



Environmental Management Strategy

Limondale Sun Farm

Prepared for Limondale Sun Farm Pty Ltd | 26 July 2018





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Document Control

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1 Introduction

1.1 Project background

The Limondale Sun Farm is a large-scale solar photovoltaic (PV) generation facility and associated infrastructure in south-western New South Wales (NSW). The project will be developed on a site within the Balranald Shire local government area (LGA), approximately 14 kilometres (km) south of the township of Balranald, as shown in Figure 1.

The project is a State significant development (SSD) under the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP). Development consent (SSD 8025) under Section 89E of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act) was granted on 31 August 2017.

The sun farm is currently undergoing a detail engineering design process to enable commencement of construction later in 2018.

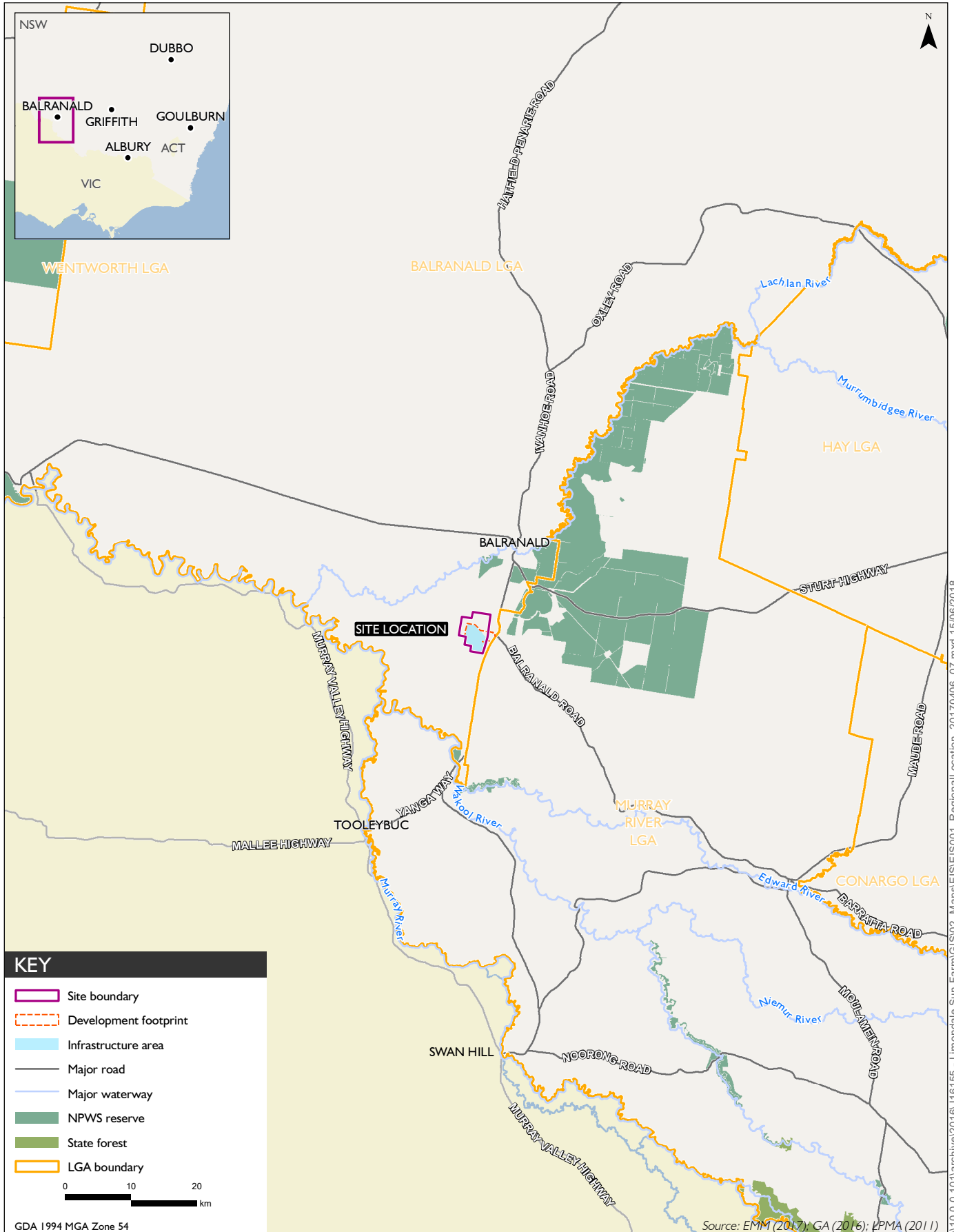
1.2 Scope and objectives

The purpose of this Environmental Management Strategy (EMS) is to outline the framework for implementation of environmental management for construction and operation of the project. It documents the environmental management measures, roles and responsibilities required to comply with the relevant legislative requirements and other applicable licences, approvals and permits.

The EMS has been prepared in accordance with the requirements of Schedule 4, Condition 1 of the conditions of consent (CoC) issued for the project as summarised in Table 1.1 below.

Table 1.1 Conditions of consent

Condition of consent	Report section
Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must:	
provide the strategic framework for environmental management of the development;	Section 1.3
identify the statutory approvals that apply to the development;	Section 2
describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 3
describe the procedures that would be implemented to:	
<ul style="list-style-type: none">keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Section 5.1
<ul style="list-style-type: none">receive, handle, respond to and record complaints;	Section 5.1.2
<ul style="list-style-type: none">resolve any disputes that may arise;	Sections 5.1 and 6.2
<ul style="list-style-type: none">respond to any non-compliance;	Section 6.1.1
<ul style="list-style-type: none">respond to emergencies; and	Emergency Response Plan
include:	
<ul style="list-style-type: none">copies of any plans approved under the conditions of this consent; and	Appendices A-F
<ul style="list-style-type: none">a clear plan depicting all the monitoring to be carried out in relation to the development.	Section 4



Regional project location

Limondale Sun Farm
 Environmental Management Strategy

Figure I.1

1.3 Strategic framework

The EMS provides the strategic framework for the Limondale Sun Farm. The purpose of the strategic framework is to provide effective environmental management for the Limondale Sun Farm. This includes the maintenance and improvement of the environmental performance through consistent policy and planning.

Environmental management will be in accordance with a suite of documents and approvals which detail the environmental performance criteria and site-specific management measures and procedures to be implemented during construction and during operation.

This EMS details the performance criteria (where relevant), mitigation and management and environmental performance monitoring (where relevant). Figure 1.2 provides an overview of the relationship between the EMS, management plans and Belectric policies and procedures governing the project. The EMS is supported by detailed management plans that have been developed to mitigate potential environmental impacts associated with the construction and operation of the project, shown in Figure 1.2.

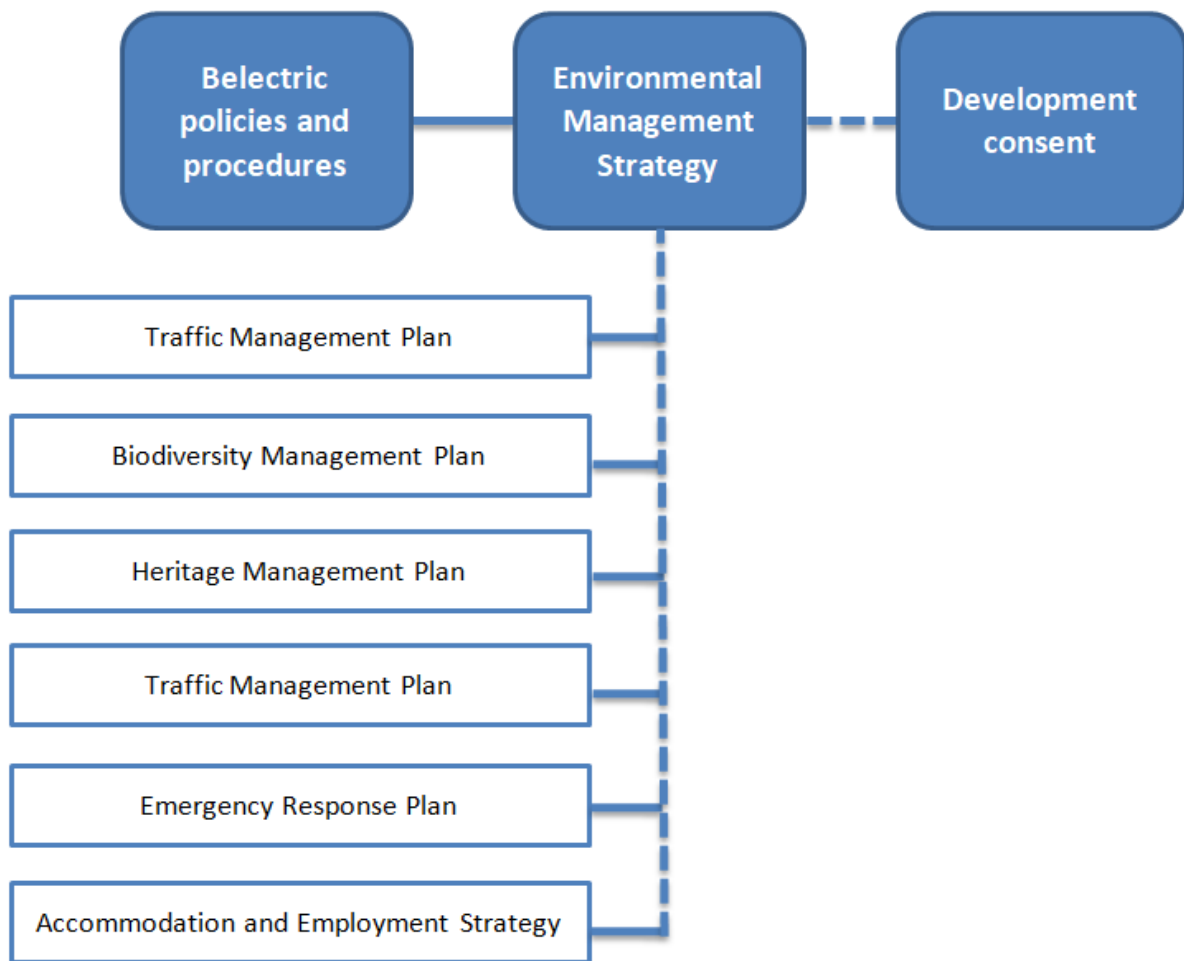


Figure 1.2 EMS strategic framework

1.3.1 Belectric policies and procedures

Belectric operates under an existing Environmental and Sustainability Policy and Safety Management Plan and prepared in accordance with Australian Standard AS/NZS 4801-2001 Health & Safety Management System. Through the delivery of the Environment and Sustainability Policy, Belectric is committed to:

- conducting environmental risk assessments on any activities which could have an environmental impact;
- incorporating environmental factors into the Belectric Safety Management System, monitor and review process so as to identify areas of concern or areas to improve;
- encouraging effective waste management with recycling and reusing requirements;
- monitor current processes through inspections and audits to identify ways of reducing pollution and waste;
- effective leadership and commitment by management in the area of environmental sustainability;
- promoting and encouraging the reporting of environmental incidents, hazards, or non-compliance by personnel;
- acting on any environmental incidents, hazards or non-compliance reports promptly; and
- fostering a positive and supportive approach to environmental sustainability within the business and encouraging personnel to actively participate in conserving the environment at work, at home and in the community.

2 Statutory requirements

2.1 Development consent

Development consent was issued for the project on 31 August 2017 (SSD 8025) by the Minister for Planning. The associated CoCs as relevant to preparation of this EMS are outlined in Table 1.1.

2.2 State and local legislation

The following legislation and environmental planning instruments are relevant to the project:

- *Environmental Planning and Assessment Act 1979*;
- Environmental Planning and Assessment Regulation 2000;
- State Environmental Planning Policy (State and Regional Development) 2011 [SRD SEPP];
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy No 33 – Hazardous and Offensive Development;
- State Environmental Planning Policy No 55 – Remediation of Land;
- State Environmental Planning Policy (Rural Lands) 2008;
- *Roads Act 1993*;
- *Crown Lands Act 1989*;
- *Local Land Services Act 2013*; and
- Balranald Local Environmental Plan 2010.

The statutory approvals / licences that are required for the project are outlined in Table 2.1.

Table 2.1 Other approvals / licenses

Legislation	Authorisation / Action	Consent or approval authority
<i>Roads Act 1993</i>	Section 138 permits for road and intersection improvements for site access road intersection with Yanga Way	NSW Roads and Maritime Service [RMS]
<i>Crown Lands Act 1989</i>	Licence / easement for ongoing access/use of TSR	NSW Department of Industry – Lands [DoI Land]
<i>Biodiversity Conservation Act 2016</i>	Residual impacts to native vegetation will require retirement of 158 biodiversity credits/	Office of Environment and Heritage [OEH]
<i>Local Land Services Act 2013</i>	There may be existing uses in the travelling stock reserves [TSR] which require consideration	Occupation of access road within TSR

3 Roles and responsibilities

Environmental management is the responsibility of all employees and contractors at Limondale Sun Farm. The key personnel and their relevant environmental and community management roles and responsibilities are outlined in Table 3.1.

Limondale Sun Farm Pty Ltd is ultimately responsible to regulatory authorities for all aspects of environmental compliance and is to facilitate the implementation of this EMS. This includes the provision of adequate resources such as:

- qualified personnel;
- adequate financial resources; and
- additional training as required for all employees and contractors.

Table 3.1 Roles and Responsibilities

Role	Responsibility
Site Manager	<ul style="list-style-type: none">• maintain a working knowledge of this EMS and be aware of all environmental legislative requirements associated with their respective operation;• provide sufficient resources for the implementation of this plan and associated plans
Environmental and Community Manager (ECM)	<ul style="list-style-type: none">• implement and maintain the EMS;• facilitate a process of managing overall compliance with regulatory requirements and undertake external reporting for legislative non-compliances as required;• coordinate complaints recording and investigation processes including associated reporting requirements;• coordinate the implementation of corrective actions and evaluate their effectiveness associated with community complaints; liaise with relevant government authorities and affected landholders in relation to regulatory conditions and compliance issues; and• coordinate training to communicate requirements of the EMS to relevant personnel.
Environment and Community Coordinators and Officers (ECC/ECO)	<ul style="list-style-type: none">• conduct monthly environmental inspections to determine compliance with legislation, standards, codes and other external requirements (ECC)• coordinate monitoring as per environmental management strategy;• review all environmental monitoring data to confirm compliance with the relevant criteria;• assist with the development and delivery of environmental training packages;• conduct environmental inspections as per the EMS; and• provide ongoing environmental advice as required.

Table 3.1 **Roles and Responsibilities**

Role	Responsibility
Operational Managers / Supervisors	<ul style="list-style-type: none">• facilitate activities under their control so that they are completed in accordance with this EMS and associates management plans and site procedures;• ensure environmental controls within their jurisdiction are operated and maintained in a proper and efficient manner;• report all environmental incidents; and• report all community complaints.
Employees and Contractors	<ul style="list-style-type: none">• conduct all activities in accordance with this EMS, and associated management plans and procedures, in an environmentally responsible manner;• immediately report all environmental incidents and community complaints to their immediate supervisor; and• participate in relevant environmental training.

4 Inspections and monitoring

The following inspections and monitoring will be undertaken by the project manager:

- monthly environmental inspections to determine compliance with legislation, standards, codes and other external requirements;
- coordination of monitoring as described in this EMS and associated sub-plans; and
- review all environmental monitoring data to confirm compliance with the relevant criteria.

A monthly environmental inspection checklist will be developed by the project manager prior to commencement of construction activities. Monthly environmental inspection records will be documented and retained onsite for the duration of the project.

The project manager will also be responsible for development of a daily inspection checklist for use by site supervisors / managers as a means to:

- ensure that adequate environmental controls are in place and operating effectively;
- identify deficiencies in controls in place, or required corrective actions/improvements, including identification of timing and responsibilities for implementation/action; and
- identify and report environmental incidents.

The monthly and daily checklists will be developed in consideration of the requirements of the CoC and this EMS and the issue specific inspection and monitoring requirements summarised in Table 4.1.

Table 4.1 Monitoring plan

Key Issue	Risk to be managed	Monitoring requirement	Timing / frequency	Responsibility
Biodiversity				
Pre-construction	<ul style="list-style-type: none"> Native vegetation removal, retention and disturbance. Direct impacts on flora, fauna and ecological communities as a result of clearing activities. Indirect impacts on biodiversity values outside the development site. 	Visual inspection of vegetation clearance activities.	Daily inspections during clearing activities.	Site Supervisor with the Environmental Advisor – report to Project Manager. Include results in monthly report to OEH during construction period..
	<ul style="list-style-type: none"> Native vegetation removal, retention and disturbance. Direct impacts on flora, fauna and ecological communities as a result of clearing activities. 	Inspection of exclusion fencing.	Daily inspections during clearing activities.	Site Supervisor with the Environmental Advisor – report to Project Manager. Include results in monthly report to OEH during construction period.
	<ul style="list-style-type: none"> Native vegetation removal, retention and disturbance. Direct impacts on flora, fauna and ecological communities as a result of clearing activities. 	Maintain a record/photo log of any issues and actions taken to remedy breaches of exclusion areas.	As required.	Site Supervisor report Project Manager. Include results in monthly report to OEH during construction period.
Construction	<ul style="list-style-type: none"> Native vegetation removal, retention and disturbance. Direct impacts on flora, fauna and ecological communities as a result of clearing activities. Indirect impacts on biodiversity values outside the development site. 	Visual inspection of vegetation clearance activities.	Daily inspections during clearing activities.	Include results in monthly report to OEH during construction period.

Table 4.1 Monitoring plan

Key Issue	Risk to be managed	Monitoring requirement	Timing / frequency	Responsibility
	<ul style="list-style-type: none"> Direct impacts on flora, fauna and ecological communities as a result of clearing activities. 	Maintain a log of salvaged animals and actions taken to relocate them.	As required prior to and during vegetation clearance and construction.	Environmental Advisor / Wildlife Handler. Include results in monthly report to OEH during construction period.
	<ul style="list-style-type: none"> Direct impacts on flora, fauna and ecological communities as a result of clearing activities. 	Inspections for fauna. Where footings have been left open overnight.	Every morning where left open overnight and prior to recommencing or back filling.	Environmental Advisor / Wildlife Handler.
	<ul style="list-style-type: none"> Indirect impacts on biodiversity values outside the development site. 	Inspections of stockpiles and storage areas to ensure no impact outside development site.	Daily inspections required at construction area mark out and during construction.	Site Supervisor with the Environmental Advisor – report to Project Manager. Include results in monthly report to OEH during construction period.
	<ul style="list-style-type: none"> Weeds, feral pests and soil pathogens. 	Inspections to detect weed germination and signs of soil pathogen infection.	Weekly during construction.	Site Supervisor with the Environmental Advisor – report to Project Manager. Include results in monthly report to OEH during construction period.
Operation	<ul style="list-style-type: none"> Weeds, feral pests and soil pathogens. 	Inspections to detect weed germination and signs of soil pathogen infection.	Monthly for 1 year following construction completion.	Site Supervisor with the Environmental Advisor – report to Project Manager.
	<ul style="list-style-type: none"> Weeds, feral pests and soil pathogens. 	On-going inspections to detect presence of feral pests.	Monthly for 1 year following construction completion.	Site Supervisor with the Environmental Advisor – report to Project Manager.
Soils and erosion				
Preconstruction Construction Operation	<ul style="list-style-type: none"> Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas. 	Inspect all sediment and erosion control measures implemented prior to works.	Prior to earthworks and clearing activities commencing.	Site Supervisor with the Environmental Advisor – report to Project Manager.
	<ul style="list-style-type: none"> Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas. 	Inspections of stockpiles and storage areas to ensure no impact outside development site.	Daily inspections required at construction area mark out and during construction.	Site Supervisor to undertake inspections and report to Project Manager.
	<ul style="list-style-type: none"> Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas. 	Sediment control measures and rehabilitation areas will be checked and maintained at	Daily during construction and as required.	Site Supervisor to undertake inspections and report to Project Manager.

Table 4.1 **Monitoring plan**

Key Issue	Risk to be managed	Monitoring requirement	Timing / frequency	Responsibility
		weekly intervals.		
	<ul style="list-style-type: none">• Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas.	Visual inspections of rehabilitation works during construction to assess the success of soil and vegetation stabilisation.	Weekly inspections.	Site Supervisor to undertake inspections and report to Project Manager.
	<ul style="list-style-type: none">• Soil erosion, sedimentation and rehabilitation of temporarily disturbed areas.	Inspections of rehabilitated areas and implement appropriate responses if rehabilitation fails.	Quarterly for two years following construction.	Site Supervisor to undertake inspections and report to Project Manager.

5 Stakeholder consultation and communication

5.1 External communication

5.1.1 Community and agencies

The local community and relevant agencies will be informed and kept up to date with the operation and environmental performance of the Project through planned meetings as relevant, and via website updates.

Information will be made available via the project website in accordance with Schedule 4 Condition 4 of the CoC:

<http://www.overlandsunfarming.com.au/limondale-sun-farm.html>

Contact details, and link to a community feedback / complaint form will also be made available via the project website.

5.1.2 Community complaints

Limondale Sun Farm will respond to community complaints relating to environmental incidents or issues.

All complaints received will be documented in a Complaints Register, which will record the nature of the complaint, any corrective / mitigative actions undertaken in response, and response times. All complaints will be responded to within 24 hours.

The following details will be recorded:

- Date and time of the complaint;
- Method by which the complaint was made;
- Personal details of the complainant (if provided);
- Nature of the complaint;
- Action taken in relation to the complaint;
- Follow-up actions required.

All complaints will be investigated by the Environment and Community Manager (ECM), who will also be responsible for:

- Ensuring adequate mitigative actions are implemented to prevent reoccurrence;
- liaising and following-up with complaints; and
- review of the complaints register to monitor the effectiveness of mitigation measures and identify any recurring themes of complaints that indicate a need to amend management approach.

The complaints procedure and contact details for the public to make complaints will be included on the project website and provided to Balranald Shire Council. Contact methods will include a phone number and email address.

5.2 Internal communication

5.2.1 Site inductions

Prior to commencement of work onsite, all project personnel will attend a site induction covering general and site specific environmental awareness, minimum requirements/standards and controls.

Site induction material will be developed and delivered by the Environment and Community team or alternate suitably qualified personnel. Site induction material will be tailored commensurate with the personnel's role and responsibilities, specific work tasks and associated environmental risks and potential impacts. As a minimum, site inductions will include:

- requirements for compliance with relevant environmental policies and procedures, and individual's responsibilities in implementing these;
- environmental risks and mitigation and control measures, including specific measures required by this EMS;
- incident reporting requirements;
- emergency procedures; and
- environmental reporting requirements.

5.2.2 Pre-start meetings

Pre-start meetings will be conducted by the Site Supervisor / Manager prior to commencement of activities each day, and will incorporate an environmental issues component to identify specific environmental risks and mitigation measures of relevance to the planned activities for the day.

Pre-start meetings will also be used as a forum for communication of complaints, or incidents as an 'environmental alert' as described below.

5.2.3 Environmental alerts

In the event of an environmental incident, incident learnings and preventative and corrective actions to be implemented to prevent reoccurrence will be communicated to project personnel as soon as practical. This will include issue of an 'environmental alert' via email and pre-start meetings, or some other means as appropriate.

6 Incident investigation and reporting

6.1 Incident notification

In the event of unpredicted impacts, appropriate investigation will be undertaken by the Environmental and Community Manager. Incidents that may be relevant to the site include:

- pollution incident;
- bushfire originating from the site;
- incidents as a result of extreme weather conditions;
- personal injury (accident or medical emergency); or
- non-compliance with relevant consent conditions resulting in environmental impacts.

A pollution incident is defined in the *Protection of the Environment Operations Act 1997* (POEO Act) as:

an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

harm to the environment is material if:

it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and

loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Pollution incidents must be reported immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.

6.2 Duty to notify

Under Section 148 of the *Protection of the Environment Operations Act 1997* (POEO Act), there is a duty to notify pollution incidents such as spills, leaks or other incidents. The Environmental and Community Manager will notify the appropriate regulatory authority of the pollution incident. If the incident presents an immediate threat to human health or property, the emergency services will be contacted first for assistance. Other agencies will be contacted afterwards to satisfy notification obligations.

The contact details for relevant authorities that may be relevant in the event of an incident or emergency are listed in the table below.

Table 6.1 Relevant authorities contact details

Organisation	Contact
Emergency services	000
Fire and Rescue NSW	1300 729 579
Balranald fire service (123 Market Street, Balranald)	03 5020 1577
Environment Protection Authority (EPA)	131 555
WorkCover NSW	13 10 50
Balranald Shire Council	03 5020 1300

6.3 Non-compliance

Non-compliances will be identified by a range of mechanisms including:

- review of monitoring results;
- complaints;
- site inspections;
- audits; and
- incident reports.

Any non-compliance with COC or any other licence / approval will be investigated as described above and reported internally and externally in accordance with the COC or other applicable licence / approval.

As part of incident investigation or complaints resolution, corrective and preventative actions will be identified, assigned to an appropriate person and closed out according to set timeframes. Corrective actions will include reference to the relevant incident report or complaint to track compliance.

6.4 Incident investigation

All incidents and near misses will be investigated and documented to:

- establish root cause and identify contributing factors;
- identify preventative and corrective actions to be implemented to prevent reoccurrence; and
- share learnings amongst the project team and other stakeholders as appropriate.

In accordance with Schedule 4, Condition 3 of the CoC, Limondale Sun Farm will:

- immediately notify the Secretary and any other relevant agencies of any incident on site;
- within 7 days of the date of the incident, provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.

6.5 Emergency response

The Emergency Response Plan details the procedures that apply in an emergency.

In the event of an emergency:

1. Activate the emergency warning system including alarms and implement the evacuation plan.
2. Dial 000 and request relevant services (ie Fire Brigade, Police, Ambulance).
 - a) Provide:
 - i) nature of incident;
 - ii) name of company, site address, nearest cross street, prominent landmarks; and
 - iii) any other relevant information (eg persons injured).
 - b) A representative is to direct emergency services from the site access intersection on Yanga Way.
3. Undertake any other actions to remove personnel from harm.

6.6 Site personnel contact details

The contact details of personnel responsible for the management and implementation of this EMS are given in the table below (includes 24 hour contact details).

Table 6.2 Personnel responsible for implementing ERP

Name	Position	Contact details
To be confirmed		

7 Review and improvement

Ongoing monitoring and review of the performance and implementation of the EMS will be undertaken as required. The EMS review will include:

- outcomes of investigations from incidents and/or complaints;
- the continuing suitability of the EMS in relation to changing conditions and information; and
- feedback from external stakeholders, including regulators and landholders.

In accordance with Schedule 3 Condition 2 of the CoC, Limondale Solar Farm will review and update the EMS and other strategies and plans required under the consent prior to carryout out any upgrading or decommissioning activities on site. The EMS and supporting plans are also to be reviewed and if necessary revised within one month of the submission of an incident report under Schedule 3 Condition 3 or any modification to the CoC.

Regular review of the EMs will allow opportunities for improvement to be identified and implemented, achieving the overall aim of continual improvement in environmental management performance. The EMS will be resubmitted for approval where material changes are required. Stakeholders will be consulted before submission is made, and approval will be obtained before making material changes.

Appendix A

Traffic Management Plan

Appendix B

Biodiversity Management Plan

Appendix C

Heritage Management Plan

Appendix D

Accommodation and Employment Strategy

Appendix E

Stormwater Management

Appendix F

Emergency Response Plan



confidential
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