BOOKAAR SOLAR FARM

PRELIMINARY ENVIRONMENTAL MANAGEMENT PLAN

AUGUST 2021

BOOKAAR RENEWABLES PTY LTD

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Introduction

1.1 OVERVIEW

This Preliminary Environmental Management Plan (PEMP) has been prepared to accompany a planning application for the Proposed Bookaar Solar Farm (the Proposal), encompassing part of 520 Meningoort Road, Lots 51 and 52 and Res 1 on LP4677 and adjacent parts of Meningoort Road, Bookaar (the 'Site'). The Proposal lies within the administrative boundary of the Corangamite Shire in Victoria. The Site is illustrated in Figure 1.

This PEMP specifies, at a strategic level, the safeguards and controls that will need to be considered in order to manage potential environmental impacts associated with the implementation of the Proposal.

The scope of this PEMP has been designed to identify high level environmental risks, management measures, standards and monitoring requirements that will be developed into detailed Environmental Management Plan for the construction, operation and decommissioning phases of the Proposal. Depending on the conditions of consent, detailed EMPs are likely to be prepared in a staged manner to address the various stages of the Project lifecycle (e.g. construction, operation and decommissioning).

This PEMP includes:

- Objectives of the PEMP
- A description of the works proposed
- Key legislation, policy and guidance relevant to the Proposal
- Allocation of roles and responsibilities
- A summary of key aspects and potential impacts
- An outline of environmental training, monitoring, auditing, reporting and corrective actions.

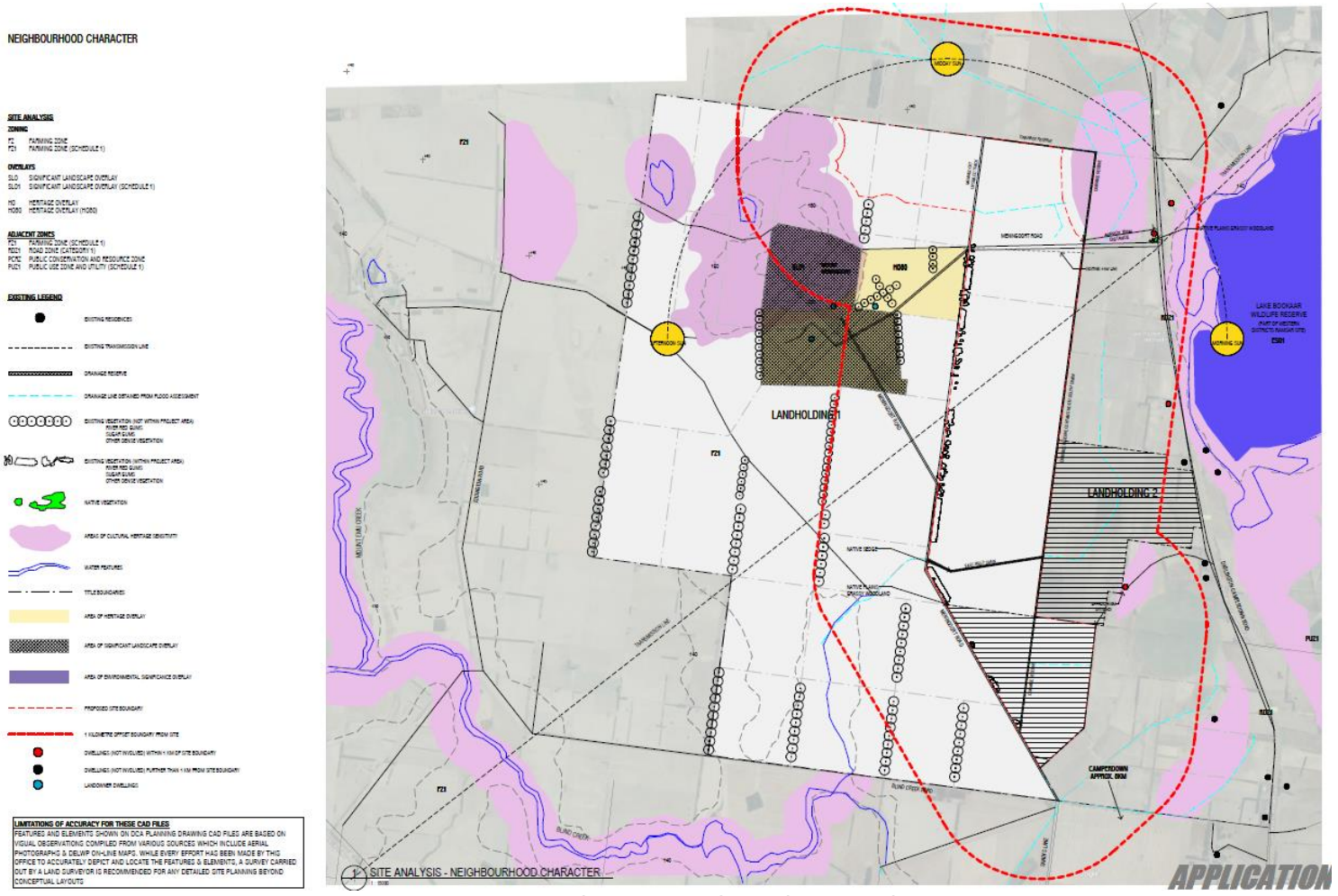

Figure 1: Site and Surrounds

1.2 OBJECTIVES

The objectives of the PEMP are to:

- Assure to the community and the relevant statutory authorities that the Proponent will commit to minimise potential environmental impacts during all stages of the Proposal;
- Provide a framework for the development of Environmental Management Plans (EMPs) for each of the construction, operation, and decommissioning stages of the Proposal;
- Identify applicable legislation, regulations, policy and guidelines relevant to all stages of the Proposal;
- Identify management responsibilities and reporting requirements for the implementation of the Proposal;
- Minimise and where appropriate mitigate potential impacts of the Proposal at each stage of development; and
- Provide clear procedures for the management of environmental impacts including remedial actions.

The PEMP has been prepared in line with the Environmental Guidelines for Major Construction Sites (EPA Victoria 1996), that provides guidance on best practice measures.

1.3 DESCRIPTION OF ACTIVITY

1.3.1 The Site

The Site (Figure 2) is located within two broader landholdings and is predominately used to graze sheep and cattle, except for a section of land in the south-east corner, which is currently used for cropping.

The landholdings are topographically dominated by Mount Meningoort, which is a prominent volcanic cone that sits in its centre. The main homestead, known as 'Meningoort', is situated at the base of Mount Meningoort overlooking the southern extent of the landholding. The homestead includes an adjoining garden and several outbuildings all of which are listed on the Victorian Heritage Register (Ref no. H300).

The homestead is a grand, single-storey, bluestone Italianate-style building which dates back to 1851. It is considered to be of architectural, historical and scientific (horticultural) significance to the State of Victoria. Several more recent dwellings are located within the grounds of the homestead.

The rest of the land within the landholdings is generally flat and comprises improved open pastures and characteristic wind breaks (tree lines) along some fence lines. The topography slopes gently in a southerly direction with a more undulating section of land located in the north west corner.

A drain network that eventually drains to Blind Creek originates to the north of the Site, and forms part of a network of artificial drains which have been constructed to drain excess water from the Landholdings and wider area (refer to the accompanying Flood Impact Assessment for more detail).

A high voltage transmission line suitable for distributing electricity generated by the Proposal transects the area connecting the Terang and the Ballarat substations of the NEM. An 11kV line transects the Site in an east west direction near Meningoort road (north).

The Site for the Proposal has been carefully selected within the wider landholdings to avoid sensitive areas identified through technical studies conducted to support this application and to ensure access to the high voltage transmission line. Furthermore, in consultation with the Landowners, the Proponent has selected the land with the lowest agricultural value within the wider landholdings to locate the Proposal, so the most productive areas remain unaffected.

1.3.2 Proposed Works

The Proposal involves the installation of a solar energy facility with a capacity of 200 MWac (282 MWdc). The Proposal includes the following elements (see the 'Site Plan'):

- 'Array Areas', containing Photovoltaic (PV) panels mounted on a single axis tracking system with a maximum height of 4 m above natural ground at maximum tilt. The tracking system would be supported by piles driven into the ground. Row spacing (pile to pile) is either 12.75 m (south of the 220kV transmission line) or 13 m (north of the 220kV transmission line);
- 82 inverters located centrally throughout the Site in pairs at 41 locations across the Site (inverter stations). Inverter stations are located at least 171 m from the Site boundary;
- Below ground cabling connecting the PV panels between trackers and inverters;
- Below ground cabling connecting the inverters to the substation;
- An internal track network of all-weather gravel tracks (4 m), including a perimeter track which forms part of a 10 m wide defendable Asset Protection Zone (APZ) that surrounds the Site;
- Four (4) gated main site access points via Meningoort Road;
- Four (4) gated emergency access points along the western boundary of the Site;

- Eight dedicated water tanks for firefighting (maximum of 3.6m high), located adjacent to each access point;
- A perimeter security fence 2.5 m high (chain mesh);
- Perimeter vegetation screens (20 m wide with 4 rows of trees and maintained to a height of at least 4 m), planted on the outside of the security fencing;
- Agricultural style fencing 1.2 m high, around the perimeter of the vegetation screens and the perimeter of the existing vegetation on the Site's western boundary;
- A SCADA system that will gather, monitor and analyse data generated through operating the Proposal;
- On-demand, downward facing lighting (restricted to 4m in height); and
- Sensor triggered CCTV security cameras located around the perimeter of the Site and adjacent to key infrastructure.

Substation Area (1.76 ha):

- Substation connecting the Proposal to the onsite 220KV transmission line, via two (2) new high voltage (HV) 220 kV transmission lines;
- A Control building (3 m high);
- Substation Operations and Maintenance building (up to 5 m high);
- A security fence (chain mesh) up to 2.5 m high, enclosing the Substation;
- A 10 m wide defendable APZ around the perimeter of the Substation; and
- Parking for 5 vehicles.

Battery Area (0.91 ha):

- A series of separate containerised battery units, connected by underground cables to the Substation (approximately 2.5 m high);
- A separate transformer adjacent to each battery; and
- A 10m defendable APZ around the perimeter of the Battery Area.

Operations Buildings Area (0.96 ha):

- A Site office building including amenities with a height of 3.6 m;
- A maintenance building and workshop with a height of 5 m;
- 3 Storage sheds with a height of 4.1 m;
- Car parking for twelve (12) vehicles;
- A septic tank and potable water tank; and

- A defendable APZ of 20 m, which allows the area to function as the nominated 'Shelter in Place' location (see Bushfire Risk Assessment Report and Mitigation Plan).

In addition to the key components outlined above, there will be a temporary construction compound (1.44 ha) to facilitate the construction phase of the Proposal. The construction compound would include:

- Temporary construction offices (up to 5 m high);
- Car and bus parking areas for construction vehicles (51 workers cars, 5 mini vans; and additional parking space provided for delivery vehicles and construction machinery);
- Staff amenity block including portable toilets, showers and a kitchen, designed for peak staff numbers during the construction period; and
- Laydown areas.

Once the Proposal is operational, the construction compound will be decommissioned and revegetated.

The Proposal has a total lifespan of 30 years. The construction phase will take approximately 12 months and require up to 150 full-time staff. The operational phase would be approximately 28 years, and generate approximately 10 full time positions nationally, with six of these full time equivalent positions likely to be based locally (see the 'Economic Impact Assessment'). Decommissioning is expected to take 12 months and would require a similar workforce to the construction period. Following decommissioning, all infrastructure associated with the solar farm will be removed from the Site.

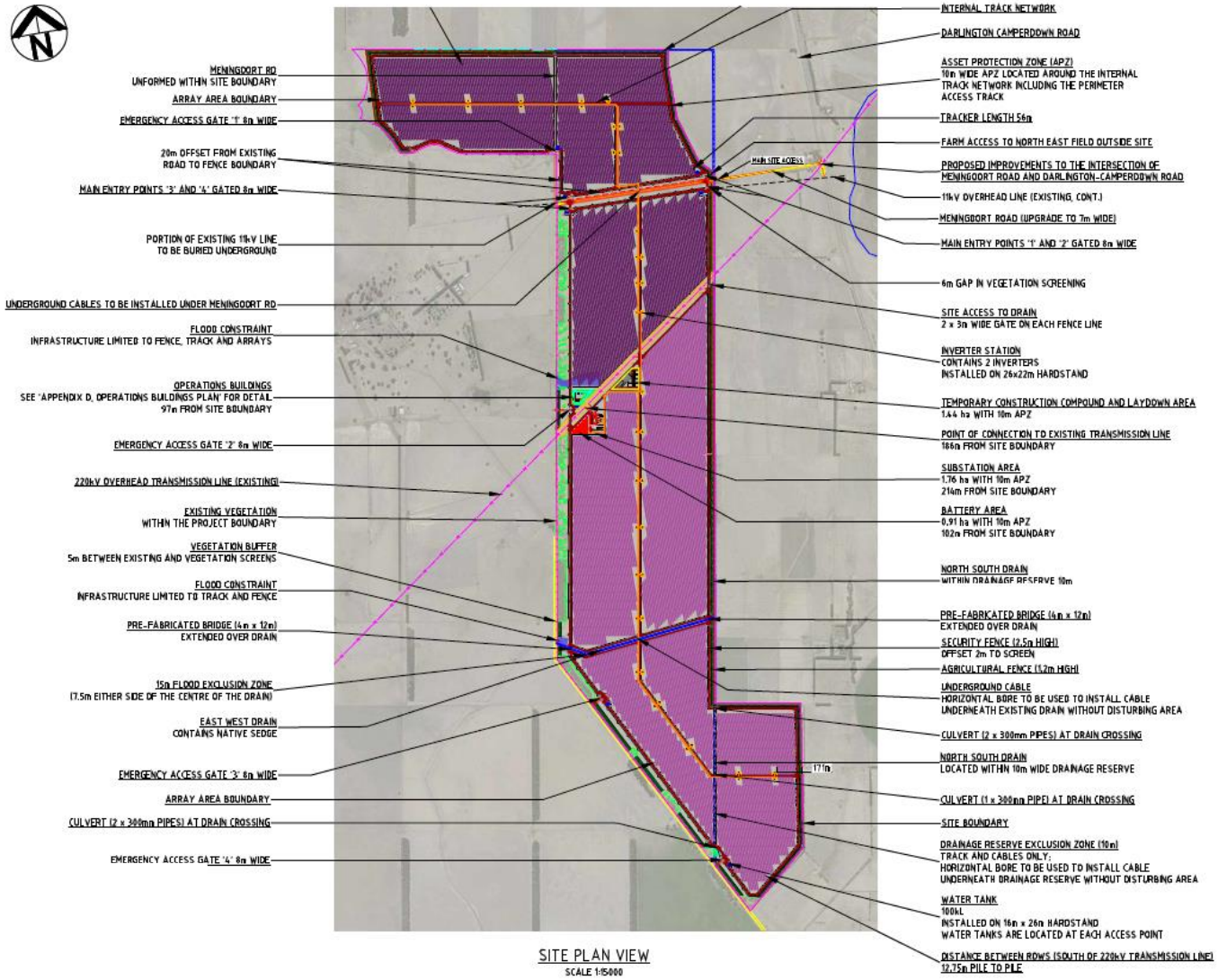

Figure 2: Site Plan (the 'Site Plan' accompanying the Planning Application is a scaled version of this plan)

1.4 PROGRAM DETAILS

1.4.1 Construction

Primary Construction Activities

The primary construction activities would be (in no particular order) as follows:

- Mobilisation; establishment of temporary construction compound and laydown areas;
- Road improvements to Meningoort Road and the intersection of Meningoort Road and Darlington Camperdown Road;
- Planting of the vegetation screens;
- Construction of the internal track network (includes two prefabricated bridges and three culverts);
- Construction of the perimeter security fence and the establishment of the APZs;
- Establishment of the substation;
- Preparation of the array area;
- Installation of piles and the tracking system;
- Securing panels to the tracking system;
- Rehabilitation of any disturbed areas;
- Trench digging and cable laying;
- Installation and connection of inverters;
- Construction of the operations area;
- Removal of temporary construction compound and facilities;
- Rehabilitation of remaining disturbed areas; and
- Solar farm commissioning.

Construction Hours

It is anticipated that the Proposal would take approximately 9 months to construct. Construction work will be undertaken within standard construction hours:

- Monday to Friday, 7am to 6pm; and
- Saturday, 8am to 5pm.

Any construction activities outside these hours would only be undertaken with the permission of relevant authorities and the notification of neighbours.

1.4.2 Operational Activities

The Proposal is expected to operate for approximately 28 years. Operational activities include:

- Monitoring of solar production – analysis of data;
- Export of solar energy to the national electricity network;
- Maintenance of all plant and equipment – visual inspections and/or engineering work as required, analysis of data; replacement of equipment as required;
- Security – remotely and through routine site inspections;
- Annual maintenance and preparation activities required to comply with the Bushfire Mitigation Operational Schedule;
- Vegetation monitoring and management – routine vegetation management and monitoring in panel areas (small livestock may be permitted to graze within panel areas, for example sheep) and within the landscape screens;
- Erosion monitoring – routine monitoring for scarring beneath the panels and along access tracks and waterways. Boundary fences will be checked and unblocked as required; and
- Any other activities that may be required as a condition of consent.

During the operational period there would be approximately 6 locally based full time equivalent staff who may routinely visit the solar farm to carry out activities as listed above. Travel would be in standard 4x4 vehicles. Should there be a requirement for major maintenance work, larger trucks and equipment may need to be deployed.

1.4.3 Decommissioning

During decommissioning all above ground infrastructure will be removed to a level of at least 0.5 m below the surface and the site restored to its pre-development condition.
Main activities would include:

- Disconnection of the solar farm from the national electricity network;
- Dismantling of the Substation and support buildings;
- Removal of the solar panels, tracking systems, inverters and cables;
- Removal of onsite tracks and fences unless agreed otherwise with the landowner; and
- Reinstatement of all disturbed ground.

Where possible, materials and equipment removed from Site would be reused or recycled in line with the waste management commitments for the Proposal.

It is anticipated that decommissioning would take up to 12 months. Impacts would generally be similar in effect but shorter in duration than those experienced during construction.

Decommissioning activities would be controlled by a decommissioning and rehabilitation plan that will form a sub plan to the relevant EMP. It is anticipated that the decommissioning and rehabilitation plan will be a condition of any planning permit.

Environmental Management Framework

This document provides an overarching environmental management framework to be implemented for the development of detailed stage specific EMP(s) and any required sub-plans. The EMPs will incorporate the key environmental objectives and management strategies that are identified in this document and any other conditions of consent identified by consenting authorities.

2.1 LEGISLATIVE AND REGULATORY CONTEXT

Commonwealth

- *Environment Protection and Biodiversity Conservation (EPBC) Act 1999*
- *Environment Protection and Biodiversity Conservation (EPBC) Regulations 2000*
- *National Environment Protection Measures (NEPM)*
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*
- *Protection of Movable Cultural Heritage Act 1986*
- *Native Title Act 1993*

Victorian Acts and Regulations

- *Environment Protection Act 1970*
- *Environment Protection Act 2017 (the 2017 Act)*
- *Pollution of Waters by Oils and Noxious Substances Act 1986*
- *National Environment Protection Council (Victoria) Act 1995*
- *Planning and Environment Act 1987*
- *Environment Protection (Industrial Waste Resource) Regulations 2009*
- *Dangerous Goods Act 1985*
- *Dangerous Goods (Storage and Handling) Regulations 2012*
- Heritage Act 2017
- Aboriginal Heritage Act 2006
- Aboriginal Heritage Regulations 2007
- Flora and Fauna Guarantee Act 1988
- Catchment and Land Protection Act, 1994
- Water Act 1989
- Country Fire Authority Act 1958
- State Environment Protection Policy (SEPP) (Prevention and Management of Contaminated Land)

- SEPP Groundwaters of Victoria
- SEPP Waters of Victoria
- SEPP Ambient Air Quality
- SEPP Air Quality Management
- Environment Protection (Vehicle Emissions) Regulations 2013
- SEPP Control of Noise from Commerce, Industry and Trade
- Water (Trade Waste) Regulations 2014

State Guidelines and Standards

- *EPA Publication 480 – Environmental Guidelines for Major Construction Sites*
- *EPA Publication 275 – Construction Techniques for Sediment Pollution Control*
- *EPA Publication 1254 – Noise Control Guidelines*
- *EPA Publication 347 – Bunding Guidelines*
- *EPA Publication 655, Acid Sulfate Soil and Rock*
- *EPA Publication IWRG621, Soil Hazard Categorisation and Management*
- *EPA Publication IWRG701, Sampling and Analysis of Waters, Wastewaters, soils and wastes.*
- *EPA Publication IWRG631 Solid Industrial Waste Hazard Categorisation and Management*
- *EPA Publication 1411, Noise from industry in regional Victoria (NIRV)*

Local Planning Policy

- Corangamite Planning Scheme

2.2 ROLES AND RESPONSIBILITIES

The Proponent has the final responsibility for the environmental management of the Bookaar Solar Farm throughout the life of the Proposal including construction, operation and decommissioning.

All personal, contractors and sub-contractors engaged by Proponent will be contractually obliged to comply with the relevant EMP along with any conditions of consent and environmental approvals.

2.3 KEY ENVIRONMENTAL ASPECTS & POTENTIAL IMPACTS

Technical investigations have been completed to identify key environmental aspects and potential impacts of the Proposal; these include:

- Acoustic Report prepared by Renzo Tonin & Associates;
- Report on Agricultural Land prepared by RM Consulting Group;
- Bushfire Risk Assessment & Mitigation Plan prepared by Fire Risk Consultants;
- Supplementary Cultural Heritage Report prepared by Ecology & Heritage Partners;
- Biodiversity Assessment prepared by Ecology & Heritage Partners;

- Traffic Impact Assessment prepared by Ratio Consultants;
- Solar Photovoltaic Glint and Glare Study prepared by PagerPower;
- Landscape and Visual Impact Statement prepared by Jacobs Group;
- Flood Impact Assessment prepared by Venant Solutions;
- Amenity Report prepared by Bookaar Renewables;
- Peat Assessment prepared by Douglas Partners;
- Economic Impact Assessment prepared by Ethos Urban; and
- Draft Landscaping Plan by Oz Trees.

In addition, community and stakeholder consultation has been undertaken to understand the issues and objectives of these groups.

Based on the investigations and consultation undertaken, the environmental issues associated with the Proposal have been identified. The following key aspects have been identified and are addressed in the PEMP:

- Waste Management;
- Water Quality/Erosion and Sediment Control;
- Air Quality/Dust and Light;
- Protection of Flora and Fauna;
- Noise and Vibration;
- Pest Management and Weed Control;
- Cultural Heritage;
- Traffic Management and Offsite Roadworks;
- Management of Fuels, Oils and Chemicals;
- Fire Risk and Emergency Management; and
- Landscape and Visual.

Table 2.1 – Principal Environmental Aspects and Objectives – Bookaar Solar Farm

Aspect	Actions	Relevant Phase of Development
Overall		
Project approach	• Comply with relevant environmental laws, regulations, policies and guidelines • Comply with any conditions of consent set out for the Proposal by the Consenting Authority • Utilise best industry practice and standards to avoid/minimise or mitigate potential environmental impacts	Relevant to: • Construction • Operation • Decommissioning
Waste Management		
Generation and management of on-site industrial and household waste	• Minimise raw material use • Minimise waste generation • Maximise reuse • Recycle where possible • Ensure safe waste disposal in compliance with relevant legislation	Relevant to: • Construction • Operation • Decommissioning

Table 2.1 – Principal Environmental Aspects and Objectives – Bookaar Solar Farm

Aspect	Actions	Relevant Phase of Development
Water Quality/ Erosion and Sediment Control		

Prevent soil erosion and/or the permanent degradation of soils at the Site	• Limit ground disturbing works to the approved development site
	• Implement strategies to minimise the requirement for soil disturbance or excavations at the Site
	• Ensure that disturbed areas are reinstated and revegetated as soon as practicable
	• Where excavation or ground disturbance is required, implement best practice sediment and erosion management practices in line with statutory regulations and guidelines which would include:
	  ○ Soil stabilisation controls
	  ○ The inclusion of sediment traps
	  ○ The strategic location of stockpiles
	  ○ Limit the volume of soil stockpiled at the site should be limited
	• The Site should be regularly inspected to detect any erosion events. If such events occur remedial action will be undertaken. This may include soil stabilisation measures such as revegetation. A review of management procedures will be undertaken to reduce the likelihood or recurrence.
		Relevant to:
		• Construction
		• Operation
		• Decommissioning

Management to control stormwater runoff impacting water quality in the surrounding environment	• Minimise the disturbance of the water regime at the Site in line with the Flood Risk Assessment • Where possible maintain onsite contours and drainage patterns • Implement best practice sediment and erosion management practices to avoid the potential for sediment deposition impacting water quality in onsite and offsite receiving water bodies • A water quality monitoring program will be implemented to ensure erosion prevention measures and remedial actions are maintained and effective.	Relevant to: • Construction • Operation • Decommissioning

Table 2.1 – Principal Environmental Aspects and Objectives – Bookaar Solar Farm

Aspect	Actions	Relevant Phase of Development
Air quality/dust and light		
Minimise emissions to the air due to vehicle, plant and equipment use	Develop protocols to minimise vehicle, plant and construction emissions to minimise air quality impacts: • Define designated access and travel routes • Set onsite speed limits • Adopt trip management protocols to avoid unnecessary trips • Ensure all vehicles and machinery that enter the site meet relevant standards for emissions • Maintain vehicles and plant in accordance with manufacturer's requirements to minimise emissions.	Relevant to: • Construction • Operation • Decommissioning
Minimise potential dust generation	Develop protocols to identify, minimise and treat dust emissions, for example: • The use of a water truck during dust generating activities within the Site • Limit the extent of clearing and excavation • Stage clearing and excavation activities to minimise total areas of exposed soil • Minimise the number and volume of stockpiles on-site and the number of work faces on stockpiles • Modify activities if dust is observed leaving the Site towards nearby sensitive receptors.	Relevant to: • Construction • Operation • Decommissioning
Minimise light pollution	• Restrict lighting to be On-demand, downward facing lighting (restricted to 4m in height)	Relevant to: • Construction • Operation • Decommissioning
Flora and Fauna		

Table 2.1 – Principal Environmental Aspects and Objectives – Bookaar Solar Farm

Aspect	Actions	Relevant Phase of Development
The protection and conservation of biodiversity, including native vegetation retention and provision of habitat for native plants and animals.	• Avoid vegetation clearing as far as reasonably practicable, in line with the recommendations in the Biodiversity Assessment • Supervise clearance activities • Offset unavoidable vegetation loss following all regulatory requirements • Protect any residual native vegetation from any accidental impacts from onsite activities • No disturbance to flora or fauna outside the approved footprint of the development.	Relevant to: • Construction • Operation • Decommissioning
Noise and Vibration		
Protect the surrounding environment from excessive noise and vibration impacts	• During the construction and decommissioning periods apply suitable noise mitigation measures guided by EPA publications 480 and 1254 in line with the recommendations of the Acoustic Assessment • Avoid noise generating activities out of normal work hours unless prior approval has been granted by the relevant regulatory authority • Maintain equipment in line with manufactures specifications • Switch off or throttle down any noise generating vehicles or equipment not in use	Relevant to: • Construction • Operation • Decommissioning
Pest Management and Weed Control		
In line with good land management practices, the site will be managed to prevent the introduction and spread of pests (flora and Fauna) and known pathogens.	• Limit surface disturbance and vegetation clearing to a minimum • Develop and implement weed management and monitoring procedures • Develop and implement procedures to eradicate or manage pest fauna within the Site • Develop and implement procedures to prevent the spread of pathogens by soil gravel or equipment transported to the Site	Relevant to: • Construction • Operation • Decommissioning
Cultural Heritage		

Table 2.1 – Principal Environmental Aspects and Objectives – Bookaar Solar Farm

Aspect	Actions	Relevant Phase of Development
Protect and prevent any unauthorised disturbances to any Aboriginal Cultural Heritage artefacts, sites or anthropological entities.	The Site does not contain any areas of identified cultural heritage sensitivity as defined under the Heritage Regulations 2018 (VIC). • The EMP will include a 'stop work" and chance find management and reporting procedures in the event that unidentified cultural heritage assets are uncovered during works at the Site.	Relevant to: • Construction • Operation • Decommissioning
Traffic Management and Offsite Roadworks		
Ensure road standards are maintained. Minimise disruption to the surrounding road network. Ensure public safety is maintained with regard to traffic and road use	In line with the recommendations of the Traffic Impact Assessment, implement measures to mitigate traffic impacts, including: • The preparation of a Traffic Management Plan (TMP) to confirm mitigation and management works required to minimise potential traffic impacts associated with the Proposal • The preparation of a Drivers Code of Conduct. The Drivers Code of Conduct will be aimed at ensuring public safety with regard to traffic associated with the Proposal. It will cover items such as driver speed, approved traffic routes to and from the Site, and driver awareness of local hazards (e.g. school bus routes, stops and timetables). • Implement an incident reporting system, allowing improvement measures to be identified and implemented.	Relevant to: • Construction • Operation • Decommissioning
Management of Fuels, Oils and Chemicals		
Prevent the release of fuels, oils or chemicals to the environment	• Chemical storage, handling and emergency response procedures will be included in a Spill Response Plan which will be developed in accordance with relevant regulatory requirements, standards, and guidelines • All hazardous materials will be handled and utilised in accordance with statutory regulations and label instructions • Employees/Contactors handling, transporting, or utilising hazardous materials will be appropriately trained including the emergency response procedures for a spill event • Adequate spill control and clean up equipment and materials will be available onsite • All spills will be recorded and if required reported to the relevant regulatory authority	Relevant to: • Construction • Operation • Decommissioning
Fire Risk and Emergency Management		

Table 2.1 – Principal Environmental Aspects and Objectives – Bookaar Solar Farm

Aspect	Actions	Relevant Phase of Development
Establish appropriate bushfire preparedness and response protocols.	Develop the mitigation strategies recommended in the Bushfire Risk Assessment and Mitigation Plan including: • Update the preliminary Bushfire Response Plan to be the formal 'Bushfire Response Plan' before the start of construction (and thereafter throughout the Proposal's lifecycle) • In preparation of the bushfire session, ensure all actions within the Bushfire Mitigation Operational Schedule are carried out annually.	Relevant to: • Construction • Operation • Decommissioning
Landscape and Visual		
To manage the visual impact of the solar farm	• Solar installations shall be of pale grey / off-white colour with a semi-matt finish, similar to other previously consented solar farms. The panel faces will be black/dark blue. • Use of local materials for road surfaces (where possible) and in accordance with local council requirements. • Upon decommissioning, remove all above ground on-site infrastructure associated with the solar farm.	Relevant to: • Construction • Operation • Decommissioning

2.4 TRAINING MONITORING AUDITING REPORTING AND CORRECTIVE ACTIONS

The following actions are required to effectively implement and manage the EMP at each stage of development:

- General environmental management training along with any job-specific training will be included in the induction process prior to any work being carried out onsite to ensure that employees, contactors and sub-contractors are fully informed of their specific environmental obligations. In addition, ongoing toolbox meetings will be held to reinforce or highlight relevant environmental and safety issues onsite.

- A number of stage specific environmental monitoring inspections and audits will be carried out during the life of the solar farm, to assess compliance with the EMP, the conditions of consent and other relevant environmental legislation and guidance.

- A regular monitoring schedule will be established to verify that the relevant EMP and environmental regulatory requirements are met and that controls are in place and functioning effectively. Where environmental monitoring determines that environmental management measures are not being implemented adequately or are not effective, corrective measures will be implemented as soon as practicable.

- A set of compliance criteria will be developed for each audit, based on the management actions and objectives outlined in the relevant EMP and other management commitments. Where non-compliance is detected corrective action will be implemented. The timing, level and scope of auditing will be reviewed and improved, where appropriate.

- Environmental monitoring and audit reports will be prepared and submitted regularly to appropriate management personnel. All monitoring and auditing documentation will be handled in line with established Project document control procedures. If and where required, the findings of environmental monitoring and audits will be reported to external stakeholders.

- The Proponent will establish clear internal and external communication procedures to address the environmental management and performance requirements of the Proposal, as well as to maintain constructive, positive and effective community engagement.

- A formal complaint handling procedure is to be established to allow any complaint to be recorded and investigated. Details of the complaint handling procedure shall include the nomination of responsibilities to individuals, establishment of reporting protocols and procedures to investigate and report on complaints and corrective actions implemented where appropriate.

- A formal incident handling procedure will to be established to ensure all environmental incidents are reported and recorded. All incidents must be reported as soon as reasonably practicable to a supervisor, and serious incidents and near misses must be reported immediately. Incidents will be investigated, and corrective actions identified and implemented. Note, incidents causing or threatening serious or material harm under the Environment Protection Act 1970 must be reported to the EPA. Emergency Response

2.5 EMERGENCY RESPONSE

This section describes how and when procedures will be in place to respond to emergencies through the development of an Emergency Response Plan which will also include a specific Bushfire Response Plan, to be prepared in consultation with relevant stakeholders.

2.6 EMERGENCY RESPONSE PLAN

A stage specific Emergency Response Plan (ERP) will be developed to deal with any unplanned incident which has the potential to have a detrimental impact on the environment or human health (e.g. chemical spills, bushfire. All personnel will be inducted into the use of emergency procedures and provided emergency contact numbers via respective inductions. All incidents and details of corrective actions will be recorded. Preliminary bushfire response Plan

A preliminary Bushfire Response Plan (preliminary BRP) has been developed as an outcome of the Bushfire Risk Assessment and Mitigation Plan. The preliminary BRP sets out the measures and chains of command required to be implemented to ensure that the Proposal is suitably prepared for a Bushfire event.

The Preliminary BRP will be updated ahead of construction to become the Bushfire Response Plan (and thereafter throughout the Proposal's lifecycle.