URBIS

ENVIRONMENTAL MANAGEMENT STRATEGY

Mulwala Solar Farm – Stage 1b

Prepared for

EE AUSTRALIA EPC 1 PTY LTD

28 July 2025

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Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHA	Aboriginal Cultural Heritage Assessment
BMP	Biodiversity Management Plan
CEMP	Construction Environmental Management Plan
DP	Deposited Plan
DPHI	Department of Planning, Housing and Infrastructure (NSW)
EA	Environmental Assessment
EHS	Environment, Health & Safety
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EPA	Environment Protection Authority (NSW)
EP&A Act	*Environmental Planning and Assessment Act 1979*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth)
GMP	Groundwater Monitoring Program
LED	Light-emitting Diode
LGA	Local Government Area
NATA	National Association of Testing Authorities
NSW	New South Wales
POEO Act	*Protection of the Environment Operations Act 1997* (NSW)
SEPP	State Environmental Planning Policy
SWMP	Stormwater Management Plan
TIA	Transport Impact Assessment
TMP	Traffic Management Plan
WMP	Waste Management Plan

1. PROJECT DESCRIPTION

1.1. PROJECT OVERVIEW

This Environmental Management Strategy (**EMS**) has been prepared for the Mulwala Solar Farm – Stage 1b (**the Project**) by Urbis Ltd on behalf of EE Australia EPC 1 Pty Ltd (**EE**, **the Proponent**) a subsidiary of European Energy A/S.

The Project will entail the construction, operation and decommissioning of a photovoltaic (**PV**) solar farm and associated infrastructure. The project is located on rural land, directly north of the township of Mulwala, in New South Wales. The main objectives of the Project are to use the solar PV modules to convert sunlight into electricity, which will be sold in the National Electricity Market (**NEM**) and produce electricity that will contribute to the Federal and NSW Governments' Renewable Energy Targets and their respective Net Zero pledges.

The Project was assessed in an Environmental Impact Statement (**EIS**) in accordance with Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (**EP&A Act**) and was the subject of a development application for State significant development (SSD 9039). Development consent was granted to SSD 9039 on 18 December 2018. The development consent was extended two years due to the NSW Government's Covid-19 Response, pursuant to the *Covid-19 Legislation Amendment (Emergency Measures) Bill 2020*, which made temporary changes to the EP&A Act.

Due to capacity restrictions on the local electricity grid, construction and operation of the Project is to be staged to allow for the orderly construction of part of the solar farm, with an expansion to deliver the approved Project should the grid infrastructure be upgraded in the future. Further detail about the development staging is provided in Section 1.5.

The development footprint of Stage 1b has been restricted to the northern portion of the site that was assessed in the EIS and subject to SSD 9039, commensurate with parts of lots 5 and 6 of DP134511. Consequently, the electricity capacity of Stage 1b will be approximately 31 MW.

1.2. DEVELOPMENT CONSENT SDD 9039

1.2.1. Schedule 4

Schedule 4 of the development consent relates to Environmental Management and Reporting. This EMS has been prepared to satisfy interalia the conditions of Schedule 4. Details of the conditions and where they are addressed in this EMS are set out in Table 1 below:

Table 1 Schedule 4 Conditions

Condition	Section of EMS
1. Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: *(a) provide the strategic framework for environmental management of the development;*	**2.2**
(b) identify the statutory approvals that apply to the development;	**2.1**
(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	**3**
(d) describe the procedures that would be implemented to: – *keep the local community and relevant agencies informed about the operation and environmental performance of the development;*	**3.3 & 4**
– *receive, handle, respond to, and record complaints;*	**4.2**
– *resolve any disputes that may arise;*	**4.2**

– *respond to any non-compliance;*	**4.5**
– *respond to emergencies; and*	**3.5**
(e) include: – *references to any plans approved under the conditions of this consent; and* – *a clear plan depicting all the monitoring to be carried out in relation to the development.*	**4.2 & 5**
Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy	**1.9**

Condition	Section of EMS
2. The Applicant must: *(a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and* *(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:* – *submission of an incident report under condition 4 of Schedule 4;* – *submission of an audit report under condition 6 of Schedule 4; or* – *any modification to the conditions of this consent.*	**1.8**

Condition	Section of EMS
3. With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. *To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.* *With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.* *Notes:* – While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. – If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.	**1.8**

Condition	Section of EMS
4. The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes	**4.5 & 4.6**

aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	

Condition	Section of EMS
5. The Department must be notified in writing to compliance@planning.nsw.gov.au within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	**4.5 & 4.6**

Condition	Section of EMS
6. The Applicant must provide regular compliance reporting to the Department on the development in accordance with the relevant Compliance Reporting requirements (DPE 2018)	**4.7**

Condition	Section of EMS
7. Within 6 months of commencing construction, or as directed by the Secretary, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must: *(a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018);* *(b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;* *(c) be carried out in consultation with the relevant agencies;* *(d) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and* *(e) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.* *Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations.* *The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.*	**4.4**

Condition	Section of EMS
8. The Applicant must: *(f) make the following information publicly available on its website as relevant to the stage of the development:* – *the EIS;* – *the final layout plans for the development;* – *current statutory approvals for the development;* – *approved strategies, plans or programs required under the conditions of this consent;* – *the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;* – *how complaints about the development can be made;* – *a complaints register;* – *compliance reports;* – *any independent environmental audit, and the Applicant's response to the recommendations in any audit; and* – *any other matter required by the Secretary; and* *(g) keep this information up to date.*	**3.6**

1.2.2. Schedule 3

Schedule 3 relates to the general environmental considerations and conditions to be met during the construction and operation of the Project. As such, this EMS and accompanying management plans and controls address the conditions of the development consent Table 2 Identifies the conditions of the consent.

Table 2 Responses to consent conditions – Schedule 3.

Task	Condition ID	Section of EMS
Aboriginal Cultural Heritage	17, 18, 19, 20	5.2.1
Air Quality	14	5.2.2
Biodiversity	11	5.2.3
Landscaping	7, 8, 15	5.2.4
Lighting	16	5.2.5
Noise and Vibration	13	5.2.6
Stormwater and Water Quality	22, 23	5.2.7
Traffic	1, 2, 6	5.2.8
Waste Management	29	5.2.9

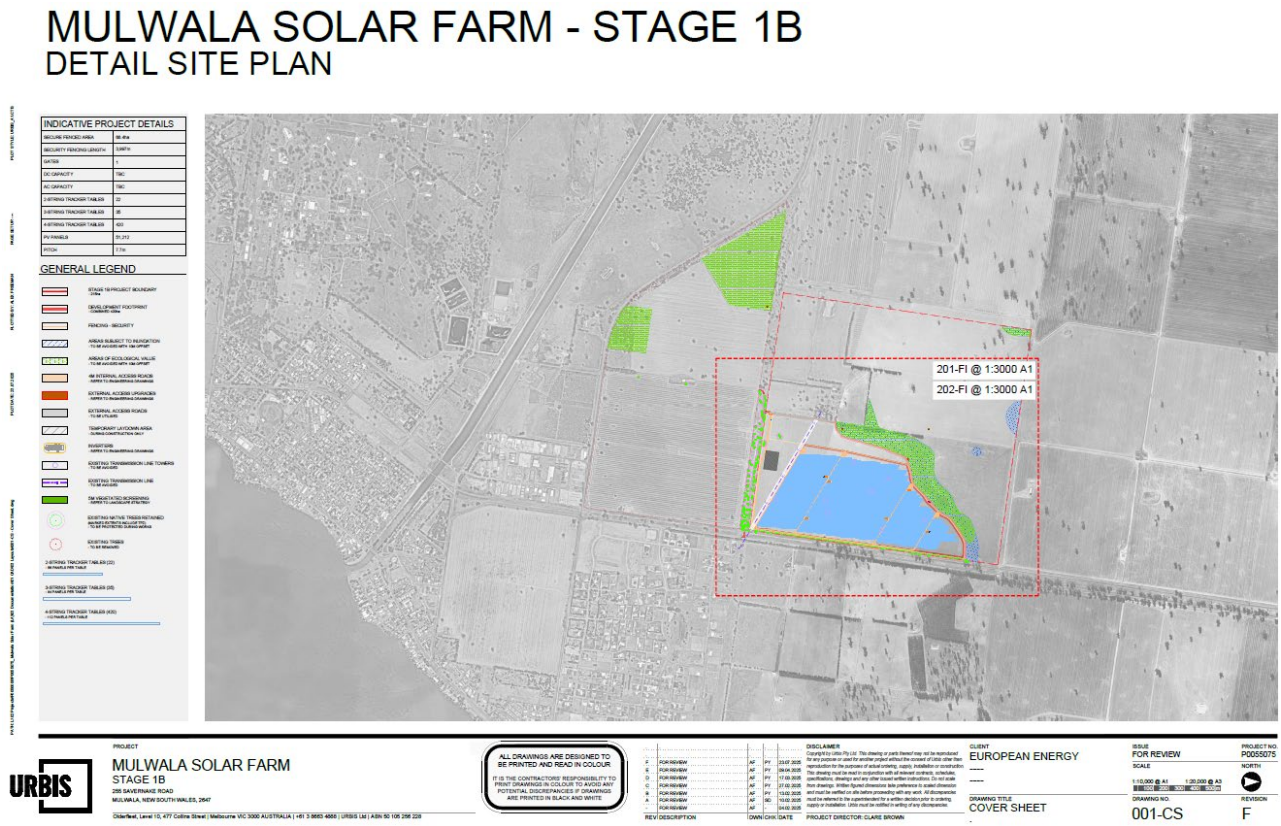
1.3. SCOPE OF THE ENVIRONMENTAL MANAGEMENT STRATEGY

1.3.1. The Site

The Site is located on the outskirts of the town of Mulwala along Savernake Road and Lambruck Lane. The Development Footprint for Stage 1b has been reduced to part of the northern portion of the approved development, corresponding to parts of Lots 5 and 6 in Deposited Plan (**DP**) 134511 (Figure 1). Please see **Appendix A** for the detailed site layout.

Upon completion of the Stage 1b works, an Intium transmission line will connect the Project with the Mulwala Substation, running in a north-south configuration and along Barooga Road. Construction of the transmission line will be undertaken by Intium (a subsidiary of Essential Energy) and is not the subject of this EMS.

Figure 1 Site Layout



Source: Urbis, 2025

1.3.2. Application of EMS

This EMS only applies to development, as shown in Figure 1. The Project is to be staged as per the staging letter provided to the Department of Planning, Housing and Infrastructure (**DPHI**) on 7th July 2025. Should the subsequent stages proceed in the future, the EMS will be updated and revised accordingly and will be submitted to DPHI for approval.

This EMS is applicable to Stage 1b, as approved by DPHI on the 8nd July 2025. This EMS applies to the following:

- Stage 1b:
  - Delivery of equipment and minor site establishment works, including installation of internal roads.
  - Construction of the northern portion of the solar farm.
  - Operation of the Mulwala Solar Farm – Stage 1b.

Construction of the intersection and road upgrades as required under condition 4 of Schedule 3 of the development consent are the subject of a separate approval under section 138 of the *Roads Act 1993* and are not the subject of this EMS.

1.3.3. Purpose of EMS

The purpose of the EMS is to provide a strategy for the successful delivery of the Mulwala Solar Farm construction and operation of Stage 1b.

Through the implementation of the EMS, a strategic environmental management framework Figure 2 is established that guides environmental assessment, management and monitoring outcomes together with a strategy for managing community information and responses on environmental performance during the construction and operation of the project. EE will ensure all reasonable and feasible measures are implemented to prevent and/or minimise any material harm to the environment that may result from the works of the development.

Figure 2 Strategic Environmental Management Framework for the Mulwala Solar Farm.

In summary, the objectives of this EMS are to:

- Ensure all related commitments made for this development are met.
- Ensure all requirements of the development consent are met.
- Describe generally the management and monitoring strategies for the environmental performance of the development as required by the development consent.
- Manage the environmental hazards and risks associated with the development.
- Minimise the potential for environmental harm.
- Provide a mechanism for communicating, implementing, and monitoring performance indicators of site environmental policy.
- To provide a process for review and continual improvement of project environmental management.

1.3.4. Scope of works

Stage 1b works will involve the construction and operation of a ground-mounted PV solar tracking array generating approximately 31 MW AC of renewable energy. The generated electricity will be exported into the network through an Intium connection to the Mulwala Substation, located approximately 1.5km south of the project site.

Key development and infrastructure components will include:

- Single-axis tracking solar arrays mounted off the ground on galvanised frames and posts with the top edge of the panel up to approximately 3.8 m above ground level at full tilt.
- Six Power Conditioning Units (**PCUs**) interspersed throughout the arrays, converting the direct current (**DC**) generated by the PV arrays into alternating current (**AC**).
- Chain wire site perimeter fencing (2.4 metre-high).
- Gravel internal maintenance access tracks and vehicle turnaround areas.
- Landscape buffer along Savernake Road.

The approved project layout is provided in **Appendix A**.

The Proponent has overall responsibility for ensuring that no disturbance outside of the project site occurs during the construction, operation or decommissioning of the project. As shown in **Appendix A**, areas outside of the final design area will be protected by the installation of perimeter fencing. The Proponent is committed to satisfying the conditions of consent to SSD 9039, this EMS and all associated management plans and strategies.

1.4. PROJECT SCHEDULE

An indicative schedule for the Project is outlined in Table 3 below. It is expected that the solar farm will be commissioned at the end of the construction period, following fulfilment of the relevant conditions of consent prior to commissioning.

Table 3 Project Schedule

Phase	Approximate Commencement	Approximate Duration
Construction	July 2025	8 months
Operation	Q2 2026	40 years
Decommissioning	Q2 2066	10 months

1.5. PROJECT STAGING

As per the definitions in the project consent, the construction of the project includes the carrying out of any earthworks on site and the construction of solar panels and any ancillary infrastructure but explicitly excludes road maintenance works to the public road network, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying.

The project staging is provided in Table 4 below. The project staging includes pre-construction (considered Stage 1a), construction, operation and decommissioning.

Table 4 Project Staging

Stage	Stage Summary	Notes
1a	Road upgrades at the intersection of Lambruck Lane and Savernake Road and site access points, in accordance with Condition 4 of Schedule 3 of the Development Consent.	The design of the upgrades has been prepared in accordance with *Austroads Guide to Road Design* and to the satisfaction of Federation Council. Consent as required by section 138 of the *Roads Act 1993* has been approved by Federation Council and in concurrence with ARTC.
1b	▪ Delivery of equipment and minor site establishment works, including installation of internal roads, removal of paddock fencing and establishment of environmentally sensitive No-Go Zones. ▪ Construction of the northern portion of the solar farm. ▪ Operation of the Mulwala Solar Farm.	▪ During this stage, heavy and Oversize and/or Overmass (**OSOM**) vehicles are expected for the delivery of heavy equipment and machinery needed during construction. ▪ The number of heavy vehicles will comply with Condition 1 of Schedule 3 of the Development Consent and appropriate measures will be implemented in accordance with the Traffic Management Plan and the EMS ▪ Construction works will entail the installation of solar panels and all associated onsite infrastructure. Relevant Management Plans as per Schedule 3 will be submitted for approval of the Secretary prior to commencing construction. These include: ▪ Biodiversity Management Plan – Stage 1b. ▪ Traffic Management Plan – Stage 1b ▪ Landscape Plan – Stage 1b ▪ Stormwater Plan – Stage 1b ▪ Aboriginal Cultural Heritage Management Plan (**ACHMP**) – Stage 1b. The ACHMP has been prepared

		as a best-practise exercise for the development that complies with Condition 20 of Schedule 3 and further introduces additional measures for the appropriate management of Aboriginal cultural heritage values. The ACHMP has been approved by Heritage NSW at the time of writing this letter. ▪ Environmental Management Strategy – Stage 1b All the relevant plans will be prepared in consultation with their relevant agencies and will include all necessary management measures identified during the engagement. The operation of the solar farm at this stage will only be undertaken on the northern plot (lots 5 and 6 of DP134511). The Emergency Plan will be prepared prior to the commissioning as required by Condition 28 of Schedule 3, in consultation with and to the satisfaction of Fire and Rescue NSW and RFS.
2	▪ Construction of the remainder of the solar farm in the southern plot of the land: – Lots 1, 3 & 4 DP 134511 – Lots 103, 114 & 115 DP 752290 – Part of Lot 116 DP 752290 – Part of Lots 2 & 7 DP 134511 ▪ Operation of the combined Mulwala Solar Farm.	This Stage has been deferred at this time due to the uncertainties associated with the capacity of the Mulwala Substation. Should the capacity be enhanced before the end of the operational life of Stage 1b of the project, Stage 2 will be constructed and become operational. At this time this stage will include the approved Battery Energy Storage System (**BESS**) in accordance with the relevant conditions of the Development Consent. In accordance with Condition 3 of Schedule 4, Stage 2-specific Management Plans will be prepared prior to the commencement of construction as required by the relevant conditions. The following Management Plans will be updated and submitted to the satisfaction of the Secretary and in consultation with the relevant agencies if deemed necessary by the Secretary: ▪ Biodiversity Management Plan – Stage 2. ▪ Traffic Management Plan – Stage 2. ▪ Landscape Plan – Stage 2. ▪ Stormwater Plan – Stage 2. ▪ Aboriginal Cultural Heritage Management Plan (**ACHMP**) – Stage 2. The ACHMP will be prepared as a best-practise exercise for the development and will comply with Condition 20 of Schedule 3. ▪ Environmental Management Strategy – Stage 2. And the consolidated operation ▪ Fire Safety Study. All the relevant plans will include all necessary management measures for the construction and operation of Stage 2.

		The Emergency Plan will be updated prior to the commissioning of Stage 2 as per Condition 28 of Schedule 3 and in accordance with Condition 3 of Schedule 4.
3	Decommissioning of the Mulwala Solar Farm.	▪ Removal of all above-ground and underground components of the project in accordance with the Development Consent. ▪ If required, the substation will be dedicated to TransGrid or relevant agency upon agreement.

1.6. SITE ACCESS

During all phases of the project, all vehicular traffic associated with the development will travel to and from the site via Melbourne Road, Tocumwal Road, Savernake Road and Lambruck Lane or Corowa Road/Spring Drive, Tocumwal Road, Savernake Road and Lambruck Lane, and the approved site access points on Lambruck Lane.

Condition 4 of Schedule 3 of the development consent requires that, prior to commencing construction, consent must be obtained from Federation Council as the local road authority under section 138 of the *Roads Act 1993* for road upgrades identified in Table 5. These upgrades must comply with the *Austroads Guide to Road Design* and be carried out to the satisfaction of the relevant road authority. Federation Council approved the application under section 138 on 10 June 2025.

Table 5 Road Upgrades prior to construction

Road	Location	Upgrade requirements
Savernake Road and Lambruck Lane	Intersection of Savernake Road and Lambruck Lane	To a standard that allows two-way heavy vehicle movements, including a bitumen seal
Lambruck Lane	Lambruck Lane between Savernake Road and the Benalla to Oaklands railway	To a standard that allows two-way heavy vehicle movements with a minimum seal of 8 metres at the railway crossing
Lambruck Lane	The approved two site access points on Lambruck Lane	Access driveways to a width of 7 metres with a gravel seal.

1.7. CONSTRUCTION, UPGRADING AND OPERATION HOURS

As per Condition 12 of Schedule 3, construction or upgrading activities on site can only be undertaken between:

- 7 am to 6 pm Monday to Friday.
- 8 am to 1 pm Saturdays.
- At no time on Sundays and NSW public holidays.

The following construction or upgrading activities may be undertaken outside these hours without the approval of the Secretary:

- The delivery of materials as requested by the NSW Police Force or other authorities for safety reasons.
- Emergency work to avoid the loss of life, property and/or material harm to the environment.

1.8. UPDATES TO THIS EMS

Prior to carrying out any upgrading of the Mulwala Solar Farm, the Proponent will update this EMS and any relevant management plans and submitted programs approved under the development consent to the satisfaction of the Secretary. The Proponent will also review and update these documents to the satisfaction of the Secretary within 1 month of the following events:

- Submission of an incident report under condition 4 of Schedule 4;
- Submission of an audit report under condition 6 of Schedule 4; or
- Any modification to the conditions of consent.

Sections 4.4 and 4.5 provide details of auditing and incident reporting, respectively.

1.9. COMMITMENT TO COMPLY WITH EMS

Following the Secretary's approval of this EMS, the Proponent is committed to complying with and implementing the measures set out.

2. LEGISLATIVE REQUIREMENTS

2.1. STATUTORY REQUIREMENTS

Table 6 summarises the statutory requirements underlying for the provisions contained within this EMS.

Table 6 Statutory requirements relevant to this EMS.

Legislation	Details
Environmental Planning and Assessment Act 1979 (EP&A Act)	The EP&A Act is the primary planning legislation in NSW. Consent of SSD 9039 was granted under Part 4 of the EP&A Act.
National Parks and Wildlife Act 1974 (NPW Act)	The NPW Act details procedures on works regarding Aboriginal Heritage findings and stop of works if needed. The Mulwala Solar Farm is to progress in accordance with the Aboriginal Cultural Heritage Management Plan and Chance Finds procedures recovered during any site work.
Biodiversity Conservation Act 2016 (BC Act)	The BC Act sets conservation requirements for the native biodiversity communities and protection levels accordingly. As part of the conditions of consent, a Biodiversity Management Plan has been prepared to avoid environmental harm.
Roads Act 1993	The Roads Act provides a framework detailing provision for road widening, levels and other required works needed for traffic controls. A Traffic Management Plan is required as part of the conditions of consent.
Protection of the Environment Operations Act 1997 (POEO Act)	The POEO Act establishes a regulatory framework for environmental protection and works. The EMS is prepared in accordance with the POEO Act for environmental controls, monitoring, compliance and consultation processes.
Waste Avoidance and Resource Recovery Act 2001 (WARR Act)	The WARR Act ensures that the consumption and disposal of waste follows ecologically sustainable development principles and outlines waste strategies. This EMS is prepared in accordance with the WARR Act.
Water Management Act 2000 (WM Act)	The WM Act establishes the sustainable and integrated management of water resources in NSW. The WM Act underpins the objectives and outcomes of the Stormwater Management Plan for the Mulwala Solar Farm.

The Project requires the following permits and licences:

- Relevant permits under the Heavy Vehicle National Law (NSW and Victoria) for the use of over-dimensional vehicles on the road network.
- *Roads Act 1993*, Section 138, for the upgrades on Savernake Road and Lambruck Lane.

Should any additional environmental or planning approvals, permits or licences be required, the following procedure will be implemented:

- Approval, licence or permit need is identified, the EPC Project Manager will notify the Proponent (if applicable).
- The EPC Project Manager will identify impacts to the Project in relation to the approval.
- The EPC Project Manager will complete the necessary work to apply for the approval, licence or permit.

2.2. STRATEGIC CONTEXT

The strategic planning framework for the project is underpinned by the *Federation Council Local Strategic Planning Statement 2020-2040* and the *Murray-Riverina Regional Plan 2041*. Key objectives and strategic directions from these documents that are relevant to the scope of this EMS are summarised below.

- **Federation Council Local Strategic Planning Statement (FCLSPS):**

  The following planning priorities of the FCLSPS are relevant to the Project:

  Priority 4: ***"A Strong Economy"***

  The FCLSPS aims to ensure suitable opportunities are made available for different industries and facilitate the diversification of the economy. This EMS will facilitate the orderly economic use of land consistent with the FCLSPS, including measures regarding the traffic of goods to ensure the different surrounding businesses are able to operate effectively and without conflicts.

  Priority 7: ***"Resilience and Natural Hazards"***

  Changing weather patterns and enabling community resilience is the main focus of Planning Priority 7. This EMS will facilitate the orderly development of the Mulwala Solar Farm with appropriate management measures with consideration of the environmental values of the land. By facilitating the decentralization of the electricity grid, the Project and this EMS will enhance the community resilience of the Federation Council.

- **Riverina Murray Regional Plan 2041 (RMRP):**

  The RMRP focuses on environmental preservation as the region is considered 'Australia's food bowl' but also considers the growing and diverse community and the economic prosperity of the region. The following objectives from the RMRP are noted in this regard:

  Objective 11: ***"Plan for integrated and resilient utility infrastructure"***

  This EMS will support development outcomes that provide resilient utility infrastructure through grid decentralisation, which will make power outages more preventable.

  Objective 13: ***"Support the transition to net-zero by 2050"***

  This EMS will support the delivery of the Mulwala Solar Farm, with a direct positive impact towards the State's Net Zero objectives.

3. PROJECT ROLES AND CONTACTS

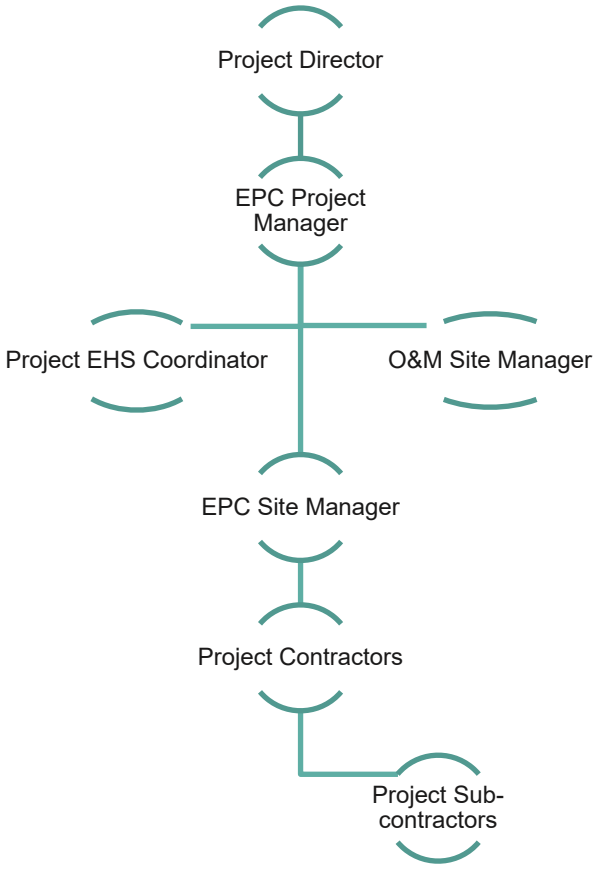
The following section outlines the likely project roles and key accountabilities during the lifecycle of the Project. The Project Team assigned to the project construction and operation by EE would also be responsible and accountable for the following actions:

- Engage suitably qualified personnel to manage each phase of the development.
- Maintain webpage and communication channels, including email and postal address.
- Notify Council and DPHI of commencement and finalisation of construction.
- Notify Council and DPHI, and any other relevant agency, of an incident or non-compliance.
- Undertake all necessary monitoring requirements.
- Review internal environmental audit report and ensure performance is maintained.
- Where necessary, revise this EMS and other management plans and submit amendments (as required) for approval to the relevant authority

3.1. MANAGEMENT STRUCTURE AND RESPONSIBILITY

Figure 3 outlines the structure of responsibility of key positions in relation to the environmental management of the Mulwala Solar Farm. The responsibilities of each position are outlined below.

Figure 3 Structure of Environmental Responsibility



3.2. CONSTRUCTION

3.2.1. Project Director

The Project Director has overall responsibility and accountability for environmental performance of the Project. The Projector Director is responsible for ensuring consistency with the relevant legislative standards, including the applicable Australian Standards, along with contractual obligations. The Project Director is also responsible to procure appropriate resources to ensure the effective implementation of this EMS.

3.2.2. EPC Project Manager

Reporting to the Project Director, the EPC Project Manager is accountable for the construction project team and contractors with respect to environmental performance on site and undertaking the following actions:

- Maintain a working knowledge of the management system and environmental management plans and monitor compliance with the requirements of this EMS.
- Coordinate incident response, including ensuring incident investigation is undertaken and corrective actions carried out.
- Ensure relevant training and qualifications are completed by personnel and maintain induction records.
- Ensure that communication and reporting systems are established and maintained for the implementation of this EMS.
- Ensure that complaints are received, registered, and responded to in a proper manner as per the Community Notification Strategy.
- Participate in environmental auditing and implement recommendations and corrective actions.

3.2.3. Project EHS Coordinator

The Project Environmental Health and Safety (**EHS**) Coordinator reports to the EPC Project Manager. The Project EHS Coordinator performs a key role in the implementation, maintenance, and monitoring of compliance to this EMS, and managing activities for the health and safety of the employees on site during the project lifecycle. Their main responsibilities are:

- Maintain a working knowledge of the environmental management system, environmental management plans, and be aware of all environmental legislative requirements.
- Maintain working knowledge of environmental risks and impacts of the development and measures required to be put in place.
- Undertake a HSE Risk Assessment for the development.
- Carry out site inspections and maintain monitoring of environmental performance.
- Develop a Corrective Action Register.
- Maintain records of compliance with the development consent and management plans.
- Maintain Complaints Register and respond to complaints or nominate a delegate to respond.
- Investigate incidents and identify preventative actions.
- Prepare incident report and implement corrective actions.
- Review contractors' environmental management plans as required.
- Review contractors' incident report.
- Participate in Independent Environmental Audits and implement recommendations.

- Liaise with DPHI as necessary and provide subsequent incident reporting depending on the severity of the incident.

3.2.4. EPC Site Manager

The EPC Site Manager reporting to the EPC Project Manager has direct day to day responsibility for managing the activities of contractors under their control and for monitoring and ensuring compliance by contractors with the relevant environmental guidelines established for the Project. These responsibilities include:

- Ensuring contractors submit EMSs appropriately covering the regulations and environmental aspects, impacts and control strategies associated with their particular scope of work.
- Ensuring contractors develop and implement environmental surveillance and audit programs under this monitor compliance with this EMS and relevant legislation.
- Ensuring that all Contractor personnel under their control are aware of their responsibilities for employee induction and awareness training including their environmental responsibilities, environmental concerns and the control measures applying to their scope of work.
- Conducting routine monitoring of environmental performance and compliance with the Project and contractors EMSs and, when requested, assist the Project EHS Coordinator to conduct scheduled environmental audits.
- Ensuring any required corrective or preventative actions are implemented and completed as required.
- Ensuring that the weekly and monthly EMS reports and checklists from each Contractor are completed to schedule and reviewed for accuracy prior to signing off and forwarding to the Project EHS Advisor.
- Ensuring that all environmental incidents, issues, or concerns are reported immediately to the Project EHS Advisor and that appropriate and timely action is taken.
- Ensuring that all documentation required by this EMS is complete and timely.
- Ensuing that all environmental complaints are handled in a prompt and courteous manner and in accordance with the procedures of this EMS.

3.2.5. Project Contractors

All site contractors and their subcontractors are to fulfil their environmental responsibilities for the Project in particular:

- The submission of an EMS for their work which complies with federal, state, and local authority regulations, and the contents of this Project EMS.
- Nomination of an environmental representative for their work area prior to commencing on-site and maintaining regular direct communication with the EHS Coordinator.
- The preparation and implementation of specific environmental control plans as deemed necessary by the EPC Site Manager or his nominee to correct identified deficiencies or to enhance overall environmental performance and compliance of the Project.
- Taking all necessary precautions and actions for activities conducted on the Project with the potential to cause environmental harm.
- Complying with this EMS and relevant regulations including the implementation of the proposed environmental monitoring programs.
- Providing environmental awareness training including induction training for all new employees detailing each person’s individual environmental responsibilities, key aspects of the Project EMS and matters specific to their individual work scope on the Project.
- The immediate verbal reporting to the responsible EPC Site Manager – or in their absence, the Project EHS Coordinator, of all environmental incidents, non-conformances, or concerns.
- The timely implementation of corrective actions or remediation strategies to control or ameliorate the extent of any environmental harm.

- The submission of environmental incident reports and weekly /monthly inspection and compliance reports to the EPC Site Manager – or in their absence, the Project EHS Coordinator, in a timely manner to assist in the compilation of the weekly /monthly EHS reports.
- Ensuring that all environmental complaints are handled in a prompt and courteous manner and in compliance with the guidelines contained in this EMS.

3.3. OPERATION

Due to the passive nature of the operation of a solar farm, significantly less environmentally sensitive activities are expected to arise, the operational phase of the Project will be subject to the requirements of this EMS, and all operational personnel will be responsible for undertaking all the activities in accordance with it. The EMS will be updated prior to commencement of operations and the below discussion is provided for context.

3.3.1. O&M Site Manager

Primary responsibilities of the Site Manager will be to:

- Ensure this EMS and other management plans are implemented to satisfy their monitoring requirements.
- Review and update the EMS and other management plans as required.
- Carry out site inspections and environmental monitoring.
- Maintain complaints register and respond to complaints.
- Manage incident response.
- Investigate incidents and identify preventative actions.
- Notify EE of incidents and non-compliances.
- Participate in Independent Environmental Audit and implement recommendations.
- Responsible for overseeing HSE management of the operation activities.

3.3.2. O&M Contractors

The primary focus of the site Contractors will be:

- Operating in compliance with the EMS and other management plans and the Project Consent.
- Notifying the O&M Site Manager of any non-compliance and incidents.

3.4. ENVIRONMENTAL AWARENESS TRAINING

Project Contractors shall be responsible for ensuring that all Project personnel under their control receive both initial and ongoing environmental awareness training to ensure they are familiar with their environmental responsibilities under the Project EMS.

Project induction will provide all new site employees with an overview of the Project EMS and all key aspects prior to allowing access to the worksite. In addition, each individual contractor shall be required to provide all new employees with environmental induction training which addresses their own EMS and which at a minimum detail:

- Individual responsibilities under the plan.
- Risk management strategies for assessing potential environmental impacts and for developing appropriate management or control strategies for any activity perceived to pose an environmental risk.
- Key environmental concerns and associated control strategies.
- How hazardous or dangerous goods will be handled.
- Waste minimisation, recycling, and disposal guidelines.

- Incident and emergency response actions including reporting and recording guidelines.
- Complaint handling procedures.
- Cultural awareness training.

The Cultural Heritage Induction Training program will be provided to the EPC Project Manager for adequacy review prior to inductions taking place.

Project contractors and the EHS Coordinator and environmental representative shall conduct ongoing environmental awareness training for key issues throughout the Project using targeted presentations at daily job pre-starts, toolbox meetings etc, and the use of targeted literature.

Project contractors shall maintain a register of all environmental training provided which records the nature of the training, dates, the names of persons trained, and trainer details as well as any refresher training that may be required.

3.5. EMERGENCY CONTACTS AND RESPONSE

Table 7 identifies the key personnel contact details for emergency responses in relation to environmental, health and safety management of the Mulwala Solar Farm.

Table 7 Environmental Responsibility Contacts

Role	Contact	Address	Telephone
Project Director	*Yannis Vasilopoulos*	*1 Nicholson St, East Melbourne*	*+61 432 272 578*
EPC Project Manager	*TBA*	*TBA*	*TBA*
EHS Coordinator	*TBA*	*TBA*	*TBA*
EPC Site Manager	*TBA*	*TBA*	*TBA*
O&M Site Manager	*TBA*	*TBA*	*TBA*

Table 7 is to be populated by the Proponent following contract award and project resourcing prior to construction commencing on the Mulwala Solar Farm site and notification will be issued to DPHI and all relevant parties.

Throughout the Project, the following preventive measures will be enforced onsite:

- Daily evaluations of active work areas.
- Weekly completion of the Environmental Inspection Checklist.
- Issuance and swift resolution of non-compliance notices.
- Timely maintenance and repairs.
- Compliance with RFS emergency works and other fire activity restrictions.
- Environmental training sessions and emergency drills.
- Uninterrupted access for emergency services vehicles across the development footprint.
- Environmental audits of worksites, subcontractors, and general compliance.

Spill kits will be available, stocked, and maintained at the main site office. Liquid substances will be stored in designated areas in accordance with relevant Australian Standards. Spill kits and other emergency supplies (e.g., silt fences, pumps) will also be located at site compounds, machinery park-up areas, and on refuelling vehicles.

Personnel involved in emergency response activities will receive specific training. As a minimum for environmental response, all light vehicles and light trucks/heavy vehicles shall carry a vehicle spill kit to provide immediate response to an incident. Hydrocarbon spills are identified as the most probable type of occurrence on the works.

Consultation with emergency services and NSW Police will occur as required throughout construction and operation to ensure any potential impacts to emergency services are identified and appropriately managed. An up-to-date list of emergency response personnel and relevant organisations (emergency services, EPA, etc.) will be maintained at the main office and site compounds.

All staff will be trained on emergency response procedures during the site induction and throughout the Project via ongoing safety training and toolboxes. A designated 4X4 vehicle of the EPC Site Manager will be allocated for site emergencies at all times during the entire Stage 1b.

3.6. ACCESS TO INFORMATION

Pursuant Condition 8 of Schedule 4, EE will make publicly available the following information on its website:

- The EIS.
- The final layout plans for the development.
- Current statutory approvals for the development.
- Approved strategies, plans or programs required under the conditions of the consent.
- The proposed staging plans for the development.
- How complaints about the development can be made.
- A complaints register.
- Compliance reports.
- Any independent environmental audit, and the Applicant’s response to the recommendations in any audit.
- Any other matter required by the Secretary.

EE will keep this information updated and relevant to the latest available information.

4. CONSULTATION AND MONITORING

4.1. COMMUNITY CONSULTATION, NOTIFICATION STRATEGY AND RESPONDING TO COMPLAINTS

Keeping the local community and relevant agencies informed about the operation and environmental performance of the Project is required by Condition 1 of Schedule 4 of the development consent. Maintaining channels of communication with the community and local agencies will assist in maintaining necessary mitigation and management measures during construction and operational phases.

The Proponent will keep direct neighbours, stakeholders and the community informed of the pre-construction, construction, and operational phases by:

- Actively engaging as necessary with the community to provide updates about the Project, its impacts, and the construction process. This may include notifications in relevant local communication channels about the nature of upcoming works, traffic disruptions and irregular work practices, if any.
- Establishing a webpage and communications channel enabling the community to seek clarification about the Project through two-way communication channels or for the community to provide feedback on any environmental concerns raised regarding construction or operational phases. It would also include links to consent documents, relevant authorities involved, publicly available reports and plans, contact detail of communications staff and work updates and schedules.
- All received complaints will be recorded to analyse possible non-compliance and will be responded to, as soon as possible, with mitigation actions to address any possible environmental and/or community impact. During construction, the project EHS Coordinator will report all complaints to the EPC Project Manager, who is responsible for reporting complaints to EE and/or elevating them, if necessary, to the relevant authority according to the relevant conditions of consent. During operation, the O&M Site Manager will be responsible for reporting complaints.
- Only the EPC Project Manager, O&M Site Manager and Project Director will be authorised to respond to the media in any form. Contacts for media enquiries will be displayed on the webpage and all media enquiries will be notified to EE to manage media communication channels.

4.2. HANDLING OF COMPLAINTS AND GRIEVANCE MECHANISM

In line with EE's stakeholder engagement policy, EE will establish a local grievance mechanism to manage community and stakeholder issues and/or complaints related to project activities.

The grievance mechanism allows for stakeholders to either anonymously or directly raise issues and/or grievances with respect to EE and Contractor activities. It also focuses on appropriate, efficient and prompt responses to community feedback to ensure European Energy:

- Provides an accessible, transparent, and confidential process for addressing grievances from project impacts.
- Builds trust and foster a positive relationship with neighbours and the community.
- Ensures grievances are resolved in a prompt, fair, and constructive manner.

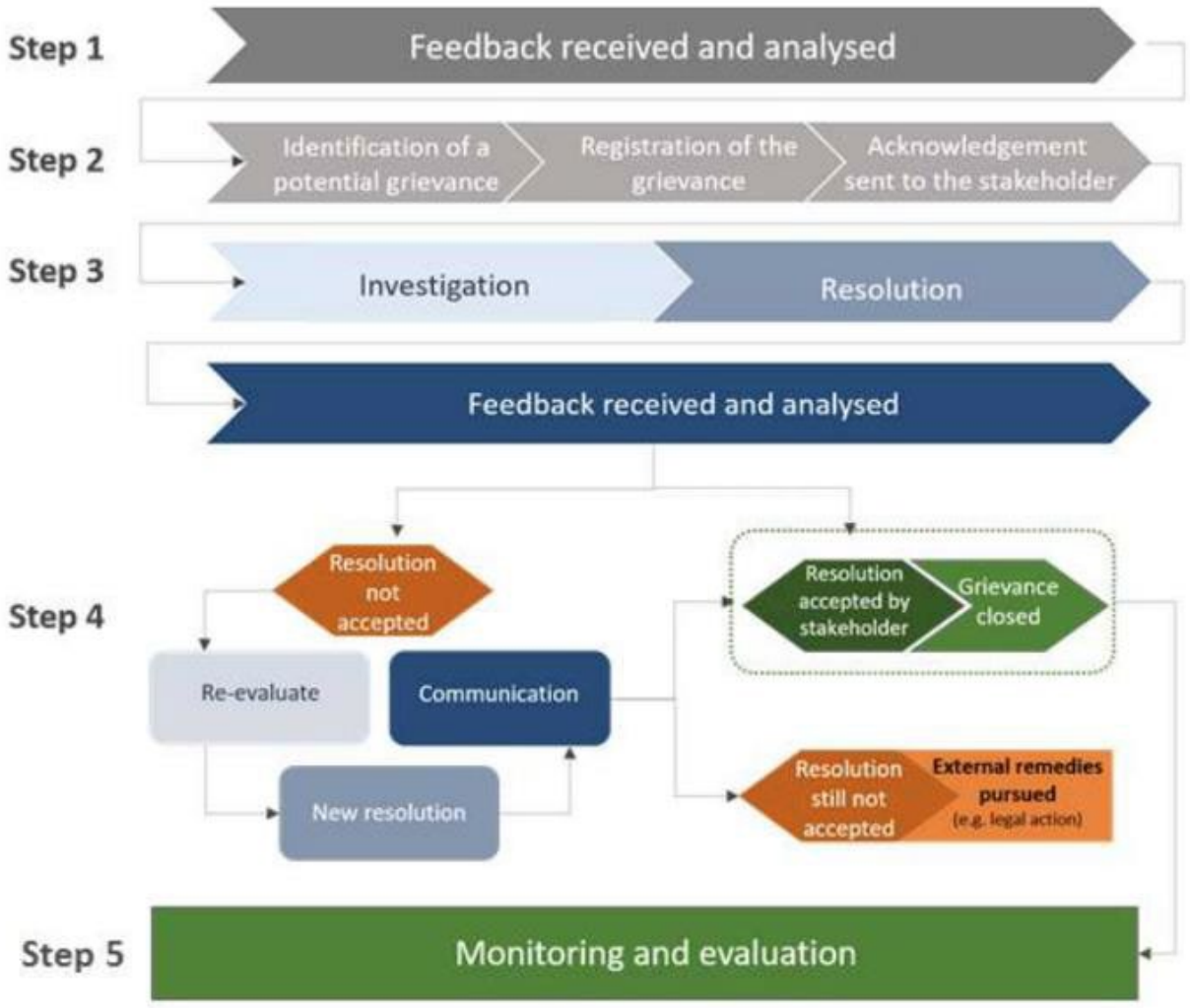
The mechanism will be widely promoted through the website and newsletter. Any person, group, or organisation affected by EE or its contractors on the project may submit a complaint, concern or grievance.

Complaint, concerns or grievances may be submitted:

- **In person**: Visit the designated Project office.
- **Online**: Submit a grievance via the European Energy Australia Complaints website
- **Email:** infoaus@europeanenergy.com
- **Phone**: Community Liaison Officer, 0450 607 350.
- **Written submissions**: Drop to site, or post to Level 17, 1 Nicholson Street East Melbourne Vic 3002.

A general framework of the grievance mechanism is shown in Figure 4:

Figure 4 Grievance Mechanism



The timeline for the resolution of each step would vary depending on the complexity of the issue raised, As a general rule:

- A designated Community Liaison Officer (**CLO**) will be appointed and will determine the nature and complexity of the complaint and send an acknowledgement of receipt within five business days.
- If the issue is determined to be minor, a designated team will investigate the grievance within 10 business days. If the investigation cannot be finalised in time or the complexity is major in nature, a 30 business days extension will be notified to undertake more research on the matter.
- Based on the investigation findings, European Energy will propose and discuss a resolution with the complainant.

Upon finalisation of the investigation:

- A written response will be provided to the complainant detailing:
  - The investigation process
  - Findings and decisions

  - Actions to be taken (if any)
  - Appeal options if the complainant is dissatisfied
- Agreed resolutions will be implemented promptly and monitored for effectiveness
- If the complainant rejects the resolution, a further re-evaluation by senior management and European Energy will be conducted, and further round of discussion and evaluation taken with complainant before a new resolution proposed.
- If the second proposed resolution is not accepted, the complainant may:
  - Pursue external mediation or arbitration
  - Make a complaint to the Australian Energy Infrastructure Commissioner.

A grievance will be considered closed internally when either a complainant accepts a proposed resolution or chooses to seek external complaint mechanisms.

The CLO will ensure the grievance resolution is implemented by the responsible function and seek feedback on satisfaction from the complainant. The CLO will record implementation as complete and the feedback from the complainant in the Grievance Log.

4.3. MONITORING

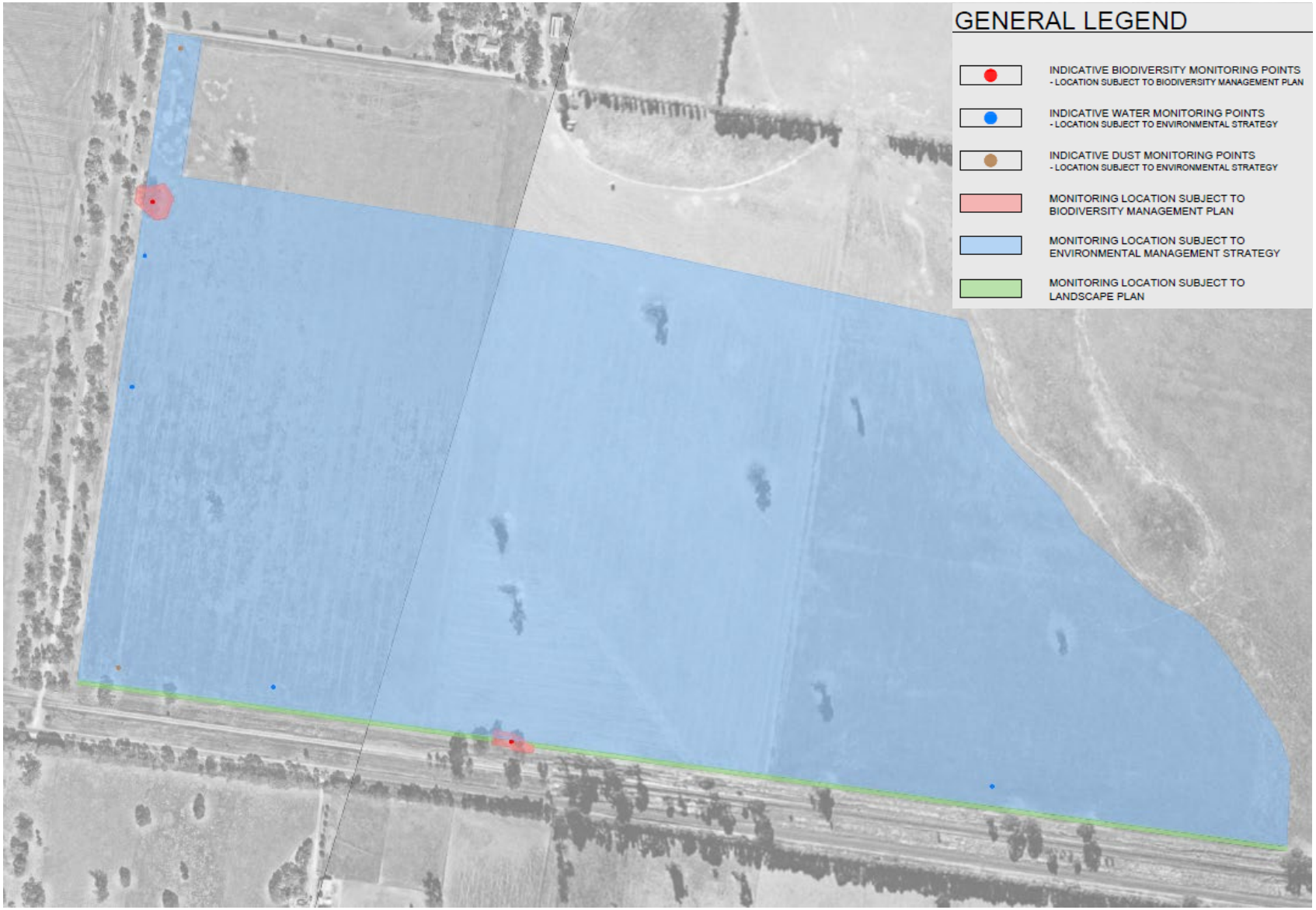
A system of daily walkthrough inspections formulated for the Project will be undertaken by the responsible person from each contractor. The EPC Project Manager would also participate routinely in walkthrough inspections, at least weekly, during construction. During operation, inspections will be undertaken by the O&M Manager daily when visitors and/or maintenance personnel are onsite. This shall ensure inspections of all construction activities and work areas are conducted to monitor compliance with this EMS regarding operations, emergency, and risk management.

Environmental monitoring requirements are to be established prior to and will be implemented over the work areas for Stage 1b and will include:

- Accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day.
- Weed monitoring protocol.
- Fauna and Flora monitoring requirements in the Management Zone 1 as outlined in the BMP to comply with Condition 11.
- Dust generation monitoring to comply with Condition 14.
- Water quality monitoring to comply with Conditions 22.
- Any other matters identified in this EMS.

A summary of the monitoring locations is presented below in Figure 5:

Figure 5 General Monitoring Plan



Source: Urbis, 2025

4.4. AUDITING

Pursuant to Condition 7 of Schedule 4, an Independent Environmental Audit will be conducted by an appointed independent contractor within six months of commencing construction, which will assess whether the requirements of the consent and appropriate management measures have been met.

Within three months of commencing the independent environmental audit, a copy of the report will be submitted to the Secretary and any other NSW Government agency to provide further recommendations and an appropriate timeline for implementation.

The audit will:

- Be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary. A team of suitably qualified auditors have already been appointed at the time of writing this EMS.
- Assess whether the development complies with the relevant requirements in the development consent and this EMS, and any strategy, plan or program required under this EMS.
- Recommend appropriate measures or actions to improve the environmental performance of the Project and any strategy, plan or program required under the development consent and this EMS as required.

The recommendations of the Independent Environmental Audit will be implemented to the written satisfaction of the Secretary.

4.5. INCIDENT REPORTING

All employees are required to report environmental incidents. The Proponent is to be informed of any environmental incidents or non-compliances immediately through verbal communication and within 24 hours in writing. A computerised database will be used for the reporting and recording of these incidents. All employees have access to the system either directly or through their supervisor. The report will cover what happened during the incident, what was done immediately to rectify or control the situation, and corrective actions to be undertaken to prevent the recurrence of the incident. Incident reports will detail lessons learned and propose measures to prevent similar occurrences in the future. Immediate actions will be taken to mitigate and reduce the impacts of incidents, with appropriate controls implemented. Efforts will be made to resolve and close out incidents as swiftly as possible, ensuring all necessary actions are taken.

All environmental incidents will be investigated to determine the cause and the actions to be taken. Investigations will be undertaken as per the procedure, and environmental incidents and corrective actions are to be reviewed at team meetings.

Throughout the lifecycle of the project, the EPC Project Manager is responsible for reporting any incident that causes or threatens to cause direct environmental harm or through the cumulative impacts and its interaction with previously existing conditions to the local authorities or the DPHI.

Any recorded non-compliance will be promptly investigated by the EPC Site Manager, EHS Coordinator and/or O&M Site Manager, who will design and implement suitable mitigation measures and urgent corrective actions.

The EPC Project Manager is required to consult with the Project Director before notifying any agencies (such as the EPA) about any incidents or non-compliances on site. Within seven days of the incident, the EPC Project Manager must provide a detailed report to the Proponent and any relevant agencies, along with any additional reports that may be requested.

If an incident or non-compliance involves an Aboriginal site, Heritage NSW and Registered Aboriginal Parties will be notified, and their input will be sought to resolve the issue.

4.6. NOTIFICATION TO THE DEPARTMENT

DPHI will be notified in writing through the Major Projects website as soon as the Proponent becomes aware of an incident, as required by Condition 4 of Schedule 4 of the development consent.

The notification will include the development details, specify the condition of consent that has been breached, describe the nature and reasons for the incident, and provide the exact location within the site of the incident. Additionally, the notification will outline the actions that have been taken or will be taken to

address the incident. In accordance with Condition 5 of Schedule 4 of the development consent, DPHI will be notified via the Major Projects website portal within seven days of the Proponent becoming aware of any non-compliance with the conditions of the development consent.

The notification will include the development details, specify the condition of consent that has been breached, describe the nature and reasons for the non-compliance, and provide the exact location within the site (if applicable). Additionally, the notification will outline the actions that have been taken or will be taken to address the non-compliance and any corrective measures to prevent similar non-compliance issues.

4.7. COMPLIANCE REPORTING

Pursuant Condition 6 of Schedule 4 and in accordance with the *DPE Compliance Reporting Requirements 2018* EE will prepare the following compliance reporting for Stage 1b:

Compliance Report	Phase	Timing	Minimum Frequency
Pre-Construction Compliance Report	Pre-construction	Report to be submitted to the Planning Secretary prior to commencement of construction	Single report only
Construction Compliance Report	Construction	Reporting required for the duration of construction	At intervals, no greater than 26 weeks from the date of commencement of construction
Pre-Operation Compliance Report	Pre-Operation	Report to be submitted to the Planning Secretary prior to commencement of operation	Single report only
Operation Compliance Report	Operation	Reporting required for the duration of operation	At intervals, no greater than 52 weeks from the date of commencement of operation

The compliance reporting is to be prepared by the Project Director or its delegate, will adhere to the *DPE Compliance Reporting Requirements 2018*, and will address the matters required by the development consent. Reporting will address, at a minimum, the following matters:

- Identify the standards, performance measures and evidence that apply to the Project as identified by the requirements in all conditions of consent during each phase.
- Describe the works carried out in the last phase, if applicable.
- Describe the works that will be carried out in the next phase.
- Include a summary of the complaints received.
- Identify any incidents and non-compliance.
- Include a summary of the monitoring results for the Project during the past phase.
- Include an analysis of these monitoring results against the relevant:
  - Impact assessment criteria/limits.
  - Monitoring results from previous phases.

- Identify any trends in the monitoring results over the life of the project.
- Describe what actions were or are being, taken to ensure compliance.

Each Compliance Report submitted to the Department must be accompanied by a declaration by an Authorised Reporting Officer. The Authorised Reporting Officer must complete a Compliance Report Declaration Form and append the Form to the Compliance Report. An electronic copy of the Compliance Report must be emailed to the Department compliance@planning.nsw.gov.au by the Proponent.

If a Compliance Report does not adequately address the requirements of the conditions of consent or provide sufficient information in relation to the requirements of this document, the Proponent will be required to revise and resubmit the Compliance Report. Non-compliances will be reviewed, and the Department will respond to identified non-compliances in accordance with powers under the *EP&A Act* and processes outlined in the *Department's Compliance Policy*.

5. ENVIRONMENTAL STRATEGY

This EMS outlines the system for managing and controlling environmental aspects throughout all Project phases. It identifies applicable requirements for activities described in Section 1 and provides the framework, system, and procedures to minimise potential environmental impacts and ensure compliance with legislative requirements.

Developed with consideration of environmental assessment documents and relevant licences, permits, and the SSD development consent, this EMS establishes the system for implementation, monitoring, and continuous improvement to minimise the Project's environmental impacts. Associated documents prepared in accordance with this EMS include:

- Biodiversity Management Plan (**BMP**)
- Landscape Plan (**LP**)
- Aboriginal Cultural Heritage Management Plan (**ACHMP**)
- Traffic Management Plan (**TMP**)
- Stormwater Management Plan (**SWMP**)

5.1. RISK ASSESSMENT

Potential environmental risks associated with the Project were identified during the environmental impact assessment phase completed by technical experts including consultation with relevant government agencies. The risks identified for each Environmental Indicator were assessed and mitigation measures proposed and recommended for the project's lifecycle. Summaries of these mitigation measures are included in each of the Environmental Management sub-Plans to be applied to the Project where relevant.

Unforeseen risks associated with unplanned activities during the Project life cycle will be identified as per EE's EHS Management Plan and appropriate controls will be implemented prior to the commencement of the activity.

5.2. ENVIRONMENTAL MANAGEMENT PLANS

5.2.1. Aboriginal Cultural Heritage

Under Condition 20 of Schedule 3 of the Development Consent, the Applicant '*must prepare a Chance Finds Protocol for the development in consultation with the Aboriginal stakeholders, and to the satisfaction of OEH*'.

An Aboriginal Cultural Heritage Management Plan (**ACHMP**) has been prepared by Urbis in order to appropriately manage and protect known and potential Aboriginal cultural heritage on the site. The ACHMP has been prepared in consultation with the Registered Aboriginal Parties (**RAPs**) and to the satisfaction of Heritage NSW.

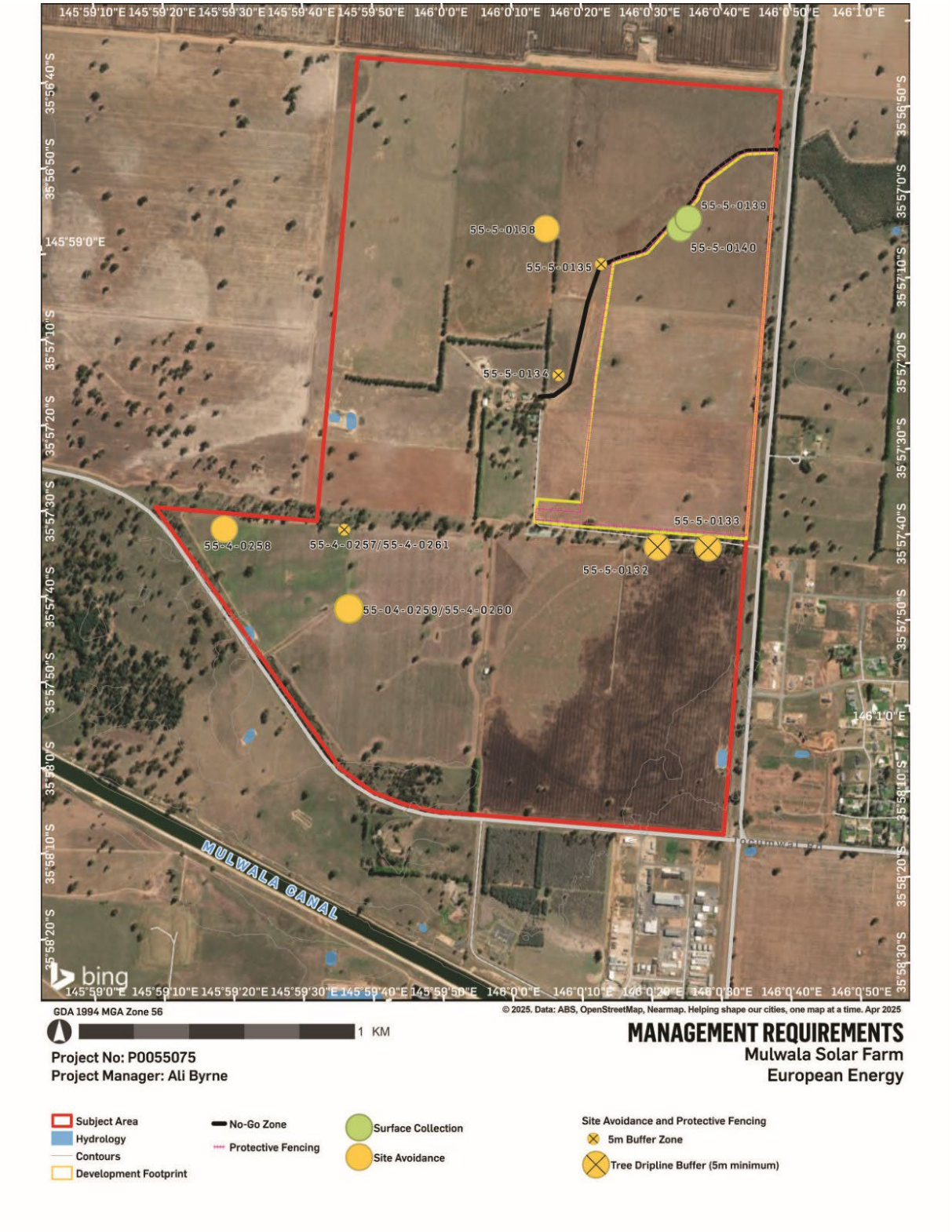
Management Strategies and Controls

The following control measures are proposed to avoid and manage any Aboriginal cultural heritage impacts:

- Establish no-go zones around avoided known aboriginal cultural heritage items.
- Avoid 55-4-0258, 55-4-0261/55-4-0257, 55-5-0134 and 55-5-0135 (Figure 4).
- Install temporary fencing around 55-4-0261/55-4-0257, 55-5-0134 and 55-5-0135, due to proximity to impact area.
- Avoid and install fencing around 55-5-0132 and 55-5-0133. Avoid 55-5-0138
- Surface salvage of 55-5-0140 and 55-5-0139, and completion/submission of Aboriginal Site Impact Recording Form.
- Toolbox talk or induction for all onsite personnel, staff and contractors.

All salvage works are to be undertaken in accordance with the ACHMP and in consultation with the RAPs. Representatives of the RAPs will be part of the archaeology team in charge of the collection.

Figure 6 Location and management measures of known aboriginal artifacts – Mulwala Solar Farm, Stage 1b delineated in yellow.



Source: Urbis, 2025

The ACHMP includes the Unexpected Finds Protocols for archaeology remains, as well as human remains, in accordance with the latest guidelines.

Unexpected finds may include:

- Aboriginal objects
- Remains of historical structures or land use

If any archaeological deposits or features are unexpectedly discovered during any site works, the following steps must be carried out:

  – All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment. The find must be cordoned-off and signage installed to avoid accidental impact.

  – The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.

  – The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and notification of the discovery of an Aboriginal object to Heritage NSW in accordance with the *National Parks and Wildlife Act 1974.*

  – Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.

  – Reporting may need to be prepared regarding the find and approved management strategies.

  – Works in the vicinity of the find would only recommence upon receipt of approval from Heritage NSW.

Should clearly identifiable human remains be uncovered anywhere within the subject site, the following procedure should be implemented:

  – All works within the vicinity of the find must immediately stop. The find must be cordoned-off and signage installed to avoid accidental impact.

  – The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).

  – The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.

  – Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.

  – Works are not to recommence until the find has been appropriately managed.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

Monitoring and Compliance

To ensure compliance by all onsite staff and contractors, and all actions required by this ACHMP are adequately implemented, the Site Supervisor or other relevant on-site staff member in charge of managing environmental safety will coordinate with all relevant contacts in order to ensure that inductions outlining the responsibilities of individuals and companies with regard to the management and protection of Aboriginal objects.

This will include noting no-go areas and environmental management zones in which Aboriginal objects are located, which must be avoided, as well as reporting procedures for unexpected finds.

Periodic inspection of the sites that are to be avoided by the project should be completed as follows:

- Prior to construction
- Fortnightly during construction for sites within 50m of works
- Post-construction

- Every five years during operation
- At any time when an incident or near miss occurs in proximity to a site, which has the potential to impact the integrity of the site
- Upon decommissioning.

A record of these inspections must be kept and any breaches will be reported to the Environment Line 131 555.

5.2.2. Air Quality

As per Condition 14 of Schedule 3, the development consent requires the Proponent to '*minimise the dust generated by the development'*. The following mitigation strategies are proposed to reduce and control dust generation from construction activities and vehicle movements, which may impact workers' health and safety, as well as nearby residents across Savernake Road if unmitigated.

Management Strategies and Controls

To minimise impacts and potential emissions from vehicles, equipment or dust generation from work, the following mitigation measures are proposed:

- All equipment is to comply with the POEO (Clean Air) Regulation Standards of Concentration.
- All machinery is to be maintained and be in good working order.
- Vehicles and equipment are to be inspected prior to use daily.
- Heavy Vehicles are to be limited to 20km/h in any unsealed areas.
- Unsealed roads are to be gravelled as soon as practicable.
- Truck loads are to be covered upon entering and exiting the site.
- Water tankers are to be used to control dust during intensive operations.
- Rehabilitation and stabilisation through vegetation of surfaces left unsealed after the completion of works.
- Truck wheel washes or other dust removal measures will be undertaken after intensive site preparation works.
- Stockpiles to be covered or grass-seeded if left unused for an extended period.

Monitoring and Compliance

Monitoring would be undertaken by visual observations where construction activities could generate fugitive dust emissions such as stockpiles, unsealed roads and any excavation and filling activities. The requirement for dust monitoring may be reviewed if complaints are received. If complaints are received and non-compliance has been assessed to happened by the EHS Coordinator, the following corrective actions are to be undertaken:

- Undertake site investigation to determine the cause of the problem.
- Modify activities/processes as assessed by the EPC Project Manager or EHS Coordinator.
- Increase the use of active dust control measures, such as watering in areas where non-compliance was recorded.
- Intensify monitoring as needed.

5.2.3. Biodiversity

Condition 11 of Schedule 3 of the development consent, requires the Proponent to '… *prepare a Biodiversity Management Plan for the development in consultation with OEH, and to the satisfaction of the Secretary'*, prior to commencing construction.

A Biodiversity Management Plan (**BMP**) has been prepared by AEP in order to appropriately manage and protect retained biodiversity values on the site. The BMP has been prepared in consultation with the Conservation Programs, Heritage and Regulation Group (**CPHR**), of the NSW Department of Climate Change, Energy, the Environment and Water (**NSW DCCEEW**).

Areas to be managed under the BMP include areas of remnant vegetation and fauna habitat (Figure 6). The 200sqm area of temporary disturbance (temporary laydown area) does not contain any native vegetation and will not be considered under this BMP. Regeneration and management will be undertaken over a period of three years. Regeneration of the BMP lands will be undertaken by utilising where possible the principles of the *Society for Ecological Restoration Australasia* (2021) *National standards for the practice of ecological restoration in Australia Edition 2.2*. Weed management of the BMP Lands will be undertaken to ensure compliance with the *Biosecurity Act 2015*.

The BMP Lands has one type of Management Zone (**MZ**) Management Zone 1 (MZ1) – Natural Regeneration Approach according to vegetation conditions and specific actions necessary to achieve the objectives of the BMP as per the conditions of consent.

This approach is applied where damage to the landscape is relatively low, and pre-existing biota will be able to recover after the cessation of degrading practices. The Natural Regeneration Approach requires limited to no interventions, with weeding being the only task undertaken by the Landscaping Contractor to encourage continual natural regeneration.

Figure 7 BMP Lands

Source: AEP, 2025

Management Strategies and Controls

- Primary weeding.
- Maintenance weeding. Maintenance will decrease and frequency may change overtime based on weed cover and monitoring.
- Fencing.

It is proposed that staged weeding works in MZ1 are undertaken to allow for the natural regeneration of the remnant vegetation and prevent the re-establishment of invasive species. To avoid unintended damage to regenerating native vegetation and water quality from off-target herbicide spray, weed removal techniques will be restricted to manual removal of weeds where possible.

Work should commence along the interface with MZ1 (i.e. areas with better condition vegetation) and continue in the direction of the development site. Any unintentional weed transfer as a result of bush regeneration works would therefore occur in the direction of poorer condition habitats.

To avoid unintended damage to native vegetation from off-target herbicide spray and a reduction in water quality, weed removal techniques will be restricted to manual removal where possible.

Scattered clumps of exotic grasses are to be deseeded and the clump crowned using a gyprock saw (or similar tool). All material will be bagged and disposed of offsite. In addition, care will be taken not to introduce weeds into this zone via the transport of seeds on clothing, boots and equipment. As such, cleaning protocols should be instated and conducted prior to entering this zone as detailed in the BMP.

Monitoring and Compliance

Upon completion of site preparation, a report outlining compliance with the site preparation works and weed control as outlined in the BMP will be provided to the Consent Authority.

To ensure the biodiversity targets as outlined in the BMP are fulfilled, baseline monitoring and data collection are to commence prior to site preparation with the Project Ecologist and Landscaping Contractor. The final location of the monitoring points is to be determined during the inspection with the Project Ecologist and Landscaping Contractor to capture the diversity of conditions present at commencement.

Each monitoring point will consist of a 10m x 10m quadrat marked with two (2) 1.8m star pickets located at the northeast and southwest corners. The location of the northeast corner should also be marked with a GPS waypoint to facilitate identification in the field and will be used as a photo monitoring point.

During the operational phase of the project, monitoring will occur at the commencement of and for the duration of the BMP on an annual basis. The Project Ecologist and Landscaping Contractor will be responsible for the establishment of monitoring points within the BMP Lands, along with the collection of baseline data. Monitoring will inform the evaluation of management effectiveness and allow for adaptive management until the Regeneration Targets are met.

Annual reports are to detail the progress of the works and any recommended additional actions, with a final report certifying completion of the BMP at the end of the implementation period, or once the specific objectives of the plan have been met. The Landscaping Contractor will provide a monthly summary of works undertaken which will be reviewed by the Project Ecologist and added to the annual report.

Each fauna rescue event is to be recorded and is to be included in the final clearing report to be provided to DPHI within one month of the clearing completion to confirm compliance of the clearing works with the EMS. Information to be included includes:

- Date and time fauna was located.
- Location on Site (habitat and GPS coordinates).
- Fauna type (e.g. possum, bird, snake etc).
- Species (if known).

If the fauna was injured the following details should be recorded:

- Time that the fauna specialist was called.
- Time that the fauna specialist arrived.

- Fauna specialist name and contact.
- What the outcome was of calling the fauna specialist.

If the fauna was not injured the following detailed should be recorded:

- *Where was the fauna relocated?* Only a qualified wildlife handler or Project Ecologist is to relocate fauna.
- Name and qualification of fauna handler.
- Any other comments.

The report will also provide details of the habitat relocated and numbers and types of hollows salvaged for remanufacture.

5.2.4. Landscaping

Objectives

Condition 8 of Schedule 3 of the development consent, requires the Proponent to '*prepare a detailed Landscaping Plan for the development in consultation with Council and RMS, to the satisfaction of the Secretary'*. A Landscape Plan has been developed by Urbis and in consultation with Council and TfNSW to satisfy Conditions 8 and 9 of Schedule 3 of the development consent and align with the objectives of the Landscape and Visual Impact Assessment submitted with the EIS for the Project.

Following complete implementation of the landscape plan, it is considered that the Project will be effectively screened from all public visual and have no residual visual impact on the surrounding landscape character.

Management Strategies and Controls

The following landscape controls are proposed to achieve an appropriate planting of the proposed palette and include weed management measures as part of the proposed works:

- Maintain a minimum 5 metre height of screening shrubs.
- Maintain 100mm maximum height of grassland within property boundary.
- The planting maintenance period will be 52 weeks and will commence from the date of practical completion of each phase of planting works (hereby specified to be a separable part of the works). It is anticipated that planting works will be undertaken in one phase. Provide any fencing or barriers necessary to protect the planting from damage throughout the planting establishment period.
- Regularly remove, by hand, rubbish and weed growth that may occur or recur throughout turfed, planted and mulched areas. Continue eradication throughout the course of the works and during the planting establishment periods – this includes the application of herbicides such as Ronstar or equivalent if required.

Monitoring and Compliance

Plant maintenance shall be deemed complete subject to the following compliance with the criteria:

- Repairs to planting media have been completed, if required.
- Ground surfaces are covered with the specified treatment to the specified depths in the Landscape Specifications.
- Pests, disease, or nutrient deficiencies or toxicities are not evident upon visual inspections.
- Organic and rock mulched surfaces have been maintained in a weed-free and tidy condition and to the specified depth.
- Vegetation is established and well-formed.
- Plants present a healthy root system that have penetrated into the surrounding, undisturbed ground and is not able to be lifted out of their planting hole.
- Vegetation is not restricting essential sight lines and signage.
- Collection and removal of litter has been completed, as required.

- All non-conformance reports and defect notifications have been closed out.

Upon completion of the planting schedule, all temporary protection fences must be removed.

5.2.5. Lighting

Objectives

Under Condition 16 of Schedule 3 of the development consent, the Proponent '*must minimise the off-site lighting impacts of the development'*. The following mitigation strategies are proposed to minimise and control lighting from construction activities and vehicle movements, as well as any activities that may require lighting during the operational phase.

Management Strategies and Controls

To minimise impacts and potential lighting spillover from vehicles, equipment or security installations, the following mitigation measures are proposed:

- Urgent maintenance works during hours of darkness may have external security lights. Any operation during darkness hours should have consideration to lighting impacts on adjacent receivers when possible and minimise continuous lighting use.
- All lighting installed and operated at the site must comply with *AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting*.

5.2.6. Noise and Vibration

Objectives

Under Condition 13 of Schedule 3 of the development consent, the Proponent '*must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version'*. The Interim Construction Noise Guideline 2009 is still applicable at the time of writing this EMS.

The following mitigation strategies are proposed to reduce and control lighting from construction activities and vehicle movements, as well as any activities that may require it during the operational phase.

Management Strategies and Controls

To minimise noise impacts during construction and operation, the following mitigation measures are proposed:

- All construction activities will be undertaken during the approved construction times as per Condition 12 of Schedule 3:
  - 7 am to 6 pm Monday to Friday
  - 8 am to 1 pm Saturdays
  - No construction, upgrading or decommissioning on Sundays and public holidays.
- Weekly reinforcement of the need to minimise noise by the EPC Project Manager.
- Weekly identification of noisy activities and adoption of improvement techniques by the EPC Project Manager.
- Avoiding the use of portable radios, public address systems or other methods of site communication that may unnecessarily impact upon nearby residents.
- Where possible, avoid the use of equipment that generates impulsive noise.
- Minimise the movement of materials and plant and unnecessary metal-on-metal contact.

Monitoring and Compliance

Monitoring will be undertaken by routine observations during all construction activities parallel to other monitoring programs. When expected noisy activities are scheduled, monitoring noise equipment should be in place to ensure no exceedance is recorded prolonged in accordance with the *Interim Construction Noise Guideline 2009*.

Should exceedances be detected, additional noise-reducing strategies will be adopted, such as installing temporary acoustic barriers at the perimeter of the subject site.

5.2.7. Stormwater and Water Quality

Objectives

A Stormwater Management Plan (**SWMP**) has been prepared by Robert Bird Group. Its main objectives are to provide mitigation measures for stormwater runoff to comply with Condition 23 of Schedule 3.

Management Strategies and Controls

To minimise overflowing risk and comply with water quality objectives as per the *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)* manual, the following mitigation measures are proposed in this EMS:

- Specifications for ford crossing and swales as approved in the SWMP.
- Gross pollutant traps will be installed at the roadside stormwater inlet pits, as required.

Monitoring and Compliance

The following monitoring protocol is proposed to be implemented to ensure water quality remains at acceptable levels as per ANZECC 2000 Water Quality Guidelines:

- Baseline surface water quality data to be established prior to construction at three separate points within the local catchment.
- Ane interval of 3 to 6 months will be established in the EPC EMP to review water quality parameters as per ANZECC Guidelines during construction and between 2 to 3 years during operation.
- Should any threshold be surpassed for the trigger value of any water quality parameter over the baseline, the following action plan will be initiated:
  - Undertake additional round of sampling as soon as practical and analysis for the parameter concerned; if three consecutive results exceed the trigger level, an investigation of a contamination plume should be undertaken and implement appropriate actions to mitigate contamination.
  - Should the trigger value exceed contamination threshold under the ANZECC Guidelines, immediately report DCCEEW and organise further monitoring rounds to investigate possible causes.
  - If water quality measurements include concentrations outlined within the *Protection of the Environment Operations (General) Regulation 2022* (Schedule 5), works must stop until the Secretary is satisfied that contamination is satisfactorily halted and remediated.

5.2.8. Traffic

Condition 6 of Schedule 3 of the development consent requires the Proponent to '*prepare a Traffic Management Plan for the Proponent in consultation with RMS (now TfNSW) and Council, and to the satisfaction of the Secretary*'.

A Traffic Management Plan (**TMP**) has been prepared by Urbis, which will be implemented to:

- Ensure the safe and efficient movement of vehicles to and from the site, minimising disruptions to the community, and maintaining a safe environment for traffic around the site boundaries.
- Address the needs of all traffic in the vicinity of and leading to the site.
- Communicate the effective controls of the proposed traffic management measures.
- Inform affected traffic about the impacts of any implemented management measures.
- Coordinate with local authorities and stakeholders to ensure compliance with all relevant regulations and guidelines.
- Monitor and review traffic conditions regularly to adapt and improve traffic management strategies as needed.

Management Strategies and Controls

An analysis of current and projected traffic patterns, including the anticipated increase in vehicle movements during the construction period, was conducted. It was concluded that it is necessary to implement a BAR (Basic Right Turn) treatment and a BAL (Basic Left Turn) treatment. These measures are required to improve traffic flow and enhance safety at the intersection. These management measures have been incorporated into the final design.

The largest vehicle accessing the site during construction will be an OSOM vehicle, a 43-meter-long combination, comprising a prime mover, a 2x8 dolly, and an 8x8 extendable low loader in an open configuration. The trailer will exit the site with a closed configuration, reducing its overall length to 34.5 metres and minimising the traffic impacts.

The site access point has been designed to accommodate this OSOM vehicle movement.

Targeted swept path analysis has been undertaken at key intersections along the OSOM haulage route to assess the suitability of this route. The analysis indicates that the OSOM vehicle will encroach into the opposite lane at certain locations, with minor kerb overruns. These encroachments are deemed acceptable under traffic management with pilot vehicles and with minor signage amendments to ensure safe and efficient vehicle movement, as outlined in the TMP.

During the construction phase, the nature of loads and monitoring procedures will be managed to ensure safety and compliance. To optimise traffic management, haulage vehicle movements will be scheduled to minimise the convoy lengths or platoons, reducing congestion and improving safety.

A traffic management system will be implemented to manage over-dimensional (OD) vehicles, ensuring they navigate the site and surrounding areas safely and efficiently. In the event of any emergency repair or maintenance requirements, a rapid response protocol will be in place to address issues promptly, minimising disruption to the construction schedule and maintaining safety standards.

Daily pre-start visual inspections of vehicles will be conducted to verify they are in good condition and adhere to manufacturer specifications. All deliveries to the site will be recorded in a register to ensure they comply with the allowable limits outlined in the consent conditions.

With the Savernake Road/ Lambruck Lane intersection design now finalised, a Traffic Guidance Scheme (**TGS**) has been developed to ensure safe and efficient traffic management throughout the project phases. This TGS incorporates key considerations based on the finalised designs and will be reviewed and approved by the traffic manager.

Key considerations for the TGS include:

- **Temporary traffic controls:** Implementation of appropriate temporary traffic measures during construction, particularly around the Savernake Road intersection, to minimise disruptions and ensure the safety of both workers and road users.
- **Signage and lane closures**: Clear signage to direct traffic flow and communicate lane closures or detours effectively.
- **Heavy vehicle movements:** Management of heavy vehicle movements, ensuring minimal impact on surrounding roads and communities.
- **Interface with railway line:** Traffic management procedures will need to manage the interface between the construction works and the railway line. This will involve procedures to guide vehicles, particularly those larger than 20 metres, through the rail corridor safely.

Monitoring and Compliance

A specific number of on-site parking spaces will be provided. These will be monitored on a day-to-day basis to determine whether there is increased parking demand due to reduced use of the shuttle bus service. To promote and incentivise this service, the following strategies are recommended:

- **Vehicle Control**: EE should control the number of vehicles provided or hired for self-performed works. This will help regulate and limit the number of vehicles on the site and encourage personnel engagement with the shuttle bus service.

- **Work Subcontract Conditions:** Compliance and involvement with the shuttle bus service will be included as one of the conditions in the Work Subcontracts for engaged subcontractors. This sets a requirement for subcontractors and their employees to support and use the shuttle service.

These measures aim to incentivise workers to share rides and reduce the overall number of private vehicles travelling to and from the site. By promoting an employee shuttle bus service and monitoring parking usage, the environmental impacts and traffic congestion associated with construction can be minimised.

EE will be required to monitor the schedules of the active railway operations and ensure that construction works and deliveries do not interfere with the rail corridor during construction times.

A Driver's Code of Conduct has been prepared as part of the TMP. EE is required to monitor and report any non-compliance with the Code of Conduct to the Secretary to ensure the safety of the local traffic network.

5.2.9. Waste

Objectives

The main objective of this section of the EMS is to ensure that generated waste during construction, operation and decommissioning of the Project is disposed responsibly and lawfully in accordance with EPA requirements and in accordance with Condition 29 of Schedule 3.

Management Strategies and Controls

Through the lifecycle of the Project, waste management measures will include, but are not limited to and subject to construction and operational requirements by the EPC and O&M Project Managers:

- Any waste material that is unable to be reused, re-processed or recycled will be disposed at a facility approved to receive that type of waste.
- Site induction to include waste management information.
- Recording of all waste by contractors.
- Use of pre-order and prefabricated material where possible.
- Waste recycling through separation and storage of recyclable and non-recyclable materials. Separate storage for putrescible, cardboard, and mixed recycling waster.
- Collection of waste by a licensed contractor.
- Green waste (including compost from the onsite) and topsoil is to be recycled for use in site landscaping if possible.
- Waste collection must only take place during working hours and days only.
- Any hazardous waste is to be segregated from other waste types and stored in bunded areas and managed to prohibit spills or washing off.

Monitoring and Compliance

- Monitoring would be undertaken by weekly assessment and recording of waste collection metrics, storage conditions and disposal procedures. During construction, the EHS Coordinator to conduct regular surveillance of waste minimisation and disposal activities, arranging corrective actions when necessary.

5.3. SUSTAINABILITY AND CLIMATE

Objectives

European Energy has detailed its strategic sustainability priorities in its 2023 Annual Report and committed to the sustainable construction and operation of its projects and to align with the UN Sustainable Development Goals. Its main priorities and sub-objectives as stated by the report are to deliver:

- *Renewable Energy that revitalises the environment.*
  - 100% of power purchased for EE's consumption was certified renewable energy in 2023.
  - EE is a 100% renewable energy company. In 2023, they produced a total of 1,870 GWh of wind power and solar power, which is an increase of 140% compared to 2022.
  - EE avoided 434,962 tonnes of CO2e GHG emissions through the 1,870 GWh renewable energy they produced at their assets, which is 140% more than in 2022.
  - EE's greenhouse gas emission intensity (scope 1 and 2) was 0.22 g CO2e/kWh in 2023, which is significantly lower compared to 4.99 CO2e/kWh in 2022.
- *A people-centric sustainable transformation.*
  - Target of a 40/60 women-to-men workforce ration to ensure gender equality.
  - Increasing the geographic origin extent of its workforce.
  - Keeping the workforce safe, with a current Lost Time Injury Rate of zero for EE's own employees.
- *Governance that empowers business accountability.*
  - Increase supplier due diligence to ensure responsible business practices
  - Objective to stakeholder engagement plans for all their projects under construction.

6. REFERENCED AND ASSOCIATED DOCUMENTS

Information within this EMS is derived from and/or is referenced from the following documents provided as appendices:

- Mulwala Solar Farm Environmental Impact Statement by RPS
- Biodiversity Management Plan – Stage 1b by AEP
- Aboriginal Cultural Heritage Management Plan – Stabe 1b by Urbis
- Landscape Management Plan – Stage 1b by Urbis
- Traffic Management Plan – Stage 1b by Urbis
- Stormwater Management Plan – Stage 1b by Robert Bird Group
- European Energy Annual Report 2023

7. DISCLAIMER

This report is dated 15 July 2025 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of EE Australia EPC 1 Pty Ltd **(Instructing Party)** for the purpose of EMS **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A LAYOUT PLANS

MULWALA SOLAR FARM - STAGE 1B
DETAIL SITE PLAN

INDICATIVE PROJECT DETAILS	
SECURE FENCED AREA	68.4ha
SECURITY FENCING LENGTH	3,997m
GATES	1
DC CAPACITY	TBC
AC CAPACITY	TBC
2-STRING TRACKER TABLES	22
3-STRING TRACKER TABLES	35
4-STRING TRACKER TABLES	420
PV PANELS	51,212
PITCH	7.7m

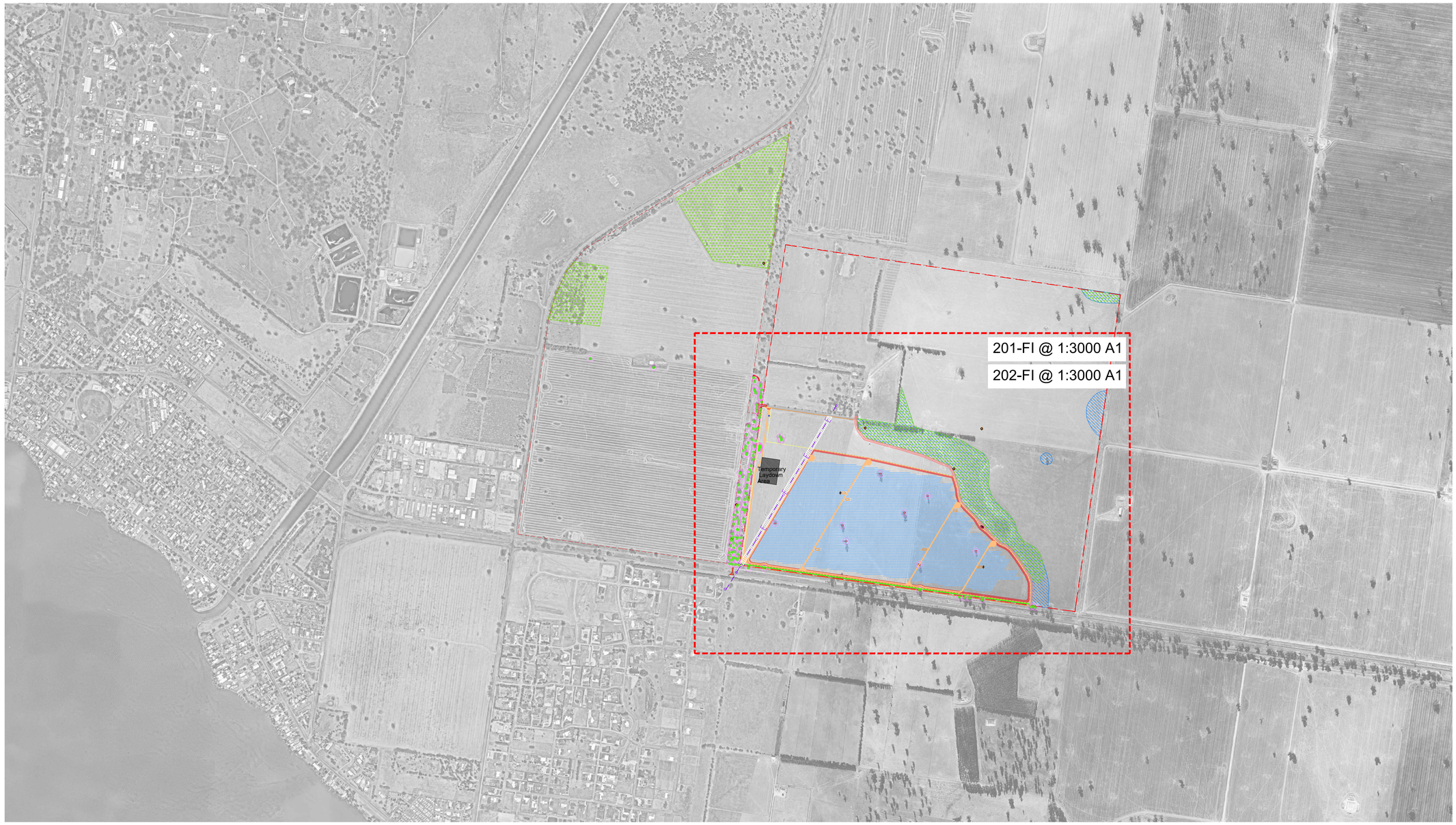
GENERAL LEGEND

- STAGE 1B PROJECT BOUNDARY - 215ha
- DEVELOPMENT FOOTPRINT - COMBINED 420ha
- FENCING - SECURITY
- AREAS SUBJECT TO INUNDATION - TO BE AVOIDED WITH 10M OFFSET
- AREAS OF ECOLOGICAL VALUE - TO BE AVOIDED WITH 10M OFFSET
- 4M INTERNAL ACCESS ROADS - REFER TO ENGINEERING DRAWINGS
- EXTERNAL ACCESS UPGRADES - REFER TO ENGINEERING DRAWINGS
- EXTERNAL ACCESS ROADS - TO BE UTILISED
- TEMPORARY LAYDOWN AREA - DURING CONSTRUCTION ONLY
- INVERTERS - REFER TO ENGINEERING DRAWINGS
- EXISTING TRANSMISSION LINE TOWERS - TO BE AVOIDED
- EXISTING TRANSMISSION LINE - TO BE AVOIDED
- 5M VEGETATED SCREENING - REFER TO LANDSCAPE STRATEGY
- EXISTING NATIVE TREES RETAINED (MARKED EXTENTS INCLUDE TPZ) - TO BE PROTECTED DURING WORKS
- EXISTING TREES - TO BE REMOVED

2-STRING TRACKER TABLES (22)
- 56 PANELS PER TABLE

3-STRING TRACKER TABLES (35)
- 84 PANELS PER TABLE

4-STRING TRACKER TABLES (420)
- 112 PANELS PER TABLE



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URBIS

PROJECT
MULWALA SOLAR FARM
STAGE 1B
255 SAVERNAKE ROAD
MULWALA, NEW SOUTH WALES, 2647

Olderfleet, Level 10, 477 Collins Street | Melbourne VIC 3000 AUSTRALIA | +61 3 8663 4888 | URBIS Ltd | ABN 50 105 256 228

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D	FOR REVIEW	AF	PY	17.03.2025
C	FOR REVIEW	AF	PY	27.02.2025
B	FOR REVIEW	AF	PY	13.02.2025
A	FOR REVIEW	AF	SD	10.02.2025
-	FOR REVIEW	AF	-	04.02.2025

PROJECT DIRECTOR: CLARE BROWN

CLIENT
EUROPEAN ENERGY

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INDICATIVE PROJECT DETAILS	
SECURE FENCED AREA	68.4ha
SECURITY FENCING LENGTH	3,997m
GATES	1
DC CAPACITY	TBC
AC CAPACITY	TBC
2-STRING TRACKER TABLES	22
3-STRING TRACKER TABLES	35
4-STRING TRACKER TABLES	420
PV PANELS	51,212
PITCH	7.7m

GENERAL LEGEND

- STAGE 1B PROJECT BOUNDARY - 215ha
- DEVELOPMENT FOOTPRINT - COMBINED 420ha
- FENCING - SECURITY
- AREAS SUBJECT TO INUNDATION - TO BE AVOIDED WITH 10M OFFSET
- AREAS OF ECOLOGICAL VALUE - TO BE AVOIDED WITH 10M OFFSET
- NO-GO ZONE - INCLUSIVE OF OFFSET REQUIREMENTS
- 10M ASSETT PROTECTION ZONE - TO BE MAINTAINED WITH 10M CLEARING
- 4M INTERNAL ACCESS ROADS - REFER TO ENGINEERING DRAWINGS
- EXTERNAL ACCESS UPGRADES - REFER TO ENGINEERING DRAWINGS
- EXTERNAL ACCESS ROADS - TO BE UTILISED
- TEMPORARY LAYDOWN AREA - DURING CONSTRUCTION ONLY
- INVERTERS - REFER TO ENGINEERING DRAWINGS
- EXISTING TRANSMISSION LINE TOWERS - TO BE AVOIDED
- EXISTING TRANSMISSION LINE - TO BE AVOIDED
- 5M VEGETATED SCREENING - REFER TO LANDSCAPE STRATEGY
- EXISTING NATIVE TREES (MARKED EXTENTS INCLUDE TPZ) - TO BE RETAINED AND PROTECTED
- EXISTING TREES - TO BE REMOVED AT STAGE 1B
- GATE
- W.T 45,0000L WATER TANK & HARDSTAND AREA
- POTENTIAL ABORIGINAL ARTEFACT - TO BE SALVAGED PRIOR TO WORKS
- POTENTIAL ABORIGINAL ARTEFACT - TO BE AVOIDED DURING WORKS
- MET STATION - REFER TO ENGINEERING DRAWINGS

2-STRING TRACKER TABLES (22)
- 56 PANELS PER TABLE

3-STRING TRACKER TABLES (35)
- 84 PANELS PER TABLE

4-STRING TRACKER TABLES (420)
- 112 PANELS PER TABLE

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PROJECT

MULWALA SOLAR FARM
STAGE 1B

255 SAVERNAKE ROAD
MULWALA, NEW SOUTH WALES, 2647

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-	FOR REVIEW	AF	-	04.02.2025

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SITE PLAN - STAGE 1B
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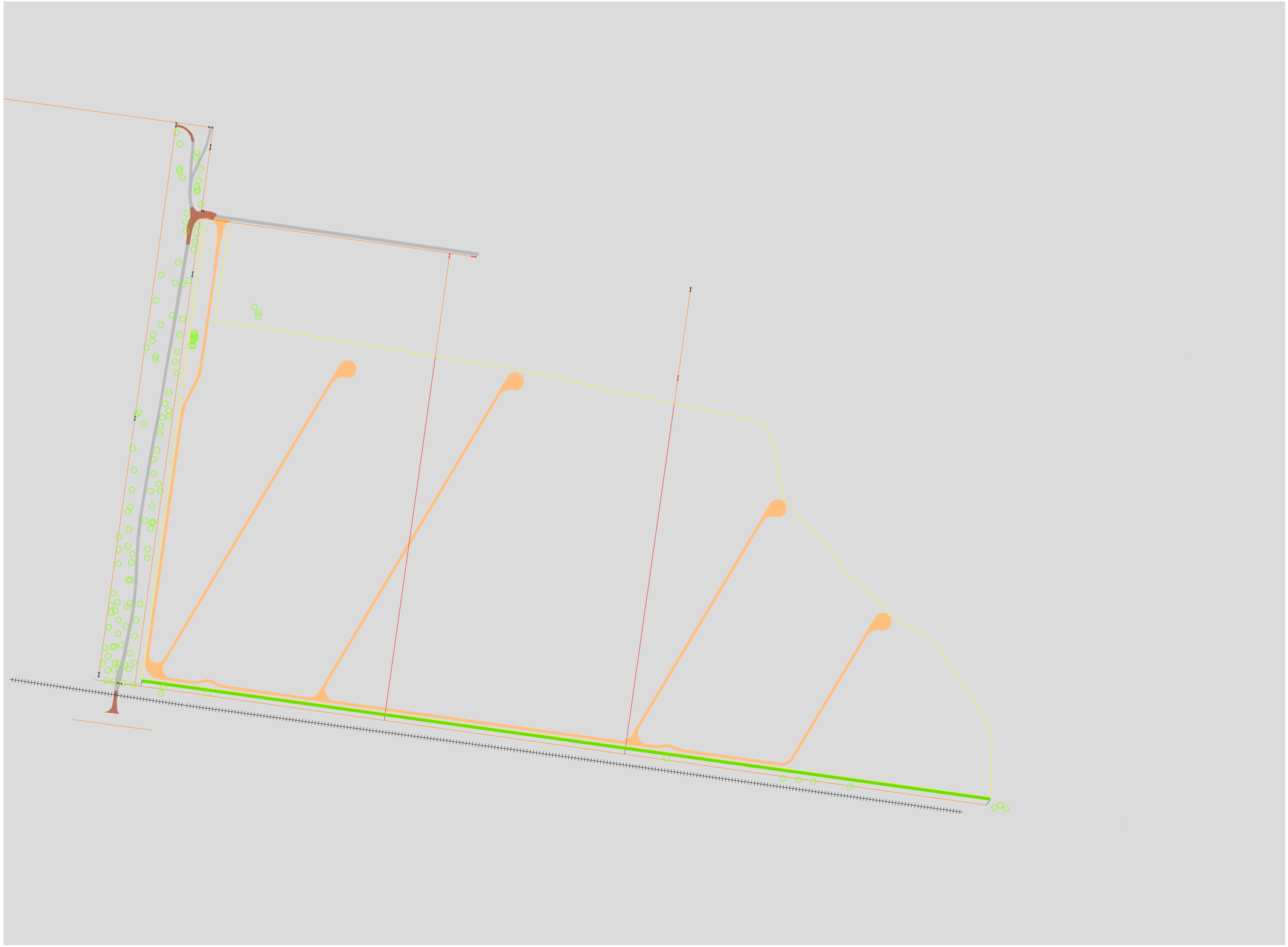

INDICATIVE PROJECT DETAILS	
SECURE FENCED AREA	68.4ha
SECURITY FENCING LENGTH	3,997m
GATES	1

GENERAL LEGEND

- FENCING - SECURITY
- FENCING - EXISTING STOCK-PROOF - TO BE UTILISED
- FENCING - EXISTING STOCK-PROOF - TO BE REMOVED
- FENCING - NEW STOCK-PROOF - TO ENCLOSE EXISTING SEGMENTS
- 4M INTERNAL ACCESS ROADS - REFER TO ENGINEERING DRAWINGS
- EXTERNAL ACCESS UPGRADES - REFER TO ENGINEERING DRAWINGS
- EXTERNAL ACCESS ROADS - TO BE UTILISED
- 5M VEGETATED SCREENING - REFER TO LANDSCAPE STRATEGY
- SECURITY GATE
- EXISTING GATE

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MULWALA SOLAR FARM

STAGE 1B

255 SAVERNAKE ROAD

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FENCING PLAN - STAGE 1B

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