INDEPENDENT AUDIT NO. 4 – AUDIT REPORT

ORANA BATTERY ENERGY STORAGE SYSTEM | SSD 45242780

JUNE 2026

SITE INSPECTION: 30 APRIL 2026

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CONTENTS

1. Introduction 5

1.1 Project overview 5

1.2 Approval requirements for Independent Audit 8

1.3 Audit Team 8

1.4 Audit Objectives 8

1.5 Audit Scope 8

2. Audit methodology 10

2.1 Audit Process Overview 10

2.2 Audit Process Detail 10

2.2.1 Audit initiation 10

2.2.2 Preparing audit activities 10

2.2.3 Consultation 10

2.2.4 Meetings 15

2.2.5 Interviews 15

2.2.6 Site inspection 16

2.2.7 Document review 16

2.2.8 Generating audit findings 16

2.2.9 Compliance evaluation 16

2.2.10 Evaluation of post approval documentation 17

2.2.11 Completing the audit 17

3. Audit findings 18

3.1 Approvals and documents audited, and evidence sighted 18

3.2 Summary of Compliance 19

3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents 23

3.4 Summary of notices from agencies 23

3.5 Other matters considered relevant by the Auditor or DPHI / Agencies / Council 24

3.6 Complaints 30

3.7 Incidents 30

3.8 Actual versus predicted impacts 30

4. Conclusions 34

Limitations 35

Appendix A – SSD 45242780 Conditions of Consent 36
Appendix B – Planning Secretary Agreement of Independent Auditors 67
Appendix C – Consultation records 70
Appendix D – Attendance Sheet 88
Appendix E – Site Photos 90
Appendix F – Auditor declaration 104

ABBREVIATIONS / GLOSSARY

Abbreviation/Term	Description
AES	Accommodation and Employment Strategy
Akaysha	Akaysha Energy Pty Ltd
BCA	Building Code of Australia
BC Act	Biodiversity Conservation Act 2016 (NSW)
BCF	Biodiversity Conservation Fund
BCS	Biodiversity Conservation and Science Group within NSW DCCEEW
BCT	Biodiversity Conservation Trust
BESS	Battery Energy Storage System
BMP	Biodiversity Management Plan
CC	Construction certificate
CCTV	Closed circuit television
CEMP	Construction Environment Management Plan
Conditions	Minister's conditions of consent
CONVA	Construction & Operational Noise & Vibration Assessment
DCCEEW CPHR	NSW Department of Climate Change, Energy, the Environment and Water - Conservation Programs, Heritage and Regulation Group
DPHI or Department	Department of Planning, Housing and Infrastructure (former Department of Planning and Environment)
DRC	Dubbo Regional Council
DoE	Department of Education NSW
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW)
EPA	NSW Environment Protection Authority
FRNSW	Fire and Rescue NSW
HBT	Hollow bearing tree
IA	Independent Audit
IAPAR	Independent Audit Post Approval Requirements 2020
kL	Kilolitre or 1,000 litres
MOD	Modification (Modification of the SSD)
NHVR	National Heavy Vehicle Regulator
OOHW	Out of hours work
OSOM	Oversize and/or over mass
the Project	The Development as described in the EIS and approved under SSD 45242780
RFS	Rural Fire Service
RMU	Ring main unit

Abbreviation/Term	Description
RtS	Response to Submissions
SSD	State Significant Development
TfNSW	Transport for NSW
TMP	Traffic Management Plan

EXECUTIVE SUMMARY

Akaysha Energy Pty Ltd (Akaysha) is developing a large-scale Battery Energy Storage System (BESS) in central-west NSW within the Central-West Orana Renewable Energy Zone (REZ). Known as the Orana BESS (the Project). The Project is located approximately two kilometres north-east of Wellington in the Dubbo Regional local government area, will have a capacity of 415MW, and provide 4 hours or 1660MWh of energy storage.

Development Consent for the Project was granted under section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (State Significant Development (SSD) 45242780) by the Executive Director of Energy, Resource and Industry Assessments of the Department of Planning, Housing and Infrastructure (the Department), as delegate of the Minister for Planning and Public Spaces on 22 December 2023, subject to Conditions of Consent (conditions). The Project was modified on the 26 September 2024 (MOD 1) to provide for additional construction laydown area and additional permanent fill batter around the southern extent of the BESS, and on the 3 August 2024 (MOD 2) to amend the development footprint and biodiversity offset requirements.

CPP has been engaged as the principal construction contractor. CPP subcontracted the Goolma Road intersection works to FKG. Construction of the Goolma Road upgrade works started on the 29 August 2024 and other Project works commenced on the 11 September 2024. Construction of the Project is forecasted for completion in mid-2026. At the time of the audit most works were largely completed with all plant and equipment in place.

This Audit was undertaken in accordance with the SSD 45242780 Condition C14, and the Department's 2020 document titled *Independent Audit Post Approval Requirements* (IAPAR). The Audit seeks to verify compliance with the relevant conditions and assess the effectiveness of environmental management on the Project. It is consistent with the scope, methodology and reporting requirements of the IAPAR.

This Audit Report presents the outcomes of the fourth independent audit (IA4) for the construction phase of the Project covering the period from 11 December 2025 to 30 April 2026 (the 'audit period'). Works undertaken during this period included energising the high voltage (HV) transformers in the substation, energising the majority of the megapack units, completion of the operation and maintenance (O&M) building, completion of the O&M warehouse, completion of internal roads, completion of electrical works and completion of other minor site finishing works (final fencing, gravel placement, etc).

The Occupation Certificate was obtained from Maltby for the O&M Building, O&M Warehouse, the Control Building and Switch Gear Buildings 1 and 2. The Goolma Road upgrade, which was operational under a provision practical completion arrangement, obtained practical completion from TfNSW on 13 January 2026. The Project is still to obtain the TransGrid / AEMO final hold point release after commissioning to allow connection to the grid.

The audit site inspection was conducted on 30 April 2026. The overall outcome of the audit was positive. Compliance records were generally organised and available at the time of the site inspection, during interviews with Akaysha and upon request to the auditee. Relevant compliance documentation and records were being collected and reported as required under the SSD to provide verification of compliance with statutory requirements.

No reportable incidents were recorded and no complaints were reported during the reporting period.

Findings and recommendations were made during the audit and are reported in Appendix A, Section 3.2 and summarised below.

Summary of Findings

In summary:

- There were sixty-five (65) Conditions assessed.
- Forty-six (46) Conditions were considered by the Auditor to be compliant.
- No non-compliances were identified during this Audit
- Five (5) observations were made related to:
    - Inconsistencies in the timing of payment of contributions to Council under the Voluntary Planning Agreement (VPA) (A15).
    - Site rehabilitation requirements under the Biodiversity Management Plan (B14).
    - Housekeeping in the Laydown area (B26).
    - Implementation of the erosion and sediment controls in the Laydown area (B27).
    - Accommodation and Employment Strategy operational requirements (B34).
- Nineteen (19) Conditions were considered by the Auditor to be not triggered.
- All findings from the third independent audit (IA3) were closed.

Detailed findings are presented in Section 3 and Appendix A, along with the adequacy of management plans and the actions taken by the project team to address the audit findings.

The Auditor would like to thank the auditees for their high level of organisation, cooperation, and assistance during the Audit.

1. INTRODUCTION

1.1 Project overview

Akaysha Energy Pty Ltd (Akaysha) is developing a large-scale Battery Energy Storage System (BESS) in central-west NSW within the Central-West Orana Renewable Energy Zone (REZ). Known as the Orana BESS (the Project), the Project is located approximately two kilometres north-east of Wellington in the Dubbo Regional local government area and will have a capacity of 415MW and provide 4 hours or 1660MWh of energy storage.

The site is located in 6945 Goolma Road, Montefiores, NSW 2080, in land described as Lots 1 and 2 DP 1226751, Lot 2 DP 1136578 and part of the Goolma Road corridor. The regional context of the site is shown in Figure 1.

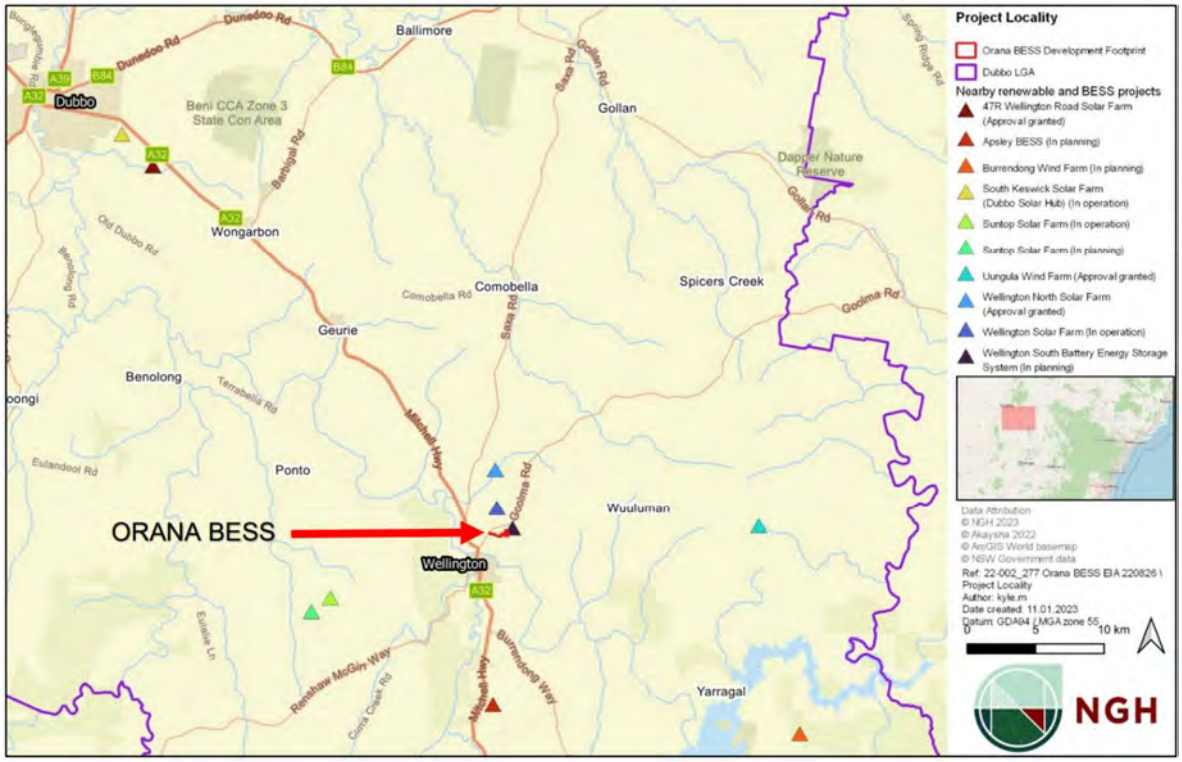


Figure 1: Regional Context Map (Source: Assessment Report, DPHI November 2023)

Development Consent for the Project was granted under section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (State Significant Development (SSD) 45242780) by the Executive Director of Energy, Resource and Industry Assessments of the Department of Planning, Housing and Infrastructure (the Department), as delegate of the Minister for Planning and Public Spaces on 22 December 2023, subject to Conditions of Consent (conditions).

The Project, as approved, includes:

- A BESS, with a nominal capacity of 415 MW / 1660 MWh

- Lithium-ion storage technology
- Approximately 448 BESS units, 112 step-up (MV) transformers, and up to 20 ring main units (RMUs)
- A substation and switchyard, up to two 330 kilovolt (kV) / 33 kV power transformers connecting the BESS to the existing TransGrid substation
- Underground transmission line, rated at 330 kV and approximately 400 metres (m) in length, from the Orana substation to the existing Wellington substation
- Associated operations and maintenance building, site office, switch room and control room
- Site access via Goolma Road
- Internal access tracks
- Security lighting, CCTV and fencing
- Water tanks

The Project was amended on the 26 September 2024 (MOD 1) by the Director Energy Assessments of the Department to provide for additional construction laydown area and additional permanent fill batter around the southern extent of the BESS. A second modification was approved by the Director Energy Assessments on 3 September 2025 (MOD 2) to include the TransGrid substation to which the BESS will connect within the Project footprint and to modify the current offset obligation to replace the species credits for *Prasophyllum sp. Wybong* with an equivalent credit requirement *for Prasophyllum sp. Petilum*.

The General Development Layout (as amended in MOD 2) is shown in Figure 2.

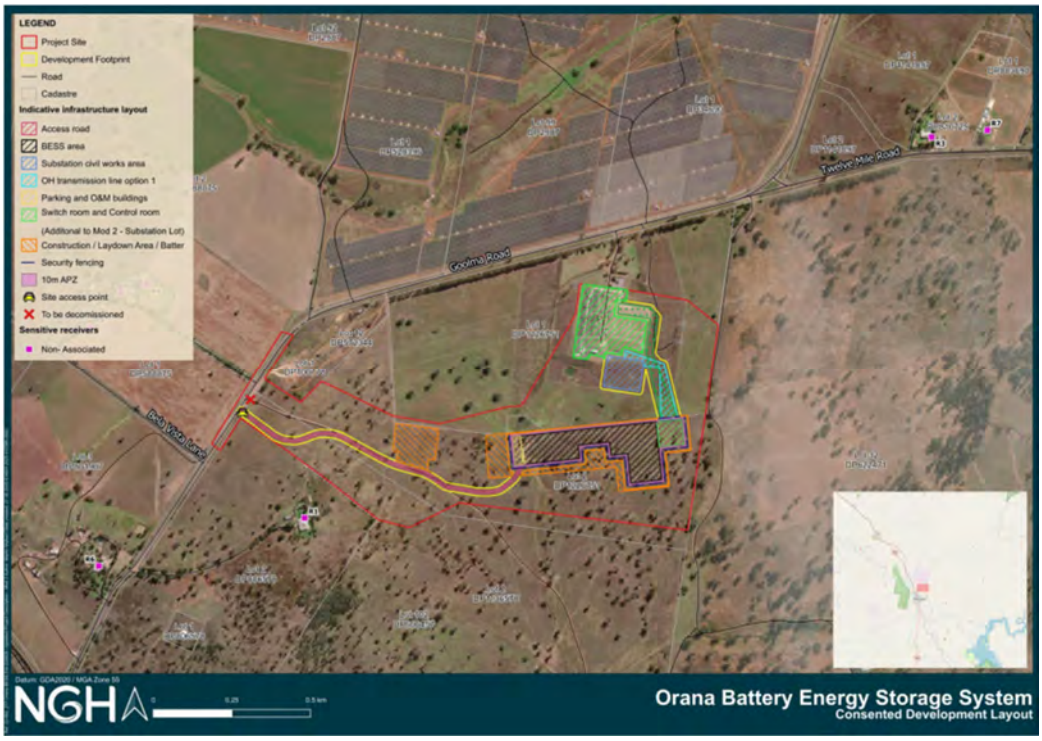


Figure 2: General Development Footprint (Source: NGH's Modification 2 Report, June 2025)

The BESS layout is shown in Figure 3.

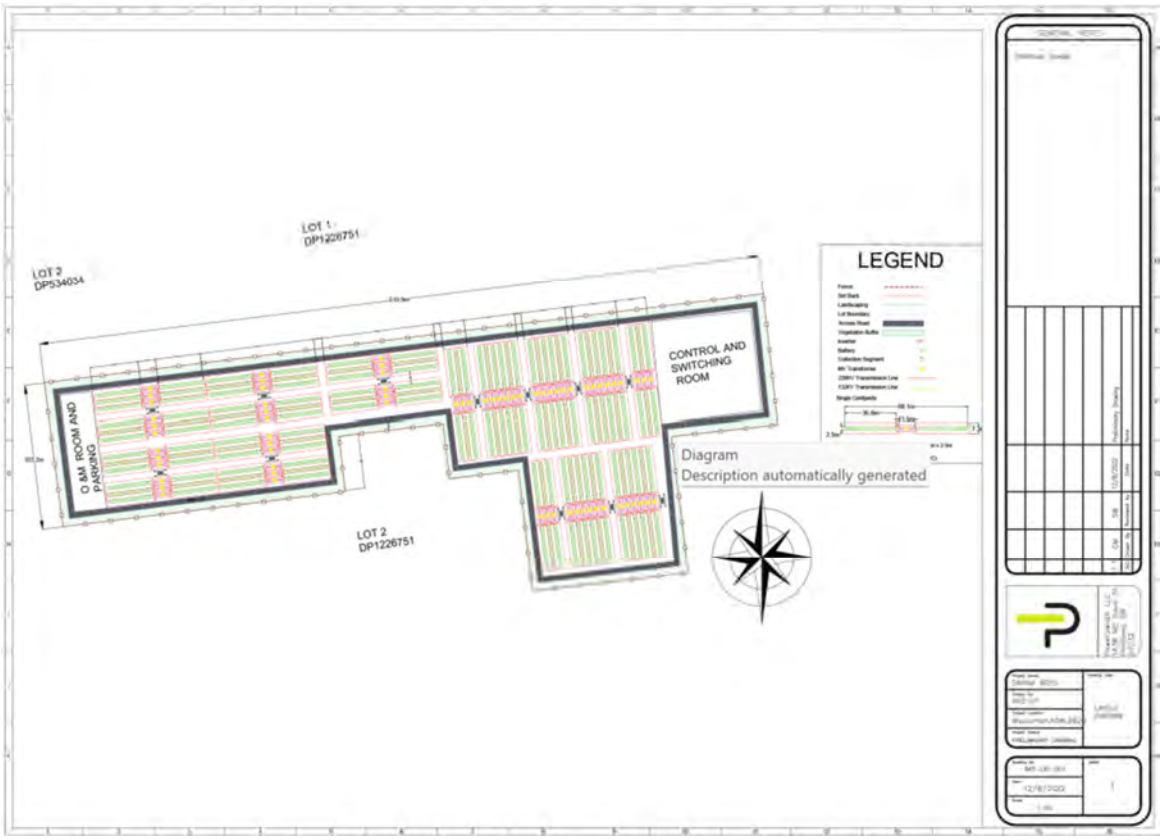


Figure 3: BESS Site Layout (Source: NGH's Modification 2 Report, June 2025)

CPP was engaged as the principal construction contractor. CPP subcontracted the Goolma Road intersection works, now completed, to FKG. Maltby Certification Group is the Project certifier.

Construction activities commenced in August 2024 and are forecasted for completion in mid-2026.

This Audit Report presents the outcomes of the fourth independent audit (IA4) for the construction of the Project covering the period from 11 December 2025 to 30 April 2026 (the 'audit period'). Works undertaken during this period included energising the high voltage (HV) transformers in the substation, energising the majority of the megapack units, completion of the operation and maintenance (O&M) building, completion of the O&M warehouse (to be used to store tools etc), completion of internal roads, completion of electrical works and completion of other minor site finishing works (final fencing, gravel placement, etc).

The Occupation Certificate was obtained from Maltby for the O&M Building, O&M Warehouse, the Control Building and Switch Gear Buildings 1 and 2. The Goolma Road upgrade, which was operational under a provision practical completion arrangement, obtained practical completion from TfNSW on 13 January 2026. The Project is still to obtain the TransGrid / AEMO final hold point release after commissioning to allow connection to the grid.

The site inspection was conducted on 30 April 2026.

1.2 Approval requirements for Independent Audit

SSD 45242780 Conditions set out the requirements for undertaking Independent Audits. The Conditions give effect to the Department's 2020 version of the document titled *Independent Audit Post Approval Requirements* (IAPAR).

1.3 Audit Team

In accordance with Section 3.1 of the IAPAR, Independent Auditors must be suitably qualified, experienced and independent of the Project, and appointed by the Planning Secretary.

The Lead Auditor was approved by the Department of Planning, Housing and Infrastructure (DPHI or the Department) on the 10 December 2024. The letter of approval is presented in Appendix B and auditor's independence declaration is attached in Appendix F.

The approved Lead Auditor:

- Ricardo Prieto-Curiel (Lead Auditor): Exemplar Global Certified Lead Environmental Auditor (Certificate No 15160). Registered Environmental Assessment Practitioner, Master's in environmental Toxicology.

1.4 Audit Objectives

The objective of this Audit was to undertake the fourth construction phase independent Audit in accordance with the requirements of the IAPAR and the SSD 45242780 Schedule 2, Condition C14 which states:

> *Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) or as updated from time to time and published on the Department's website.*

This Audit seeks to fulfill the requirements of Condition C14 verify compliance with the relevant Conditions and assess the effectiveness of environmental management on the Project.

1.5 Audit Scope

This Audit Report presents the outcomes of the fourth independent audit (IA4) for the construction of the Project covering the period from 11 December 2025 to 30 April 2026 (the 'audit period').

This Audit adopts the scope defined within the IAPAR 2020, being:

- "An assessment of compliance with:
  - all conditions of consent applicable to the phase of the development that is being audited; and
  - all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans.
- A review of the environmental performance of the development, including but not necessarily limited to, an assessment of:

- actual impacts compared to predicted impacts documented in the environmental impact assessment
- the physical extent of the development in comparison with the approved boundary
- incidents, non-compliances and complaints that occurred or were made during the audit period
- the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit, and
- feedback received from the Department, and other agencies and stakeholders, on the environmental performance of the project during the audit period.

- A review of the status of implementation of previous Independent Audit findings recommendations and actions (if any)
- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate, and
- Any other matters considered relevant by the auditor or the Department, considering relevant regulatory requirements and legislation, knowledge of the development's past performance."

2. AUDIT METHODOLOGY

2.1 Audit Process Overview

The Audit was conducted in a manner consistent with *AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems* and the methodology set out in the Department's IAPAR.

2.2 Audit Process Detail

2.2.1 Audit initiation

Prior to the commencement of the Audit the following tasks were completed:

- Establish initial contact with the auditee
- Confirm the audit team
- Confirm the audit purpose, scope and criteria.

2.2.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan, and prepared work documents (audit checklists) and distributed to the Project team in preparation for the Audit.

2.2.3 Consultation

WolfPeak consulted with the Department on 19 March 2026 to obtain their input into the scope of the Independent Audit and confirmation on whether other stakeholders should be consulted, in accordance with the guidance provided under Section 3.2 of the IAPAR. The Department responded on the 26 March 2026. A summary of feedback provided from the Department is shown in Table 1 and the correspondence with the Department in Appendix C.

In addition, the Department requested that consultation be undertaken with the Local Council (Dubbo regional Council), Environment Protection Authority (EPA), Transport NSW (TfNSW), NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW)'s Conservation Programs, Heritage and Regulation (NSW DCCEEW CPHR), Heritage NSW, Water Group of DCCEEW, NSW Rural Fire Service and the Community Consultative Committee (CCC). WolfPeak consulted with the above stakeholders on the 27 March 2026. A summary of the feedback provided from these stakeholders is shown in Table 1 and the corresponding correspondence is provided in Appendix C.

Table 1: Areas of focus raised during consultation

Stakeholder	Areas of Focus	Where addressed
Department of Planning, Housing and Infrastructure	DPHI requested to address/review the following aspect:	
	• the Audit needs to ensure that it addresses all conditions of consent for the Project and meet the requirements of the Independent Audit Post Approval Requirements (DPIE, 2020). https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf.	Appendix A, Section 1.4
	• As part of your Audit can you please address/review the following aspects:	
	- Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project.	Appendix A, Sections 3.3, 3.5, 3.8
	- Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust.	Appendix A, Section 3.3
	- Details of the works that have been undertaken so far at the Project.	Section 1.1
	- Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans.	Appendix A, Section 3.3
	- Are accurate records are being kept, specifically in relation to community complaints and actions.	Appendix A, Section 3.6
	• Please consult with the following:	
	- a. Local Council – Dubbo Regional Council	
	- b. Environment Protection Authority	Appendix C, Sections 2.2.3, 3.5
	- c. Transport for NSW	
	- d. NSW DCCEEW CPHR	
	- e. Heritage NSW	
	- f. Water Group of DCCEEW	
	- g. NSW Rural Fire Service	
	- h. Community Consultative Committee	
	• The non-compliance reported in the previous IEA with Schedule 2 Condition B1 is under investigation by the Department, can you please review that the recommendations and actions proposed are being implemented and that records are being kept tracking vehicle movements from the project.	Appendix A, Section 3.5
	• This email is to be appended to the Audit Report.	Appendix C
	• The Proponent should review the Audit Report prior to submission to NSW Planning, to ensure all the requirements of the Consent relating to Independent Environmental Audits have been met.	Section 2.2.11
	• Lastly, it is the expectation that the lead auditor attends audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to provide the auditor with reasonable access to all requested development areas and activities; thus the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and	Appendices D and A

<table>
<tr><th>Stakeholder</th><th>Areas of Focus</th><th>Where addressed</th></tr>
<tr><td></td><td>an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise).</td><td></td></tr>
<tr><td>Dubbo Regional Council</td><td>The Dubbo Regional Council was consulted on 27 March 2026 and responded on 30 April 2026. It indicated that the modified consent states the following:

APPENDIX 7:
GENERAL TERMS OF THE APPLICANT'S VPA OFFER
The VPA must include provisions for the payment, collection, management and distribution of the contributions under the agreement, with a focus on funding community enhancement in the area surrounding the project site.
<table><tr><th>Council</th><th>Payment details</th></tr><tr><td>Dubbo Regional Council</td><td>• Contributions to the value of $3,200,000 up front at the commencement of commercial operations.</td></tr></table>
However the Planning Agreement entered into on 19 August 2024, as per Condition A15 reads slightly different. To paraphrase the Planning Agreement it requires:

• The Developer to pay Council $1.3 million at commencement of operations, which will be utilised for the Wellington Road Shared Pathway;

• The Developer to pay to Council $160,000 from Year 8 onwards and annually;

• Council to allocate monetary contributions towards community benefits identified in the Renewable Energy Benefit Framework;

• Funds will be indexed in accordance with CPI.

The Planning Agreement will result in Council receiving $3,200,000 (subject to CPI increases) over a 20-year period.</td><td>Section 3.5</td></tr>
<tr><td>Environment Protection Authority (EPA)</td><td>The EPA was consulted on 27 March 2026. An email acknowledging the consultation request was received on the 27 March 2026. No comments were subsequently received from the EPA</td><td>Appendix C</td></tr>
<tr><td>Transport for NSW</td><td>TfNSW was consulted on 27 March 2026 and provided a response on 30 March 2026. It suggested that the following matters be addressed within the audit:

• Compliance with Instrument of Consent transport-related conditions
• Implementation and enforcement of shuttle bus arrangements
• Management of construction traffic volumes during AM and PM peak periods
• Any pre-construction minor works mitigation measures and associated Planning Secretary approvals
• Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs)</td><td>Section 3.5, Appendix A</td></tr>
</table>

Stakeholder	Areas of Focus	Where addressed
	• Commitments made within the Environmental Impact Statement (EIS) • Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions • Effectiveness of mitigation measures detailed within the TMP • Alignment between assessed and actual traffic volumes and vehicle characteristics • Suitability of existing intersection treatments under cumulative background and project traffic • Ongoing appropriateness of approved OSOM routes for the configurations being utilised • Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response • Audit report outcomes and recommended actions relevant to the State Road network	
NSW DCCEEW CPHR	NSW DCCEEW CPHR was consulted on 27 March 2026 and a response was provided in letter dated 1 April 2026. CPHR noted that the scope of WolfPeak's audit will include assessment of compliance with the development consent conditions. CPHR has previously provided advice on the first three 6-monthly construction phase independent audits of Orana BESS. We have nothing further to add to our previous advice.	Noted. IA1, IA2 and IA3
Heritage NSW	Heritage NSW was consulted on 27 March 2026 and a response was provided on 30 March 2026. Heritage NSW requested to consider as a part of the audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, to please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed. It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.	Section 3.5, Appendix A
Water Group of DCCEEW	NSW DCCEEW Water Group was consulted on 27 March 2026 and a response was provided in letter dated 1 April 2026. NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following: • Identification of compliance requirements and documentation of any non -compliances.	Section 3.5, Appendix A

Stakeholder	Areas of Focus	Where addressed
	• Assessment of the adequacy and implementation of management plans and sub plans. • Assessment of compliance against relevant regulatory requirements and legislation . • Assessment of compliance between actual and predicted impacts in the environmental assessment. • Reporting requirements for management plans. • Identification of strengths of the project in environmental management and opportunities for improvement. NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope : • The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: - Water Management Plan s and related sub -plans e.g. , Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. - Extraction Plans and related sub -plans e.g. , Water Management Plan, Subsidence Management Plan. • The requirement to prepare and implement trigger action response plan s for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance -based reporting. • Water supply availability is clearly defined for the project. • Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025 . Consideration is also to be given to the relevance of excluded works at the site with reference to the factsheet at the following address: https://water.dpie.nsw.gov.au/__data/assets/pdf_file/0008/554444/la -interpreting -excluded -works -dams -fact -sheet.pdf • Water metering at the site is in accordance with the NSW Non -Urban Metering Framework where relevant. • Water Access Licence /s used to account for water take by the project nominates the work where the water is being taken from. • Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.	
NSW Rural Fire Service	NSW Rural Fire Service (RFS) was consulted on 24 November 2025, and a response was provided on the 13 April 2026. RFS indicated: The NSW RFS provided a response to the modification and it is at your discretion, as the certifier, to be satisfied the terms for the consent have been met.	Noted

Stakeholder	Areas of Focus	Where addressed
	We have no further concerns or issues for you to address relating to post approval requirements and compliance.	
Community Consultative Committee (CCC)	There is no CCC for the project, neither the SSD requires one.	N/A

Note: Consultation records are presented in Appendix C.

2.2.4 Meetings

The opening meeting was held on 30 April 2026 at the construction site project offices with project personnel and the WolfPeak auditor. During the opening meeting, the objectives and scope of the Audit, the resources required, overview of the project and status of the works and methodology to be applied were discussed.

A closing meeting was carried out on the 30 April 2026. The preliminary audit findings were presented, recommendations (as appropriate) were made, and any post-audit actions were confirmed. The opening and closing meetings attendance sheet is provided in Appendix D.

2.2.5 Interviews

The Auditor conducted interviews on 30 April 2026 with key Project personnel during and following the site inspection. During the inspection key personnel involved in on-site Project delivery, including those with responsibilities for environmental management, who could assist on verifying the compliance status of the development were interviewed.

All other communication was conducted remotely, which included a detailed request for information and auditee responses to the request. The names of personnel interviewed during the audit are provided in Table 2.

Table 2: Audit meeting personnel interviewed

Name	Role	Organisation
Darcy Plant	Project Engineer	Akaysha
Angus Wilson	Operations Manager	Akaysha
William May	Project Engineer	Akaysha
Rob Meyers	Construction Manager	Akaysha

2.2.6 Site inspection

The on-site audit activities included an inspection of the work activities including the completed Goolma Road intersection, the battery units area (with all units and infrastructure constructed and under commissioning), boundary fencing and buffer areas, cleared areas, tree protection and heritage protection zones and the like to verify implementation of mitigation measures from the CEMP and subplans relevant to the works taking place at the time of the inspection.

The site inspection was conducted on 30 April 2026, and detailed observations are discussed in Section 3 and Appendix A. Photos taken during the inspections are presented in Appendix E.

2.2.7 Document review

The Audit included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The primary documents reviewed are presented in Section 3.1. Evidence gathered during the Audit is referenced in the compliance tables presented in Appendix A.

2.2.8 Generating audit findings

Audit findings were based on verifiable evidence. The evidence included:

- relevant records, documents and reports
- interviews of relevant site personnel
- photographs
- figures and plans
- site inspections of relevant locations, activities and processes.

Section 3 and Appendix A present the general audit findings and recommendations.

2.2.9 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table in Appendix A, using the descriptors below:

Table 3: Compliance status descriptors

Status	Description
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Compliant	WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.
Non-compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.

Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Observations and notes may also be made to provide context, identify opportunities for improvement or highlight positive initiatives.

2.2.10 Evaluation of post approval documentation

The Auditor assessed whether post approval documents:

- have been developed in accordance with the Conditions and their content is adequate
- have been implemented in accordance with the Conditions.

The adequacy of post approval documents was determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document
- whether there are any opportunities for improvement.

2.2.11 Completing the audit

The Audit Report was distributed to the Applicant to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

The Auditor's findings have been determined independent of the auditees, the Department and any other parties, based on the evidence assessed during the audit.

3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

The documents audited comprised those prepared under the conditions from Schedule 2 of SSD 45242780 applicable to the works being undertaken at the time of the Audit. The primary documents reviewed during the audit are as follows:

- *Development Consent SSD 45242780, dated 22 December 2023 and amended on 26 September 2024 MOD 1 and on 3 August 2025 (MOD 2) (the Consent).*
- *Environmental Impact Statement (EIS) Orana BESS, dated April 2023 by NGH.*
- Modification Report Orana Battery Energy Storage System Mod 1, dated June 2024 by NGH
- Modification Application Orana Battery Energy Storage System Mod 2, dated June 2025 by NGH
- Environmental Management Strategy Orana BESS – (rev E dated 16 January 2026) prepared by WSP.
- Biodiversity Management Plan (BMP) Orana BESS (rev J, dated 6 March 2026) prepared by WSP (the BMP) and attachments including the Masked Owl Management Plan.
- Orana Battery Energy Storage System Accommodation and Employment Strategy (Rev C, dated 15 July 2024) prepared by Consolidated Power Projects (the AES).
- Akaysha Chance Finds Protocol, Version 3 dated 12 July 2024, prepared by Virtus Heritage.
- Stage 1 Traffic Management Plan Rev L 19 September 24 prepared by Amber Traffic & Transportation Direction.
- Stage 2a Traffic Management Plan Rev C 7 March 2025 prepared by Amber Traffic & Transportation Direction.
- Stage 2b Traffic Management Plan Rev A 17 April 2025 prepared by Amber Traffic & Transportation Direction.
- Occupation Certificate for Orana Battery Energy Storage System, Maltby Certification Group Occupation Certificate No. OCMCG40/2025 issued on 14/04/2026
- Project Website https://community.akayshaenergy.com/orana-bess
- Complaints Management System in Project Website.

All records and evidence sighted against each condition are detailed within Appendix A.

3.2 Summary of Compliance

All findings from previous audits that remained open at the completion of the third independent audit (IA3) have been closed during this audit (refer to Table 4).

Table 5, presents the summary of compliance and recommended actions in response to each of the findings from this Audit. Detailed findings against each requirement are presented in Appendix A.

In summary:

- There were sixty-five (65) Conditions assessed.
- Forty-six (46) Conditions were considered by the Auditor to be compliant.
- No non-compliances were identified during this Audit
- Five (5) observations were made related to:
    - Inconsistencies in the timing of payment of contributions to Council under the Voluntary Planning Agreement (VPA) (A15).
    - Site rehabilitation requirements under the Biodiversity Management Plan (B14).
    - Housekeeping in the Laydown area (B26).
    - Implementation of the erosion and sediment controls in the Laydown area (B27).
    - Accommodation and Employment Strategy operational requirements (B34).
- Nineteen (19) Conditions were considered by the Auditor to be not triggered.

Table 4: Status of previous audit findings

Item ID	Ref.	Category	Condition / Requirement	Audit Finding	Recommendation[1] / Applicant Action	Status[2]
IA3-04	A3	Observation	***Terms of Consent*** *The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:* *a) any strategies, plans or correspondence that are submitted in accordance with this consent;* *b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and* *c) the implementation of any actions or measures contained in these documents.*	**Observation**: The Department's approval of Out of Hours Works (OOHW) up to the 30 June 2026 required that the OOHW approval be made publicly available on the Project website at the earliest convenience. However such approval is not directly uploaded in the Project website but available via a link to the NSW Government Planning Portal.	**Recommendation**: Upload the Department's approval of OOHW to the 30 June 2026 issued on the 11 November 2025 in the Project Website. **IA4 update**: the Department's approval of OOHW to the 30 June 2026 issued on the 11 November 2025 is uploaded in the Project Website.	**CLOSED**
IA3-07	B27	Observation	***Erosion and Sediment Controls*** *The Applicant must:* *a) minimise any soil erosion and control sediment generation;* *b) ensure the battery storage and ancillary infrastructure and any other land disturbance associated with the construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version;* *c) ensure the battery storage and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site; and* *d) ensure the battery storage and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site.*	**Observation**: Sediment basin 3 has been removed given that most of its catchment has been stabilised (with gravel or concrete). A partially exposed slope located upstream of the former Sediment Basin 3 and outside the fenced project area does not appear to have sediment and erosion controls other than some minor bunding and partial mound revegetation	**Recommendation**: As required, install sediment and erosion controls to manage stormwater flowing from the exposed mound located upstream of the former Sediment basin 3. **IA4 update**: During the audit site inspection, the mound was observed hydromulched and stabilised (refer to photos in Appendix E)	**CLOSED**
IA3-08	C20	Observation	***Access to Information*** *The Applicant must:* *a) make the following information publicly available on its website as relevant to the stage of the development:* *i. the EIS;* *ii. the final layout plans for the development;* *iii. current statutory approvals for the development;* *iv. approved strategies, plans or programs required under the conditions of this consent (other than the Fire Safety Study and Emergency Plan);* *v. the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged;* *vi. a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent;* *vii. how complaints about the development can be made;* *viii. any independent environmental audit, and the Applicant's response to the recommendations in any audit; and* *ix. any other matter required by the Planning Secretary; and keep this information up to date.*	**Observation**: The summary of monitoring results uploaded in the project website are recent inspection reports. The Independent Audit reports are not directly uploaded in the project website but through a link to the Major Project's portal where the Independent Audit reports are available. Although the findings of first independent audit are closed, the Applicant's response to the findings of the first independent audit are not uploaded in the project website.	**Recommendation**: Upload in the project website the Independent Audit Reports, the Applicant response to the findings of the first independent audit and a comprehensive summary of monitoring results reported in accordance with approved management plans. **IA4 update**: Independent audit reports and response to findings have been uploaded in the project website. Inspection reports have been uploaded for multiple months. There are also FAQs	**CLOSED**

1. Auditor's recommendation. The recommended action does not preclude the need for all non-compliances to be reported by the proponent in accordance with the terms of the consent. 2. At the time of finalising this Audit Report.

Table 5: Status of findings from the Fourth Independent Audit (IA4)

Item ID	Ref.	Category	Condition / Requirement	Audit Finding	Recommendation[1] / Applicant Action	Status[2]
IA4-01	A15	Observation	***Community Enhancement*** *Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with:* *a) Division 7.1 of Part 7 of the EP&A Act; and* *b) the terms of the correspondence dated 27 November 2023, which are summarised in Appendix 6. Planning Agreement for Orama BESS and Dubbo regional Council 2/08/2024*	**Observation**: there are inconsistencies regarding the timing of payment of contributions to Council under the Voluntary Planning Agreement (VPA) between the terms of the consent itself and between the consent and the VPA entered with Council on 19 August 2024. Condition A15(b) and Appendix 7 of the consent are inconsistent, as Condition A15(b) requires annual payments of $160,000 for 20 years whilst Appendix 7 requires upfront payment of $3.2 million at the commencement of commercial operation. In addition, there are inconsistencies between the VPA entered with Council on 19 August 2024 with the consent, as the signed VPA requires the Developer to pay Council $1.3 million at commencement of operations and then payments to Council for the amount of $160,000 from Year 8 onwards.	The Applicant entered into a VPA with Council on the 19 August 2024 with payments totalling the amount required under A15. No recommendation other than informing the Department of the payment timing inconsistencies with the submission of the Audit report (for other details refer to Section 3.5).	**CLOSED**
!A4-02	B14	Observation	***Biodiversity Management Plan (Rehabilitation)*** *Prior to commencing construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with **CPHR**, and to the satisfaction of the Planning Secretary. This plan must:* *c) be prepared in accordance with the revised Biodiversity Development Assessment Report (dated 6 September 2024);* *d) include a description of the measures and timeframes that would be implemented for:* *i. protecting vegetation and fauna habitat outside the approved disturbance areas;* *ii. managing the remnant vegetation and fauna habitat on site;* *iii. minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development;* *iv. avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependant fauna;* *v. minimising the impacts to fauna on site and implementing fauna management protocols, including design of temporary fencing;* *vi. rehabilitating and revegetating temporary disturbance areas with species that are native to the area; maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and* *vii. controlling weeds, feral pests and pathogens.* *e) include a program to monitor and report on the effectiveness of mitigation measures;* *f) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site; and* *g) include details of who would be responsible for monitoring, reviewing and implementing the plan.* *Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.*	**Observation**: Section 5.8 of the Biodiversity Management Plan provides details of site rehabilitation of temporary disturbance areas such as construction compound and laydown areas. It indicates that, amongst other items, these areas will be progressively rehabilitated and revegetated during the later stages of construction and post construction and that a qualified Bush Regeneration will be engaged to implement a rehabilitation plan with the goal of establishing species from PCT 266.	**Recommendation**: Implement Section 5.8 of the BMP prior to commencement of operations.	**OPEN**

Item ID	Ref.	Category	Condition / Requirement	Audit Finding	Recommendation[1] / Applicant Action	Status[2]
IA4-03	B26	Observation	***Water Pollution*** *The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act*	**Observation**: The following was observed in the laydown area (Photos 24 and 25 in Appendix E): • several chemical containers were unbunded • minor potential spills were noted in exposed soils near a shipping container	**Recommendation**: ensure that all chemical containers are bunded and clean up potential spills within the laydown area	**OPEN**
IA4-04	B27	Observation	***Erosion and Sediment Controls*** *The Applicant must:* *a) minimise any soil erosion and control sediment generation;* *b) ensure the battery storage and ancillary infrastructure and any other land disturbance associated with the construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version;* *c) ensure the battery storage and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site; and* *d) ensure the battery storage and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site.*	**Observation**: The stockpiles in the laydown area were observed with insufficient erosion and sediment controls in place (refer to Photo 26 in Appendix E)	**Recommendation**: Install sediment and erosion controls at the laydown area' stockpiles.	**OPEN**
IA4-05	B34	Observation	***Accommodation and Employment Strategy*** *Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council and Mid-Western Regional Council. This strategy must:* *a) propose measures to ensure there is sufficient accommodation for the workforce associated with the development;* *b) consider the cumulative impacts associated with other State significant development projects in the area;* *c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and* *d) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.* *The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary prior to commencement of construction, and implement the plan throughout construction.*	**Observation**: Condition B34(c) requires the Accommodation and Employment Strategy (AES) *to investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible*. The AES (CPP, July 2024) does not include project operations, specifically the AES (July 2024) indicates that *the AES does not apply to the operations and decommissioning of the BESS. The operations and decommissioning will be part of separate work packages in the future*.	**Recommendation**: Prepare an AES (or update the current version) to address the operational requirements of Condition B34	**OPEN**

2. Auditor's recommendation. The recommended action does not preclude the need for all non-compliances to be reported by the proponent in accordance with the terms of the consent.
3. At the time of finalising this Audit Report.

3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents

A review of the Project's management plans, including the Environmental Management Strategy (EMS), the BMP, the Traffic Management Plans (TMPs) and the AES (for references refer to Section 3.1) indicated that the plans are generally compliant with the requirements of the SSD-45242780 and generally appropriate for the works undertaken at the time of the audit.

The Project's management plans were observed to be generally implemented during the audit period, with some minor observations regarding housekeeping and erosion and sediment controls in the Laydown area raised for this audit period (refer to Table 5 for details).

Project records indicate that the applicant has generally implemented the EMS during the reporting period. Weekly inspections are undertaken in accordance with the Environmental Management Strategy. CPP undertakes the regular weekly inspections for the project, covering housekeeping, safety, tools and equipment, environmental aspects, permits to work/SWMS, quality, and mobile plant operations, with a different focus area each week. Environmental monitoring has been undertaken during the audit period including vehicle movement (refer to B2), and dust visual monitoring (refer to B20). An Environmental Manager supervises and manages the site's environmental performance.

No clearing occurred during the reporting period. During site inspection, the implementation of the BMP was observed on site including protection of vegetation retained within the site, boundary fencing to protect vegetation outside the disturbance boundary, the presence of nest boxes installed in trees within and adjacent to the site (refer to photos in Appendix E), environmental inspections and environmental induction training.

The TMP was implemented as discussed in Section 3.4. Consistent with the AES, some local contractors have been used during the audit period.

3.4 Summary of notices from agencies

To the Auditor's knowledge no formal enforcement notices, orders or penalty notices were issued by the Department or other agencies during the audit period.

A written direction from the Planning Secretary was issued to Akaysha during the audit period. The Department, in letter to Akaysha dated 9 April 2026, issued a notice to furnish Information and records related to a non-compliance raised in IA3 on exceedances of traffic movements during peak hour. Peak hour records for the period 1 October 2025 to 30 November 2025 were requested. Upon request, the Department provided an extension to the submission of the traffic movement records to the 29 May 2026. At the time of completing this audit report, Akaysha provided evidence to the auditor that a response to the Department's information request was issued on the 29 May 2026.

Communications with the Department and other agencies as part of the implementation of the consent are discussed in Appendix A.

3.5 Other matters considered relevant by the Auditor or DPHI / Agencies / Council

There were no other matters considered relevant by the Auditor.

Feedback provided by the Department is detailed in Section 2.2.3. Table 1 provides details of the Departments consultation feedback and provides references to the section of the audit where each requirement is addressed.

Consultation was undertaken with Council and agencies as requested by the Department (refer to Section 2.2.3 and Appendix C). The auditor's responses to questions or requests made by Council and agencies are addressed below.

Dubbo Regional Council (DRC)

The Dubbo Regional Council was consulted on 27 March 2026 and responded on 30 April 2026. It indicated that there are some inconsistencies between the Voluntary Planning Agreement (VPA) entered into on 19 August 2024 and the VPA requirements of the consent (for details refer to Table 1 and Appendix C). This matter is discussed below.

Voluntary Planning Agreement (VPA)

Condition A15 requires the Applicant to enter into a VPA with Council in accordance with Division 7.1 of Part 7 of the EP&A Act and the terms of the correspondence dated 27 November 2023 which is summarised in Appendix 7 of the consent as follows:

APPENDIX 7:
GENERAL TERMS OF THE APPLICANT'S VPA OFFER

The VPA must include provisions for the payment, collection, management and distribution of the contributions under the agreement, with a focus on funding community enhancement in the area surrounding the project site.

Council	*Payment details*
Dubbo Regional Council	• Contributions to the value of $3,200,000 up front at the commencement of commercial operations.

Council correspondence dated 27 November 2023 (re: Orana BESS - Draft Terms for a Planning Agreement), which is referred to in Condition A15(b), was obtained from the Major Project's portal and can be downloaded from the following link:

https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=RFI-63770456%2120231220T051512.916%20GMT

The VPA entered into on 19 August 2024, as per Condition A15 was obtained from Council website https://www.dubbo.nsw.gov.au/Builders-Developers/Planning-Controls-Tools-and-Resources/planning-agreements

A review of Council correspondence dated 27 November 2023, Appendix 7 of the consent and the VPA entered into on 19 August 2024 indicates the following:

- The total contributions to the value of $3,200,000 are consistent in Council correspondence dated 27 November 2023 (which is referred to in Condition A15(b), Appendix 7 of the consent and the VPA entered into on 19 August 2024
- However, there are inconsistencies regarding the timing for the payment of the contributions in the consent and the signed VPA. Whilst Council correspondence dated 27 November 2023 provides an equivalent annual contribution of $160,000 (in present value) for the 20 year project life (totalling $3.2m in present value), Appendix 7 of the consent requires contributions of $3.2m up front at the commencement of commercial operations, and the actual VPA entered into on 19 August 2024 requires the Developer to pay Council $1.3 million at commencement of operations and then payments to Council for the amount of $160,000 from Year 8 onwards and annually resulting in Council receiving $3.2m (subject to CPI increases) over a 20-year period.

In summary, Condition A15(b) and Appendix 7 of the consent are inconsistent, as Condition A15(b) requires annual payments of $160,000 for 20 years whilst Appendix 7 requires upfront payment of $3.2 million at the commencement of commercial operation. In addition, there are inconsistencies between the actual signed VPA and the consent, as the signed VPA requires the Developer to pay Council $1.3 million at commencement of operations and then payments to Council for the amount of $160,000 from Year 8 onwards. This has been raised as an Observation for the attention of the Department.

Environment Protection Authority (EPA)

The EPA was consulted on 27 March 2026. An email acknowledging the consultation request was received on the 27 March 2026. No comments were subsequently received from the EPA

Transport for NSW

TfNSW was consulted on 27 March 2026 and a response was provided on 30 March 2026. TfNSW requested that the following matters be addressed within the audit:

- "*Compliance with Instrument of Consent transport-related conditions*
- *Implementation and enforcement of shuttle bus arrangements*
- *Management of construction traffic volumes during AM and PM peak periods*
- *Any pre-construction minor works mitigation measures and associated Planning Secretary approvals*
- *Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs)*
- *Commitments made within the Environmental Impact Statement (EIS)*
- *Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions*
- *Effectiveness of mitigation measures detailed within the TMP*
- *Alignment between assessed and actual traffic volumes and vehicle characteristics*

- *Suitability of existing intersection treatments under cumulative background and project traffic*
- *Ongoing appropriateness of approved OSOM routes for the configurations being utilised*
- *Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response*
- *Audit report outcomes and recommended actions relevant to the State Road network*."

Transport related conditions have been assessed for compliance in this audit (refer to Appendix A). No compliance issues have been identified for the audit period in relation to Conditions B2 to B10 (refer to Appendix A).

The audit site inspection and review of project records indicated that the auditee has generally implemented the TMPs during the audit period. The TMPs were prepared in consultation with TfNSW and Council with consideration of the EIS and Traffic Impact Assessment, and the TMPs were then approved by the Department in accordance Condition B10 (for details refer to Appendix A). No traffic related incidents or complaints have been received during the audit period. The mitigation measures in the TMPs were considered generally effective.

Five x 14 seater shuttle buses have been operating on site during construction. The shuttle buses operated during peak hours to bring project personnel to the site (leave Wellington approx. 6:30-7:30 am and depart the site at 5pm). The use of shuttle buses is documented in the TMPs. Instructions to contractors regarding off site parking to shuttle bus users was sighted including directions to the off site car park in Wellinton (location of off-site carpark is also identified in the TMP). As works are completed, records showed a reduction in employee numbers (January to May 2026) and the progressive removal of the shuttle bus services. Recent project records showed that a shuttle bus was removed on the 20/03/2026, one on the 10/04/2026 and the last shuttle bus removed on the 7/05/2026. Employee numbers in May 2026 were consistently below 50 and therefore the removal of the shuttle bus service responded to the lack of demand. The Orana BESS car park register shows the parking sites allowed to the shuttle buses.

The traffic movement register for December 2025 to April 2026 showed that heavy and light vehicle movements were within the limits in Condition B1 and those approved by the Department in correspondence dated 16 April 2025 (traffic movement limits are documented in the TMPs). Escorted vehicle movements were not required during the audit period. OSOM movements occurred in previous audit periods with no issues reported. A temporary vehicle pass system was used to approved vehicles for site access, with vehicle passes/stickers issued to approved vehicles (refer to Photos in Appendix E). A boom gate was installed at the site entry point to enable controlled access and prevent unauthorised or unmanaged vehicle entry during peak periods. The boom gate was removed during week 27 April with the reduction of employees and with all plant and equipment delivered. Some exceedances of light vehicle movements recorded in the last audit (IA3) are currently being investigated by the Department.

The site is provided with sufficient parking for all vehicles, with no parking on the public road network observed during the site visit or otherwise recorded during the audit period. Speed limits are applied in internal roads, with signage provided for 10km/h and 25km/h speed limits depending on the site road (refer to photos in Appendix E).

Approved travel routes are documented in the TMPs and are implemented through inductions and notifications to truck companies and employees. The auditee implements a Driver's code of conduct which addresses, amongst other items, drivers, traffic routes and safe driving practices. The TMPs provide details of school bus routes and public transport and measures to avoid conflict.

The Goolma Road intersection works were completed during the IA2 period in accordance with the consent. A notice of Provisional Practical completion was issued by TfNSW on 13 February 2025. The intersection has been operational during construction under the Provisional Practical completion notice. A notice of Practical completion was issued by TfNSW on 13 January 2026. TfNSW confirmed that Transport for NSW (TfNSW) has inspected the Works and is satisfied that Practical Completion has been achieved. It also indicated that A Post-Opening Road Safety Audit was completed on 23 November 2025 and has been submitted to TfNSW.

NSW DCCEEW CPHR

NSW DCCEEW CPHR was consulted on 27 March 2026, and a response was provided on in letter dated 1 April 2026. It requested the following:

"CPHR noted that the scope of WolfPeak's audit will include assessment of compliance with the development consent conditions.

CPHR has previously provided advice on the first three 6-monthly construction phase independent audits of Orana BESS. We have nothing further to add to our previous advice.

Noted. For assessment of compliance against biodiversity conditions refer to Appendix A.

Heritage NSW

Heritage NSW was consulted on 27 March 2026, and a response was provided on 30 March 2026. Heritage NSW requested the following:

"…consider as a part of the audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, to please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed.

It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project."

Contact was established with compliance@planning.nsw.gov.au as part of the audit consultation (refer to Appendix C0.

Conditions B23 and B24 relate to heritage protection, including requirements for the development not to cause any direct or indirect impacts on Aboriginal heritage items located outside the project footprint, and preparation of a Chance Finds Protocol respectively. No compliance issues have been identified in relation to heritage.

As discussed in Appendix A, no unexpected heritage findings have been reported to date. The construction footprint is fenced, and construction works are contained within the site. An exclusion zone (including fencing) has been installed around the culturally modified tree located outside the site and requiring protection under the EIS (refer to Photos in Appendix E).

A Chance Finds Protocol, Version 3 dated 12 July 2024, was prepared by Virtus Heritage for Akaysha in accordance with Condition B24. The Department, in correspondence dated 19 July 2024 to Akaysha, noted that no further comments on the Chage Finds Protocol (V3) at this time and instructed that the documents be made publicly available on the project website at the earliest convenience. The document is available on the project website.

The auditee has advised that it has not registered any AHIMS items in the AHIMS register. A review of the EIS indicates that no Aboriginal cultural heritage items were identified on site.

Water Group of DCCEEW

NSW DCCEEW Water Group was consulted on 27 March 2026, and a response was provided in letter dated 1 April 2026. The following comments were provided.

"*NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:*

- *Identification of compliance requirements and documentation of any non - compliances.*
- *Assessment of the adequacy and implementation of management plans and sub plans.*
- *Assessment of compliance against relevant regulatory requirements and legislation.*
- *Assessment of compliance between actual and predicted impacts in the environmental assessment.*
- *Reporting requirements for management plans.*
- *Identification of strengths of the project in environmental management and opportunities for improvement."*

Refer to Appendix A and scope of the audit in Section 1.5.

"NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:

- Water Management Plan s and related sub -plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.

- Extraction Plans and related sub -plans e.g., Water Management Plan, Subsidence Management Plan."

SSD 45242780 requires the preparation of an Environmental Management Strategy (EMS) and includes conditions related water supply (B25), water pollution (B26) and operating conditions (B27) including minimisation of soil erosion and sediment generation, reduce impacts on surface

water, localised flooding and groundwater. The SSD does not specifically require the preparation of a Water Management Plan, Surface and Groundwater Management Plan, Site Water Balance, Extraction Plan or Subsidence Management Plan. In addition to the EMS, the auditee's contractor prepared a Construction Environmental Management Plan (CEMP) (CPP, March 2025) which includes a Water Management Plan and a Soil Erosion, Sedimentation and Drainage Management Plan. A sediment and erosion control plan has been prepared and implemented during construction (refer to Appendix A).

The BESS has now been constructed, and the permanent stormwater management system is in place and operational. The operational stormwater drainage includes a number of pits and drainage lines that flows to a basin (refer to Photos in Appendix E). The operational basin and operational stormwater system were inspected during the audit site inspection. The main basin was observed in good condition and evidence of off-site water pollution could be noted.

"*The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance -based reporting."*

Refer to above. The CPP's CEMP includes criteria for discharges of stormwater captured in the site's sediment basins. SSD 45242780 does not include requirements for annual reporting but requires that non-compliances and incidents be reported to the Department. No incidents or non-compliances related to water have been reported during the reporting period.

"*Water supply availability is clearly defined for the project."*

Water from the site has been purchased from the town water supplier Starr's Water and McKechnie Water during the audit period. The water is purchased and transported by truck to the site. There is no water meter on site. Tax invoices from town water supplier Starr's Water and McKechnie Water for the audit period sighted.

"Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025. Consideration is also to be given to the relevance of excluded works at the site with reference to the factsheet at the following website: https://water.dpie.nsw.gov.au/__data/assets/pdf_file/0008/554444/la -interpreting -excluded -works -dams -fact -sheet.pdf"

Refer to above. Water is purchased from the town water supplier and transported to the site by truck. The operational stormwater drainage system is documented in issued for construction drawings prepared for the Project.

"Water metering at the site is in accordance with the NSW Non -Urban Metering Framework where relevant."

The auditee advised that there is no water meter on site.

"Water Access Licence /s used to account for water take by the project nominates the work where the water is being taken from."

As indicated above, water for the Project has been purchased from the town water supplier during the audit period and transported to the site by truck.

"Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated."

As indicated above, SSD 45242780 does not include requirements for annual reporting. The auditor is not aware of any reporting undertaken by the auditee outside the SSD 45242780 approval or that undertaken under legislation such the Water Management Act.

NSW Rural Fire Service

NSW Rural Fire Service (RFS) was consulted on 24 November 2025, and a response was provided on the 13 April 2026. RFS indicated:

"The NSW RFS provided a response to the modification, and it is at your discretion, as the certifier, to be satisfied the terms for the consent have been met.

We have no further concerns or issues for you to address relating to post approval requirements and compliance".

Noted

3.6 Complaints

In accordance with Condition C20, the project website https://community.akayshaenergy.com/Complaints-Register provides the project's complaint management system with the steps to be undertaken in the event of a complaint, including a complaints form, timeframes for resolving the complaint, investigation, escalation and recording and registering the complaint.

The project maintains a complaint register. Projects records provided by the auditee indicated that no complaints have been received during the reporting period.

3.7 Incidents

The auditee maintains an incident register for the Project. During the audit period, the auditee recorded eleven (11) minor/negligible safety related incidents. No reportable incidents, as defined in SSD-45242780, were recorded during the audit period.

3.8 Actual versus predicted impacts

The Audit considered the actual impacts based on the site inspection and review of records, on whether they are consistent with the relevant impacts predicted in the development consent's environmental assessment documentation.

The EIS and RtS and subsequent modifications (the EIS documents) included a range of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the Project. Full assessment of the accuracy of these predictions would also require a significant number of studies involving measurement and modelling using actual data points as inputs. Other than considering the construction requirements specified in the conditions and mitigation measures, to the Auditor's knowledge there are no requirements to undertake such studies and doing so does not form part of this Audit. Any such comparison is qualitative only.

The works observed and the impacts therein appear to be generally consistent with those identified in the EIS documents. A summary of the assessment is presented in Table 6.

Table 6: Summary of Predicted Versus Actual Impacts for key construction assessment issues

Aspect	Summary of Impacts	Actual impacts observed during the audit period	Consistent (Y/N)
Biodiversity	The Project would result in the loss of 14.22 ha of native vegetation being Plant Community Type (PCT) 266 White Box grassy woodland. The Project would result in the removal of 53 hollow bearing trees with 162 hollow bearing trees to be retained on the site. MOD1 predicted an additional impact on 3.6 ha of native vegetation, being PCT 266, but given the low vegetation integrity score of PCT 266, those impacts did not generate any ecosystem credits. Despite that, presence was assumed for some species which resulted in credit changes in the SSD. MOD2 did not predict impacts on biodiversity but amended the offset obligation by replacing *Prasoplhyllum* sp. for *Prasophyllum Petilum*. The updated BDR (updated as part of MOD1) included the Masked Owl as a candidate species requiring offset. The Department recommended the preparation of a Biodiversity Management Plan (BMP) in consultation with BSC to ensure remaining biodiversity values on site are appropriately managed and maintained.	Project clearing was completed in previous audit periods. As far as the auditor could observe during the site inspection, the clearing has been restricted to the approved project site. Retained vegetation within the site and immediately outside the site is protected with fencing/delineation. No unexpected biodiversity finds reported during the audit period. Biodiversity offset credits have been retired. A BMP was prepared and then revised following approval of MOD1 and MOD2. The BMP has been approved by DPHI.	Y
Aboriginal Cultural Heritage	Site surveys undertaken in consultation with Registered Aboriginal Parties (RAPs) identified no Aboriginal cultural heritage items on site. One culturally modified tree was identified approximately 150 m to the south of the development footprint. This site would be avoided, and an exclusion zone would be established to avoid any incidental harm. The Department has recommended a condition requiring Akaysha prepare a Chance Finds Protocol for the project.	An exclusion zone (including fencing) has been installed around the culturally modified tree (refer to site photos in Appendix E). A Chance Finds Protocol, Version 3 dated 12 July 2024, was prepared by Virtus Heritage for Akaysha, in consultation with Aboriginal Stakeholders and Heritage NSW.	Y
Historic Heritage	The site and surrounds are not subject to any Commonwealth or State historic heritage listings. While no locally listed heritage items occur within the site, the curtilage of two local heritage listed homesteads (Nanima Homestead and Keston Homestead) adjoin the site boundary. The Nanima Homestead (R1) and its associated buildings would be located around 640 m from the BESS and 200m from the proposed access track, and the Keston Homestead buildings would be 500 m and 1.3 km away. Neither homestead would be physically impacted by the project.	No impacts on the Nanima Homestead and Keston Homestead were observed during the site inspection or noted in project records. No complaints have been received during the audit period on the Project.	Y
Traffic, Transport	The main increase in traffic would occur over the 18-month construction period. A revised	CPP monitors vehicles movements and prepares Monthly Vehicle Movements	Y

Aspect	Summary of Impacts	Actual impacts observed during the audit period	Consistent (Y/N)
and Accessibility	Traffic Impact Assessment (Amber, 20 March 25) was prepared to support an application to increase vehicle movements during construction from 35 to 80 heavy vehicle movements per day, from 30 to 50 light vehicle movements and from 5 to 10 heavy vehicle movements during the AM or PM project peak hours, and from 6 to 15 heavy vehicle movements requiring escort. The Department approved the request to increase vehicle movements in correspondence dated 16/04/2025. The Department recommended restricting vehicle movements during peak times (6-7 am and 5-6 pm), to prevent queuing on the public road network and manage the flow of vehicles entering and exiting the site. Heavy vehicles delivering plant during construction would travel from the Port of Newcastle, via the State road network, using Goolma Road to access the site from the north. Heavy vehicles delivering other construction equipment and materials would access the site via Goolma Road from the Mitchell Highway to the south. All roads along these routes are approved B-double routes. Traffic modelling indicated that the proposed transport route has sufficient capacity to accommodate the construction traffic associated with the project. No road upgrades (other than for the site access) are required	reports. Monthly Vehicle Movement reports detailing the number of heavy and light vehicles every day and during peak and off-peak hours are prepared by the auditee. A review of the Monthly Vehicle Movements reports during the reporting period (heavy, light and during peak hours) indicated that the actual project vehicle numbers are compliant with the limits in Condition B1 those subsequently approved by the Department in correspondence dated 16 April 2025 (refer to Appendix A). The road upgrades required for the Goolma Road intersection have been completed. Approved travel routes are documented in the TMPs and are implemented through inductions and notifications to truck companies and employees. No impacts on traffic routes recorded.	
Noise and Vibration	Nine non-associated residential receivers are located within 1.5 km of the site, with the closest (R1) being located approximately 200m south of the proposed access road and approximately 640 m from the BESS. Noise generated by construction activities was predicted to be below the 'highly noise affected' criterion of 75 dB(A) for all residential receivers under EPA's Interim Construction Noise Guideline (ICNG). Construction noise levels were predicted to comply with the 'noise affected' criterion under the ICNG at all non-associated residential receivers, except for receiver R1, where an exceedance of up to 3 dB(A) is predicted when simultaneous operation of the three noisiest items of equipment occurs within 700 m of the dwelling. This exceedance represents a worst-case scenario which is unlikely to occur for an extended period, and Akaysha has committed to continuing to offer a neighbour agreement to R1 to mitigate impacts. MOD1 noise impact assessment determined that while the modification would result in a	No noise complaints have been received during the audit period. No noise monitoring was undertaken during the audit period. EnviroScience Solutions undertook unattended environmental noise monitoring at 3 locations around the site for a week in the last audit period from Monday 17/03/25 to Sunday 30/03/25. Two monitoring stations showed exceedances for the night time when no works were taking place. The third station showed some exceedances for the day time and evening periods on two days; however other measures were generally below the criteria.	Y

Aspect	Summary of Impacts	Actual impacts observed during the audit period	Consistent (Y/N)
	minor (1 dB(A)) increase in construction noise, it would generally not alter construction noise impacts assessed under the original project. MOD2 did not predict changes in noise impacts. No vibration impacts are predicted at any vibration sensitive receivers based on separation distances exceeding 200 m.		
Water quality	The project is not located on flood prone land and would be designed to transfer catchment flows around the site in a stable manner. The project would involve minimal excavations, and with the implementation of appropriate contamination controls, groundwater impacts were considered unlikely. Water quality impacts during construction would be managed by contamination controls and erosion and sediment control measures.	The risk of water quality impacts due to construction is low as civil works have been completed (refer to photos in Appendix E). The operational stormwater drainage system has been completed and is now operational.	Y

There were no reportable environmental incidents during the audit period.

The works were within the approved boundary (as best as could be confirmed by visual inspection only).

Based on the site inspection, document review and high degree of compliance, works appear to be consistent with the approved layout plans and the environmental impacts are mostly qualitatively well within that predicted by the EIS, RtS and subsequent modifications.

4. CONCLUSIONS

This Audit Report presents the outcomes of the fourth independent audit (IA4) for the construction of the Orana BESS Project (State Significant Development SSD-45242780) covering the period from 11 December 2025 to 30 April 2026 (the 'audit period').

The Audit was undertaken in accordance with the SSD-45242780 Condition of Consent C14 and the NSW Government's Independent Audit Guideline Post Approval Requirements (IAPAR).

Works undertaken during this period included energising the high voltage (HV) transformers in the substation, energising the majority of the megapack units, completion of the operation and maintenance (O&M) building, completion of the O&M warehouse, completion of internal roads, completion of electrical works and completion of other minor site finishing works (final fencing, gravel placement, etc). Occupation Certificate was obtained from Maltby for the O&M Building, O&M Warehouse, the Control Building and Switch Gear Buildings 1 and 2. The Goolma Road upgrade, which was operational under a provision practical completion arrangement, obtained practical completion from TfNSW on 13 January 2026. The Project is still to obtain the TransGrid / AEMO final hold point release after commissioning to allow connection to the grid. The site inspection was conducted on 30 April 2026.

The overall outcome of the audit was positive. Compliance records were generally organised and available at the time of the site inspection, during interviews with Akaysha and upon request to the auditee. Relevant compliance documentation and records were being collected and reported as required under the SSD to provide verification of compliance with statutory requirements. No reportable incidents were recorded during the audit period. No complaints reported during the reporting period. Some findings and recommendations were made during the audit and are reported in Appendix A, Section 3.2 and summarised below:

- There were sixty-five (65) Conditions assessed.
- Forty-six (46) Conditions were considered by the Auditor to be compliant.
- No non-compliances were identified during this Audit
- Five (5) observations were made related to:
    - Inconsistencies in the timing of payment of contributions to Council under the Voluntary Planning Agreement (VPA) (A15).
    - Site rehabilitation requirements under the Biodiversity Management Plan (B14).
    - Housekeeping in the Laydown area (B26).
    - Implementation of the erosion and sediment controls in the Laydown area (B27).
    - Accommodation and Employment Strategy operational requirements (B34).
- Nineteen (19) Conditions were considered by the Auditor to be not triggered.

All findings from the third independent audit (IA3) were closed.

The Auditor would like to thank the auditees for their high level of organisation, cooperation, and assistance during the Audit.

LIMITATIONS

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With respect to conditions relating to compliance with the design, Building Codes of Australia (BCA) or satisfaction of the Independent Verifier / Certifier / Certifying Authority, the Independent Audits relied on confirmation from the Independent Verifier / Certifier / Certifying Authority that this is the case. The Independent Audits do not extend to an assessment of the works against the design or BCA requirements themselves, nor did they examine the steps the Independent Verifier / Certifier / Certifying Authority has taken to verify that the design is compliant.

The assessment of actual impacts and those predicted in the Environmental Impact Assessment(s) was a high-level assessment qualitative assessment only. The Environmental Impact Assessment(s) include a voluminous number of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the Project (including mitigation measures). Full assessment of the accuracy of these predictions would also require a significant number of studies involving measurement and modelling using actual data points as inputs. Other than the requirements specified in the report, to the Auditor's knowledge there are no requirements to undertake such studies and doing so does not form part of this Independent Audit.

Audits of all post approval documents prepared to satisfy the conditions, including an assessment of the implementation of Environmental Management Plans and Sub-plans, adopts a Judgement Based Sampling approach. Judgement Based Sampling is the process of selecting a sample of commitments and evidence from within the total available data set (population) to obtain and evaluate evidence about some characteristic of that population, in order to form a conclusion concerning the population.

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APPENDIX A – SSD 45242780 CONDITIONS OF CONSENT

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
PART A ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
A1	In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, commissioning, upgrading, operation, decommissioning or rehabilitation of the development.	Evidence referred to elsewhere in this table. Site inspection and interview with auditees 30/04/2026 Site photos – Appendix E	The review of project records and the visual inspection of the site indicated that the applicant have implemented reasonable and feasible measures to prevent environmental impacts.	Compliant
TERMS OF CONSENT				
A2	The development may only be carried out: a) in compliance with the conditions of this consent; b) in accordance with all written directions of the Planning Secretary; c) generally in accordance with the EIS; and d) generally in accordance with the Development Layout in Appendix 1.	Development Consent - Orana Battery Energy Storage System SSD 45242780 approved by Executive Director Energy, Resource and Industry Assessments on 22/12/2023 Mod-1 SSD 45242780: Additional construction laydown area and permanent fill batters approved on 26/09/2029 by DPHI Mod-2 SSD 45242780: Amendment to approved development footprint and biodiversity offset requirements Environmental Impact Assessment Orana Battery Energy Storage System Final v2.1 18/04/2023 prepared by NGH Occupation Certificate for Orana Battery Energy Storage System, Maltby Certification Group Occupation Certificate No. OCMCG40/2025 issued on 14/04/2026 Email from Certifier (Maltby Certification Group) to Akaysha, dated 30/04/26, re: Occupation Certificate (OCMCG40/2025) - Clarification Construction Certificate No. CCMCG40/2025 issued on 14/02/2025 by James Maltby of Maltby Certification Group Pty Ltd for the BESS including ancillary Switchgear and Control Buildings Construction Certificate No. CCMCG40/2025/02 issued on 21/05/2025 by James Maltby of Maltby Certification Group for the Wellington Substation extension and supporting electrical infrastructure associated with the BESS Construction Certificate No. CCMCG40/2025/03 for O&M Warehouse Building approved on 23/10/2025 by James Maltby of Maltby Certification Group Pty Ltd.	Development was observed to be generally carried out in accordance with the EIS, and the approved plans prepared for the project. Practical completion of Goolma Road obtained during audit period The Goolma Road intersection works were completed during the IA2 period in accordance with the consent. A notice of Provisional Practical completion was issued by TfNSW on 13/02/2025. A notice of Practical completion was issued during the audit period by TfNSW on 13/01/2026 An Occupation Certificate (OC) for the Orana Battery Energy Storage System, was obtained from Maltby Certification Group Occupation Certificate No. OCMCG40/2025 issued on 14/04/2026. The Certifier clarified in email to Akaysha, dated 30/04/26 that the OC was for Switch Gear Building 1&2, Control Building, O&M Building and O&M Warehouse. Still to be obtained is the TransGrid / AEMO final approval after commissioning to allow operations The auditees reported that there was one written direction from the Planning Secretary during the audit period in addition to responses to documentation submitted for approval or requests as reported elsewhere in this table. DPHI, in letter to Akaysha dated 9/04/26, issued a notice to furnish Information and records related to a non-compliance raised in IA3 on exceedances of traffic movements during peak hour. Peak hour records for the period 1/10/25 to 30/11/25 were requested. Upon request, DPHI provided an extension to the submission of the traffic movement records to the 29 May 2026. At the time of completing this audit report, Akaysha provided evidence to the auditor that a response to the Department's information request was issued on the 29 May 2026. Construction Certificates issued to date for the project included: – Construction Certificate No. CCMCG40/2025 (CC1 14/02/2025): Battery Energy Storage System (400mW) including ancillary Switchgear and Control Buildings – Construction Certificate No. CCMCG40/2025/02 (CC2) 21/05/2025: Wellington Substation extension and supporting electrical infrastructure associated with the Orana Battery Energy Storage System.	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		TfNSW Notice of Provisional Practical Completion dated 13/02/2025, re: WAD Wuuluman CHR(S) BAL MR 633 Goolma Road WST24/00057 TfNSW Notice of Practical Completion dated 13 January 2026, re: WAD Wuuluman CHR(S) BAL MR633 Goolma Road WST24/00057 Weekly Site Inspection Reports by CPP sighted: Weekly Site Inspection Reports by CPP sighted: – 3/02/2026 – 11/02/2026 – 15/02/2026 – 22/021/2026 – 3/03/2026 – 8/03/2026 – 18/03/2026 – 22/03/2026 – 1/04/2026 – 11/04/2026 DPHI letter to Akaysha, 9/04/26, re: Notice to furnish Information and records DPHI letter to Akaysha, 22/04/2026, re: Notice to Furnish Information and Records – Extension Request Akaysha email to DPHI dated 29/05/2026, re: Response to the Notice to Furnish Information on traffic exceedances	– Construction Certificate No. CCMCG40/2025/03 for O&M Warehouse Building approved on 23/10/2025 by James Maltby of Maltby Certification Group Pty Ltd. No Construction Certificates issued for the project during the audit period. Weekly site inspections are being regularly undertaken for the project, covering areas such as housekeeping, tools and equipment, permits/SWMS, quality, mobile plant, and environmental aspects, including sediment controls, water drainage, air quality, solid/liquid waste, stockpiles, and chemical storage. During the site inspection, it was observed that construction works were confined within the site footprint, secured by the installed fence (refer to site photos). BESS and Substation CCs issued as discussed above. The auditee advised that a final sign-off certificate will be issued at the end of construction.	
A3	The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this consent; b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and c) the implementation of any actions or measures contained in these documents.	DPHI letter to Akaysha, 9/04/26, re: Notice to furnish Information and records DPHI letter to Akaysha, 22/04/2026, re: Notice to Furnish Information and Records – Extension Request Biodiversity Management Plan (BMP) Orana BESS (rev J, dated 6 March 2026) prepared by WSP. DPHI letter to Akaysha dated 25/03/2026, re: Biodiversity Management Plan Environmental Management Strategy Orana BESS – (rev E dated 16 January 2026) prepared by WSP DPHI letter to Akaysha Energy dated 3/03/2026, re: Orana BESS – Environmental Management Strategy	The auditees reported that there was one written direction from the Planning Secretary during the audit period in addition to responses to documentation submitted for approval or requests as reported elsewhere in this table. DPHI, in letter to Akaysha dated 9/04/26, issued a notice to furnish Information and records related to a non-compliance raised in IA3 on exceedances of traffic movements during peak hour. Peak hour records for the period 1/10/25 to 30/11/25 were requested. Upon request, DPHI provided an extension to the submission of the traffic movement records to the 29 May 2026. During the audit period, the Biodiversity Management Plan (rev J, dated 6 March 2026) was revised, and the revised version was approved by DPHI on the 25/03/2026. In its approval letter, DPHI required the applicant to make the document publicly available on the project website. The latest version of the BMP is uploaded in the project website. During the audit period, the Environmental Management Strategy (rev E, dated 16 January 2026) was revised, and the revised version was approved by DPHI on the 03/03/2026. In its approval letter, DPHI required the applicant to make the document publicly available on the	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		DPHI letter to Akaysha dated 5/03/2026, re: IEA 5 June 2025 to 10 December 2026	project website. The latest version of the EMS is uploaded in the project website. DPHI, in letter to Akaysha dated 5/03/2026 required the IA3 and response to audit findings to be made publicly available. IA3 and the applicant response are publicly available in the project website. (Note: for other directions issued in previous reporting periods refer to IA1, IA2 and IA3)	
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Interview with auditees 30/04/2026 DPHI letter to Akaysha, 9/04/26, re: Notice to furnish Information and records DPHI letter to Akaysha, 22/04/2026, re: Notice to Furnish Information and Records – Extension Request	No inconsistencies reported or identified during the audit other that those reported under Condition A15.	Compliant
BATTERY STORAGE RESTRICTION				
A5	Unless the Planning Secretary agrees otherwise in writing, the battery storage associated with the development must not exceed a total delivery capacity of 400 MW. Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage in the future.	Akaysha letter to DPHI dated 1/02/2024: Request to marginally exceed 400MW capacity due to technology and performance enhancements DPHI letter to Development ANZ dated 4/03/2024, re: Request to increase the approved capacity of the BESS https://akayshaenergy.com/projects/orana-bess	DPHI, in correspondence to Development ANZ dated 4/03/2024, approved a 15 MW increase to the total delivery capacity prescribed in Condition A5, to a total of 415 MW. DPHI required that the approval of increase capacity be made publicly available on the project website. The approval to increase capacity is uploaded in the project website No changes to this condition since last audit	Compliant
UPGRADING OF BATTERY STORAGE AND ANCILLARY INFRASTRUCTURE				
A6	The Applicant may upgrade the battery storage and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades.	Interview with auditees 30/04/2026 IFC drawings Eastern BESS Yard Facility Site Plan Rev O 13/12/24 by Consolidated Power Projects Tesla Storage Shed Concept Design 12/02/25 DPHI email to Akaysha dated 28 April 2026, re: IFC fire hydrant system layout	No upgrades reported for the audit reporting period. Design has reportedly remained within the approved development footprint Issued for Construction drawings (IFC) provided, Akaysha waiting for the As built drawings from CPP O&M warehouse and fire tank storage areas now completed. Upload receipts of layouts to DPHI and DPHI sent RFI regarding fire hydrant system in RFI_3 folder. DPHI email to Akaysha dated 28 April 2026, re: IFC fire hydrant system layout, DPHI indicated that they had no comments (email sighted) No changes from last audit. The as-built drawings currently being finalised and will be submitted to DPHI once ready	Not triggered
STRUCTURAL ADEQUACY				

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A7	The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia. Notes: • Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development. • The EP&A Regulation sets out the requirements for the certification of the development.	Occupation Certificate for Orana Battery Energy Storage System, Maltby Certification Group Occupation Certificate No. OCMCG40/2025 issued on 14/04/2026 Email from Certifier (Maltby Certification Group) to Akaysha, dated 30/04/26, re: Occupation Certificate (OCMCG40/2025) - Clarification Construction Certificate No. CCMCG40/2025 issued on 14/02/2025 by James Maltby of Maltby Certification Group Pty Ltd for the BESS including ancillary Switchgear and Control Buildings Construction Certificate No. CCMCG40/2025/02 issued on 21/05/2025 by James Maltby of Maltby Certification Group for the Wellington Substation extension and supporting electrical infrastructure associated with the BESS Construction Certificate No. CCMCG40/2025/03 for O&M Warehouse Building approved on 23/10/2025 by James Maltby of Maltby Certification Group Pty Ltd. TfNSW Notice of Practical Completion dated 13 January 2026, re: WAD Wuuluman CHR(S) BAL MR633 Goolma Road WST24/00057	An Occupation Certificate (OC) for the Orana Battery Energy Storage System, was obtained from Maltby Certification Group Occupation Certificate No. OCMCG40/2025 issued on 14/04/2026. The Certifier clarified in email to Akaysha, dated 30/04/26 that the OC was for Switch Gear Building 1&2, Control Building, O&M Building and O&M Warehouse. Still to be obtained is the TransGrid / AEMO final approval after commissioning to allow operations Construction Certificates issued to date for the project included: – Construction Certificate No. CCMCG40/2025 (CC1 14/02/2025): Battery Energy Storage System (400mW) including ancillary Switchgear and Control Buildings – Construction Certificate No. CCMCG40/2025/02 (CC2) 21/05/2025: Wellington Substation extension and supporting electrical infrastructure associated with the Orana Battery Energy Storage System. – Construction Certificate No. CCMCG40/2025/03 for O&M Warehouse Building approved on 23/10/2025 by James Maltby of Maltby Certification Group Pty Ltd. Practical completion of Goolma Road obtained during audit period The Goolma Road intersection works were completed during the IA2 period in accordance with the consent. A notice of Provisional Practical completion was issued by TfNSW on 13/02/2025. A notice of Practical completion was issued during the audit period by TfNSW on 13/01/2026 Note: WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.	Compliant
DEMOLITION				
A8	The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Interview with auditees 30/04/2026	No demolition of buildings or infrastructure required.	Not triggered
PROTECTION OF PUBLIC INFRASTRUCTURE				
A9	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. Note: This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.	Interview with auditees 30/04/2026 Pre-Construction Geotagged Condition Survey OPT-33290, Lot 2 6945 Goolma Road, Montefiores NSW (inspection date: 23/04/2024) prepared by Aus Dilaps	No repair works on public infrastructure in audit period Pre-Construction Geotagged Condition Survey OPT-33290, at Lot 2 6945 Goolma Road, Montefiores NSW of Council assets was undertaken by AusDilaps and include kerbs, gutters, footpaths and roadways. The auditee previously advised that no repair works or relocation of public infrastructure have been undertaken since the project commenced. No damage of public infrastructure reported during the audit period	Not triggered

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
OPERATION OF PLANT AND EQUIPMENT				
A10	All plant and equipment used on site, or in connection with the development, must be: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Orana BESS Equipment Register (sighted) Coates equipment code 1272 Haulotte Scissor33D, 3 monthly inspection 4/02/2026, Annual inspection 20/20/25 EVS124 Iveco 6x6 Trakker and Finn T330 MMA 1872 Hydro mulcher - Rego: XO19LJ, Truck service history (last service 7/04/26) EX154 - 2020 Kobelco SK135SR, Rego No. 66931E, Service 8 November 2025 20T Franna Maintenance Report Reson: XN07AF, inspections 13 and 21 January 2026	The Orana BESS Plant List was provided, including the plant ID, plant name, manufacturer, Registration/serial number, contractor company, next maintenance date. Service reports for plant and equipment (4 examples) during the audit period sighted	Compliant
SUBDIVISION				
A11	The Applicant may subdivide land comprising the site for the purposes of carrying out the development as identified in Appendix 3 and in accordance with the requirements of the EP&A Act, EP&A Regulation and the Conveyancing Act 1919 (NSW). Notes: • Under Part 6 of the EP&A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision. • Division 6.4 of Part 6 of the Act sets out the application requirements for subdivision certificates.	DP1301494 - Plan of Subdivision of Lot 2 DP1226754 and Right of Access affecting Lot 2 DP1136578, 24/04/2024, Pat Clarkstone Plan Information Notice 24/04/2024 issued by Land Registry Services	Land has been purchased by Akaysha via a land agreement. and the site has been subdivided and registered in the land title office. This was evidenced and reported in previous audit periods. DP1301494 - Plan of Subdivision of Lot 2 DP1226754 and Right of Access affecting Lot 2 DP1136578 was provided prepared by Pat Clarkstone and was officially registered on 24/04/2024 under Dubbo Regional Council. Plan Information Notice for DP1301494 was issued by Land Registry Services indicating that land was officially registered. No changes during the audit period	Not triggered
APPLICABILITY OF GUIDELINES				
A12	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	CEMP and subplans	The management plans appear to reference the current guidelines, standards and protocols relevant to the topics that each document addresses during construction phase.	Compliant
COMPLIANCE				
A13	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Orana BESS Specific Induction dated 28/04/2026, video Orana BESS Specific Induction V3 April 2024 (superseded) Induction Register to 23/04/2026 Email 26/11/2024 Akaysha-Stemar re: Deliver - MU Incomer BCT200 External Current Transformers	Orana BESS Specific Induction V3 April 2024 was initially prepared that cover critical information to ensure that workers and visitors understand the site's safety, operational, and compliance requirements. During IA3 the auditee advised that the Induction was revised in April 2025. A copy of the CPP induction was provided during the audit (the actual date in the induction was 11/12/2025). The revised induction covers environmental aspects and risks, as well emergency management and community liaison. A revised induction (video) dated 28/04/2026 was provided covering environmental aspects and risks.	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Project Directions and Requirement prepared by Akaysha issued to service providers and suppliers Email 4/06/25 CPPA to Conpower re: induction snapshot to encourage carpooling	The Orana BESS Completed Induction Register (up to 23/04/2026) was sighed. It provides details of personnel inducted, organisation, role, contact details, medical information, inductee, etc. Email dated 26/11/2024 from Akaysha was provided, sharing the Traffic Management Plan with the supplier of MU Incomer BCT200 External Current Transformers. The plan is distributed to drivers traveling to the site. The Project Directions and Requirements document, prepared by Akaysha, specifies that delivery drivers must report to the site office upon arrival and complete an induction. Pre-engagement package which is sent to transport companies which includes driver delivery instructions	
EVIDENCE OF CONSULTATION				
A14	Where conditions of this consent require consultation with an identified party, the Applicant must: a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) provide details of the consultation undertaken including: i. the outcome of that consultation, matters resolved and unresolved; and ii. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	For evidence of consultation during the audit period refer to B10	The auditee consulted with TfNSW regarding the revised TMP operations stage 3. It also consulted with Councils on the TMP stage 3. For details refer to B10 For details of consultation during IA1, IA2 and IA3 refer to the IA1, IA2 and IA3 reports	Compliant
COMMUNITY ENHANCEMENT				
A15	Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with: a) Division 7.1 of Part 7 of the EP&A Act; and b) the terms of the correspondence dated 27 November 2023, which are summarised in Appendix 6.	Planning Agreement for Orama BESS and Dubbo regional Council 2/08/2024	This condition is not considered triggered for the current audit. The VPA was agreed with Council in 2024. However, during Council consultation for IA4, Council indicated that there are inconsistencies between the actual signed VAP and the consent. This is discussed in detailed in Section 3.5 of the audit report. **Observation**: there are inconsistencies regarding the timing of payment of contributions to Council under the Voluntary Planning Agreement (VPA) between the terms of the consent itself and between the consent and the VPA entered with Council on 19 August 2024. Condition A15(b) and Appendix 7 of the consent are inconsistent, as Condition A15(b) requires annual payments of $160,000 for 20 years whilst Appendix 7 requires upfront payment of $3.2 million at the commencement of commercial operation. In addition, there are inconsistencies between the VPA entered with Council on 19 August 2024 with the consent, as the signed VPA requires the Developer to pay Council $1.3 million at commencement of operations and then payments to Council for the amount of $160,000 from Year 8 onwards. **Recommendation**: no recommendation other than informing the Department of the inconsistencies. Note: at the time of completing this audit report, Akaysha provided evidence to the auditor (internal email dated 27/05/2026 requesting	Not triggered

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			the preparation of an invoice for the first payment of the VPA) that the first payment of the VPA was being organised.	
PART B ENVIRONMENTAL CONDITIONS - GENERAL				
TRANSPORT				
Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions				
B1	The Applicant must ensure that: a) the development does not generate more than: i. 35 heavy vehicle movements a day during construction, upgrading or decommissioning; ii. 30 light vehicle movements, 5 shuttle bus vehicle movements and 5 heavy vehicle movements during the AM (6-7 am) or PM (5-6 pm) project peak hours during construction, upgrading or decommissioning; and iii. 6 movements of heavy vehicles requiring escort during construction, upgrading or decommissioning; and b) the length of any vehicles (excluding heavy vehicles requires escort) used for the development does not exceed 26 metres, unless the Planning Secretary agrees otherwise.	Orana BESS Stage 1 Traffic Management Plan Rev L, 19/09/2024 prepared by Amber Orana BESS Traffic Management Plan, 10/04/22025 prepared by CPP Stage 2a Traffic Management Plan Rev C 7/03/25 by Amber Letter 13/03/25 DPHI-Akaysha re: Approval of TMP Stage 2a Stage 2b Traffic Management Plan Rev A 17/04/25 by Amber Letter 14/05/25 DPHI-Akaysha re: Approval of TMP Stage 2b Letter 7/04/25 Akaysha-DPHI re: Request to increase vehicle movements in relation to Condition B1 Letter 16/04/25 DPHI-Akaysha re: request to vary vehicle numbers Monthly Vehicle Movements December 2025 to April 2026 by PCC Escorted Vehicle Movements Register Orana BESS (CPP) Oversize and/or Overmass (OSOM) Mass or Dimension Exemption Permit No. 1154161V3 dated 7/05/25 issued by National Heavy Vehicle Regulator (NHVR) - permit period 20/05/25-16/08/25 Interview with auditees 30/04/2026	CPP monitors vehicles movements and prepares Monthly Vehicle Movements reports with details the number of heavy vehicles and light vehicles during both peak and off-peak hours. A review of the Monthly Vehicle Movements reports for the audit period including December 2025, January 2026, February 2026, March 2026 and April 2026 (heavy, light and during peak hours) indicates that the Project complied with the approved limits. No OSOM movements requiring escort reported during the audit period. On 7/04/25, the auditees made a request to DPHI increase vehicle movements relation to Condition B1 which include: – from 35 to 80 heavy vehicle movements per day during construction, upgrading or decommissioning. – from 30 to 50 light vehicle movements and from 5 to 10 heavy vehicle movements during the AM (6-7am) or PM (5-6pm) project peak hours during construction, upgrading or decommissioning. There is no proposed change to the 5 shuttle bus movements. – from 6 to 15 heavy vehicle movements requiring escort during construction, upgrading or decommissioning. The Department approved the request on16/04/25 noting that: – increase in vehicle movements must also be incorporated within an updated Traffic Management Plan to be approved prior to any additional movements being undertaken. – there is a change to the high-risk heavy vehicle route to facilitate transformer deliveries to site as detailed in the TIA prepared by Amber (20 March 2025). – original route from Adelaide primarily used the Barrier and Mitchell Highways while the updated route primarily used the Newell Highway before using the Mitchell Highway at Dubbo. In accordance with Condition B4 of Schedule 2, all heavy vehicles requiring escort will still be travelling to and from the site via the Mitchell Highway and Goolma Road – prior to undertaking any heavy vehicle movements requiring escort please provide an updated Traffic Management Plan for Stage 2b of the development, in accordance with the staging request approved by the Department on 8 October 2024 (PA-23) The Stage 2b TMP provides the updated traffic movements as approved by DPHI on 16/04/25.	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B2	The Applicant must keep accurate records of the number of heavy vehicles requiring escort and heavy vehicles entering or leaving the site each day for the duration of the project.	Monthly Vehicle Movements December 2025 to April 2026 by PCC Escorted Vehicle Movements Register Orana BESS (CPP) Oversize and/or Overmass (OSOM) Mass or Dimension Exemption Permit No. 1154161V3 dated 7/05/25 issued by National Heavy Vehicle Regulator (NHVR) - permit period 20/05/25-16/08/25 Email 22/05/25 Akaysha -TfNSW re: OSOM Movement Notification	CPP monitors vehicles movements and prepares Monthly Vehicle Movements reports with details the number of heavy vehicles and light vehicles during both peak and off-peak hours. A review of the Monthly Vehicle Movements reports for the audit period including December 2025, January 2026, February 2026, March 2026 and April 2026 (heavy, light and during peak hours) indicates that the Project complied with the approved limits.	Compliant
Access Route				
B3	All heavy vehicles associated with the development must travel to and from the site via: a) Castlereagh Highway and Goolma Road; or b) Mitchell Highway and Goolma Road, as shown in Appendix 4.	Orana BESS - Heavy Vehicle Route Map Orana BESS Stage 1 Traffic Management Plan Rev L, 19/09/2024 prepared by Amber Orana BESS Traffic Management Plan, 10/04/22025 prepared by CPP Stage 2a Traffic Management Plan Rev C 7/03/25 by Amber Letter 13/03/25 DPHI-Akaysha re: Approval of TMP Stage 2a Stage 2b Traffic Management Plan Rev A 17/04/25 by Amber Letter 14/05/25 DPHI-Akaysha re: Approval of TMP Stage 2b Traffic Management Plan (TMP) Stage 3 (Operational Phase) 30/03/2026, by Amber Project Directions and Requirement prepared by Akaysha issued to service providers and suppliers	The Orana BESS Traffic Management Plan, 10/04/22025 prepared by CPP, the Stage 2a Traffic Management Plan Rev C 7/03/25 by Amber, and the Stage 2b Traffic Management Plan Rev A 17/04/25 by Amber show the traffic routes for heavy vehicles. Access routes are also shown in the Traffic Management Plan (TMP) Stage 3 (Operational Phase) dated 30/03/2026 Orana BESS - Heavy Vehicle Route Map that provides directions from Selwyn Street, Mayfield North NSW to 6945 Goolma Road, Montefiores NSW 2820, Australia The Project Directions and Requirements document, prepared by Akaysha, includes the route to the site and specifies that delivery drivers must report to the site office upon arrival, complete an induction, and that the document is provided to all service providers and suppliers for guidance and compliance.	Compliant
B4	All heavy vehicles requiring escort associated with the development must travel to and from the site via the Mitchell Highway and Goolma Road, as described in the EIS.	Stage 2b Traffic Management Plan Rev A 17/04/25 by Amber Letter 14/05/25 DPHI-Akaysha re: Approval of TMP Stage 2b Project Directions and Requirement prepared by Akaysha issued to service providers and suppliers Oversize and/or Overmass (OSOM) Mass or Dimension Exemption Permit No. 1154161V3 dated 7/05/25 issued by National Heavy Vehicle Regulator (NHVR) - permit period 20/05/25-16/08/25	No vehicles requiring escort occurred during the audit period. The Orana BESS Traffic Management Plan, 10/04/22025 prepared by CPP, the Stage 2a Traffic Management Plan Rev C 7/03/25 by Amber, and the Stage 2b Traffic Management Plan Rev A 17/04/25 by Amber show the traffic routes for heavy vehicles. The Stage 2b Traffic Management Plan Rev A 17/04/25 by Amber specifically shows the traffic routes for heavy vehicles requiring escort. The Project Directions and Requirements document, prepared by Akaysha, includes the route to the site and specifies that delivery drivers must report to the site office upon arrival, complete an induction, and that the document is provided to all service providers and suppliers for guidance and compliance. Oversize and/or Overmass (OSOM) Mass or Dimension Exemption Permit No. 1154161V3 dated 7/05/25 issued by National Heavy	Not triggered

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Notification from Akaysha to TfNSW of OSOM to transport a transformer leaving Victoria on 24/05/25 and expected delivery on 28/05/25.	Vehicle Regulator (NHVR) - permit period 20/05/25-16/08/25. The permit provides route for the OSOM which complies with B4. A notification to TfNSW was submitted for a OSOM transporting a transformer from Victoria departing on 24/05/25. The auditee advised that that the first OSOM for the project was completed on Monday 2/06/2025.	
Site Access				
B5	All vehicles associated with the development must enter and exit the site via the site access point off Goolma Road as identified in Appendix 1.	Site inspection 30/04/2026 Site photos – Appendix E	During the site inspection, it was observed that only one access point to the site was provided off Goolma Road. No other accesses sighted or reported during the audit	Compliant
B6	Prior to commencing construction, the Applicant must close and remove the existing site access servicing Lot 2 DP1136578.	Site inspection 30/04/2026 Site photos – Appendix E	As indicated in IA2, access to Lot 2 was removed prior to the commencement of construction. Refer to the site photos for reference. The previous access was observed closed during the site inspection of IA2. Works completed.	Not triggered
Road Upgrades				
B7	Unless the Planning Secretary agrees otherwise, prior to commencing construction, the Applicant must complete the road upgrades detailed in Appendix 5. Unless the relevant road authority agrees otherwise, these upgrades must comply with the current Austroads Guidelines, Australian Standards and TfNSW supplements, and be carried out to the satisfaction of the relevant roads authority.	Site inspection 30/04/2026 TfNSW Notice of Practical Completion dated 13 January 2026, re: WAD Wuuluman CHR(S) BAL MR633 Goolma Road WST24/00057 TfNSW Site Inspection Report for 6945 Goolma Road, prepared by Barker Ryan Stewart (BRS) in the following dates: – Site Inspection No.1: 4/09/2024 – Site Inspection No.2: 20/09/2024 – Site Inspection No.3: 23/09/2024 – Site Inspection No.4: 24/09/2024 – Site Inspection No.5: 25/09/2024 – Site Inspection No.6: 01/10/2024 – Site Inspection No.7: 02/10/2024 – Site Inspection No.8: 02/10/2024 – Site Inspection No.9: 21/10/2024 – Site Inspection No.10: 02/11/2024 – Site Inspection No.11: 04/11/2024 – Site Inspection No.12: 06/11/2024 – Site Inspection No.13: 07/11/2024 – Site Inspection No.14: 14/11/2024 – Site Inspection No.15: 19/11/2024 – Site Inspection No.16: 25/11/2024 – Site Inspection No.17: 29/11/2024 – Site Inspection No.18: 06/12/2024 – Site Inspection No.19: 09/12/2024	During the audit period, a notice of Practical completion was issued ‘ by TfNSW on 13/01/2026. TfNSW confirmed that Transport for NSW (TfNSW) has inspected the Works and is satisfied that Practical Completion has been achieved. It also indicated that A Post-Opening Road Safety Audit was completed on 23/11/2025 and has been submitted to TfNSW. Previously, the Goolma Road intersection works were completed during the IA2 period in accordance with the consent. A notice of Provisional Practical completion was issued by TfNSW on 13/02/2025 During the site inspection, the intersection was observed completed and functional. During construction of the road upgrades, TfNSW Site Inspection Reports were undertaken by Barker Ryan Stewart (BRS), an independent project verifier working on behalf of TfNSW to ensure compliance. A total of 19 site inspection reports were prepared for the project, as evidenced by the documents provided (refer to IA1 and IA2).	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Letter 13/02/25 TfNSW to Akaysha re: Notice of Provisional Practical Completion - WAD Wuuluman CHR(S) BAL MR633 Goolma Road WST24/00057		
B8	Unless the Planning Secretary agrees otherwise, prior to commencing construction, the Applicant must provide a Strategic Concept Design to TfNSW for approval, detailing the intersection design identified in Appendix 5. The Strategic Concept Design must satisfy the requirements set out in Appendix 6 and the applicable guidelines and standards identified in condition B7.	6945 Goolma Road, Montefiores – Detailed Design Verification (Ref No. 240367) - Schedule 8 - Detailed Design Documents Certificate by Barker Ryan Stewart Letter 30/04/2024 TfNSW-Akaysha re: Post Consent to Condition B7, B8 Letter 13/09/12024 TfNSW-Akaysha re: Approval to Commence Construction Letter 13/09/12024 TfNSW-Akaysha re: Detailed Design Acceptance	Completed in IA1. Detailed Design Documents were certified by Barker Ryan Stewart. TfNSW approved the strategic concept design and swept paths for the intersection treatments required to facilitate safe turning movements for the project on 30/04/2024. The TfNSW, in its letter dated 13/09/2024, acknowledged receipt of and accepted all pre-construction documentation, authorizing works to commence within the State Road Reserve. TfNSW approved the detailed design documentation on 13/09/2024 and noted that its validity is for 2 years from the date of approval. As indicated in B7, during the audit period, a notice of Practical completion was issued ‘ by TfNSW on 13/01/2026.	Not triggered
Operating Conditions				
B9	The Applicant must ensure: a) the internal roads are constructed and maintained as all-weather roads; b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; c) the capacity of the existing roadside drainage network is not reduced; d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the sealed public road network.	Site inspection 30/04/2026 Pavement Plans (7 sheets) 12/08/2024 prepared by Quanta Services	Internal access roads have been constructed to allow all-weather traffic for light and heavy vehicles (refer to photos in Appendix E). All vehicles observed parked on site. Light vehicle carpark have capacity for about 45 spaces. All vehicles were observed leaving the site in a forward direction. No vehicle loading observed during site inspection. No dirt from the project site was observed along the public roads during the site inspection. Pavement plans dated 12/08/2024 prepared by Quanta Services showing internal pavement works for the project.	Compliant
Traffic Management Plan				
B10	Prior to commencing road upgrades identified in condition B7, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW, Council and Mid-Western Regional Council, and to the satisfaction of the Planning Secretary. This plan must include: a) details of the transport route to be used for all development-related traffic; b) details of the road upgrade works required by condition B7; c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: i. temporary traffic controls, including detours and signage; ii. notifying the local community about development-related traffic impacts;	Site inspection 30/04/2026 Traffic Management Plan (TMP) Stage 3 (Operational Phase) 30/03/2026, by Amber TfNSW letter to Akaysha dated 8 April 2026, re: Stage 3 Traffic Management Plan (Operational Phase) dated March 2026 Dubbo Regional Council email to Akaysha dated 20/04/2026, re: Transport Management Plan	Traffic Management Plans (TMP) were prepared in accordance with B10 and approved by DPHI as reported in previous audits. The TMP has been staged as discussed in C3. During the audit period, the auditee prepared the Traffic Management Plan (TMP) Stage 3 (Operational Phase) dated 30/03/2026. It carried out consultation on this TMP as discussed below. TfNSW, in letter dated 8 April 2026, advised Akaysha that the TMP (operational phase) was generally acceptable with the following comments: • *Traffic volumes generated by the operational phase of the development are to remain consistent with the limits specified in the development consent, including those relating to heavy vehicle*	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	iii. procedures for receiving and addressing complaints from the community about development related traffic; iv. minimising potential cumulative traffic impacts with other projects in the area. v. minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network; vi. minimising dirt tracked onto the public road network from development-related traffic; vii. details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service as described in the EIS; viii. encouraging car-pooling or ride sharing by employees; ix. scheduling of heavy vehicle movements to minimise convoy length or platoons, and to minimise conflict with light vehicles; x. responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; xi. responding to any emergency repair or maintenance requirements; and xii. a traffic management system for managing heavy vehicles requiring escort; d) a driver's code of conduct that addresses: i. driver fatigue; ii. procedures to ensure that drivers adhere to the designated transport routes and speed limits; and iii. procedures to ensure that drivers implement safe driving practices; and e) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan. Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.	Mid Western Regional Council email to Akaysha date not provided in the evidence, re: Stage 3 Traffic Management Plan SSD-45242780-PA-51 for Traffic Management Plan Stage 3 CPP ORANA BESS Car Park Register Register with employee number of site, from 1/01/26 to 10/05/26 Orana Carpark Directions, March 2019 v1.1 Orana Battery Energy Storage System Traffic Management Plan Stage 1 (Rev L, 19/09/2024) prepared by Amber Traffic & Transportation Direction. DPHI letter to Akaysha dated 8/10/2024 re: Orana BESS – Traffic Management Plan Stage 1 DPHI letter to Akaysha dated 8/10/2024 re: Orana BESS – Traffic Management Plan Staging Orana BESS Traffic Management Plan, 10/04/22025 prepared by CPP Stage 2a Traffic Management Plan Rev C 7/03/25 by Amber Letter 13/03/25 DPHI-Akaysha re: Approval of TMP Stage 2a Stage 2b Traffic Management Plan Rev A 17/04/25 by Amber Letter 14/05/25 DPHI-Akaysha re: Approval of TMP Stage 2b Email 4/06/25 CPPA to Conpower re: induction snapshot to encourage carpooling Tesla Maersk Project Logistics Execution Plan (Maersk, 23/06/2025)	*movements, peak hour movements, and heavy vehicles requiring escort.* *• All heavy vehicles are to utilise the approved haulage routes as identified in the development consent.* *• Any heavy vehicles requiring escort, including over-dimensional vehicles, are to obtain the relevant approvals and permits from the appropriate authorities, including the National Heavy Vehicle Regulator (NHVR), prior to travel.* *• The proponent is to ensure that all vehicles enter and exit the site in a forward direction and that no queuing or parking occurs on the State road network.* *• Appropriate measures are to be implemented to ensure that no debris or material is tracked onto the surrounding road network.* *Should there be any variation to the assessed traffic volumes, further consultation with TfNSW will be required.* *The Planning Secretary should be satisfied that the above matter has been adequately addressed prior to approving the TMP.* Dubbo Regional Council, in email dated 20/04/26 indicated that the TMP Stage 3 had been reviewed by Council's infrastructure division who raised no issues given the road is under the responsibility of TfNSW. Mid-Western Regional Council also indicated (email date not available in evidence provided) that Council had reviewed the Stage 3 TMP and is satisfied to accept the TMP with some comments noted for consideration. Planning Portal records indicate that the TMP Stage 3 has been submitted to DPHI. As discussed in previous audit reports, DPHI, in correspondence dated 8/10/24, approved the staging of the Traffic Management Plan. DPHI conditioned the approval to Stage 2 works only proceeding after the completion of the Goolma Road intersection. DPHI, in correspondence dated 8/10/24, approved the Traffic Management Plan Stage 1 (Rev L). Consultation records were included in Appendix B of the plan. The auditees provided evidence of consultation conducted via email regarding the Traffic Management Plan (TMP), which was sent to nearby residents, TfNSW, and Dubbo Regional Council. For details of consultation refer to IA1. During the IA2 period, DPHI approved the request to stage the TMP provisions in correspondence 10/03/25. It required that updates to the TMP are made prior to the commencement of each stage. A Stage 2a TMP (7/03/25) was prepared by Amber, which was approved by DPHI on 13/03/25. A Stage 2b TMP (17/04/25) was prepared by Amber, which was approved by DPHI on 14/05/25. The audit site inspection and review of project records indicated that the auditee has generally implemented the TMPs during the audit period. The traffic movement register for December 2025 to April 2026 showed that heavy and light vehicle movements were within the limits in Condition B1 and those approved by the Department in correspondence dated 16 April 2025 (traffic movement limits are documented in the TMPs). Escorted vehicle movements were not required during the audit period. The site is provided with sufficient	

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			parking for all vehicles (including 45 LV parking spaces), with no parking on the public road network observed during the site visit or otherwise recorded during the audit period. A temporary vehicle pass system was used to approved vehicles for site access, with vehicle passes/stickers issued to approved vehicles (refer to Photos in Appendix E). Instructions to contractors regarding off site parking to shuttle bus users was sighted including directions to the off site car park in Wellington (location of off-site carpark is also identified in the TMP). A boom gate was installed at the site driveway to control vehicle movements. The boom gate was removed during week 27/04. A boom gate was installed at the site entry point to enable controlled access and prevent unauthorised or unmanaged vehicle entry during peak periods. Speed limits are applied in internal roads, with signage provided for 10km/h and 25km/h speed limits depending on the site road (refer to photos in Appendix E). Five x 14 seater shuttle buses have been operating on site during the audit period. The shuttle buses operated during peak hours to bring project personnel to the site (leave Wellington approx. 630-730 am, and leave the site at 5pm). The use of shuttle buses is documented in the TMPs. As works are completed, records showed a reduction in employee numbers (January to May 2026) an the progressive removal of the shuttle bus services. Recent project records showed that a shuttle bus was removed on the 20/03/2026, one on the 10/04/2026 and the last shuttle bus removed on the 7/05/2026. Employee numbers in May 2026 were consistently below 50 and therefore the removal of the shuttle bus service responded to the lack of demand. The Orana BESS car park register shows the sites allowed to the shuttle buses. Approved travel routes are documented in the TMPs and are implemented through inductions and notifications to truck companies and employees. The auditee implements a Driver's code of conduct which addresses, amongst other items, drivers, traffic routes and safe driving practices. The TMPs provide the school bus routes and public transport details and measures to avoid conflict. Car park can take 45 LV. Car parking pass system as of last week, but it was used to control LV movements	
BIODIVERSITY				
Vegetation Clearance				
B11	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	Site inspection 30/04/2026 Orana BESS Habitat Tree and Pre-Clearance Report June 2024 V2.0 21/06/2024 by NGH Letter 12/09/2024 NGH-Akaysha re: Orana BESS HBT removal and Ecologist supervision Report: Pre-clearing checks for fauna and flora (48 hours prior) prepared by NGH (12,17, 18, 19, 20, 21, 23, 24, 25 September 2024) for Stage 1	No clearing activities reportedly occurred during the current audit period. Trees remaining on site are protected with fencing and no-go flagging. Site footprint fenced off. Refer to photos in Appendix E. For details of clearing refer to IA1 and IA2. During the previous audit periods, pre-clearance surveys were undertaken by ecologist specialists NGH on two occasions. These were documented in Orana BESS Habitat Tree and Pre-Clearance Report June 2024 V2.0 21/06/2024 by NGH and Letter 12/09/2024 NGH-Akaysha re: Orana BESS Letter of Advice HBT clearing for Sept 2024 – Stage 1 The first survey was undertaken between the 8 and10 May 2024 by NGH qualified Ecologist to:	Not triggered

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Report: Pre-clearing check for fauna and flora (48 hours prior) prepared by NGH (21, 22, 23, 25, 26, 27, 28 November 2024) for Stage 2	• confirm previously identified or new, significant fauna habitat features and breeding places within the disturbance footprint and or/animal activity. • clearly mark all Hollow Bearing Trees (HBTs) planned for removal to prepare for staged clearing. • clearly mark all trees to be retained, to inform the Project Arborist prior to the installation of tree protection zones (TPZ). • identify and mark items that may provide animal habitat, such as hollow logs and rock piles, to be retained and moved outside of the project boundary for use by fauna. • identify current Priority weed infestations. The second survey was undertaken between the 3 and 7 June 2024 by NGH qualified Ecologist and the Project Arborists. This survey was specifically targeted at the HBTs planned for removal and was conducted via elevated work platform (EWP) to; • assess if wildlife was present within the hollows and if any wildlife breeding had commenced in hollows. • confirm if previously recorded (from the ground) tree hollows were suitable for wildlife breeding. • block any unoccupied hollow entrances deemed suitable habitat, to prevent nesting activities in advance of the Spring breeding season (August through to October) when clearing is planned to take place. In addition, pre-clearing checks for fauna and flora (49 hours prior) were undertaken by NGH (Veronica Philips, an ecologist from NGH P/L) for Stage 1 and Stage 2 to confirm that all relevant measures have been implemented as required. The evidence provided indicates that the clearing works had been supervised by ecologists from NGH.	
Biodiversity Offsets				
B12	Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 1 below. The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by: a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; b) making payments into an offset fund that has been developed by the NSW Government; or c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.	Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation (issued by the Biodiversity Conservation Trust, dated 27/02/2024 (date received) BCT ref: BCF678 Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation (issued by the Biodiversity Conservation Trust, dated 1/11/2024 (date received) BCT ref: BCF794 Charge Quote Q00483 was issued by the BCT to Akaysha on 10 October 2024 Emails from/to BCT to NGH dated 10/10/24, 9/01/25, 10/01/25 and 15/01/25 Letter 14/04/25 NGH-DPHI (Department of Energy, Resource and Industry	This condition was completed in previous audit periods and is not triggered in the current period. For details refer to previous audit reports. Two Statements issued by the Biodiversity Conservation Trust confirming payment were provided as evidence of payment for the biodiversity credit retirement obligations satisfied by payment to the Biodiversity Conservation Fund under BCT reference numbers BCF678, for $191,834.34 (excluding GST), dated 24/02/2024, and BCF794, for $490,479.79 dated 7/11/24(excluding GST) (for details refer to IA1) A Modification Application (MOD2) was submitted by the Applicant and subsequently approved by DPHI on 3/08/2025 which amended the offset obligation by replacing *Prasoplhyllum sp*. for *Prasophyllum Petilum*. Further, the Department advised the Auditor that it had received confirmation of payment into the Biodiversity Conservation trust for 13 credits for *Prasophyllum Petilum* (refer to Appendix C).	Not triggered

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	Table 1: Species Credit Requirements **Species Credit Species** / **Credits Required** Pink-tailed Legless Lizard (*Aprasia parapulchella*) — 49 Superb parrot *(Polytelis swainsonii)* — 46 Masked Owl *(Tyto novaehollandiae)* — 33 Key's Matchstick Grasshopper (*Keyacris scurra*) — 7 Ausfeld's Wattle (*Acacia ausfeldii*) — 9 Tumut Grevillea (*Grevillea wilkinsonii*) — 13 *Prasophyllum sp. ~~Wybong~~ Petilum* — 13 Silky Swainson pea (*Swainsona sericea*) — 9 Small Purple pea (*Swainsona recta*) — 9 *Euphrasia arguta* — 10	Assessments) re: Orana BESS SSD 45242780 – DPHI Non-Compliance Notification Letter		
B13	Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must provide evidence to the Planning Secretary that biodiversity credits have been retired.	Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation (issued by the Biodiversity Conservation Trust, dated 27/02/2024 (date received) BCT ref: BCF678. Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation (issued by the Biodiversity Conservation Trust, dated 1/11/2024 (date received) BCT ref: BCF794. Biodiversity Management Plan (BMP) Orana BESS (rev G, dated 8 November 2024) prepared by WSP.	This condition was completed in previous audit periods and is not triggered in the current period. For details refer to previous audit reports. Appendix C of the BMP attaches the evidence of payment of the credits carried out to date. The BMP was submitted to DPHI and DPHI approved the document. As indicated above, a Modification Application (MOD2) was submitted by the Applicant and subsequently approved by DPHI on 3/08/2025 which amended the offset obligation by replacing *Prasoplhyllum sp.* for *Prasophyllum Petilum.* Further, the Department advised the Auditor that it had received confirmation of payment into the Biodiversity Conservation trust for 13 credits for *Prasophyllum Petilum* (refer to Appendix C). Refer to B12.	Not triggered
Biodiversity Management Plan				
B14	Prior to commencing construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with **~~BCS~~CPHR**, and to the satisfaction of the Planning Secretary. This plan must: h) be prepared in accordance with the revised Biodiversity Development Assessment Report (dated 6 September 2024); i) include a description of the measures and timeframes that would be implemented for: viii. protecting vegetation and fauna habitat outside the approved disturbance areas; ix. managing the remnant vegetation and fauna habitat on site; x. minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; xi. avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependant fauna; xii. minimising the impacts to fauna on site and implementing fauna management protocols, including design of temporary fencing; xiii. rehabilitating and revegetating temporary disturbance areas with species that are native to the area; maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and	Site inspection 30/04/2026. Biodiversity Management Plan (BMP) Orana BESS (rev J, dated 6 March 2026) prepared by WSP. DPHI letter to Akaysha dated 25/03/2026, re: Biodiversity Management Plan Biodiversity Management Plan (BMP) Orana BESS (rev G, dated 8 November 2024) prepared by WSP (superseded). Biodiversity Management Plan Orana BESS (rev H, dated 5 March 2025) prepared by WSP (superseded) Biodiversity Management Plan Orana BESS (rev I, dated 21 January 2026) prepared by WSP (superseded) Quotation landscaping package dated 5/03/2026 from Ican Growing Futures to Akaysha	During the audit period, the BMP was revised into rev J, dated 6 March 2026, and the revised version was approved by DPHI on the 25/03/2026 Historically, a BMP Orana BESS was initially prepared and then revised on a number of occasions, including with MOD 1 (rev H, dated 8 November 2024), then again revised with MOD 2 (rev I dated 21 January 2026) and then following IA3 (rev J dated 6 March 2026). The BMP was prepared in consultation with BCS as per evidence provided in the BMP and approved by DPHI as reported in previous periods. No clearing has been reportedly undertaken during the current audit reporting period. All clearing was undertaken during the IA1 reporting period (for details refer to IA1). It is understood that disturbance of land within the Wellington substation, which did not contain native vegetation or habitat areas but highly disturbed adjoining exotic vegetation, occurred during the previous audit period. During site inspection, the implementation of the BMP was observed on site including protection of vegetation retained within the site, boundary fending to protect vegetation outside the disturbance boundary, the presence of nest boxes installed in trees within and adjacent to the site (refer to photos in Appendix E), environmental inspections and	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	xiv. controlling weeds, feral pests and pathogens. j) include a program to monitor and report on the effectiveness of mitigation measures; k) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site; and l) include details of who would be responsible for monitoring, reviewing and implementing the plan. Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.	DPHI letter to Akaysha dated 20/11/2024, re: Orana BESS – Biodiversity Management Plan Orana BESS Habitat Tree and Pre Clearance Report June 2024 V2.0 21/06/2024 by NGH DPHI email to Akaysha date 23/01/26, re: Orana Battery Energy Storage System. - Post Approval Document Received - (SSD-45242780-PA-49) Letter 12/09/2024 NGH-Akaysha re: Orana BESS HBT removal and Ecologist supervision Report: Pre-clearing check for fauna and flora (48 hours prior) prepared by NGH (12,17, 18, 19, 20, 21, 23, 24, 25 September 2024) for Stage 1 Report: Pre-clearing check for fauna and flora (48 hours prior) prepared by NGH (21, 22, 23, 25, 26, 27, 28 November 2024) for Stage 2 Email DPHI to Akaysha dated 13/09/2024: receival of relevant documentation to support the commencement of HBT removal on 13/09/24 in line with approved BMP	environmental induction training. The implementation of the BMP during clearing activities is discussed in IA1 and IA2. No actions for biodiversity management reportedly required under the BMP (during audit period). No unexpected finds during audit period. No documentation prepared during the audit period related to the BMP. Rehabilitation activities are reportedly being planned, including planting of trees along both sides of the entrance to pass the boom gate approximately 470 lineal metres with a range of recommended Acacia species (as per Quotation landscaping package dated 5/03/2026 from Ican Growing Futures to Akaysha). Hydroseeding proposed in 5 areas around the site including laydown area and compound area as indicated in email from contractor to Akaysha dated 8 May 2026. The auditee also advised that CPP are starting their clean up of both areas and rehabilitation will commence post backfilling of soil. Tree planting & maintenance alongside BESS accessway expected to start in May once contractor arrives on site. **Observation**: Section 5.8 of the Biodiversity Management Plan provides details of site rehabilitation of temporary disturbance areas such as construction compound and laydown areas. It indicates that, amongst other items, these areas will be progressively rehabilitated and revegetated during the later stages of construction and post construction and that a qualified Bush Regeneration will be engaged to implement a rehabilitation plan with the goal of establishing species from PCT 266. **Recommendation**: Implement Section 5.8 of the BMP prior to commencement of operations.	
AMENITY				
Construction Hours				
B15	Road upgrades, construction, commissioning, demolition, upgrading or decommissioning activities (excluding blasting) may only be undertaken between: a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and NSW public holidays; unless the Planning Secretary agrees otherwise.	Site inspection and interviews on 30/04/2026 DPHI letter to Akaysha dated 20/11/2024, re: Orana BESS – Stage 1 Road Upgrade – Out of Hours Works Email 30/09/2024 Akaysha-TfNSW re: Request to amend construction hours Email 22/11/2024 TfNSW-Akaysha re: Response to request to amend construction hours Email 26/06/2024 Akaysha-DRC (Dubbo Regional Council) re: Orana BESS queries Email 26/09/2024 Akaysha-DRC re: Orana BESS queries / increasing works hours on Saturdays Email 09/10/2024 DRC-Akaysha re: response / increasing works hours on Saturdays	Construction hours are provided in project management documentation (e.g. TMPs) and are communicated to personnel in induction training material. No OOHWs reportedly undertaken during the audit period. No complaints regarding construction hours have been recorded during the reporting period. During the construction phase, the auditee obtained approval from DPHI to amend construction hours on few occasions (refer to B17). Most recently, the Department approved on the 11/11/2025 a request for OOHW on Saturdays 1:00 pm to 5:00 pm) and Sundays (8:00 am to 5:00 pm) until 30/06/2025. The OOHWs were consulted with immediately adjacent residents, Council and TfNSW as reported in previous audit periods. In its letter of approval, DPHI noted that the OOHW request was prepared in consultation with immediately adjacent receivers, Council and TfNSW. DPHI required that the approval be made publicly available at the earliest convenience. The approval letter is publicly available in the project website via a link to the major project website.	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Email 9/09/2024 Akaysha-Palmers Farm re: Road works – Goolma Road on Saturday hours (consultation) Email 10/09/2024 Palmers Farm- Akaysha re: response to consultation Letter 28/04/25 Akaysha-DPHI re: Request to vary construction hours Letter 13/05/25 TfNSW-Akaysha re: Review of Out of Hours request for Orana BESS SSD-45242780 Letter 20/05/25 DPHI-Akaysha re: Out of Hours Approval Letter 9/10/25 Akaysha-DPHI re: Extension Request to vary construction hours Letter 11/11/2025 DPHI-Akaysha re: Orana BESS out of Hours Request		
Exceptions to Construction Hours				
B16	The following activities may be carried outside the hours specified in condition B15 above: a) commissioning activities that are inaudible at non-associated residences b) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or c) emergency work to avoid the loss of life, property or prevent material harm to the environment.	Site inspection and interviews on 30/04/2026	No OOHWs reportedly undertaken during the audit period. No complaints regarding construction hours have been recorded during the reporting period. Not triggered	Not triggered
Variation of Construction Hours				
B17	The hours of construction activities specified in condition B15 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be: a) considered on a case-by-case or activity-specific basis; b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been or will be undertaken; d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and e) accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009), or latest version.	Site inspection and interviews on 30/04/2026 DPHI letter to Akaysha dated 20/11/2024, re: Orana BESS – Stage 1 Road Upgrade – Out of Hours Works Emails Akaysha-residents and residents-Akaysha (several March-April 2025) with consultation on extended hours Letter 28/04/25 Akaysha-DPHI re: Request to vary construction hours TfNSW letter 13/05/25 Review of Out of Hours Request for Orana BESS SSD-45242780 Letter 13/05/25 TfNSW-Akaysha re: Review of Out of Hours request for Orana BESS SSD-45242780 Letter 20/05/25 DPHI-Akaysha re: Out of Hours Approval	No written approvals to vary construction hours from the Planning Secretary received during the audit period. During the IA3 audit period, the Department approved on the 11/11/2025 a request for OOHW on Saturdays 1:00 pm to 5:00 pm) and Sundays (8:00 am to 5:00 pm) until 30/06/2026. The OOHWs were consulted with immediately adjacent residents, Council and TfNSW. In its letter of approval, DPHI noted that the OOHW request was prepared in consultation with immediately adjacent receivers, Council and TfNSW. DPHI required that the approval be made publicly available at the earliest convenience. The approval letter is publicly available in the project website via a link to the major project website. As indicated in B15, no OOHWs reportedly undertaken during the audit period. No complaints regarding construction hours have been recorded during the reporting period.	Compliant

<table>
<tr><th>SSD ID No.</th><th>Compliance Requirement</th><th>Evidence collected</th><th>Independent Audit findings and recommendations</th><th>Compliance Status</th></tr>
<tr><td></td><td></td><td>Letter 9/10/25 Akaysha-DPHI re: Extension Request to vary construction hours

Letter 11/11/2025 DPHI-Akaysha re: Orana BESS out of Hours Request

Minutes of Team Meetings for Sunday 9/11/25 and 16/11/25</td><td></td><td></td></tr>
<tr><td colspan="5">Noise</td></tr>
<tr><td>B18</td><td>The Applicant must:

a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009) or its latest version; and

b) take all reasonable and feasible steps to minimise operational noise and ensure that the noise generated by the operation of the development does not exceed the noise limits in Table 2 below to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residences unless the Planning Secretary agrees otherwise.

Table 2: Noise Limit Requirements
<table><tr><th rowspan="2">Location</th><th colspan="4">Noise Limits in dB(A)</th></tr><tr><th>Day
$L_{Aeq\ (15min)}$</th><th>Evening
$L_{Aeq\ (15min)}$</th><th>Night
$L_{Aeq\ (15min)}$</th><th>Night
L_{AFmax}</th></tr><tr><td>Non-associated residences</td><td>40</td><td>35</td><td>35</td><td>52</td></tr></table></td><td>Construction & Operational Noise & Vibration Assessment Rev 6, 31/03/2023 prepared by Renzo Tonin & Asso.

Environmental Noise Assessment V02 April 25 by Enviro Science Solutions</td><td>The Construction & Operational Noise & Vibration Assessment (CONVA)) (Rev 6), dated 31/03/2023 and prepared by Renzo Tonin & Associates, noted that noise emissions from the construction phase of the project are predicted to exceed the nominated criteria at one (1) of the nearest receiver locations when the three (3) loudest items of plant and equipment operate concurrently and at the closest proximity to the receiver. In-principle recommendations are provided in Section 4.4 to limit the potential impact of construction noise to acceptable levels.

The assessment determined that the large distance between the site and the nearest affected receivers makes structural damage from construction vibration negligible, with a very low risk of complaints from residents. Additionally, road traffic noise during construction complies with relevant criteria, and operational traffic noise impacts are considered negligible due to minimal traffic movements.

Noise monitoring is required under the Environmental Management Strategy “as relevant to the plant and equipment on site and in response to noise complaints”.

No noise monitoring undertaken during the reporting period. No noise complaints received during the reporting period.

Noise monitoring was undertaken at the site during the IA2 period. It involved EnviroScience Solutions undertaking unattended environmental noise monitoring at 3 locations around the site for a period of a week from Monday 17/03/25 to Sunday 30/03/25. Two monitoring stations showed exceedances for the night time when no works were taking place. The third station showed some exceedances for the day time and evening periods on two days, however other measures were generally below the criteria. The assessment recommended that attended monitoring—utilising 15-minute spot measurements during the Day, Evening, and Night periods at sensitive receiver locations—would be beneficial to the project. This would allow for observations to determine the sources of elevated noise levels during these periods (e.g. traffic, wildlife, construction activities, or vegetation movement).</td><td>Compliant</td></tr>
<tr><td>B19</td><td>Unless the Planning Secretary agrees otherwise, within 3 months of the commencement of operation, the Applicant must prepare and submit a Noise Monitoring Report for the development to the satisfaction of the Planning Secretary. The Noise Monitoring Report must:

a) be prepared by a suitably qualified, experienced and independent acoustic consultant;

b) demonstrate that noise monitoring:

i. has been carried out in accordance with the procedures in the Noise Policy for Industry (EPA, 2017); and</td><td>Interview with auditees 30/04/2026</td><td>The project is in the construction phase, this condition will be addressed during operation phase.</td><td>Not triggered</td></tr>
</table>

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	ii. includes monitoring during the day, evening and night periods during operational, temperature and meteorological conditions that would represent typical worst-case scenarios where reasonable and feasible; and c) include: i. 1/3 octave data and calculated sound power levels along with a discussion of any excessive annoying characteristics and directionality; ii. an analysis of compliance with the noise limits specified in condition B18 at R1; iii. an outline of implemented at-source and transmission pathway mitigation measures and their effectiveness at reducing operational noise; and iv. a description of contingency measures in the event implemented mitigation measures are not effective at reducing noise levels to comply with limits specified in condition B18 at R1 at all times. The Applicant must undertake further noise monitoring of the development if required by the Planning Secretary.			
Dust				
B20	The Applicant must minimise the dust generated by the development.	Site inspection and interviews 30/04/2026 Environmental Management Strategy Orana BESS (Akaysha, August 2024)	During the audit site inspection the BESS site was observed constructed, with surfaces covered in gravel, slabs or other infrastructure and no bare soils exposed. No dust was observed during the site inspection. A staging area located near the internal access road was observed with some stockpiles. No dust was observed in that area Dust generation is reportedly managed on site using water carts (if required), speed limits and visual inspections. Dust management measures are provided in the Environmental Management Strategy.	Compliant
Visual				
B21	The Applicant must: a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Site inspection 30/04/2026	This is primarily an operational condition. No advertising signs or logos observed during the site inspection. The battery units are white with no evident visual glaring or reflection noted during the site inspection	Compliant
Lighting				
B22	The Applicant must: a) minimise the off-site lighting impacts of the development; and b) ensure that any external lighting associated with the development: i. is installed as low intensity lighting (except where required for safety or emergency purposes);	Site inspection and interviews 30/04/2026 Orana Lighting Design Report Orana BESS, prepared by CPP (20/12/2024, and updated 23/01/2026)	There have been no lights reportedly at night at the site during construction, except for the site compound which has low intensity lighting for security and safety reasons. No complaints or issues reported to date regarding lighting impacts. Project operational lights have been installed but not commissioned in the BESS site. The Orana Lighting Design Report Orana BESS,	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	ii. does not shine above the horizontal; and iii. complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.		prepared by CPP (updated 23/01/2026) requires the project lights to comply with AS/NZS 4282.	
HERITAGE				
Protection of Heritage Items				
B23	The Applicant must ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items located outside the approved development footprint.	Site inspection and interviews 30/04/2026	No unexpected heritage findings have been reported to date. The construction footprint is fenced, and construction works are contained within the site. An exclusion zone (including fencing) has been installed around the culturally modified tree located outside the site (refer to Photos in Appendix E). No updates of the AHIMS register reportedly undertaken by Akaysha	Compliant
Chance Finds Protocol				
B24	Prior to the commencement of road upgrade works, the Applicant must prepare a Chance Finds Protocol for the development in consultation with Aboriginal Stakeholders, and to the satisfaction of Heritage NSW. Following approval, the Applicant must implement the Chance Finds Protocol.	Akaysha Chance Finds Protocol, Version 3 dated 12 July 2024, prepared by Virtus Heritage Letter 19/070/2024 DPHI-Akaysha re: Akaysha Chance Finds Protocol Consultation Log and Correspondence on Heritage (Stage 1.1) by Akaysha Email 18/08/2022 Heritage NSW-Akaysha re: response to consultation	A Chance Finds Protocol, Version 3 dated 12 July 2024, was prepared by Virtus Heritage for Akaysha. The Department, in correspondence dated 19/07/2024 to Akaysha, noted that no further comments on the Chage Finds Protocol (V3) at this time and instructed that the documents be made publicly available on the project website at the earliest convenience. The document is available on the project website: https://community.akayshaenergy.com/orana-bess Consultation Log and Correspondence prepared by Akaysha provide details of consultations undertaken with Heritage NSW and other relevant stakeholders. The log includes the name or group of the stakeholder, the date the consultation was sent, the date a response was received, and details of the response. An email dated 18/08/2022 from Heritage NSW to Akaysha provided a list of possible stakeholders within the Dubbo Regional LGA to contact. As indicated in B23, no unexpected heritage findings have been reported to date. No changes since last audit	Compliant
SOIL AND WATER				
Water Supply				
B25	The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.	Site inspection and interviews 30/04/2026 Starr's Water and McKechnie Water Tax Invoice 2676 dated 17/02/26 Starr's Water and McKechnie Water Tax Invoice 2743 dated 7/04/26	No need for much water reported during the audit period as most of the site was constructed. The potential for dust generation is very low as site areas are covered with gravel and BESS units/slabs. During the audit period, water from the site has been purchased from the town water supplier Starr's Water and McKechnie Water. The water is purchased and transported by truck to the site. There is no water meter on site. Tax invoices from town water supplier Starr's Water and McKechnie Water for the audit period sighted.	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Starr's Water and McKechnie Water Tax Invoice 2603 dated 8/01/26 Starr's Water and McKechnie Water Tax Invoice 2623 dated 15/01/26 Starr's Water and McKechnie Water Tax Invoice 2635 dated 25/01/26 Starr's Water and McKechnie Water Tax Invoice 2655 dated 29/01/26		
Water Pollution				
B26	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	Site inspection and interviews 30/04/2026 Erosion and Sediment Control Plan Rev 1, 30/05/2025 by Consolidated Power (Hatch)	The BESS has been constructed and the permanent stormwater management system is in place and operational. A large basin is located at the site which collects site stormwater water. Operational stormwater drainage has been constructed and flows to the basin (refer to Photos in Appendix E). The operational basin and operational stormwater system were inspected during the audit site inspection (refer to photos in Appendix E). The main basin was observed in good condition and evidence of off-site water pollution could be noted. The site has been developed with surfaces covered in gravel or slabs, and exposed soil surfaces observed during the site inspection. A laydown area is located within the site to the north of the vehicular access. The laydown area was inspected and the following was observed. **Observation**: The following was observed in the laydown area (Photos 24 and 25 in Appendix E): - several chemicals containers were unbunded - minor potential spills were noted in exposed soils near a shipping container **Recommendation**: ensure that all chemical containers are bunded and clean up potential spills within the laydown area Note: at the time of completing this audit report, Akaysha provided the auditor drone photographs showing the Laydown area being dismantled, however the auditor could not evidence from the photos that the recommendation made under condition B26 was completed	Compliant
Operating Conditions				
B27	The Applicant must: e) minimise any soil erosion and control sediment generation; f) ensure the battery storage and ancillary infrastructure and any other land disturbance associated with the construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version;	Site inspection and interviews 30/04/2026 Erosion & Sediment Control Plan – BESS Yard Rev 0,12/08/2024 and Rev 1, 30/05/2025) prepared by Hatch for CPP, Drawings 12937-CI-DR-00110 and 12937-CI-DR-00111 Soil and Water Management Plan - Road Remediation & Safety Improvements Soil & Water Management Plan - Goolma Road Rev	During the audit site inspection it was observed that the site has been constructed and that the operational stormwater drainage system, which includes, amongst other, a water basin where the site drains to, pits and drainage lines, is in place and operational (refer to photos in Appendix E). Stormwater drainage Plans – Sheets 1-7, prepared by Harch dated 12/08/24 (sheets 1-3), 2/10/25 (sheet 4), 14/10/25 (sheets 5-6), 20/10/24 (sheet 7) sighted. Erosion & Sediment Control Plans (ESC) were prepared for the construction phase by consulting engineers Hatch for the site and for the Goolma Road works, showing the locations of controls and the	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	g) ensure the battery storage and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site; and h) ensure the battery storage and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site.	1,12/09/2024 prepared by Harch for CPP Drawings 2937-CI-DR-00370 and 2937-CI-DR-00371 Stormwater drainage Plan – Sheets 1-7, prepared by Harch dated 12/08/24 (sheets 1-3), 2/10/25 (sheet 4), 14/10/25 (sheets 5-6), 20/10/24 (sheet 7) O&M Area Stormwater Plan, prepared by Hatch dated 2/10/2025	types of controls required. They included 4 sediment basins to which the entire site drained to. These construction ESC Plans are not longer applicable. As indicated above, the site manages water under the operational stormwater system as civil works have been completed. **Observation**: The stockpiles in the laydown area were observed with insufficient erosion and sediment controls in place (refer to Photo 26 in Appendix E) **Recommendation**: Install sediment and erosion controls at the laydown area' stockpiles. Note: at the time of completing this audit report, Akaysha provided the auditor drone photographs showing the Laydown area being dismantled, however the auditor could not evidence from the photos that the recommendation made under condition B26 was completed	
HAZARDS				
Fire Safety Study				
B28	Prior to commencing construction of the battery storage, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary in writing. The study must: e) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline; f) describe the final design of the battery storage; g) include reasonable worst-case bush fire scenario to and from the battery storage and the associated bush fire management; and h) identify measures to eliminate the expansion of any fire incident including: i. adequate fire safety systems and appropriate water supply; ii. separation and / or compartmentalisation of battery units; and iii. strategies and incident control measures specific to the battery storage design. Following approval by the Planning Secretary, the Applicant must implement the measures described in the Fire Safety Study. Note: 'to the satisfaction of FRNSW' above means confirmation in writing from FRNSW that the Study meets the requirements of FRNSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline.	Fire Hazard and Risk Assessment (FHRA) prepared by NJM Design dated 28 November 2024 (Rev 6) FRNSW written report application for fire safety study by Akaysha (undated) FRNSW Clarification Register Based on the Teams meeting held between Akaysha Energy, NJM and FRNSW on 31/07/2024 prepared by Akaysha Email 18/07/2024 Akaysha-FRNSW re: Orana BESS - FSS Review with FRNSW Request Email 1/08/2024 FRNSW-Akaysha re: response to FSS Review with FRNSW Request Email 29/11/2024 Akaysha-FRNSW re: Submission of documents for Orana BESS - FSS Review Fire Safety Study (FSS) for BESS Rev 7, 14/05/2025 by NJM Design Email 12/05/25 Akaysha- FRNSW, re: Fire Safety Study Email 13/05/25 FRNSW-Akaysha, re: Fire Safety Study Fire Safety Study (FSS) for BESS rev 9, dated 10 July 2025	No change during the audit period. Fire water system constructed and commissioned in accordance with the approved Fire Safety Study. As reported in IA3, the Fire Safety Study was finalized to the satisfaction of Fire and Rescue NSW and in correspondence dated 25 July 2025 DPHI approved the Fire Safety Study (Rev 9, dated 10 July 2025). DPHI noted that the Fire Safety Study: - has been prepared in consultation, and to the satisfaction of Fire and Rescue NSW; - has been prepared generally in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 2 – Fire Safety Study Guidelines; - considers the installation of Tesla Megapack 2XL batteries; - outlines a fire intervention strategy that includes the provision of 288,000 litres of firefighting water capacity and a hydrant system; and - contains the information required by the conditions of approval. The Department in email dated 16 January 2026 clarified that the Fire Safety Study does not need to be uploaded in the website (refer to IA3 for details).	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Letter 25/07/2025 DPHI-Akaysha, re: Orana BESS Fire Safety Study		
Storage and Handling of Dangerous Goods				
B29	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: a) the requirements of all relevant Australian Standards; and b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency.	Site inspection 30/04/2026 Site photos – Appendix E	Small volumes of chemicals are stored on site in self bunded storages (refer to photos in Appendix E).	Compliant
Operating Conditions				
B30	The Applicant must: a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; b) ensure that the development: i. complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; and ii. is suitably equipped to respond to any fires on site, including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection; c) ensure that the battery storage area: i. includes a 10 metre defendable space around the perimeter that permits unobstructed vehicle access; and ii. is managed as an asset protection zone (including the defendable space); d) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and e) notify the relevant Local Emergency Management Committee following construction of the development, and prior to commencing operations.	Interview with auditees 30/04/2026 Fire Safety Study (FSS) for BESS rev 9, dated 10 July 2025 Letter 25/07/2025 DPHI-Akaysha, re: Orana BESS Fire Safety Study Email Akaysha to Dubbo Council dated 6/05/2026, re: Notification of Orana BESS nearing operation Email Akaysha to RFS dated 6/05/2026, re: Notification of Orana BESS completion of works Email Akaysha to FRNSW dated 6/05/2026, re: Notification of Orana BESS completion of works Fire and Rescue NSW email to Akaysha, 3/02/26 re: FRNSW Site Inspection	This is considered to be primarily an operational condition. The site operations are yet to commence. In its majority the site is clear of vegetation with minor risk of fire The site includes 288 kL water storage in accordance with the approved Fire Safety Study, which is well in excess of the 20 kL required under B30. This requirement resulted following consultation with FRNSW (refer to B28). The 288 kL water storage includes 2 x 144 kl water tanks on site following the inclusion of a reticulated hydrant system (refer to photos in Appendix E. A buffer perimeter space has been built which separates the site infrastructure from the outside (refer to photos in Appendix E). Notifications to RFS and Fire Rescue issued on 6/05/26 to address B30e. The auditee advised that it is not aware of a Local Emergency Management Committee. The auditee wrote to Council on the 6/05/2026 to request contact details of the Local Emergency Management Committee. Project records also indicate that Fire Rescue NSW also inspected the site on the 10 February 2026	Compliant
Emergency Plan				
B31	Prior to commencing commissioning, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, and provide a copy of the plan to the NSW RFS Orana Fire Control Centre and FRNSW. The plan must: a) be prepared in accordance with the findings of the Fire Safety Study required under condition B28 of Schedule 2; b) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent); c) include details on how the battery storage and sub-systems can be safely isolated in an emergency; d) include bushfire emergency management planning, including: i. details of the location, management and maintenance of the Asset Protection Zone;	Emergency Response Plan rev 3, dated 14 November 2025), prepared by Akaysha Energy Emergency Services Information Package (rev 4, dated 17 Nov 2025), prepared by Akaysha Energy Letter DPHI-Akaysha dated 24/11/2025, re: Orana BESS Emergency Plan Letter FRNSW-Akaysha dated 18/11/2025, re: Emergency Plan Submission – Orana BESS	No changes from last audit On the 24/11/2025, DPHI approved the Emergency Plan (rev 3, dated 14 November 2025) and associated Emergency Services Information Package (rev 4, dated 17 Nov 2025) in accordance with Condition B31. In its letter, DPHI noted that the Emergency Plan and associated Emergency Services Information Package had been prepared in consultation with, and to the satisfaction of, RFS and FRNSW. In correspondence dated 18/11/25, FRNSW indicated its satisfaction with the Emergency Plan and Emergency Services Information Package as per the condition of consent. The Department's approval of the Emergency Plan granted on the 24 November 2025 requires the plan to be publicly available on the	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	ii. a list of works that should not be carried out during a total fire ban; iii. details of how RFS would be notified, and procedures that would be implemented, in the event that: – there is a fire on-site or in the vicinity of the site; – there are any activities on site that would have the potential to ignite surrounding vegetation; or – there are any proposed activities to be carried out during a bushfire danger period; and e) include an Emergency Services Information Package in accordance with Emergency services information and tactical fire plan (FRNSW, 2019), to the satisfaction of FRNSW and RFS.	Email RFS-Akaysha dated 6/11/2025, re: Orana BESS Emergency Response Plan and ESIP	project website, however Condition C20 indicates that the Applicant must make approved plans publicly available with the exception of the Emergency Plan and the Fire Safety Study. As indicated in IA3, the Department subsequently clarified that the Emergency Plan did not need to be uploaded in the website.	
B32	The Applicant must: a) implement the Emergency Plan and the Emergency Services Information Package for the duration of the development; and b) following commencement of commissioning of the battery storage, keep a copy of the Emergency Services Information Package on-site in a prominent position adjacent to the site entry points at all times	Emergency Response Plan rev 3, dated 14 November 2025), prepared by Akaysha Energy Emergency Services Information Package (rev 4, dated 17 Nov 2025), prepared by Akaysha Energy Letter DPHI-Akaysha dated 24/11/2025, re: Orana BESS Emergency Plan Site inspection 30/04/2026	The 3 key scenarios considered in the approved Emergency Plan relate to fires, specifically bushfire, battery fire and main power transformer fire. The site has been constructed in accordance with the requirements of the approved Fire Safety Study as discussed under B28, incorporating fire measures (e.g. 288 kL water storage tanks, a reticulated hydrant system, buffer perimeter space, etc) (refer to photos in Appendix E. Many of the requirements of the Emergency Plan relate to site operations.	Compliant
WASTE				
B33	The Applicant must: a) minimise the waste generated by the development; b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); c) store and handle all waste on site in accordance with its classification; d) not receive or dispose of any waste on site; and e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.	Construction Environmental Management Plan (CEMP) 20/03/2025 by Consolidated Power Projects Orana Waste Register 4/12/2025 to 23/04/2026 Sam's Liquid Waste & Hire Delivery dockets 31315 dated 20/03/2026 Sam's Waste Management invoice 131196 dated 23/04/26 Wellington Plant Hire Delivery Note 33D dated 22/01/2026, Delivery Note 92 dated 26/03/2026, all septic waste JR Richards & Sons, Docket No.: 0103783 (dated 8/01/2026), Docket No. 0103787 (dated 22/01/2026), Docket No. 0103788 (dated 22/01/2026), Docket No. 0103793 (dated 6/02/2026), Docket No. 0103798 (dated 19/02/2026), Docket No. 0114606 (dated 19/03/2026), Docket No. 0114610 (dated 2/04/2026) Dubbo Regional Council Notice of Determination Liquid Waste Discharge to	Section 8.3 of the CEMP provides details on waste minimisation and management Plan. The project maintains a Waste Register showing date, waste type, disposal location, tonnage/volume and disposal certificate reference. The Waste Register provided during the audit is current to 23/04/2026 Liquid waste (septic, portaloo) has been removed during the audit period by Wellington Plant Hire. Wellington Plant Hire has an approval by Council to discharge to sewer (valid to 23/08/2028) (sighted) No spoil removed from the site. Waste removed during the audit period included general construction waste, office waste, cardboard and septic waste Dockets and tax invoices sighted.	Compliant

<table>
<tr><th>SSD ID No.</th><th>Compliance Requirement</th><th>Evidence collected</th><th>Independent Audit findings and recommendations</th><th>Compliance Status</th></tr>
<tr><td></td><td></td><td>Seer dated 23/08/2023 (date of approval lapses 23/08/2028)</td><td></td><td></td></tr>
<tr><td colspan="5">ACCOMMODATION AND EMPLOYMENT STRATEGY</td></tr>
<tr><td>B34</td><td>Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council and Mid-Western Regional Council. This strategy must:
e) propose measures to ensure there is sufficient accommodation for the workforce associated with the development;
f) consider the cumulative impacts associated with other State significant development projects in the area;
g) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and
h) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.
The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary prior to commencement of construction, and implement the plan throughout construction.</td><td>Orana Battery Energy Storage System Accommodation and Employment Strategy (Rev C, dated 15 July 2024) prepared by Consolidated Power Projects.
DPHI letter to Akaysha Energy dated 23/07/2024, re: Orana BESS – Accommodation and Employment Strategy
Project Monthly Report May 2025 by CPP
Project Monthly Report December 2025 by CPP
Project Monthly Report January 2026 by CPP
Project Monthly Report February 2026 by CPP
Project Monthly Report March 2026 by CPP
Email 31/03/2026, Akaysha to DRC, re: Accommodation and Employment Strategy
Kerryann Stanley Invoice #000030 dated 19/02/26, Aboriginal contractor
Purchase Order Fallon Ahsee Aboriginal Art, Wellington, dated 7 April 2026
Ican Growing Futures Quotation to Akaysha for Landscaping Package dated 5/03/26 (Dubbo company)</td><td>In correspondence dated 23/07/2024, DPHI approved the Accommodation and Employment Strategy (AES) (Rev C, dated 15 July 2024).
CPP Project Monthly reports for December 25, January, February and March 2026 provided. These reports report on the implementation of the AES.
During IA4, Akaysha emailed Council on the 31/03/26 to inform about commencement of upcoming demobilisation and submitting extract from CPP report on implementation of AES, and closing out the AES with no further opportunities for meetings. With the email, Akaysha provided Council with an extract from the most recent CPP report relating to Accommodation and Employment Strategy reporting.
Current employees on site are low (during audit period). Local indigenous artist engaged to paint a mural on the water tanks and shed wall at the site entry, invoices and PO sighted for the audit period. Tree planting quote provided from local provider from Dubbo.
For implementation of the AES during previous audit periods refer to IA1, IA2 and IA3.
Observation: Condition B34(c) requires the Accommodation and Employment Strategy (AES) to investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible. The AES (CPP, July 2024) does not include project operations, specifically the AES (July 2024) indicates that the AES does not apply to the operations and decommissioning of the BESS. The operations and decommissioning will be part of separate work packages in the future.
Recommendation: Prepare an AES (or update the current version) to address the operational requirements of Condition B34</td><td>Compliant</td></tr>
<tr><td colspan="5">DECOMMISSIONING AND REHABILITATION</td></tr>
<tr><td>B35</td><td>Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to comply with the objectives in Table 3 below.
Table 3: Rehabilitation Objectives
<table>
<tr><th>Feature</th><th>Objective</th></tr>
<tr><td>Site</td><td>• Safe, stable and non-polluting.</td></tr>
<tr><td>Battery Storage and ancillary infrastructure</td><td>• To be decommissioned and removed, unless the Planning Secretary agrees otherwise, with the exception of assets held by the Network Service Provider.</td></tr>
<tr><td>Land use</td><td>• Restore land to pre-existing use.</td></tr>
<tr><td>Community</td><td>• Ensure public safety at all times.</td></tr>
</table></td><td>Site inspection on 30/04/2026</td><td>The project is under construction</td><td>Not triggered</td></tr>
</table>

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
PARTC ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
ENVIRONMENTAL MANAGEMENT				
Environmental Management Strategy				
C1	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: a) provide the strategic framework for environmental management of the development; b) identify the statutory approvals that apply to the development; c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; d) set out the procedures that would be implemented to: i. keep the local community and relevant agencies informed about the operation and environmental performance of the development; ii. receive, handle, respond to, and record complaints; iii. resolve any disputes that may arise; iv. respond to any non-compliance; v. respond to emergencies; and e) include: i. references to any strategies, plans and programs approved under the conditions of this consent; and ii. a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this consent. Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	Environmental Management Strategy Orana BESS – (rev E dated 16 January 2026) prepared by WSP DPHI letter to Akaysha Energy dated 3/03/2026, re: Orana BESS – Environmental Management Strategy Weekly Site Inspection Reports by CPP sighted: – 3/02/2026 – 11/02/2026 – 15/02/2026 – 22/021/2026 – 3/03/2026 – 8/03/2026 – 18/03/2026 – 22/03/2026 – 1/04/2026 – 11/04/2026 Construction Environmental Management Plan Revision F, 20/03/25 by Consolidated Power Projects (CPP) DPHI email to Akaysha dated 23/01/2026, re: Orana BESS Post Approval Document received SSD-45242780 PA-46	DPHI, in correspondence to Akasha Energy dated 3/03/2026, approved the Orana BESS – Environmental Management Strategy (rev E dated 16 January 2026). Previously, DPHI, in correspondence to Akasha Energy dated 31/07/2024, approved the Orana BESS – Environmental Management Strategy (rev D dated 30 July 2024). Project records indicate that the applicant has generally implemented the EMS during the reporting period. Weekly inspections are undertaken in accordance with the Environmental Management Strategy. CPP undertakes the regular weekly inspections for the project, covering housekeeping, safety, tools and equipment, environmental aspects, permits to work/SWMS, quality, and mobile plant operations, with a different focus area each week. Additional comments can be added in the register Environmental monitoring has been undertaken during the audit period including vehicle movement (refer to B2), and dust visual monitoring (refer to B20). An Environmental Manager supervises and manages the site's environmental performance. The contractor, CPP, has a CEMP prepared for the project under contractual requirements with Akaysha. The CEMP sits under the EMS and is not a document prepared under the Development Consent. The CPP's CEMP was updated on 20/03/2025.	Compliant
Revision of Strategies, Plans and Programs				
C2	The Applicant must: a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning 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 Planning Secretary within 1 month of the: i. submission of an incident report under condition C10 of Schedule 2; ii. submission of an audit report under condition C14 of Schedule 2; or iii. any modification to the conditions of this consent.	Interview with auditees 30/04/2026 Environmental Management Strategy Orana BESS – (rev E dated 16 January 2025) prepared by WSP Biodiversity Management Plan Orana BESS (rev J, dated 6 March 2026) prepared by WSP DPHI email to Akaysha dated 23/01/2026, re: Orana BESS Post Approval Document received SSD-45242780 PA-46 DPHI email to Akaysha dated 23/01/2026, re: Orana BESS Post Approval Document received SSD-45242780 PA-49	No incidents (as defined in the Development Consent) reported during the reporting period. No modifications of the consent granted during the audit period. During the audit period, the BMP was revised into rev J, dated 6 March 2026, and the revised version was approved by DPHI on the 25/03/2026. During the audit period, DPHI, in correspondence to Akasha Energy dated 3/03/2026, approved the Orana BESS – Environmental Management Strategy (rev E dated 16 January 2026).	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Staging, Combining and Updating Strategies, Plans or Programs				
C3	With the approval of the Planning Secretary, the development may be staged and the Applicant may: a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	DPHI letter to Akaysha dated 8/10/2024 re: Orana BESS – Traffic Management Plan Staging Stage 2a Traffic Management Plan Rev C 7/02/25 by Amber Letter 13/03/25 DPHI-Akaysha re: Approval of TMP Stage 2a Stage 2b Traffic Management Plan Rev A 17/04/25 by Amber Letter 14/05/25 DPHI-Akaysha re: Approval of TP Stage 2b Traffic Management Plan (TMP) Stage 3 (Operational Phase) dated 30/03/2026 by Amber	No changes in the staging status of the project during the reporting period. The project has not been staged, other than the traffic works and Traffic Management Plan as discussed in previous audits and summarised below. During IA1, DPHI, in correspondence dated 8/10/24, approved the staging of the Traffic Management Plan (refer also to B10). During IA2, on 3/03/25 the auditees made a request to further stage TMP to the DPHI and the Department approved then request on 10/03/25. TMP Stage 2a was approved by DPHI on 13/03/25, TMP Stage 2b was approved on 14/05/25. During the audit period, the auditee prepared the Traffic Management Plan (TMP) Stage 3 (Operational Phase) dated 30/03/2026. The auditee carried out consultation on this TMP with TfNSW and Councils as detailed in B10. It is understood that the Stage 3 TMP will be submitted to DPHI for approval prior to operations.	Compliant
C4	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	As above	As above During the audit period, the auditee prepared the Traffic Management Plan (TMP) Stage 3 (Operational Phase) dated 30/03/2026. The auditee carried out consultation on this TMP with TfNSW and Councils as detailed in B10. It is understood that the Stage 3 TMP will be submitted to DPHI for approval prior to operations.	Compliant
C5	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	As above	As above Refer also to B10 (implementation).	Compliant
C6	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	As above	Not triggered	Not triggered
NOTIFICATIONS				
Notification of Department				
C7	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	Letter 17/06/2024 Akaysha to DPHI re: Request to commence limited construction activities prior to completion of Goolma road upgrades Letter 19/07/2024 DPHI-Akaysha re: Orana BESS road upgrade and enabling works request Letter 10/09/2024 Akaysha to DPHI re: Commencement of Goolma Road and Enabling Site Works Stage 2a Traffic Management Plan Rev C 7/02/25 by Amber	IA1: Akaysha, in its email dated 17/06/2024, made a request to the Department to commence limited construction activities prior to the completion of Goolma Road upgrades. On 19/07/2024, The Department approved the request. Akaysha, in correspondence dated 10/09/2024, notified DPHI of the commencement of Goolma Road upgrade road on the 29/08/2024 and the development plans to commence construction in line with the parallel works approval on the 11/09/2024. IA2: The TMP has been staged as discussed in B10 The notification of commencement of Stage 2a on the 14/03/25 to the Department was provided in letter dated 13/03/25.	Not triggered

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Letter 13/03/25 DPHI-Akaysha re: Approval of TMP Stage 2a Stage 2b Traffic Management Plan Rev A 17/04/25 by Amber Letter 14/05/25 DPHI-Akaysha re: Approval of TP Stage 2b Letter 13/03/2025 Akaysha to DPHI, re: Commencement of Stage 2A construction activities Letter 10/06/25 Akaysha to DPHI, re: Commencement of Stage 2B construction activities Letter 11/06/25 DPHI to Akaysha, re: Orana BESS Construction Commencement Stage 2b	IA3: no notification required during this period IA4: no notification required during this period	
Final Layout Plans				
C8	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, showing comparison to the approved layout and including details on the siting of battery storage and ancillary infrastructure. The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.	DRW No. 12937-EL-DR-10000 Overall Site Layout Rev A 29/05/2024 by Consolidated Power Projects DRW No. 12937-EL-DR-10001 Facility Plan Rev B 29/05/2024 by Consolidated Power Projects DRW No. 12937-EL-DR-11100 General Arrangement Rev A 29/05/2024 by Consolidated Power Projects Email 9/07/2024 DPHI-Akaysha re: Acknowledgement receipt for the submission of Final Layout Drawings Fire Safety Study (FSS) for BESS rev 9, dated 10 July 2025 Letter 25/07/2025 DPHI-Akaysha, re: Orana BESS Fire Safety Study Email 28/04/2026 DPHI-Akaysha, re: Final Layout Drawings – O&M and Fire Hydrants	This condition was complied in previous audits. Sighted an email from DPHI dated 9/07/2024 acknowledging the submission of the final layout drawings to the Department. Since then the Fire Safety Study prepared in consultation with RFNSW required some fire related design changes to accommodate water tanks. The Fire Safety Study was submitted to and approved by DPHI on the 25/07/2025. Final Layout Drawings (amended to incorporate the fire hydrant changes in the Fire Safety Study, and minor changes in the OM Shed) submitted to DPHI in SSD-45242780-PA-52. DPHI responded on the 28 April 2026 accepting (no comments) the fire water hydrant layout and O&M drawings.	Compliant
Work as Executed Plans				
C9	Prior to commencing operations or following the upgrades of any battery storage components or ancillary infrastructure, the Applicant must submit work as executed plans of the development showing comparison to the final layout plans to the Department via the Major Projects website and to Council.	Interview with Auditees 30/04/2026	The project is in the construction phase, this condition will be addressed during final phase.	Not triggered
Incident Notification				
C10	The Applicant must notify the Department within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and address details of the incident including:	Interview with Auditees 30/04/2026	The auditee maintains an incident register. Eleven minor/negligible safety related incidents recorded in the register during the audit period.	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	a) date, time and location; b) a brief description of what occurred and why it has been classified as an incident; c) a description of what immediate steps were taken in relation to the incident; and d) identifying a contact person for further communication regarding the incident.	Incident Register audit period, with minor incidents from 4/02/26 to 25/03/26	No incidents as defined in the Development Consent were reported under C10 during the audit period. .	
C10A	The Applicant must provide the Department with a subsequent incident report in accordance with Appendix 8 (Incident Notification and Reporting Requirements).	Interview with Auditees 30/04/2026 Incident Register	Refer to above. Not triggered	Not triggered
Non-Compliance Notification				
C11	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing and must be submitted via the NSW planning portal (Major Projects). The notification must identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply, the reasons for the noncompliance (if known), and what actions have been undertaken, or will be undertaken, and when, to address the non-compliance. Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Interview with Auditees 30/04/2026 DPHI letter to Akaysha dated 5/03/2026, re: Independent Environmental Audit – 5 June 2025 to 10 December 2025 DPHI letter to Akaysha dated 9/04/2026, re: Notice to Furnish Information and Records	No non-compliance notifications issued to the Department during the reporting period. Response to findings to IA3, which included closed non-compliances, were provided to DPHI as indicated in C14. In response to IA3, DPHI in letter dated 5/03/2026 indicated that the non-compliances identified in the IA3 with Schedule 2 Condition B1 was being investigated further by Department, in accordance with the Department's Compliance Policy. It also indicated that the non-compliances with Condition C2 and C20 have been assessed by the Department in accordance with its Compliance Policy, with the Department on this occasion determining to record the breaches with no further enforcement action proposed. Subsequently, DPHI, in letter to Akaysha dated 9/04/26, issued a notice to furnish Information and records related to the non-compliance raised in IA3 on exceedances of traffic movements during peak hour (B1). Peak hour records for the period 1/10/25 to 30/11/25 were requested. Upon request, DPHI provided an extension to the submission of the traffic movement records to the 29 May 2026 (refer to condition A2 for details). At the time of completing this audit report, Akaysha provided evidence to the auditor that a response to the Department's information request was issued on the 29 May 2026. For non-compliance reporting during previous audits refer to IA1, IA2 and IA3.	Compliant
C12	Deleted	Mod-1 SSD 45242780 : Additional construction laydown area and permanent fill batters approved on 26/09/2029 by DPHI	This requirement was removed in Modification 1.	
C13	Deleted	Mod-1 SSD 45242780 : Additional construction laydown area and permanent fill batters approved on 26/09/2029 by DPHI	This requirement was removed in Modification 1.	
INDEPENDENT ENVIRONMENTAL AUDIT				
C14	Independent Environmental Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) or as updated from time to time and published on the Department's website.	IAPAR 2020 Independent Audit 1 by WolfPeak dated 6/02/25 Post Approval dated 14/02/25 re: submission of Orana BESS Independent Audit No. 1 Rev 3, 6/02/25 by WolfPeak and response to audit findings.	WolfPeak was engaged by Akaysha to undertake the independent audits for the project. Independent Audit No. 3, dated 29/01/26, prepared by WolfPeak, and the response to the audit findings were submitted to DPHI on the 10/02/26, within the required timeframe specified in the IAPAR 2020. DPHI provided its response to IA3 on 5/03/2026 indicating that it considered the IEA report to generally satisfy the reporting requirements of the consent and IAPAR 2020.	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Letter 26/02/2025 DPHI-Akaysha re: Response to submission of IA1 Orana BESS Proponent response to audit findings (IA1). Independent Audit 2 by WolfPeak dated 29/07/2025 Letter 14/08/2025 DPHI-Akaysha re: Orana BESS – Independent Environmental Audit No. 2 Orana BESS Proponent response to audit findings (IA2). DPHI letter to Akaysha dated 5/03/2026, re: Independent Environmental Audit – 5 June 2025 to 10 December 2025 DPHI email 10/02/26, re: lodgement of IA3 and Proponent response to findings SSD-45242780-PA-50	The current audit has been undertaken in accordance with IAPAR (2020), and within the timeframes required under IAPAR (2020) For compliance with this condition for other audits, refer to IA1, IA2 and IA3 reports.	
C15	Deleted	Mod-1 SSD 45242780: Additional construction laydown area and permanent fill batters approved on 26/09/2029 by DPHI	This requirement was removed in Modification 1.	
C16	Deleted	Mod-1 SSD 45242780: Additional construction laydown area and permanent fill batters approved on 26/09/2029 by DPHI	This requirement was removed in Modification 1.	
C17	Deleted	Mod-1 SSD 45242780: Additional construction laydown area and permanent fill batters approved on 26/09/2029 by DPHI	This requirement was removed in Modification 1.	
C18	Deleted	Mod-1 SSD 45242780: Additional construction laydown area and permanent fill batters approved on 26/09/2029 by DPHI	This requirement was removed in Modification 1.	
C19	Notwithstanding the requirements of the Independent Audit Post Approvals Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.		The project is under construction	Not Triggered
ACCESS TO INFORMATION				
C20	The Applicant must: a) make the following information publicly available on its website as relevant to the stage of the development: i. the EIS; ii. the final layout plans for the development;	There are two project websites with information about the project: https://community.akayshaenergy.com/orana-bess https://akayshaenergy.com/projects/orana-bess	The website https://community.akayshaenergy.com/orana-bess contains the following or access to that information via links to the major projects website: i. EIS ii. A Final Layout Plan is uploaded	Compliant

SSD ID No.	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	iii. current statutory approvals for the development; iv. approved strategies, plans or programs required under the conditions of this consent (other than the Fire Safety Study and Emergency Plan); v. the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; vi. a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; vii. how complaints about the development can be made; viii. any independent environmental audit, and the Applicant's response to the recommendations in any audit; and ix. any other matter required by the Planning Secretary; and b) keep this information up to date.		iii. The SSD approval is available in the Major Projects link provided in the website iv. Environmental Management Strategy, Biodiversity Management Plan, Traffic Management Plans and Accommodation and Employment Strategy uploaded v. Traffic Management Plan Stages uploaded vi. Monitoring: environmental inspection reports uploaded. FAQs and other project information uploaded vii. Community feedback form and contact details provided viii. The first, second and third independent audits and applicant responses to these audit findings are uploaded in the website. ix. The approved capacity increase to 415 MW and the Chance Finds Protocol are uploaded in the website in accordance with Planning Secretary requests (DPHI correspondences dated 4/03/2024 and 19/07/24 respectively).	

APPENDIX B – PLANNING SECRETARY AGREEMENT OF INDEPENDENT AUDITORS

Department of Planning, Housing and Infrastructure

NSW GOVERNMENT

NSW Planning ref: SSD-45242780-PA-26

Timothy Hoban
GM Development
Akaysha Energy Pty Ltd
Everlane Building, Level 7 22 Gordon Street
Cremorne, VIC, 3121
10/12/2024

Sent via the Major Projects Portal only

Subject: Orana BESS - IEA Team Agreement

Dear Mr Hoban

Reference is made to your post approval matter, SSD-45242780-PA-26, request for the Planning Secretary's agreement of suitably qualified, experienced, and independent persons to conduct an Independent Audit of the (Orana BESS SSD-45242780).

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition C15 of the Development Consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I agree to the following independent audit team:

- Mr Ricardo Prieto-Curiel
- Mr Steve Fermio

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of the Development Consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

Should you wish to discuss the matter further, please contact Wayne Jones on (02) 6575 3406.

Department of Planning, Housing and Infrastructure

NSW GOVERNMENT

Yours sincerely



Iwan Davies
Director
Energy Assessments

As nominee of the Planning Secretary

APPENDIX C – CONSULTATION RECORDS

Consultation to DPHI

From: Ricardo Prieto-Curiel <rprietocuriel@wolfpeak.com.au>
Sent: Thursday, 19 March 2026 10:29 AM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: Darcy Plant <darcy.plant@akayshaenergy.com>; Chris Leighton <chris.leighton@akayshaenergy.com>; Ana Maria Munoz Acosta <ammunoz@wolfpeak.com.au>
Subject: Independent Audit 4 - Orana BESS - SSD 45242780

Dear Sir/Madam,

I am one of the Department of Planning, Housing and Infrastructure (the Department) approved Independent Auditors on the Orana Battery Energy Storage System - SSD 45242780 (the Project).

I am currently preparing to undertake the fourth construction phase independent audit (IA4) of the Project. The audit is required to be conducted in accordance with SSD 45242780 Conditions C14 and the Department's 2020 Independent Audits Post Approval Requirements (IAPAR).

The Approval (as amended in Mod-2) is available at the following link:
https://www.planningportal.nsw.gov.au/major-projects/projects/orana-battery-energy-storage-system-modification-2

The IAPAR is available at the following link:
https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf

The on-site component of the audit is currently scheduled for **Wednesday 29 April 2026**, with the report to be submitted to the Department no later than two months afterwards. The audit pertains to post approval requirements and compliance.

In accordance with Section 3.2 of the IAPAR, I am consulting with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request the Department to confirm:

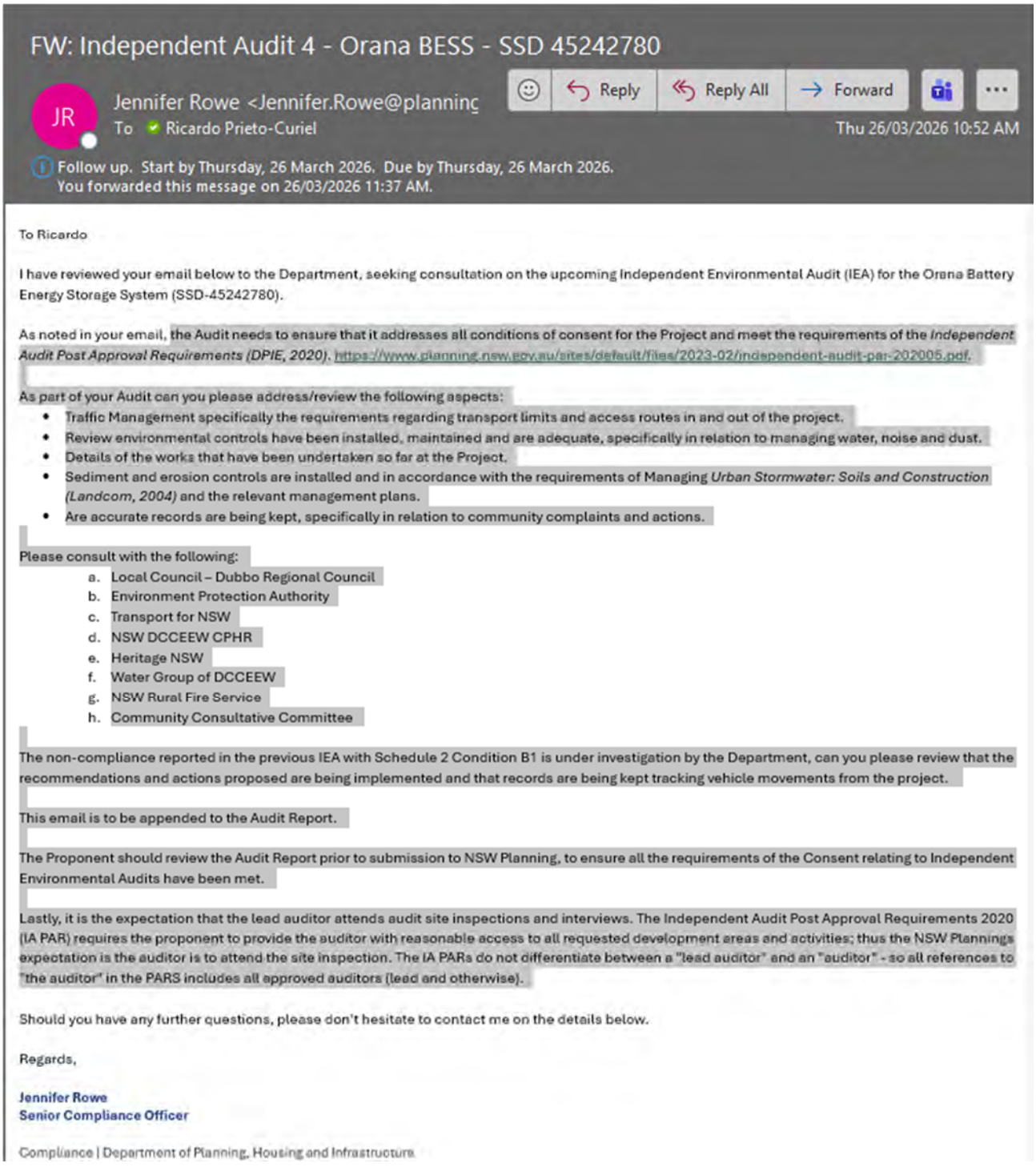
- If it has any concerns/key issues it would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR, or
- If it recommends that other parties or agencies are to be consulted. If so, I request that the Department identify those parties.

Please feel free to reach out should you have any questions. I look forward to your input to ensure the audit meets the Department's expectations and fully addresses any key concerns.

Yours sincerely,

Ricardo

Ricardo Prieto-Curiel
Principal Environmental and Planning Specialist



FW: Independent Audit 4 - Orana BESS - SSD 45242780

JR

Jennifer Rowe <Jennifer.Rowe@planninc

To Ricardo Prieto-Curiel

Reply | Reply All | Forward

Thu 26/03/2026 10:52 AM

Follow up. Start by Thursday, 26 March 2026. Due by Thursday, 26 March 2026.
You forwarded this message on 26/03/2026 11:37 AM.

To Ricardo

I have reviewed your email below to the Department, seeking consultation on the upcoming Independent Environmental Audit (IEA) for the Orana Battery Energy Storage System (SSD-45242780).

As noted in your email, the Audit needs to ensure that it addresses all conditions of consent for the Project and meet the requirements of the *Independent Audit Post Approval Requirements (DPIE, 2020)*. https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf.

As part of your Audit can you please address/review the following aspects:

- Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project.
- Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust.
- Details of the works that have been undertaken so far at the Project.
- Sediment and erosion controls are installed and in accordance with the requirements of Managing *Urban Stormwater: Soils and Construction (Landcom, 2004)* and the relevant management plans.
- Are accurate records are being kept, specifically in relation to community complaints and actions.

Please consult with the following:

a. Local Council – Dubbo Regional Council
b. Environment Protection Authority
c. Transport for NSW
d. NSW DCCEEW CPHR
e. Heritage NSW
f. Water Group of DCCEEW
g. NSW Rural Fire Service
h. Community Consultative Committee

The non-compliance reported in the previous IEA with Schedule 2 Condition B1 is under investigation by the Department, can you please review that the recommendations and actions proposed are being implemented and that records are being kept tracking vehicle movements from the project.

This email is to be appended to the Audit Report.

The Proponent should review the Audit Report prior to submission to NSW Planning, to ensure all the requirements of the Consent relating to Independent Environmental Audits have been met.

Lastly, it is the expectation that the lead auditor attends audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to provide the auditor with reasonable access to all requested development areas and activities; thus the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise).

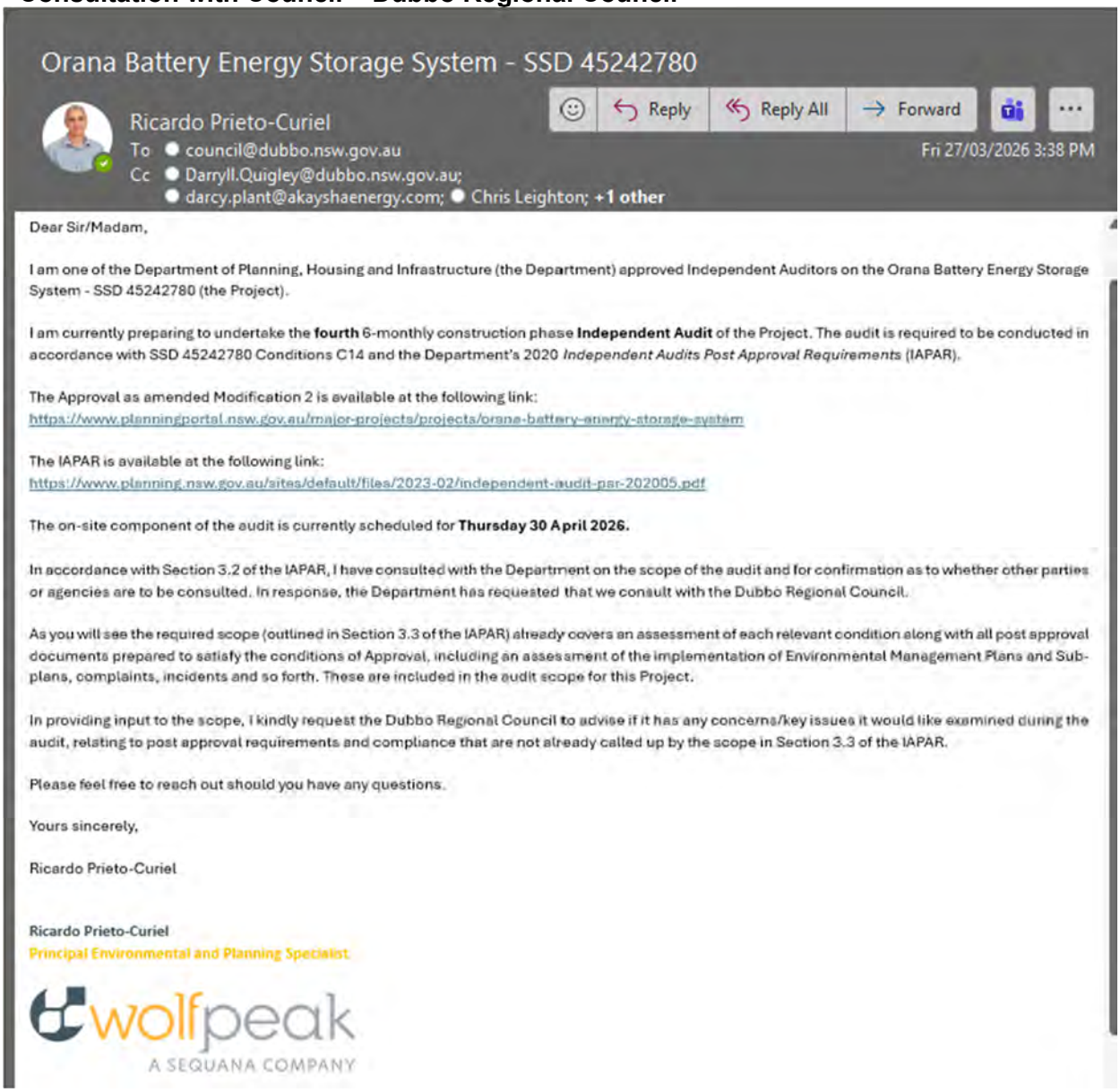
Should you have any further questions, please don't hesitate to contact me on the details below.

Regards,

Jennifer Rowe
Senior Compliance Officer

Compliance | Department of Planning, Housing and Infrastructure

Consultation with Council – Dubbo Regional Council



Orana Battery Energy Storage System - SSD 45242780

Ricardo Prieto-Curiel

Reply | Reply All | Forward

To council@dubbo.nsw.gov.au

Cc Darryll.Quigley@dubbo.nsw.gov.au; darcy.plant@akayshaenergy.com; Chris Leighton; **+1 other**

Fri 27/03/2026 3:38 PM

Dear Sir/Madam,

I am one of the Department of Planning, Housing and Infrastructure (the Department) approved Independent Auditors on the Orana Battery Energy Storage System - SSD 45242780 (the Project).

I am currently preparing to undertake the **fourth** 6-monthly construction phase **Independent Audit** of the Project. The audit is required to be conducted in accordance with SSD 45242780 Conditions C14 and the Department's 2020 *Independent Audits Post Approval Requirements* (IAPAR).

The Approval as amended Modification 2 is available at the following link:
https://www.planningportal.nsw.gov.au/major-projects/projects/orana-battery-energy-storage-system

The IAPAR is available at the following link:
https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-psr-202005.pdf

The on-site component of the audit is currently scheduled for **Thursday 30 April 2026.**

In accordance with Section 3.2 of the IAPAR, I have consulted with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted. In response, the Department has requested that we consult with the Dubbo Regional Council.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request the Dubbo Regional Council to advise if it has any concerns/key issues it would like examined during the audit, relating to post approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Please feel free to reach out should you have any questions.

Yours sincerely,

Ricardo Prieto-Curiel

Ricardo Prieto-Curiel
Principal Environmental and Planning Specialist

wolfpeak
A SEQUANA COMPANY

SSD-4542780¶
AD26/38958¶
·¶
30·April·2026¶
¶
¶
WOLFPEAK¶
Level·1,·180·George·Street¶
SYDNEY·NSW·2000·¶
¶
rprietocuriel@wolfpeak.com.au¶
¶
Ricardo·Prieto-Curiel¶
¶
RE: → SSD-45242780·(MOD·2)·ORANA·BATTERY·ENERGY·STORAGE·SYSTEM·¶
→ 6945·GOOLMA·ROAD·WUULUMAN¶
¶
I·refer·to·your·recent·email·dated·27·March·2026·regarding·an·Independent·Environmental·Audit·for·the·Orana·Battery·Energy·Storage·System·approval·and·your·request·for·any·concerns/key·issues·in·this·regard.¶
¶
Council·Officers·have·reviewed·your·request·and·provide·the·following·comment:¶
¶

- → The·Modified·consent·states·as·follows·in·Appendix·7:¶

APPENDIX 7:
GENERAL TERMS OF THE APPLICANT'S VPA OFFER

The VPA must include provisions for the payment, collection, management and distribution of the contributions under the agreement, with a focus on funding community enhancement in the area surrounding the project site.

Council	*Payment details*
Dubbo Regional Council	• Contributions to the value of $3,200,000 up front at the commencement of commercial operations.

¶
However,·the·Planning·Agreement·entered·into·on·19·August·2024,·as·per·Condition·A15·https://www.dubbo.nsw.gov.au/Builders-Developers/Planning-Controls-Tools-and-Resources/planning-agreements·reads·slightly·different.¶
¶
To·paraphrase·the·Planning·Agreement·it·requires:¶
¶

- → The·Developer·to·pay·Council·$1.3·million·at·commencement·of·operations,·which·will·be·utilised·for·the·Wellington·Road·Shared·Pathway;¶
- → The·Developer·to·pay·to·Council·$160,000·from·Year·8·onwards·and·annually;¶
- → Council·to·allocate·monetary·contributions·towards·community·benefits·identified·in·the·Renewable·Energy·Benefit·Framework;¶
- → Funds·will·be·indexed·in·accordance·with·CPI.¶

¶
The· Planning· Agreement· will· result· in· Council· receiving· $3,200,000· (subject· to· CPI·increases)·over·a·20-year·period.¶



¶

¶

If·you·have·any·enquiries·in·this·matter,·please·do·not·hesitate·to·contact·Council's·Manager·Building·&·Development·Services,·Darryll·Quigley·during·normal·office·hours,·on·6801·4656.¶

¶

¶

Yours·faithfully¶



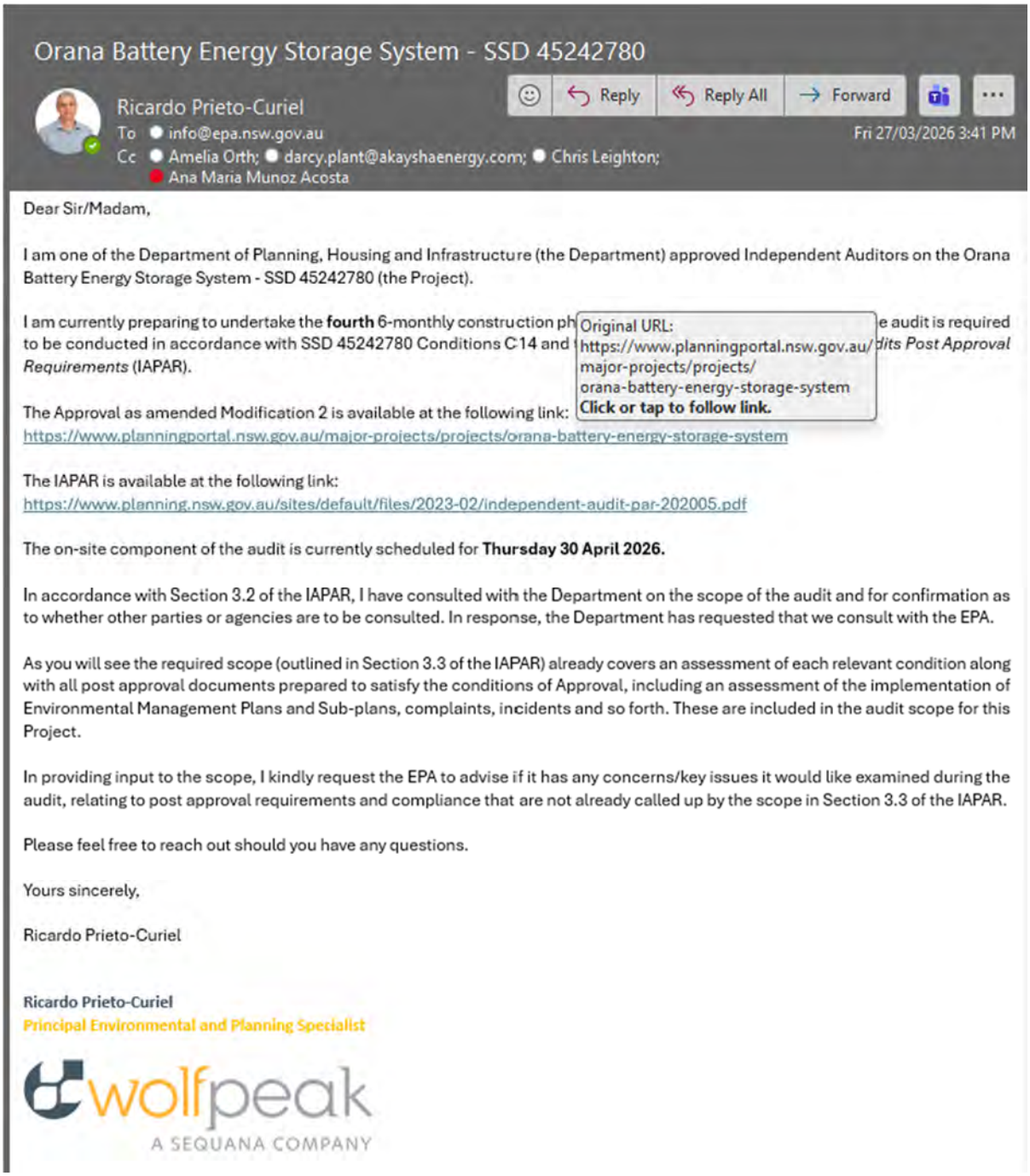
¶

Darryll·Quigley¶

Manager·Building·and·Development·Services¶

¶

Consultation with EPA



Orana Battery Energy Storage System - SSD 45242780

Reply | Reply All | Forward

Ricardo Prieto-Curiel
To info@epa.nsw.gov.au
Cc Amelia Orth; darcy.plant@akayshaenergy.com; Chris Leighton; Ana Maria Munoz Acosta
Fri 27/03/2026 3:41 PM

Dear Sir/Madam,

I am one of the Department of Planning, Housing and Infrastructure (the Department) approved Independent Auditors on the Orana Battery Energy Storage System - SSD 45242780 (the Project).

I am currently preparing to undertake the **fourth** 6-monthly construction ph e audit is required to be conducted in accordance with SSD 45242780 Conditions C14 and dits Post Approval *Requirements* (IAPAR).

Original URL:
https://www.planningportal.nsw.gov.au/major-projects/projects/orana-battery-energy-storage-system
Click or tap to follow link.

The Approval as amended Modification 2 is available at the following link:
https://www.planningportal.nsw.gov.au/major-projects/projects/orana-battery-energy-storage-system

The IAPAR is available at the following link:
https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf

The on-site component of the audit is currently scheduled for **Thursday 30 April 2026.**

In accordance with Section 3.2 of the IAPAR, I have consulted with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted. In response, the Department has requested that we consult with the EPA.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request the EPA to advise if it has any concerns/key issues it would like examined during the audit, relating to post approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Please feel free to reach out should you have any questions.

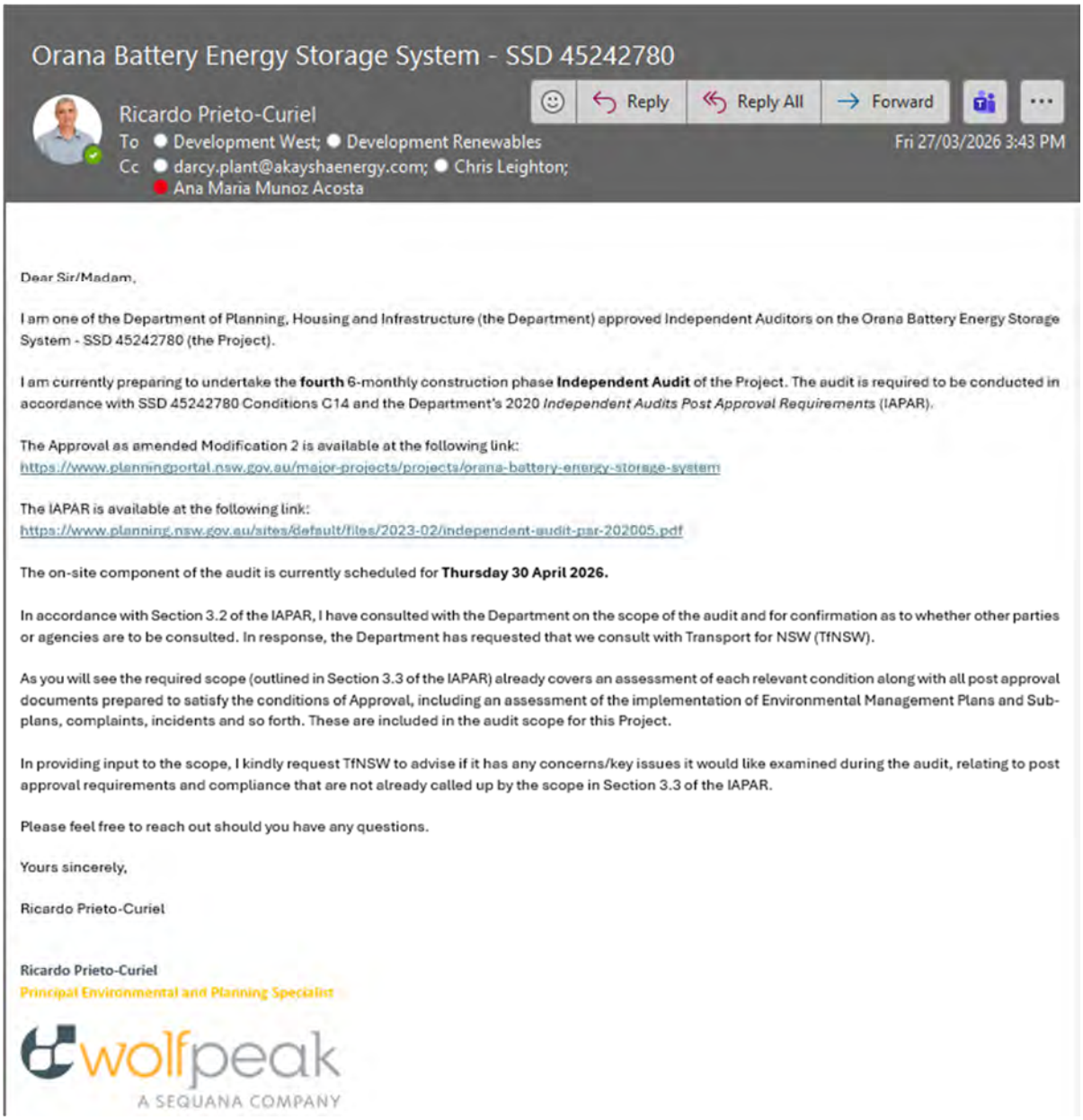
Yours sincerely,

Ricardo Prieto-Curiel

Ricardo Prieto-Curiel
Principal Environmental and Planning Specialist

wolfpeak
A SEQUANA COMPANY

Consultation with Transport NSW



Orana Battery Energy Storage System - SSD 45242780

Reply | Reply All | Forward

Ricardo Prieto-Curiel
To Development West; Development Renewables
Cc darcy.plant@akayshaenergy.com; Chris Leighton; Ana Maria Munoz Acosta
Fri 27/03/2026 3:43 PM

Dear Sir/Madam,

I am one of the Department of Planning, Housing and Infrastructure (the Department) approved Independent Auditors on the Orana Battery Energy Storage System - SSD 45242780 (the Project).

I am currently preparing to undertake the **fourth** 6-monthly construction phase **Independent Audit** of the Project. The audit is required to be conducted in accordance with SSD 45242780 Conditions C14 and the Department's 2020 *Independent Audits Post Approval Requirements* (IAPAR).

The Approval as amended Modification 2 is available at the following link:
https://www.planningportal.nsw.gov.au/major-projects/projects/orana-battery-energy-storage-system

The IAPAR is available at the following link:
https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-psr-202005.pdf

The on-site component of the audit is currently scheduled for **Thursday 30 April 2026.**

In accordance with Section 3.2 of the IAPAR, I have consulted with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted. In response, the Department has requested that we consult with Transport for NSW (TfNSW).

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request TfNSW to advise if it has any concerns/key issues it would like examined during the audit, relating to post approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Please feel free to reach out should you have any questions.

Yours sincerely,

Ricardo Prieto-Curiel

Ricardo Prieto-Curiel
Principal Environmental and Planning Specialist

wolfpeak
A SEQUANA COMPANY

From: Development Renewables <development.renewables@transport.nsw.gov.au>
Sent: Monday, 30 March 2026 1:27 PM
To: Ricardo Prieto-Curiel <rprietocuriel@wolfpeak.com.au>; Development Renewables <development.renewables@transport.nsw.gov.au>
Cc: darcy.plant@akayshaenergy.com; Chris Leighton <chris.leighton@akayshaenergy.com>; Ana Maria Munoz Acosta <ammunoz@wolfpeak.com.au>
Subject: RE: Orana Battery Energy Storage System - SSD 45242780

Hello Ricardo,

TfNSW suggests that the Independent Environmental Audit scope consider:

- Compliance with Instrument of Consent transport-related conditions
- Implementation and enforcement of shuttle bus arrangements
- Management of construction traffic volumes during AM and PM peak periods
- Any pre-construction minor works mitigation measures and associated Planning Secretary approvals
- Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs)
- Commitments made within the Environmental Impact Statement (EIS)
- Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions
- Effectiveness of mitigation measures detailed within the TMP
- Alignment between assessed and actual traffic volumes and vehicle characteristics
- Suitability of existing intersection treatments under cumulative background and project traffic
- Ongoing appropriateness of approved OSOM routes for the configurations being utilised
- Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response
- Audit report outcomes and recommended actions relevant to the State Road network

Kind regards

Rosa Gillogly
Development Services Support Officer
Development Services West
Transport Planning – Planning, Integration and Passenger
Transport for NSW

E rosa.gillogly@transport.nsw.gov.au

transport.nsw.gov.au

Level 1 51-55 Currajong Street
Parkes NSW 2870

I work flexibly. Unless it suits you, I don't expect you to read or respond to my emails outside of your normal work hours.

Transport for NSW

I recognise and acknowledge that modern New South Wales is an overlay on Aboriginal land and that many of the transport routes of today follow songlines Aboriginal people have followed for tens of thousands of years. I pay my respects to the Aboriginal people of NSW and Elders past and present.

Consultation with NSW DCCEEW CPHR



Orana Battery Energy Storage System - SSD 45242780

Ricardo Prieto-Curiel

Reply | Reply All | Forward

To Environment Line; David Geering

Cc darcy.plant@akayshaenergy.com; Chris Leighton; Ana Maria Munoz Acosta

Fri 27/03/2026 3:48 PM

Dear Sir/Madam,

I am one of the Department of Planning, Housing and Infrastructure (the Department) approved Independent Auditors on the Orana Battery Energy Storage System - SSD 45242780 (the Project).

I am currently preparing to undertake the **fourth** 6-monthly construction phase **Independent Audit** of the Project. The audit is required to be conducted in accordance with SSD 45242780 Conditions C14 and the Department's 2020 *Independent Audits Post Approval Requirements* (IAPAR).

The Approval as amended Modification 2 is available at the following link:
https://www.planningportal.nsw.gov.au/major-projects/projects/orana-battery-energy-storage-system

The IAPAR is available at the following link:
https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf

The on-site component of the audit is currently scheduled for **Thursday 30 April 2026.**

In accordance with Section 3.2 of the IAPAR, I have consulted with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted. In response, the Department has requested that we consult with NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) CPHR.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request NSW DCCEEW CPHR to advise if it has any concerns/key issues it would like examined during the audit, relating to post approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Please feel free to reach out should you have any questions.

Yours sincerely,

Ricardo Prieto-Curiel

Ricardo Prieto-Curiel
Principal Environmental and Planning Specialist

wolfpeak
A SEQUANA COMPANY

NSW GOVERNMENT

Department of Climate Change, Energy, the Environment and Water

Your ref: SSD-45242780
Our ref: DOC26/186734

Ricardo Prieto-Curiel
Principal Environmental and Planning Specialist
WolfPeak

By email: rprietocuriel@wolfpeak.com.au

Dear Ricardo

Subject: Orana Battery Energy Storage System – Independent Audit

Thank you for your request via e-mail dated 13 March 2026 to the Conservation Programs, Heritage & Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water inviting seeking input into an independent environmental audit of the Orana Battery Energy Storage System (Orana BESS).

CPHR notes that the scope of WolfPeak's audit will include assessment of compliance with the development consent conditions.

CPHR has previously provided advice on the first three 6-monthly construction phase independent audits of Orana BESS. We have nothing further to add to our previous advice.

If you have any further questions about this issue, please contact the Conservation Planning and Assessment team - North at rog.nw@dcceew.nsw.gov.au.

Yours sincerely

NGolightly

Naomi Golightly
A/ Senior Team Leader, Conservation Planning and Assessments - North
Conservation Programs, Heritage and Regulation Group (CPHR)

1 April 2026

48-52 Wingewarra Street, Dubbo 2830 • dcceew.nsw.gov.au

Consultation with Heritage NSW



Orana Battery Energy Storage System - SSD 45242780

Ricardo Prieto-Curiel

Reply | Reply All | Forward

To heritagemailbox@environment.nsw.gov.au; Heritage NSW

Cc darcy.plant@akayshaenergy.com; Chris Leighton; Ana Maria Munoz Acosta

Fri 27/03/2026 3:51 PM

Dear Sir/Madam,

I am one of the Department of Planning, Housing and Infrastructure (the Department) approved Independent Auditors on the Orana Battery Energy Storage System - SSD 45242780 (the Project).

I am currently preparing to undertake the **fourth** 6-monthly construction phase **Independent Audit** of the Project. The audit is required to be conducted in accordance with SSD 45242780 Conditions C14 and the Department's 2020 *Independent Audits Post Approval Requirements* (IAPAR).

The Approval as amended Modification 2 is available at the following link:
https://www.planningportal.nsw.gov.au/major-projects/projects/orana-battery-energy-storage-system

The IAPAR is available at the following link:
https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf

The on-site component of the audit is currently scheduled for **Thursday 30 April 2026.**

In accordance with Section 3.2 of the IAPAR, I have consulted with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted. In response, the Department has requested that we consult with Heritage NSW.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request Heritage NSW to advise if it has any concerns/key issues it would like examined during the audit, relating to post approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Please feel free to reach out should you have any questions.

Yours sincerely,

Ricardo Prieto-Curiel

Ricardo Prieto-Curiel
Principal Environmental and Planning Specialist

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From: Alison Lamond <alison.lamond@dcceew.nsw.gov.au>
Sent: Monday, 30 March 2026 3:59 PM
To: Ricardo Prieto-Curiel <rprietocuriel@wolfpeak.com.au>
Cc: darcy.plant@akayshaenergy.com; Chris Leighton <chris.leighton@akayshaenergy.com>; Ana Maria Munoz Acosta <ammunoz@wolfpeak.com.au>
Subject: RE: Orana Battery Energy Storage System - SSD 45242780 Independent Audit

You don't often get email from alison.lamond@dcceew.nsw.gov.au. Learn why this is important

Hello Ricardo,
Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for your project. Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed.
It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.
If you have any questions regarding these comments, please contact heritagemailbox@environment.nsw.gov.au.

Kind regards,

Alison Lamond *BSci, BA (Hons), (she/her)*
Strategic Manager – Major Projects
Heritage NSW
Department of Climate Change,
Energy, the Environment and Water

M 0419 762 918 **E** alison.lamond@dcceew.nsw.gov.au

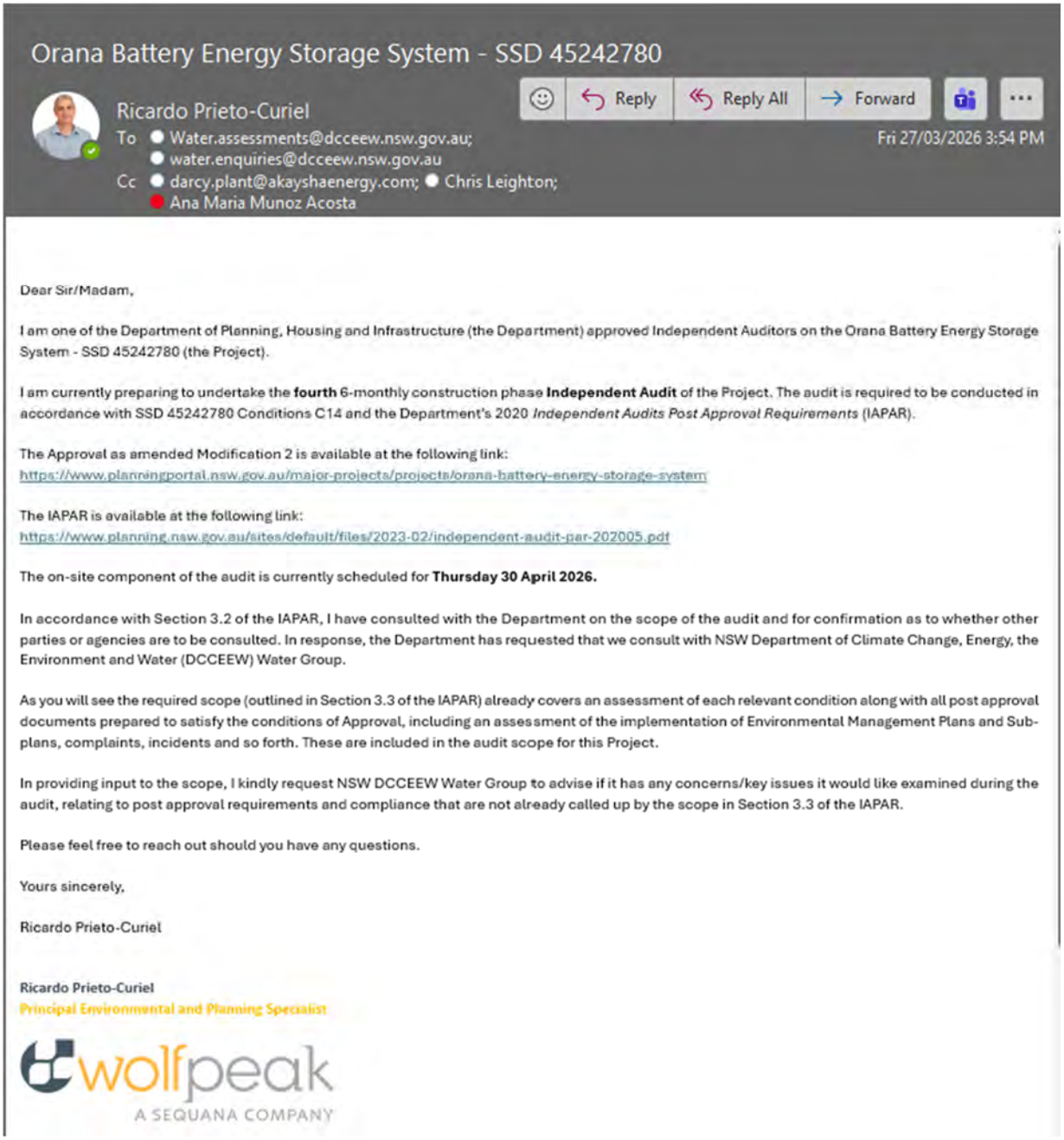
dcceew.nsw.gov.au

Level 3, 6 Stewart Ave
Newcastle West NSW 2303

Locked Bag 1002, Dangar NSW 2309

Working days Monday to Friday, 9:00am - 5:00pm

Consultation with Water Group of DCCEEW



Orana Battery Energy Storage System - SSD 45242780

Reply | Reply All | Forward

Ricardo Prieto-Curiel

To Water.assessments@dcceew.nsw.gov.au; water.enquiries@dcceew.nsw.gov.au

Cc darcy.plant@akayshaenergy.com; Chris Leighton; Ana Maria Munoz Acosta

Fri 27/03/2026 3:54 PM

Dear Sir/Madam,

I am one of the Department of Planning, Housing and Infrastructure (the Department) approved Independent Auditors on the Orana Battery Energy Storage System - SSD 45242780 (the Project).

I am currently preparing to undertake the **fourth** 6-monthly construction phase **Independent Audit** of the Project. The audit is required to be conducted in accordance with SSD 45242780 Conditions C14 and the Department's 2020 *Independent Audits Post Approval Requirements* (IAPAR).

The Approval as amended Modification 2 is available at the following link:
https://www.planningportal.nsw.gov.au/major-projects/projects/orana-battery-energy-storage-system

The IAPAR is available at the following link:
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The on-site component of the audit is currently scheduled for **Thursday 30 April 2026.**

In accordance with Section 3.2 of the IAPAR, I have consulted with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted. In response, the Department has requested that we consult with NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request NSW DCCEEW Water Group to advise if it has any concerns/key issues it would like examined during the audit, relating to post approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Please feel free to reach out should you have any questions.

Yours sincerely,

Ricardo Prieto-Curiel

Ricardo Prieto-Curiel
Principal Environmental and Planning Specialist

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NSW Department of Climate Change, Energy, the Environment and Water

NSW GOVERNMENT

Our ref: OUT26/3852

Ricardo Prieto-Curiel
Wolfpeak
Email: rprietocurriel@wolfpeak.com.au

1/04/2026

Subject: Orana Battery Energy Storage System - Independent Environmental Audit - SSD-45242780

Dear Ricardo Prieto-Curiel,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
    - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124
https://www.nsw.gov.au/departments-and-agencies/dcceew

NSW Department of Climate Change, Energy, the Environment and Water

NSW GOVERNMENT

- Extraction Plans and related sub-plans e.g. Water Management Plan, Subsidence Management Plan.

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025. Consideration is also to be given to the relevance of excluded works at the site with reference to the factsheet at the following link: https://water.dpie.nsw.gov.au/__data/assets/pdf_file/0008/554444/la-interpreting-excluded-works-dams-fact-sheet.pdf
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at water.assessments@dcceew.nsw.gov.au

Yours sincerely,

Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124
https://www.nsw.gov.au/departments-and-agencies/dcceew

Consultation with RFS



Orana Battery Energy Storage System - SSD 45242780

Reply | Reply All | Forward

Ricardo Prieto-Curiel
To webmaster@rfs.nsw.gov.au; Joshua.calandra@rfs.nsw.gov.au
Cc darcy.plant@akayshaenergy.com; Chris Leighton; Ana Maria Munoz Acosta
Fri 27/03/2026 3:57 PM

Dear Sir/Madam,

I am one of the Department of Planning, Housing and Infrastructure (the Department) approved Independent Auditors on the Orana Battery Energy Storage System - SSD 45242780 (the Project).

I am currently preparing to undertake the **fourth** 6-monthly construction phase **Independent Audit** of the Project. The audit is required to be conducted in accordance with SSD 45242780 Conditions C14 and the Department's 2020 *Independent Audits Post Approval Requirements* (IAPAR).

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The on-site component of the audit is currently scheduled for **Thursday 30 April 2026.**

In accordance with Section 3.2 of the IAPAR, I have consulted with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted. In response, the Department has requested that we consult with NSW Rural Fire Service.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request NSW Rural Fire Service to advise if it has any concerns/key issues it would like examined during the audit, relating to post approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Please feel free to reach out should you have any questions.

Yours sincerely,

Ricardo Prieto-Curiel

Ricardo Prieto-Curiel
Principal Environmental and Planning Specialist

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From: Joshua Calandra <Joshua.Calandra@rfs.nsw.gov.au>
Sent: Monday, 13 April 2026 4:00 PM
To: Ricardo Prieto-Curiel <rprietocuriel@wolfpeak.com.au>
Cc: Kimberley Durtanovski <Kimberley.Durtanovski@rfs.nsw.gov.au>; Kalpana Varghese <Kalpana.Varghese@rfs.nsw.gov.au>
Subject: NSW RFS - Orana Battery Energy Storage System - SSD 45242780

You don't often get email from joshua.calandra@rfs.nsw.gov.au. Learn why this is important

Hi Ricardo,
The NSW RFS provided a response to the modification and it is at your discretion, as the certifier, to be satisfied the terms for the consent have been met.
We have no further concerns or issues for you to address relating to post approval requirements and compliance.

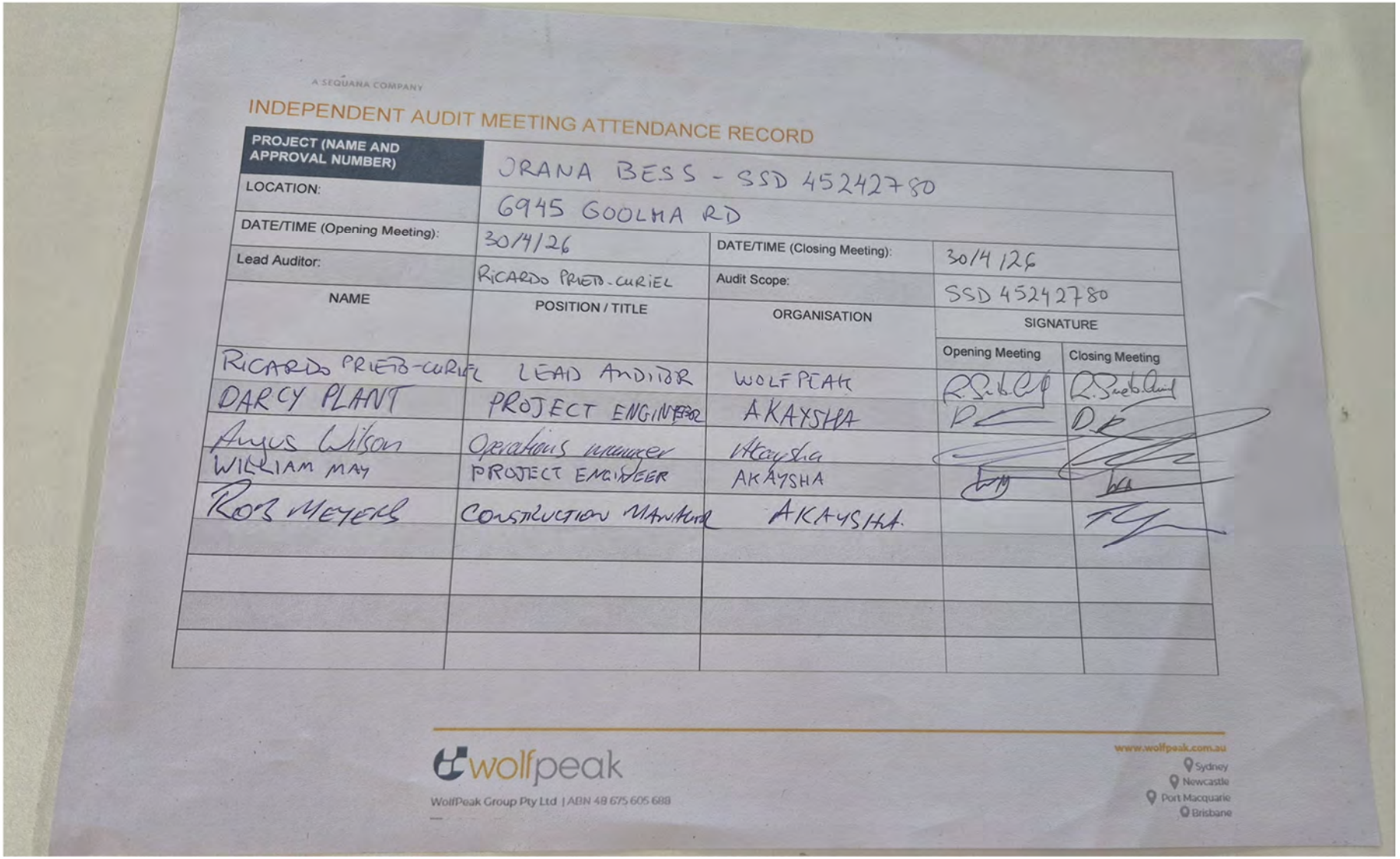
Kind Regards,

Josh Calandra
A/Supervisor – Development Assessment and Planning | Planning and Environment Services (East)

RFS

P 02 8741 3409 E Joshua.Calandra@rfs.nsw.gov.au
Building B, 121-131 Oratava Ave, West Pennant Hills NSW 2125
Locked Bag 17 Granville NSW 2142
www.rfs.nsw.gov.au

APPENDIX D – ATTENDANCE SHEET



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INDEPENDENT AUDIT MEETING ATTENDANCE RECORD

PROJECT (NAME AND APPROVAL NUMBER)	ORANA BESS - SSD 45242780		
LOCATION:	6945 GOOLMA RD		
DATE/TIME (Opening Meeting):	30/4/26	DATE/TIME (Closing Meeting):	30/4/26
Lead Auditor:	RICARDO PRIETO-CURIEL	Audit Scope:	SSD 45242780

NAME	POSITION / TITLE	ORGANISATION	SIGNATURE	
			Opening Meeting	Closing Meeting
RICARDO PRIETO-CURIEL	LEAD AUDITOR	WOLFPEAK		
DARCY PLANT	PROJECT ENGINEER	AKAYSHA		
Angus Wilson	Operations manager	Akaysha		
WILLIAM MAY	PROJECT ENGINEER	AKAYSHA		
ROB MEYERS	CONSTRUCTION MANAGER	AKAYSHA		

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Newcastle
Port Macquarie
Brisbane

APPENDIX E – SITE PHOTOS

Observations from the site inspection are provided in the table below. The Auditor was escorted around the site by Project personnel who made themselves available for this purpose.

Site inspection photographs

No.	Comment	Photograph
1	Goolma Road upgraded intersection access	
2	Stabilised and delineated access road and speed limit sign	

No.	Comment	Photograph
3	Tree located outside site, next to access road, with protection flagging	
4	Rumble grid along vehicular access	
5	Site's car park	

No.	Comment	Photograph
6	Access to LV carpark, speed limit sign and maintenance building in the background	 
7	Heritage protection area outside site (fencing around area)	

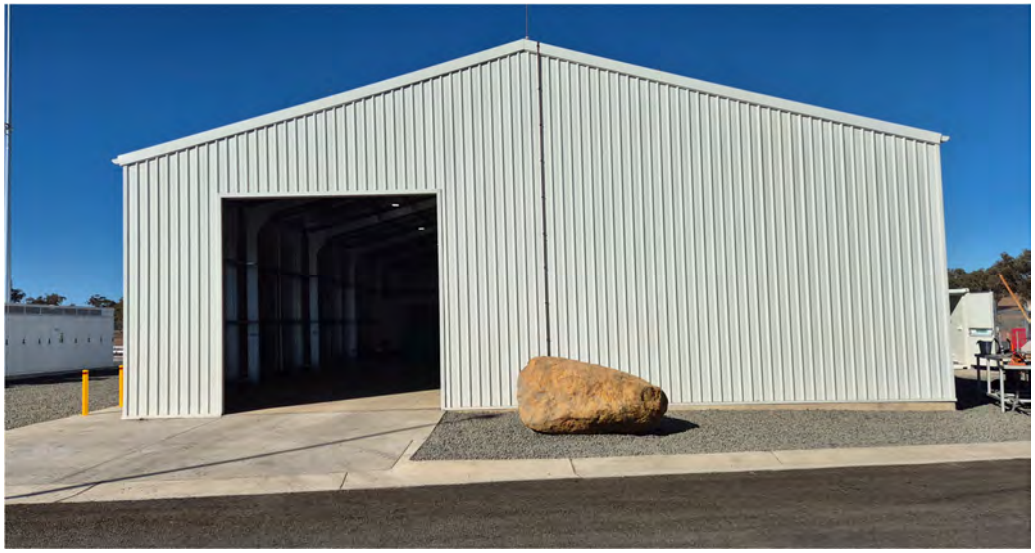
No.	Comment	Photograph
8	Light vehicle carpark	
9	Masked owl nest boxes	

No.	Comment	Photograph
10	Waste bins / segregation	
11	Constructed stormwater system leading to operational stormwater basin	

No.	Comment	Photograph
12	Operational Stormwater basin	
13	Battery units, gravelled buffer area to boundary fence, and perimeter fire hydrant system	
14	Fire water tanks (2 x 144 kL)	

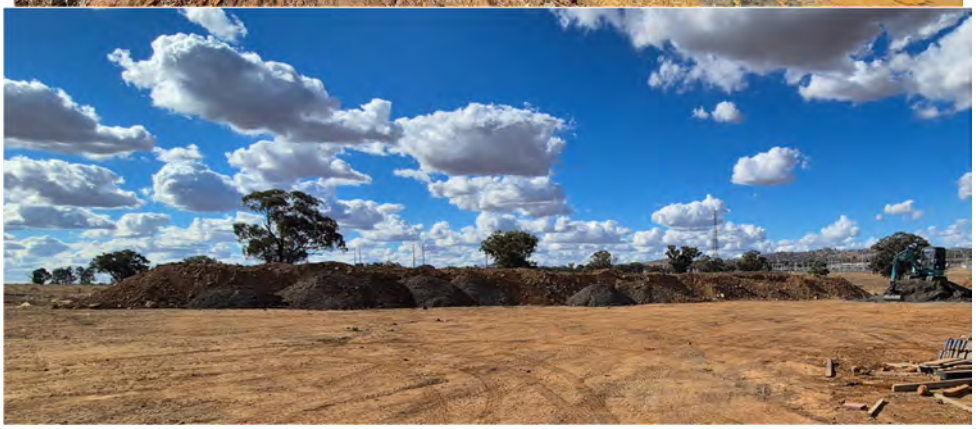
No.	Comment	Photograph
15	Battery units installed and being commissioned	
16	Wellington Substation in the distance	

No.	Comment	Photograph
17	Site Substation	
18	Stormwater system outside site perimeter	

No.	Comment	Photograph
19	Operation and Maintenance Shed	
20	Operation and Maintenance Shed (internal)	

No.	Comment	Photograph
21	Bunded chemical storage inside shed	
22	Concrete washout bay	

No.	Comment	Photograph
23	Laydown area	
24	**Observation: unbunded chemicals in laydown area**	  

No.	Comment	Photograph
25	**Observation: dark coloured surface soils potentially affected by spills in laydown area**	
26	**Observation: stockpiles in laydown area with limited erosion and sediment controls**	 

No.	Comment	Photograph
27	Photos provided by auditee (car park pass, boom gate and off site parking in Wellington)	  

APPENDIX F – AUDITOR DECLARATION

Independent Audit Report Declaration

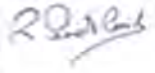
Project Name:	Orana Battery Energy Storage System (BESS)
Consent Number:	SSD-45242780
Description of Project:	Construction and operation of the Orana Battery Storage System
Project Address:	6945 Goolma Road, Wellington. Lot 1 & 2 DP 1226751, Lot 2 DP 1136578, Road Corridor (Goolma Road)
Proponent:	Akaysha Energy Pty Ltd
Title of Audit	Independent Audit 4 Orana BESS (construction phase)
Date:	30 April 2026

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
ii. the findings of the audit are reported truthfully, accurately and completely;
iii. I have exercised due diligence and professional judgement in conducting the audit;
iv. I have acted professionally, objectively and in an unbiased manner;
v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000; and
b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Proposed Auditor:	Ricardo Prieto-Curiel
Signature:	
Qualification:	Bachelor of Biological Sciences Masters in Environmental Toxicology Registered Environmental Assessment Practitioner (REAP - 46189) Exemplar Global Lead Environmental Auditor (No. 15160)
Company:	WolfPeak Group Pty Ltd