint is within 48 hours of EPC being made aware of the complaint. The responsibility for responding to the complainant lies with Birdwood Energy, not the EPC.

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## 9. Incident Management

### 9.1 Requirement

It is required under this CEMP for any Incident with the potential to cause an environmental Impact to be reported to the Quality and Environment Manager immediately.

### 9.2 Internal Reporting

The Environmental Due Diligence induction will emphasise this obligation to all contractors and personnel working on-site.

### 9.3 Emergency Response

In the event of an emergency, the initial response is critical to ensure that the necessary assistance is provided in a timely manner to safeguard life.

In these circumstances the protocols and procedures are specified in the Emergency Management Plan with a hardcopy kept on-site the Site Office.

The Emergency Management Procedures will be detailed in the Emergency Management Plan, to be made available as a separate attachment to the CEMP.

### 9.4 Immediate Response

Upon receiving notification of an incident with the potential to cause an environmental impact, but not constituting an emergency, the Quality and Environment Manager will:

- Isolate the area affected by the incident;
- Stop all work in the area;
- Implement containment measures to prevent the impact of the incident spreading;
- Decide as to the significance of the potential environmental impact and, as appropriate, undertake appropriate external notifications.

### 9.5 External Notifications

#### 9.5.1 Material Harm

The EPA shall be notified where any pollution incident occurs in the course of an activity such that material harm to the environment is either caused or threatened.

Under the Environmental Protection Act 2017, "Material Harm" is defined as:

"...harm that is caused by pollution or waste that-

- (a) involves an actual adverse effect on human health or the environment that is not negligible; or
  - (b) involves an actual adverse effect on an area of high conservation value or of special significance; or
  - (c) results in, or is likely to result in, costs in excess of the threshold amount being incurred in order to take appropriate action to prevent or minimise the harm or to rehabilitate or restore the environment to the state it was in before the harm.
- (2) For the purposes of subsection (1), harm may become **material harm** regardless of the period of time in which the harm occurs and as a result of-
- (a) a single occurrence of harm arising from an activity; or
  - (b) Multiple occurrences of harm arising from the same activity; or

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- (c) The cumulative effect of harm arising from an activity combined with harm arising from other activities or factors
- (3) In this section, **threshold amount** means \$10 000 or a higher amount prescribed by the regulations.”

As soon as the immediate response actions have been implemented, the Quality and Environment Manager will decide as to whether material harm has been caused or is threatened.

## 9.5.2 EPA Notification Due to Material Harm

If the Quality and Environment Manager determines material harm exists, they will notify the EPA as soon as practicable and provide the following information:

- The time, date, location, nature and duration of the incident;
- The location of the place where the harm is occurring or is likely to occur;
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- The circumstances in which the incident occurred (including the cause of incident, if known); and
- The action taken, or proposed action to be taken, to deal with the incident, and any resulting pollution or threatened pollution, if known.

Following EPA notification, the Quality and Environment Manager will also inform the Benalla Rural City Council Environmental Representative of the situation. This initial notification to these stakeholders will be for information purposes only. The EPC will continue to concentrate exclusively on responding to an instruction or request from the EPA.

## 9.5.3 No Material Harm

Where an incident has occurred that has not resulted in material harm, the Quality and Environmental Manager will immediately notify the Benalla Rural City Council Environmental Representative and provide the following information:

- The time, date, location, nature and duration of the incident;
- The location of the place where the harm is occurring or is likely to occur;
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- The circumstances in which the incident occurred (including the cause of incident, if known); and
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution if known.

## 9.6 Incident Investigation

### 9.6.1 Avoid Recurrence

As soon as the incident has been contained and external notifications have been made, the Quality and Environment Manager will undertake an incident investigation. One purpose of the investigation is to identify and understand the cause of the incident with a view to modifying the procedures to avoid the potential for recurrence. The types of preventative

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actions could include revision to work instructions or undertaking targeted environmental due diligence sessions at tool box meetings prior to works recommencing.

## **9.6.2 Restoration**

The other purpose of the incident investigation will be to define the appropriate remediation work required in order to address any biophysical impact of the incident. The appropriate remediation work would be determined by the specific circumstances of the incident. An example of what remediation could include would be stabilising and re-seeding an area that was inappropriately cleared.

## **9.7 Incident Reporting**

### **9.7.1 Documentation**

Any environmental incident will be recorded on an Environmental Incident Report (BSF Form 06) and will be maintained throughout the construction period. Each Environmental Incident Report will include the following details:

- The date, time and duration of the incident;
- Clarify whether there was material harm to the environment or not;
- Detail the nature of the incident;
- Climatic conditions;
- The location of the incident;
- Any pollutants involved;
- The circumstances in which the incident occurred; and
- Corrective action taken;
- Details of any external notification, such as to the EPA.

## **9.8 Dissemination**

For any environmental incident for which there is no material harm, the Quality and Environment Manager will provide a copy of the Environment Incident Report to both Benalla Rural City Council and the Environmental Representative, within a five working day period of the incident occurring.

For any incident where material harm has, or could have resulted, and the EPA has been notified, the Quality and Environmental Manager will provide a report to the EPA as may be instructed, in accordance with the timeframes that may be so specified by the EPA.

Copies of any EPA reporting associated with an environmental incident will also be provided to the Department of Environment and Water, Benalla Rural City Council and the Environmental Representative.

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## 10. Work Instructions

### 10.1 Requirement

The BSF has a matrix of construction Safe Work Method Statements (SWMS) to be prepared that will allow the anticipated level of risk associated with each activity to be determined.

Work Instructions (WI) are documents that will be prepared to detail how discrete and specific construction activities will be undertaken. These WI will constitute the construction SWMS mentioned in this CEMP.

### 10.2 Scope

Any Work Instruction will include, at minimum:

- The techniques and construction methodology required for an activity;
- Plant, equipment and personnel involved; and
- Environmental controls and safeguards to be adopted during the works.

Sign off for each WI will be prepared and approved prior to any work activities commencing. Specifically, each WI will be developed by the work crew that is to undertake a construction activity and will be signed off by the Quality and Environmental Manager as well as the Site Construction Manager.

The trigger for requiring a WI will be an assessment by the Quality and Environmental Manager in conjunction with the Site Construction Manager, of the environmental risk(s) associated with the actual tasks to be performed and before they are undertaken.

The objective of preparing a WI and having these approved prior to works being undertaken is to ensure that appropriate environmental safeguards are incorporated into the construction methods in order to ensure that the risks are appropriately managed, consistent with the Risk Matrix.

The appropriate management means that the anticipated environmental risks, after the safeguards have been considered and incorporated into a WI, will be LOW, not MEDIUM or HIGH.

### 10.3 Timing

As and when discrete and specific construction activities are refined and scheduled, the need for a WI will be assessed by the Quality and Environmental Manager. This is a process that will continue throughout the construction phase. It is anticipated that each WI will be completed within two weeks.

BSF Form 12 will be used to demonstrate compliance with the process. The EPC will also keep hard copies of all approved WIs at its office.

### 10.4 Assigning Risk

When provided with detail on a work activity, (i.e. when, how and where) the following risk assessment principles will be applied by the Quality and Environmental Manager to assign risk to determine whether a WI is required or not.

The decision will be based on whether, in the absence of identified environmental safeguards being adopted, the environmental risk associated with that work activity would

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have a medium or high-risk rating. That is, the decision will be made on the assumption that no environmental safeguards or controls are proposed.

The following rating method is assumed, where “Likelihood” is interpreted as:

- Very likely – expected to occur
- Likely - probably will occur
- Unlikely – might occur
- Very unlikely – could occur but doubtful

Whilst “Environmental Consequence” is interpreted as:

- Catastrophic – irreversible and material harm
- Major – significant but reversible impact
- Moderate – serious impact but readily managed
- Minor – localised and acceptable impact

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## 10.4.1 Environmental Risk Matrix

Environmental Consequence	Likelihood			
	Very Unlikely	Likely	Unlikely	Very Unlikely
Catastrophic	High	High	High	Medium
Major	High	High	Medium	Medium
Moderate	High	Medium	Medium	Low
Minor	Medium	Medium	Low	Low

*Table 4 – Environmental Risk Matrix*

The matrix above will be used by the Quality and Environmental Manager to apply risk analysis principles to help identify the activities which will trigger the requirement for the preparation of a WI.

## 10.4.2 Environmental Risk

Judgments on the consequence and likelihood of risk require an understanding of what potential environmental risks exist. When the detail in the discrete work package is known (i.e. how, where and when), then relevant environmental risks can be identified and considered.

To inform this decision making, the following list shows the key potential environmental risks associated with the construction effort:

- Damage to Aboriginal sites;
- Spread of weeds;
- Causing a bushfire;
- Generating excessive dust;
- Generating excessive noise;
- Damage to the water tables, groundwater interference;
- Damage to local flora;
- Damage to local fauna or fauna habitats;
- Soil contamination;
- Contributing to flooding off-site.

### 10.4.3 Preliminary Environmental Risk Matrix

A preliminary risk matrix for the various construction phase tasks is provided below. The Quality and Environmental Manager will ensure that a WI is prepared for those activities that are defined as MEDIUM or HIGH risk.

As other work activities are detailed (i.e. how, when and where) the risk assessment will be applied by the Quality and Environmental Manager to analyse the risk and decide whether a specific WI is required.

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## 10.4.4 Preliminary Environmental Risk Register

#	Project Phase	Risk	Cause	Effect/Impact	Current Risk Rating					
					Consequence		Likelihood		Rating	
1	Mobilisation	Increased Traffic movements	Vehicle and equipment movement Construction personnel movement	Road congestion	1	Minor	L	Likely	1L	MEDIUM
2	Mobilisation	Increased traffic movements	Vehicle and equipment movement Construction personnel movement	Vehicle collisions	2	Moderate	U	Unlikely	2U	MEDIUM
3	Mobilisation	Increased traffic movements	Vehicle and equipment movement Construction personnel movement	Animal collisions	1	Minor	U	Unlikely	1U	LOW
4	Mobilisation	Noise	Vehicle and equipment movement Construction personnel movement	Impact on local noise	2	Moderate	L	Likely	2L	MEDIUM
5	Mobilisation	Dust generation	Vehicle and equipment movement Construction personnel movement	Short term impact on air quality	3	Major	L	Likely	3L	HIGH
6	Mobilisation	Community not engaged	Lack of community information dissemination, website not established	Community uproar	2	Moderate	VU	Very Unlikely	2VU	LOW

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7	Site civil works	Soil and water impact	Lack of measures and maintenance	Water pollution Movement of soil off-site	2	Moderate	U	Unlikely	2U	MEDIUM
8	Site civil works	Flora and fauna impact	Extensive clearing required Undertaking clearing works at wrong time	Impacts on local flora and fauna	3	Major	U	Unlikely	3U	MEDIUM
9	Site civil works	Fire	Hot work, machinery, sparks	Uncontrolled bushfire	3	Major	U	Unlikely	3U	MEDIUM
10	Site civil works	Increased traffic	Vehicle, machinery movement	Road congestion	2	Moderate	U	Unlikely	2U	MEDIUM
11	Site civil works	Dust generation	Vehicle, machinery movement and lack of dust control	Local air quality impacts	3	Major	L	Likely	3L	HIGH
12	Site civil works	Lack of water	No site water storage	Potential dust generation	3	Major	U	Unlikely	3U	MEDIUM
13	Site civil works	Noise	Machinery movement	Impact on local noise levels	2	Moderate	L	Likely	2L	MEDIUM
14	Site civil works	Spreading of weeds	Machinery movement	Spreading of weeds	2	Moderate	U	Unlikely	2U	MEDIUM
15	Site civil works	Air emissions	Machinery movement, poor maintenance	Local air quality impacts	1	Minor	U	Unlikely	1U	LOW
16	Site civil works	Litter generation	Lack of waste containments	Local impact	1	Minor	U	Unlikely	1U	LOW
17	Site civil works	Flooding impacts	Creating barriers to flood movement	Redirection of floodwaters	2	Moderate	U	Unlikely	2U	MEDIUM
18	Site civil works	Flooding impact	Not locating MV equipment above flood areas	Potential flooding and floodwater pollution	1	Minor	U	Unlikely	1U	LOW

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19	Site civil works	Spills	Refuelling Chemical Storage	Surface water pollution Soil contamination	2	Moderate	U	Unlikely	2U	MEDIUM
20	Mechanical Works	Noise	Hammering posts Air wrenches Machinery movements	Impact on local noise amenity	3	Major	L	Likely	3L	HIGH
21	Mechanical Works	Waste Generation	PV Module packaging Excess steel materials	Increase local waste at landfill	1	Minor	U	Unlikely	1U	LOW
22	Mechanical Works	Air emissions	Vehicle and equipment movement Poor maintenance	Local air quality	1	Minor	U	Unlikely	1U	LOW
23	Mechanical Works	Increased traffic movements	Vehicle and equipment moving Construction movement Delivery of materials	Road congestion personnel	1	Minor	L	Likely	1L	MEDIUM
24	Mechanical Works	Soil and water movement	Inappropriate measures Lack of Maintenance	ESCP Water pollution Movement of soil off site	2	Moderate	U	Unlikely	2U	MEDIUM
25	Mechanical Works	Fire	Hot work	Uncontrolled bush fire	3	Major	U	Unlikely	3U	MEDIUM
26	Electrical Works	Flora and Fauna	Fencing of existing vegetation zones	Impacts on flora and fauna	2	Moderate	U	Unlikely	2U	MEDIUM
27	Electrical Works	Waste generation	Excess waste construction materials	Impact on local landfill	1	Moderate	U	Unlikely	1U	LOW
28	Electrical Works	Increased traffic	Vehicle and traffic movement	Road congestion	1	Major	L	Likely	1L	MEDIUM

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		movement	Deliveries and personnel movement							
29	Electrical Works	Spills	Refuelling	Surface water pollution	3	Major	U	Unlikely	3U	MEDIUM
30	Electrical Works	Fire	Hot work	Uncontrolled bushfire	3	Major	U	Unlikely	3U	MEDIUM
31	Electrical Works	Soil and water movement	Inappropriate measures of ESCP Lack of ESCP Maintenance	Water pollution Movement of soil off site	2	Moderate	U	Unlikely	2U	MEDIUM
32	Demobilisation	Visual impact	Lack of screening	Local visibility	1	Minor	U	Unlikely	1U	LOW
33	Demobilisation	Increased traffic movements	Vehicle and equipment movement Personnel movement	Road congestion	1	Minor	L	Likely	1L	MEDIUM
34	Demobilisation	Increased traffic movements	Vehicle and equipment movement Personnel movement	Collisions	2	Moderate	U	Unlikely	2U	MEDIUM

Table 5 – Preliminary Environmental Risk Register

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## 10.5 Safe Work Methods

Procedures are in place for daily hazard and risk assessments and workforce sign-off for safe work methods. The site will conduct a daily Pre-Start Meeting for all contractors before they start work. All contractors will sign onto the Pre-Start document after the Pre-Start Meeting has concluded. Below is a table which highlights how the hazards will be captured and communicated to all site personnel daily.

<b>Daily Pre-Start Meeting</b>	Hazards will be identified in the previous shift and for the coming shift are discussed by the crew, identify the person in charge of each work group and its work methods; recorded on the Pre-Start Meeting Record
<b>Site Inspection</b>	Inspecting personnel assign a response and a priority; tracked to implementation and completion.
<b>Toolbox Meeting</b>	Site Manager assigns a response and a priority; tracked to implementation and completion
<b>Ad-hoc report during the days work verbally or by using BSF SF-08. Hazard and incident Report to Supervisor</b>	Intermediate response and control by supervisor, reported at the next daily pre-start meeting. If necessary, the Site Manager may implement other control measures.
<b>New hazard identified during project planning or construction</b>	SWMS prepared or noted, prepared, and presented before the task is undertaken. SWMS signed by all personnel involved with the task
<b>Accident investigation</b>	Project manager assigns a response and a priority; tracked to implementation and completion.

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Table 6 – SWMS Hazard Capture Methodology

## 10.6 Minimising Environmental Risk

### 10.6.1 Intent

The intent is to have a WI prepared for any construction activity that is initially assessed as having a MEDIUM or HIGH environmental risk rating, and for those works not to commence until a WI has been approved on the basis that the anticipated risk (i.e. after controls are put in place) is minimised to a LOW rating.

### 10.6.2 Process

The process of preparing a WI will be as follows:

- A discrete work activity will be identified and scheduled;
- Detail on this activity will be provided to the Quality and Environmental Manager who will assign a risk rating;
- Any activity assigned a MEDIUM or HIGH risk rating will require a WI to be prepared;
- A WI will be submitted to the Quality and Environmental Manager;
- The Quality and Environmental Manager will review the WI, inspect the proposed works location, check that applicable safeguards and requirements specified in this CEMP have

been incorporated into the construction method, and then add any relevant safeguards required to minimise the anticipated risk rating to LOW;

- The Construction Manager will then sign off on the WI;
- BSF 12 Work Instruction Register will be updated, and a copy of the approved WI kept in hardcopy at the site; and
- The approved WI will then be explained to the work crew undertaking the activity prior to commencement of works. This explanation will be delivered at the toolbox meeting before works commence.

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## 11. Aboriginal Heritage Plan

### 11.1 Requirement

The BSF Aboriginal Heritage Plan is to identify, monitor and manage any Aboriginal heritage and shall be developed in consultation with the Aboriginal stakeholders, and include the following:

- Details of further archaeological investigations and/or salvage measures to be carried out prior to construction;
- Procedures for the management of identified objects within the project area;
- Procedures for dealing with unidentified objects and/or human remains;
- Aboriginal cultural heritage induction processes for construction personnel; and
- Procedures for ongoing Aboriginal consultation and involvement.

### 11.2 Objective of the AHP

The AHP addresses any specific issues associated with the management of any Aboriginal cultural heritage which is of significance to the local indigenous people of the Baddaginnie area.

This CEMP AHP is to provide information and actions to:

- Protect any identified and unidentified Aboriginal cultural heritage from damage or harm;
- Ensure that if any Aboriginal cultural heritage cannot be protected that appropriate management measures, such as salvage and storage or Aboriginal cultural heritage material, are implemented; and
- Ensure that effective and open consultation with the local indigenous people occurs through the establishment of a continued consultation protocol and site-specific consultation oversight management.

### 11.3 Background

BSF proponent has undertaken Aboriginal Heritage Assessments for the project and found that there is no cultural heritage of significance.

### 11.4 Aboriginal Community Consultation

There are no areas of significance for aboriginal heritage on the proposed BSF site, hence aboriginal community consultation has not been required.

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## **12. Soil and Water Impacts**

### **12.1 Requirement**

This CEMP is to elaborate on the measures used to monitor the soil and water impacts the BSF has during construction. It is the responsibility of the Quality and Environment Manager and the Site Construction Manager to adhere to the policies and put WIs in place to ensure the BSF has no detrimental effects to the surrounding environment and habitats.

### **12.2 Erosion and Sediment Control Plan**

The BSF site represents a low-medium risk environment. The site is mostly flat with waterflow draining in a northeast direction. A Surface Water Assessment performed by SWM Consulting shows that surface water flows are slow moving and draining in a North-East direction. The assessment concluded that 2 shallow retaining basins shall be constructed in the North-West of the site so as to not alter the existing run-off from the property. It is anticipated that these retaining basins will also form part of the Erosion and Sediment Control Plans during construction. There is a tributary of Baddaginnie Creek which course runs approximately 220m to the west of the BSF location, although stormwater runoff from BSF does not flow toward that direction.

There are a range of other earthwork related activities that will occur as part of the site preparation, and these include:

- New access to BSF from Foreshaw Road in the form of an access road with road base to double gates, which will allow the entry of semi-trailers and machinery needed for the construction of BSF;
- New internal access roads for BSF to be used for machinery and logistics during construction, also to help mitigate dust during construction;
- Use of water cartage trucks during construction, as required, for dust suppression;
- The use of excavators for the electrical cable trenches and foundation preparations;
- Concrete trucks for the construction of foundations for electrical plant and PV mounting structure.

Earthworks, regardless of the site, create a risk of erosion and sedimentation, and as such, the earthworks construction drawings are being prepared by a third party and civil service provider for the project and will consider the conditions present at the BSF site in order to mitigate any issues during construction.

As is standard practice, these earthworks drawings will include erosion and sedimentation control plans that will specify soil and water management controls that will be adopted to minimise soil erosion and any discharge of sediment and other pollutants to lands and/or waters during construction activities.

The Erosion and Sediment and Control Plans (ESCPs) will be kept as a hard copy on site. The Quality and Environmental manager will be responsible for the ESCPs being carried out to design specifications.

All ESCPs will be reported on in the Weekly Inspection Checklist (BSF Form 02).

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### 12.2.1 Erosion and Sediment Risk Minimisation Best Practice

The following procedures will also be implemented to minimise erosion and sedimentation risks at BSF:

- Ensure that a minimum of land to the risk of erosion for the shortest period;
- Ensure no stockpiles of spoil, fill or erodible material are placed in or near drainage lines;
- Following any rainfall event, access tracks will be inspected to ensure that they can be used without causing erosion or sedimentation, and that erosion control structures and measures are in place;
- Works will not be undertaken immediately prior to or during periods of high rainfall; and
- When and wherever possible, works will be undertaken in a manner to facilitate progressive revegetation.

### 12.2.2 Dangerous Goods Storage

Dangerous goods will be stored in a way that mitigates any risk of contamination or incident occurring. Fuel will be stored, where portable, in site fuel bunds, in a dedicated area away from any waterways. A large bulk diesel fuel storage tank will be kept in site compound with protective barriers to prevent any risk of contamination from damage to the tank.

Hazardous substances that are to be used in the construction of BSF are indicated below in the table, along with the typical expected quantities that will be stored as per the MSDSs from suppliers. There will be copies of the MSDSs on hand to be used during SWMS and Toolbox meetings.

Diesel	500L
PVC Cement	10L
Unleaded Petrol	100L
Galvanising Paint	10L
PVC Priming Fluid	20L
Marking Paint	5L
Jointing Compound	5kg

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Table 7 – Hazardous Substances Stored on Site

The materials above will be stored as per specifications and OH&S best practice and they will always be used as per the relevant MSDS, using appropriate PPE during construction phase. As a precaution there will be spill kits kept on-site in case of an emergency or incident. In the event of any such incident the following procedures will be followed:

- Immediate notification to the Quality and Environment manager;
- Isolation of any spill using PPE and emergency spill kit(s);
- Scrape and collect soil to a depth where there is no visible contamination staining and place the material into a secure covered receptacle;
- The Quality and environmental Manager will have samples analysed to establish the waste classification; and
- The material will be transported and disposed of at a waste treatment facility that is permitted to accept the material.

An Environmental Incident Report (BSF Form 07) is to be completed for any spill occurrence.

Refuelling is only to be performed at the fuel storage area and never anywhere near a drainage point. Plant maintenance, which includes pre-start checks, shall also be performed in the fuel storage area or machine compound.

### 12.3 Waterway Crossings

No waterway crossings will be involved in the construction of BSF.

### 12.4 Groundwater Interference

It is anticipated that there will be no construction activities at BSF that are likely to pose any risk of interference to the groundwater.

Activities requiring sub-surface works include the following:

- Shallow excavation, which is associated with PV mounting structure foundations, which will be to a maximum depth of 0.7m;
- Shallow excavation required to form the electrical infrastructure foundations and equipment stands, which will be to a maximum depth of 3m;
- Shallow trenches for the electrical underground distribution system within the installation. This is to be to depths of no more than 900mm for DC reticulation, 1300mm for MV reticulation and 500mm for Comms and earthing trenches; and
- A new Ausnet power pole to be installed by Ausnet on the property.

If groundwater is intercepted, and any dewatering is required, the following criteria will be applied. Discharge of water to the environment will be undertaken in a manner that avoids any environmental impacts. The Quality and Environmental Manager will oversee this and in the event of any groundwater interception they will contact Goulburn Broken CMA. The BSF will use contained site toilets. All associated effluent will be contained and emptied regularly, as required by, septic pumping tank, so that there is to be no treatment on the BSF site. The septic tank will be pumped out locally at the accepted location.

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### 12.5 Water Sources

The water used by BSF during construction will be brought on site by water cartage and stored in water tanks. There will be potable water used on-site for drinking purposes and personnel will be asked to bring their own water in reusable containers to mitigate the use of single-use plastic bottles.

## 13. Flood Management Plan

The BSF flood management plan is set out to identify the risk associated with the Baddaginnie Solar Farm including contingency measures for the site during any potential floods, including measures for the removal of any debris on the BSF site, which will avoid any deviations of natural and existing flood paths at the location.

A surface Water Assessment has been carried out by SWM Consulting to determine the effect BSF will have on flood and stormwater run-off. The Assessment has recommended swales and detention permanent detention basins be constructed as mitigation measures so as to not effect existing water storage and flow. During the 1% AEP flood and storm events, flood depths range from 0 to 0.3m across the BSF location.



## 14. Ground Cover Management Plan

### 14.1 Dust Suppression

This BSF CEMP is required to outline the measures and procedures used by the BSF EPC to mitigate any associated issues due to the presence of dust.

Below is a list of activities to be undertaken which may cause dust to become airborne:

- Low-level site levelling;
- Minor works to remove the old fence around the perimeter and to erect a new site fence;
- The distribution of materials around the construction envelope;
- The pile driving machinery moving across the site;
- Machinery associated with access road construction;
- Logistics;
- Personnel vehicle access;
- Machines used for excavations and trenches; and
- Mobilisation and demobilisation activities.

The construction will be done in a manner that minimises dust generation from the site, including from vehicle movements. All project related activities on the site will be undertaken with the objective of preventing visible emission of dust from the site. Watering for dust suppression will be used when required to avoid excessive dust.

A watering program will be developed once construction commences and the Quality and Environment Manager will ensure that watering programs in place require a water truck to water the site in affected areas, when required due to excessive dust.

Any stockpiles can be placed in areas where wind exposure is limited and other measures such as wind breaks, and watering of the stock piles may be implemented from time to time.

Weekly reporting will monitor the dust mitigation and the program will adapt to suit the weather and site conditions.

Other measures are put in place to limit the impact of dust at BSF, this includes dedicated access roads, and minimising vehicle speed within the site.

### 14.2 Access Roads

There will be road-base placed at the site entry and access roads will consist of compacted road-base to prevent construction and maintenance personnel disturbing the soil in the field.

### 14.3 Monitoring

The Quality and Environmental Manager together with Site Construction Manager will oversee the dust management plan and reporting into reports will be managed accordingly.

## 15. Flora and Fauna Management Plan (FFMP)

### 15.1 Requirement

The Baddaginnie Solar Farm proponent has developed the construction site with an emphasis on retaining the local vegetation parcels on the site. It has been designed in such a way that the treed

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environs will be left mostly undisturbed, and the solar project installation will be fenced off from the existing environment and habitats.

## 15.2 Objective

The objective of the FFMP is to successfully implement construction measures to avoid unintended adverse effects on Flora and Fauna during the construction of BSF.

## 15.3 Performance Criteria

BSF will adopt measurable performance criteria in order to actively monitor the construction activities with the Quality and Environmental Manager adhering to the measures in this FFMP. The risk matrix will be used in order to adapt WIs for relevant tasks.

## 15.4 Assessment

The Quality and Environmental Manager will perform weekly inspections and follow up with any required WI for tasks associated with the FFMP.

## 15.5 Pre-Construction

All personnel, contractors and subcontractors on BSF will be inducted and made aware of their obligation to adhere to the FFMP and the role of the inductees. This will highlight the need for compliance on the project by all workers in the aim of maintaining the site's condition pre-post construction phase.

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### 15.5.1 On-Site Flora

The site has been used for livestock grazing and the flora comprises both native and introduced species of flora. No listed rare or threatened flora have been observed, although there is a potential that rare or threatened species exist on the site. Disturbance of vegetation during construction shall be limited to the BSF footprint area and even within the BSF footprint, vegetation disturbance should be kept to a minimum.

### 15.5.2 On-Site Fauna

Inductees will be advised during the induction process that there is to be no interaction with any fauna in the construction zones. In the event that rare or threatened fauna are encountered, the Quality and Environmental Manager will be notified immediately. The Quality and Environmental Manager will then be required to consult with an ecologist before continuing works.

In the event of the appearance of any snakes in the construction zone, the Quality and Environmental Manager will be notified immediately, so contact can be made with the correct departments to have the creature relocated safely. The area is to be quarantined and no works to continue until the relocation has been completed.

## 15.6 Post Construction

Once the construction phase has been completed, site remediation and maintenance will be performed. There will be an ongoing O&M management plan that will be adapted from time to time to meet any changing requirements.

The proponent will engage an O&M service provider who will perform the necessary maintenance of the solar farm and the property.

The O&M management plan will outline the tasks, roles and responsibilities and will be developed as the project nears completion and the O&M service contract is awarded.

There will be ongoing records of the installation as it will be a restricted access venue and all contractors will be required to be inducted, licenced and capable of performing the tasks required.

The site vegetation management will be outsourced to a suitable contractor who is authorised to perform work in MV installation scenarios and who understands the risks associated with such installations.

## 16. Landscape Plan

The Baddaginnie Solar Farm project will retain a significant amount of native vegetation at the site which will be preserved due to a reduction in construction zone to accommodate this.

Densely planted native trees, shrubs and groundcovers will be planted to act as visual screening, in accordance with the approved Landscaping Plan. The trees, shrubs and groundcovers will be planted within three months of the date of completion of the construction phase and will be maintained in good health and condition thereafter. Any dead or diseased plants will be replaced. The Quality and Environmental Manager will be responsible for this.

It is proposed that outer livestock fence be erected to protect visual screening vegetation greatly reducing any risk of interference throughout the project lifetime.

Weed management will be monitored throughout the project. The Quality and Environmental Manager will introduce relevant WIs when required to manage any work activities which could lead to the distribution of weeds.

It is proposed that as part of the ongoing post-construction phase and dust management plan, that a suitable, non-aggressive, local native species of ground cover, will be selected to create a soil-retention blanket on site. The cover would be selected in order to not introduce any risks associated with:

- Bushfire;
- Weed management;
- Aboriginal Site Heritage, if applicable; and
- Land management.

All workers will be inducted and familiarised with the environmental plans for the BSF and the Quality and Environmental Manager will manage this process throughout the project. This includes making sure that no foreign living material is introduced to the site. It is BSF's objective to establish a healthy, self-sustaining, weed-free ground cover around the solar panels, which will not become a fuel hazard. The proponent and O&M service provider will be responsible for this upkeep once construction is completed.

A stabilisation and rehabilitation plan will be created once the construction phase is nearing its end, so plans and strategies can be implemented to fast track the landscape rejuvenation of the BSF project site.

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## **17. Construction Noise Management Plan**

In general, there will be some mechanical tasks involving machinery which will create noise at BSF. These are listed below:

- Truck movement during mobilisation, construction and demobilisation phases;
- Excavators used for site preparation, fence removal, trench excavations, foundation preparations, trench infills, access roads preparation and construction and site remediation work;
- Pile rammers deployed for the pile installation phase;
- Cranes used for the delivery of heavy payloads such as MV equipment and unloading of site buildings etc;
- Septic tank cleaner to empty toilets at regular interval during construction phase;
- Trucks for delivery of equipment such as solar panels, solar tracker, BoS, site buildings;
- Cars for personnel access to site throughout the construction phase with periodic visits for the O&M lifetime of installation;
- Small plant such as generators for power to site, vi-plate for compaction of trenches and access roads etc.; and
- Small handheld tools used such as impact drivers for module installation, hammer drills for installing equipment to concrete bases etc.

BSF will have several construction activities requiring machinery that will have a noise impact. The items of machinery that will cause the bulk of the high-level noise are listed below:

- D-9/Grader
- Telehandler
- Compactor
- Front End Loader
- Truck/Delivery
- Truck /Removal
- Ramming Machine
- Cement Truck
- Cable Winch

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Some tasks will require personnel to use PPE in order to have effective protection from excessive noise levels experienced during these tasks. This will be discussed at all Pre-Start discussions and enforced by the Quality and Environmental Manager and the site OH&S Manager. All high noise impact activities will have modified hours, if required after any public consultation. The pile ramming is potentially noisiest of all the activities, in that it has long durations of generating a high-level noise with impulsive, intermittent, low frequency or tonal characteristics. Other construction activities with high levels of noise include jack hammering, pile driving, rock hammering, saw cutting, vibration, rolling and blasting. Where possible the noise producing times will be reduced to start from 7:00 AM Monday to Friday and from 9:00 AM on Saturdays.

The EPC will prioritise the selection of low noise emitting machinery in the contractor selection phase and implement specific work practices to minimise noise where possible. A dedicated WI will be developed for the pile ramming as it is not a low impact construction task.

The planned hours of work at BSF are Monday to Friday 7:00 AM to 6:00 PM (note the requirement of Pre-Start and Tool Box meetings at start of day) and Saturday 9:00 AM to 4:00 PM, with no work during public holidays, without consent through the community consultation process.

Any out-of-hours works will be planned for and may consist of out-of-hours deliveries for large loads which may be programmed by local traffic management authorities. The Quality and Environmental Manager will engage with any local neighbours in the event this is required in a bid to engage local public support to mitigate any construction related complaints.

In the event of any complaints being made to the proponent, the Quality and Environmental Manager will immediately investigate the source and investigate any measures to be implemented to avoid recurrence. All complaints will be added to the register.

Should any out of hours noise activities be required for any reason, a Noise Impact Statement will be developed and handled by the Quality and Environmental Manager, and will contain:

- Location, nature, timing and out of hours works proposed;
- Clarification of buffer distances to receptors;
- A jurisdiction for the request, including an explanation as to the need for the activities to be undertaken during varied construction hours;
- Any other information necessary to reasonably determine that activities undertaken during the varied construction hours will not adversely impact on the acoustic amenity of receptors in the vicinity of the site; and
- A conclusion as to whether the activities constitute low or high environmental risk.

The effectiveness of the Construction Noise Management Plan will be the responsibility of the Quality and Environmental Manager, who will work closely with the Site Construction manager in enforcing the operational times and conduct of all personnel, in order to maintain community satisfaction with the noise levels experienced.

## 18. Traffic Management Plan

### 18.1 Requirement

The BSF Traffic Management Plan will be produced by the EPC.

### 18.2 Traffic Volumes

Construction activities would be undertaken during standard daytime construction hours (7:00am to 7:00pm Monday to Friday, and 9:00am to 4:00pm on Saturdays). Any construction outside of these normal working hours would only be undertaken with prior approval from relevant authorities. Approximately 8 trucks will access the site per day during peak construction periods. The delivery trucks will predominantly be Medium and Heavy Rigid Trucks.

Articulated Vehicles will occasionally be used to transport larger plant such as the PV panels and mounting system. Over the course of construction, approximately 38 articulated vehicles will access the site, with a peak of 5 per day.

A maximum of 20 staff will be on-site during peak construction periods. Assuming a vehicle occupancy rate of 2.0 for workers, the site is expected to generate 10 passenger vehicle movements during each of the peak periods.

Therefore, it is anticipated that during peak construction the site could generate a maximum of 13 heavy and 20 light vehicle movements per day.

Heavy vehicles will approach the site via Baddaginnie-Benalla Rd from the east, then turn left into Forshaw Rd to access the site. Heavy vehicles leaving the site will turn out of Forshaw Rd, then head west along Baddaginnie-Benalla Rd, then turn left onto Palmerston St to get back onto the Hume Fwy.

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## 19. Emergency Response Plan

The BSF will have an Emergency Response Plan that will be displayed in all site buildings and explained in full clearly to all personnel during induction.

It will be managed by the Quality and Environmental Manager and put in place in conjunction with the selected EPC Safety Policy and in general be carried out in the framework of:

- EPCs Safety Policy – to AS4801;
- Certification to the Australian Government Building and Construction OHS Accreditation Schemes;
- Responsibility exercised by Senior Management, Project and Site Managers and the Proponent;
- With support from the Health & Safety Advisors; and
- Encourage ownership of personal health & well-being.

### 19.1 Emergency Response Procedures

The EPC will be contractually responsible to implement the Baddaginnie Solar Farm Emergency Response prior to construction activities commencing on the project.

The ERP will include a bushfire evacuation plan which is consistent with CFA Guidelines and will include evacuation triggers in Catastrophic and Extreme fire danger rating periods.

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## 20. Waste Management

Building Baddaginnie Solar Farm will generate a range of waste materials that must be disposed of. The range of liquid and non-liquid wastes generated during construction is detailed in the table below.

Information is provided on the source and waste classification. The waste classification is as defined in Schedule 5 of the Protection of the environment Operations Act 2021.

The Quality and Environmental Manager is responsible for implementing the correct disposal measures during construction of Baddaginnie Solar Farm.

### 20.1 Waste Classification Types

Source	Waste	Priority Classified
Personnel rubbish	Glass/Food scraps/plastics	No
Packaging	Plastic	No
Packaging	Rubber	No
Packaging off cuts	Metal	No
Packaging Office	Paper	No
Located Debris on site	Concrete	No
Packaging Office	Cardboard	No
Weed, Wash Down	Residual Soils	No
Earthworks	Highly Excavated Natural Material (Note 1)	No
Clearing	Vegetation (Note 2)	No
Packaging	Wood (Note 3)	No
Personnel	Food scraps and contents of bins	No
Amenities	Effluent	Yes
Survey Marking	Empty Spray Cans	No
Spill	Hydrocarbon contaminated soil	Subject to testing
Spill	Rags and oil absorbent material (Note 4)	General Solid Waste (non-putrescible)

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Table – Waste Classification Types

*Table Notes:*

- Note 1: VENM means natural material such as clay, gravel, sand, soil or rock fines) that has been excavated from areas that are not contaminated with manufactured chemicals, or with process residues, as a result of industrial, commercial, mining or agricultural activities, and does not contain sulfidic ores or soils or any other waste.
- Note 2: Garden waste includes waste that consists of branches, grass, leaves, plants, lopping's, tree trunks, tree stumps and similar materials, and includes any mixture of those materials.

- *Note 3: Means sawdust, timber offcuts, wooden crates, wooden packaging, wood shavings and similar materials. Includes any mixture of those materials but does not include wood treated with chemicals such as copper chrome arsenate (CCA), high temperature creosote (HTC), pigmented emulsified creosote (PEC) and light organic solvent preservative (LOSP).*
- *Note 4: Only if rags and material contain non-volatile petroleum hydrocarbons and do not contain free liquids.*

It should also be noted that the construction of BSF will not generate building or demolition waste, as this type of waste must comprise amongst other things, unsegregated material. Waste segregation will be encouraged to maximise the recycling opportunities. Metals, cardboard, untreated and cables will be recycled.

Wash down from vehicle cleaning associated with weed hygiene will be evaporated.

No quantities of hazardous waste are expected to be generated during the BSF construction, whilst it is conceivable that problematic waste would be restricted to quantities of hydrocarbon contaminated soil that is the result from a spill or burst hydraulic hose.

If this occurs, or if any unanticipated waste does possess hazardous characteristics, a check will be made that it hasn't been pre-classified by the EPA and if not, it will be chemically assessed to determine whether it is hazardous, restricted solid or general solid waste (putrescible and non-putrescible).

This assessment process will be undertaken in accordance with the Protection of the Environment Operations Act 2021.

## 20.2 No Burning

No burning of any waste type, including vegetation, will be undertaken at BSF.

## 20.3 Storage

Wastes containing putrescible material (generated from the amenities office and including food scraps, lunch wrappers, etc.) will be stored in secure covered bins and removed by rubbish sub-contractor and disposed of correctly.

## 20.4 Recycling

All materials possible to be recycled will be, including cables, cardboard, timber etc.

## 20.5 Disposal

All waste construction materials that cannot be recycled or re-used on-site will be disposed of off-site at the Benalla Landfill and Resource Recovery Centre, located at 96 Old Farnley Rd, Benalla, VIC.. This waste disposal facility is an EPA licenced landfill and recycling facility.

The following items will be placed in a recycling bin on-site for off-site recycling at the Moyhall Transfer Station:

- Glass
- Metal
- Paper
- Concrete
- Wood (if any)
- Vegetation (if any).

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It is anticipated that there will be very little wood and vegetation waste because the construction zones are already cleared and the existing native vegetation habitats are to remain as undisturbed as possible.

## **20.6 Waste Tracking**

All waste from the BSF will be tracked using the Waste Register (BSF Form 08).

This register will identify the following, at a minimum:

- Date and time that loads departed site;
- Who inspected the load and type of waste;
- Vehicle registration and load quantity; and
- Fate of waste (disposal, recycling or composting).

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## 21. Compliance Tracking Program

### 21.1 Requirement

The BSF Pty Ltd proponent is required to develop and implement a Compliance Tracking Program to track compliance with the requirements of the BSF approval during the construction and operation of the project.

The construction phase and operational phase may see different contractors providing services and hence shall be treated as separate phases of the BSF project for purposes of this CEMP.

### 21.2 Compliance Reporting

The following information will be submitted to the Moyhall Solar Farm Pty Ltd and Proponent:

- Results of monthly internal compliance audits;
- Constantly updated Complaints/Incidents Register, and
- Results of any external audits.

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