


ADVERTISED PLAN

Environmental Management Plan Proposed Battery Energy Storage System at Phillip Island

Project Commencement Status	<p>Works can commence pending project manager approval and pre-start meeting</p> <p><u>Please note:</u> Works require the removal of native vegetation which is subject to Council approval</p>
Key Requirements <ul style="list-style-type: none"> • A pre-start meeting is required to be conducted with the supervising consultant prior to works commencing • The supervising consultant shall be advised of any unplanned excavations (Unplanned excavations also require prior approval from Mondo). • A suitably qualified ecological consultant shall perform monthly inspections of environmental control measures. • The EMP shall be available and on-site at all times during the work and all relevant persons shall be familiar with its instruction 	
Project Environmental Management Consultancy	
Acacia Project Code	E417
Supervising Consultant	Matt Hall (0400 544 191)

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Issue / Amendment Status

Issue	Date	Description	Author	Approval
1	02/07/2021	Initial Draft Release	T. Gamble	M. Hall
2		Final Draft Review		

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1 ABBREVIATIONS AND DEFINITIONS

Term	Definition
AC	Activity Centre
EMP	Environmental Management Plan
EPA	Environmental Protection Agency (Victoria)
IRWG	Industrial Waste Resource Guidelines
LGA	Local Government Area
SRZ	Structural Root Zone; The area around the base of a tree required for the tree's stability in the ground. This zone considers a tree's structural stability only, not the root zone required for a tree's vigour and long-term viability, which will usually be a larger area.
TPZ	Tree Protection Zone; A specified area above and below ground and at a given distance from the trunk set aside for the protection of a tree's roots and crown to provide for the viability and stability of a tree to be retained where it is potentially subject to damage by development.

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Mondo

Phillip Island Battery Energy Storage System EMP

2 INTRODUCTION

Acacia Environmental Management was engaged by Mondo to develop an Environmental Management Plan (EMP) for the installation of a battery storage facility at 380 Back Beach Rd in the township of Cowes on Phillip Island (Figure 1).

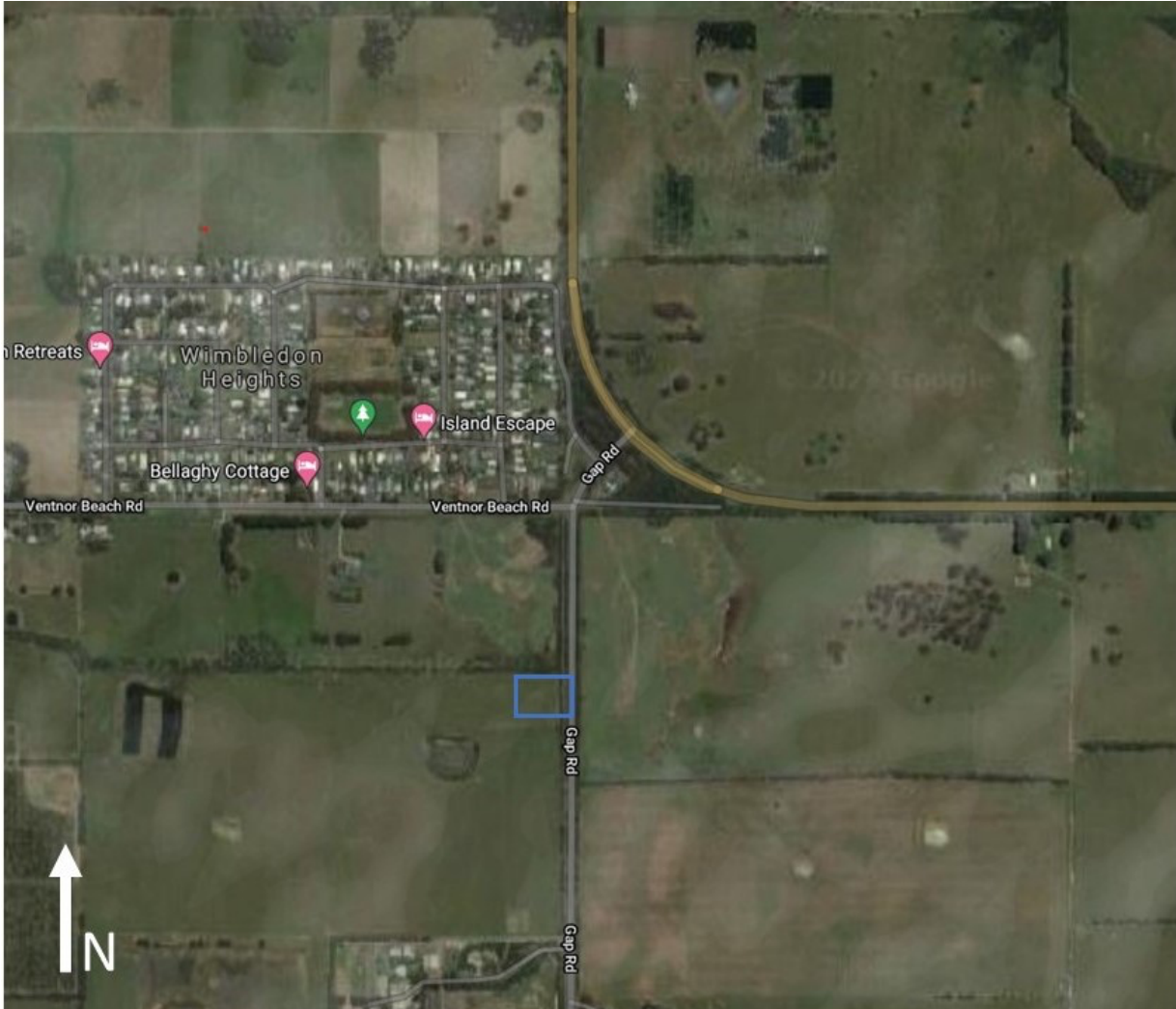


Figure 1: Blue polygon indicates location of proposed facility.

This EMP is intended to provide Mondo employees and its service providers with specific guidance and instruction in relation to ecological and environmental considerations specific to the work site and planned activities.

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2.1 VEGETATION CONSTRAINTS SUMMARY

Vegetation Constraints Summary						
AC #	Tree # / Other	Recommended Action/s	Reason/s	Referral/s		Follow-Up Action/s
				Authority	Type	
2	Endangered Swamp Scrub	Remove prior to works commencing	Removal of vegetation required to facilitate access to site.	Bass Coast Council	Approval	Offset to be sourced and secured prior to commencement of works. Permit required for removal of native vegetation from Bass Coast Council. Vegetation protection fencing shall be installed around areas of retained vegetation by the project ecological consultant prior to the commencement of construction works.

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2.2 PRINCIPLES

This EMP has been developed with the principle of avoiding, minimising or eliminating impacts to flora (vegetation including trees), fauna, cultural heritage and the greater environment in the vicinity of the work site. These principles are primarily achieved through the design and construction approach that sees new underground cables installed below ground and activity centres associated with the construction process, situated away from significant adjacent vegetation.

This EMP does NOT allow for:

1. The removal of native vegetation without prior approval from council unless otherwise permitted under an existing exemption;
2. Identified threatened species to be impacted without due process relating to relevant legislation and or council regulation;
3. The removal of trees subject to council regulation unless otherwise permitted by agreement with council.
- 4.

This EMP does provide for and enables minor vegetation pruning to be undertaken where it has been determined as being unavoidable. Examples of minor pruning may include the pruning of a small quantity of vegetation from ground flora, shrubs or trees including tree ferns with the use of secateurs or a handsaw. Where applicable, any pruning will be carried out in accordance with Australian Standard 4373-2007 'Pruning of Amenity Trees'.

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Phillip Island Battery Energy Storage System EMP

3 WORK VICINITY DESCRIPTION

The proposed facility shall be located within the north-east corner of 380 Back Beach Road adjacent to Gap Road, Cowes. The facility is estimated to have a construction footprint of 50m x 50m (inclusive of direct and indirect activities) and will consist of a paved and fenced area containing low structures, connected to the electricity grid via underground cables. The construction of a driveway will also be required to provide access to the site.

The site has been divided into two activity centres (See Figure 2). Each activity centre is described further in Section 7, below.



Figure 2: Site plan. Dashed yellow lines indicate construction footprint, white lines indicate location of vegetation protection fencing, red hashed areas indicate areas of native vegetation to be removed, blue hashed area indicates existing pumping station, light blue line indicates roadside drain.

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Phillip Island Battery Energy Storage System EMP

4 LEGISLATIVE IMPLICATIONS

Works will be conducted within the Bass Coast Council LGA. All activities are subject to applicable local planning zones and overlays listed within the local planning schemes. This is in addition to any applicable state and federal legislation.

The proposed site is subject to the following local planning zones and overlays:

- FZ – Farming Zone

These zones and overlays listed above pose no restrictions for the proposed works described in this EMP.

5 GENERAL ENVIRONMENTAL CONTROLS

The following section contains generalised environmental protection measures related to construction. Specific control measures for this project are outlined in section 7.

For further information please refer to EPA Victoria Publication 1834 'Civil construction, building and demolition guide'.

5.1 SEDIMENT, EROSION AND DUST CONTROLS

During construction, all efforts should be made to prevent movement of sediment off-site across property boundaries. Flows of surface water should be directed away from sensitive areas (e.g. away from soil stockpiles and areas of unstable soil). Any water contaminated with sediment should be directed into sediment retention structures and not be allowed to enter drains or waterways. Scalping and vegetation removal should be minimised where possible and should be staged by stripping areas only when necessary and undertaking progressive stabilisation and/or rehabilitation (e.g. through the use of geotextiles, seeding or revegetation).

Works over extended hot and/or dry conditions may lead to the liberation of dust from access roads and stockpile areas. As such, water shall be applied to these areas as a dust suppressant as required (i.e. if liberated dust is visibly reaching a sensitive receptor and causing a health or environmental hazard). Water can be applied via a water cart, sprinklers, or a handheld hose. During extreme weather conditions (i.e. high winds) activities likely to generate dust shall be halted until conditions settle.

5.2 NOISE MANAGEMENT

Construction activities which generate noise should be scheduled comply with work hours in line with EPA Victoria guidelines and any local council regulations. Please refer to EPA Victoria Publication 1834 'Civil construction, building and demolition guide' for detailed noise schedule guidelines. Where works are to occur in residential areas, site neighbours likely to be affected should be notified in advance through means such as letter drops, signage and advertisements.

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5.3 WASTE MANAGEMENT

Waste should be managed according to the waste management hierarchy as outlined in the Environmental Protection Act (2017). The hierarchy outlines preferable management options for waste management, these are (in order of preference):

- Avoidance
- Reuse
- Recycling
- Recovery of Energy
- Treatment
- Containment
- Disposal

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Details and guidance relating to these management options are outlined in the industrial waste resource guidelines (IWRG) on the EPA website:

<http://www.epa.vic.gov.au/business-and-industry/guidelines/waste-guidance/industrial-waste-resource-guidelines>

EPA Victoria categorises waste types into four broad categories:

- Fill materials,
- Solid inert waste from an industrial source,
- Putrescible waste from an industrial source, and;
- Prescribed industrial waste.

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These are then further broken down into hazard categories, an outline of these categories and waste management options can be found in the EPA Victoria publication IWRG600.2 'Waste Categorisation'.

5.4 BIOSECURITY AND HYGIENE CONTROLS

It is important that all construction related vehicles and plant leaving the site are in clean condition and that no dirt or mud are transported or tracked onto the sealed public road network. Furthermore, all vehicles driving to and from site shall follow a protocol to prevent the spread or introduction of weeds and soil-borne pathogens such as phytophthora. Vehicles should be clean and free from mud/soil, including the tyres and any loaded equipment. Any vehicles that require access to site that have come from an area known to harbour any restricted soil-borne pathogen (and which have been off-road within these locations) shall be required to apply Phytoclean or similar bleach-based product to all surfaces which may come into contact with the ground as a precautionary measure.

And vegetative material containing weedy species should not be spread on site and should be disposed of at an appropriate, licenced facility.

6 FLORA AND FAUNA

A site inspection was conducted on 07/06/2021 by Tim Gamble & Julian Thompson (Acacia Environmental Management) and desktop flora and fauna assessments were undertaken on 11/06/2021 by Tim Gamble (Acacia Environmental Management).

The majority of vegetation in the vicinity of the proposed work zone is generally highly modified and characterised by areas of exotic pasture species. The area along the northern fence line and roadside reserve consists of indigenous vegetation representative of Swamp Scrub (EVC 53) which is listed as Endangered within the Gippsland Plains bioregion (Figure 3).



Figure 3. Swamp Scrub vegetation on roadside reserve, bisected by bike path.

A search of the Victorian Biodiversity Atlas revealed no listed species within 1km of the work zone that are anticipated to be impacted by the works. There are several listed bird species that have been recorded in the area however these are highly mobile species and able to avoid any disturbances caused by works.

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7 ACTIVITY CENTRES

Activity centres (AC) are specific zones within the work site vicinity where the majority of activity associated with construction will occur. These centres encompass the anticipated footprint of the battery facility and access infrastructure. The activity centres have been identified by the project ecological consultant for the purposes of this report.

All excavation works will be completed within the activity centres nominated on the construction design plans. In the event that additional excavation is required, a hold point will be established while the situation is assessed and relevant stakeholders will be consulted before any additional works proceed.

Where deemed necessary the following will apply:

Parawebbing or hard-fencing will be erected at activity centres prior to commencement of works to form a vegetation protection zone. Fencing will be maintained during construction works. Erection and maintenance of the vegetation protection fencing will be done as specified in the specific site treatments. This will ensure native vegetation is protected and will assist construction personnel identify areas that are vegetation protection zones (*i.e.* 'no-go zones'). Works must not impinge or impact 'no-go zones' and any requirement to conduct works within 'no-go zones' will trigger authorization/permits from the local shire council. The fencing will be signed as 'Vegetation Protection Zone'.

Noise control and soil erosion will be managed as per the civil delivery partners Project Management Plan (PMP). Additional information for each activity site is listed in the subsequent sections.

All drains and areas of water flow will have appropriate sediment management devices installed to ensure that sediments and runoff do not contaminate adjacent waterways.

An inspection of the site will be undertaken prior to commencement of works to identify vegetation and small branches that may need to be tied back or pruned to avoid unintentional damage or provide the minimum clearance necessary for operations. This vegetation management will be sensitive and minimal and will be undertaken in accordance with Australian Standard 4373-2007 'Pruning of Amenity Trees'.

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7.1 PRE-START CONTROL MEASURES

Prior to commencing works on-site, the civil contractor and project ecological consultant will undertake a joint site walkthrough. The purpose of this walkthrough is to identify and discuss site-specific environmental issues and any general concerns of both parties.

During the walkthrough the following aspects (including but not limited to) are to be addressed:

- Specific ecological sensitive areas;
- Requirements for supervision by the project ecological consultant;
- Control measures to be followed at each activity centre;
- Appropriate locations for the storage of plant and equipment;
- Appropriate material/soil storage locations;
- Pruning and vegetation management requirements;
- The establishment of prescribed 'no-go zones';
- SRZ and TPZ incursions; and
- Access and egress to site.

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7.2 SITE PLAN AND ACTIVITY CENTRES



Figure 4: Site plan. Dashed yellow lines indicate construction footprint, white lines indicate location of vegetation protection fencing, red hashed areas indicate areas of native vegetation to be removed, blue hashed area indicates existing pumping station, light blue line indicates roadside drain.

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7.3 ACTIVITY CENTRE 1

7.3.1 Site Description

Activity Centre 1 is located in the northeast corner of #380 Back Beach Rd and will consist of the battery storage infrastructure. The facility is estimated to have a construction footprint of 50m x 50m consisting of a paved and fenced area containing low structures (Figure 5). There is an existing fenced pumping station close to the proposed site entrance which is located outside the planned works area (Figure 6).

The works area currently supports a predominantly weedy mix of exotic grasses and broadleaf herbs. The composition of species present falls below the threshold required to be considered native vegetation under DELWPs 'Guidelines for the removal, destruction or lopping of native vegetation'.

To the north and east of the site there is native vegetation belonging to the endangered Swamp Scrub ecological vegetation class in close proximity to the works zone. These areas will be isolated from the works via a physical barrier and signposted as a designated 'No Go Zone'.

Excavated soil generated during construction to be stockpiled on site shall be surrounded by a silt fence and covered in the event of high wind or rain events. If the stockpile is anticipated to left for longer than 28 days, it shall be seeded with sterile rye grass to minimise sediment movement. It is noted that the surrounding area is relatively flat and there is a low capacity for sediment to migrate away from the immediate works area.



Figure 5: Approximate footprint of AC1, looking east towards Gap Road.

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Figure 6: Existing pumping station to be retained.

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7.3.2 Control Measures

- A pre-start activity shall be undertaken by the Civil Contractor and the Project Ecological Consultant prior to commencing any works;
- In the event that wildlife enters the work site, works will cease until the animals have autonomously moved away outside of the works vicinity. If an animal is found to be trapped within the work site, a local wildlife carer shall be contacted to advise on next steps. Note: Swamp Wallabies were spotted within the property boundary during the site visit.
- Vegetation protection zones will be established around endangered Swamp Scrub which will be retained. This will consist of a physical barrier which will be labelled as a 'No Go Zone'.
- Plant and equipment shall only be stored in appropriate areas as identified during the pre-start activity, identification of alternate storage location shall require approval from the Project Ecological Consultant;
- All plant and equipment to be thoroughly cleaned before entering the works vicinity;
- All soil to be reinstated will be properly covered and secured prior to the onset of heavy wind or rain event;
- A water cart or equivalent will be made available for dust suppression as required.
- Machinery swing zones shall not intersect with any nearby trees or indigenous vegetation, including potential impacts caused through heat from exhaust pipes;
- Any unplanned excavations shall require approval from the Project Ecological Consultant prior to occurring.

7.4 ACTIVITY CENTRE 2

7.4.1 Site Description

Works at activity centre 2 consist of the construction of a new driveway to facilitate vehicle access during construction and operation of this facility. It is located adjacent to the northeast corner of AC1 within the road reserve on the western side of Gap Rd (see Figure 6). Works at AC2 involve the construction of a 7m wide driveway and culvert to allow vehicle access to the site.

The area consists of a gravel bike trail that bisects the native endangered Swamp Scrub growing on either side. A spoon drain running parallel to the road, approximately 2m from the road edge also runs through the works zone.

The areas with Swamp Scrub present consist of a canopy layer of Swamp Paperbark (*Melaleuca ericafolia*) and a patchy degraded understorey of various species including Hop Goodenia (*Goodenia ovata*), Thatch Saw-sedge (*Gahnia radula*), Sweet Pittosporum (*Pittosporum undulatum*) and Drain Flat-sedge (*Cyperus eragrostis*).

The two patches shown in red in Figures 2 and 6 show the area of swamp scrub to be cleared (0.017ha). Removal of this vegetation will require a native vegetation removal offset to be sourced and secured prior to the commencement of works. A permit from Bass Coast Council will also be required. As the area to be cleared contains weedy species, any vegetative waste generated from these activities shall be taken off site and disposed of at an appropriate, licenced facility.

The driveway construction will require the installation of a new culvert along the existing spoon drain. Sediment controls such as coir logs shall be installed downstream of the works zone prior to the commencement of works. Post construction, any areas of bare soil in the vicinity of the drain shall be seeded with a mix of sterile rye grass and indigenous perennial species. There is also a sewer access pit in this area which will need to be avoided (Figure 7).

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Figure 6: Indicative footprint of AC2, looking northwest from eastern side of Gap Rd. The red area indicates approximate extent of vegetation removal.

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Figure 7: Sewer access pit present in AC1 to be avoided.

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7.4.2 Control Measures

- A pre-start activity shall be undertaken by the Civil Contractor and the Project Ecological Consultant prior to commencing any works;
- Vegetation removal shall be conducted prior to the commencement of construction by a suitably qualified contractor. No-go zones shall be installed prior to vegetation removal.
- Waste generated during vegetation removal shall be taken off site and disposed of at an appropriate facility.
- Appropriate sediment controls such as coir logs should be installed downstream of the work site prior to the commencement of works and maintained for the duration of the construction phase of works.
- Any areas of bare ground left after construction of the driveway shall be seeded with a mix of sterile rye and perennial indigenous species.
- In the event that wildlife enters the work site, works will cease until the animals have autonomously moved away outside of the works vicinity. If an animal is found to be trapped within the work site, a local wildlife carer shall be contacted to advise on next steps. Note: Swamp Wallabies were spotted within the property boundary during the site visit.
- Vegetation protection zones will be established around endangered Swamp Scrub which will be retained. This will consist of a physical barrier which will be labelled as a 'No Go Zone'.
- Plant and equipment shall only be stored in appropriate areas as identified during the pre-start activity, identification of alternate storage location shall require approval from the Project Ecological Consultant;
- All plant and equipment to be thoroughly cleaned before entering the works vicinity;
- All soil to be reinstated will be properly covered and secured prior to the onset of heavy wind or rain event;
- Machinery swing zones shall not intersect with any nearby trees or indigenous vegetation, including potential impacts caused through heat from exhaust pipes;
- Any unplanned excavations shall require approval from the Project Ecological Consultant prior to occurring.

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8 MONITORING & SUPERVISION

8.1 MONITORING

A suitably qualified ecological consultant shall perform monthly site visits in order to check that the prescribed environmental controls remain in good working order and all activity is consistent with those listed within the relevant construction plans and this EMP.

8.2 WEED MANAGEMENT

Existing weeds along the length of the project site have been documented in Section 5. All works are to be in line with EMS 21-89 Minimising the Spread of Livestock & Plant Diseases.

8.3 FOLLOW UP DOCUMENTATION

A summary document will be prepared, upon request, by Acacia Environmental Management following completion of the works for the project, detailing all the control measures put in place and the results of all supervision and testing.

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9 SUPPORTING DOCUMENTS

9.1 RELEVANT DOCUMENTS (INTERNAL AND EXTERNAL)

- Australian Standard – Protection of trees on development sites AS 4970-2009
- Australian Standard – Pruning of Amenity Trees AS 4373-2007
- Dandenong Ranges HV ABC Replacement Program, Environment Management Framework
- Dangerous Goods and Hazardous Substances HSP 05-10
- Electrical Safety HSP 05-07
- Emergency Preparedness HSP 03-02
- Environmental Aspects EMS 21-51
- EPA - Environmental Guidelines for Major Construction Sites
- Hazard Identification, Assessment and Control procedure HSP 04-01
- Hazardous Substance-Dangerous Goods Risk Assessment HSP 05-10A
- Job Safety Assessment Guidelines HSP 04-03
- Manual Handling HSP 05-12
- Occupational Noise Exposure HSP 05-01
- Personal Protective Equipment HSP 02-05
- Pests, Diseases and Weeds Management EMS 21-89
- Plant HSP 05-02
- Safe Work Australia - Excavation Code of Practice
- Thermal Environment HSP 05-03
- Working at Heights HSP 05-13

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9.2 LEGISLATIVE CONSIDERATIONS

- Aboriginal Heritage Act (2006)
- Aboriginal Heritage Regulations (2007)
- Catchment and Land Protection Act (1994)
- Electrical Safety Regulations (2002)
- Electrical Safety Act (1998)
- Environmental Planning and Protection Act (1979)
- Environment Protection Act (1970)
- Environment Protection & Biodiversity Conservation Act (1999)
- Flora Fauna Guarantee Act (1988)
- Heritage Act (1995)
- Occupational Health and Safety Act (2004).
- Occupational Health and Safety Regulations (2007)
- Planning and Environment Act (1987)
- Road Management Act (2004)
- Victorian Planning Provisions 52.17 and 52.17-6 (Native Vegetation)
- Water Act (2007)
- Wildlife Act (1975)

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