ORANA BESS - Proponent response to Audit No.4 findings

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponents Proposed Action/Action taken/ Response. (as applicable)	Proposed Action Due Date
Condition B14 IA4-02	**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: a) protecting vegetation and fauna habitat outside the approved disturbance areas; b) managing the remnant vegetation and fauna habitat on site; c) minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; d) iv. avoiding the removal of hollow-bearing trees during spring to avoid the main	**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.	Implement Section 5.8 of the BMP prior to commencement of operations.	The contractor is currently tidying the compound and laydown areas and rehabilitating the temporary construction areas. The contractor has confirmed that rehabilitation will be undertaken in accordance with Section 5.8 of the BMP, using a seed mix selected from the approved species list in Table 5.2 of the BMP.	August 2026

	breeding period for hollow-dependant fauna; e) minimising the impacts to fauna on site and implementing fauna management protocols, including design of temporary fencing; f) 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 g) 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				
Condition B15 IA4-03	**Water Pollution** The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Ac	**Observation:** The following was observed in the laydown area (Photos 24 and 25 in Appendix E):	**Recommendation:** ensure that all chemical containers are bunded and clean up potential	The contractor is in the process of sorting through the excess materials in the laydown area. Site team	June 2026

		• several chemical containers were unbunded • minor potential spills were noted in exposed soils near a shipping container	spills within the laydown area	has confirmed that all unbunded containers were empty and have since been removed from site as part of the cleanup process.	
Condition B15 IA4-04	**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	Topsoil will be reinstated in accordance with the BMP, and erosion and sediment controls will be implemented following hydroseeding and rehabilitation, as outlined in the BMP.	August 2026

Condition B34 IA4-05	**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	A document is currently being drafted outlining the number of operations team members local to the area. It is anticipated that at least five team members will be locally based.	June 2026