

Environmental Management Strategy

Bellambi Heights BESS

October 2025



Environmental Management Strategy

Bellambi Heights BESS

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Applicant:	Vena Energy Services (Australia) Pty Ltd

Document history and status

Revision	Date	Actions
1	14/11/2024	Submission to DPHI
2	11/02/2025	Response to DPHI comments
3	21/10/2025	<p>Updated to reflect approval of SSD-33344237-Mod-1 and minor corrections to reflect consent conditions. Updates include:</p> <ul style="list-style-type: none"> • Updated logo to reflect current branding. • Minor formatting changes. • Section 1: <ul style="list-style-type: none"> ○ Figure 1: Project layout has been updated to show the approved modified footprint. • Section 2.1: <ul style="list-style-type: none"> ○ Replaced the Environmental Policy with Vena Groups new Health, Safety, Security and Environment Policy. • Section 3: <ul style="list-style-type: none"> ○ Table 2 has been updated to include reference to SSD-33344237-Mod-1. ○ The authority for the construction and occupation certificates has been updated to Principal Certifying Authority in Table 2 • Section 9: <ul style="list-style-type: none"> ○ Updated timing of Emergency Management Plan to reflect condition B30. • Section 11.2: <ul style="list-style-type: none"> ○ Updated timing of Emergency Management Plan to reflect condition B30. ○ Removal of reference to the Fire Safety Study being required prior to the Construction Bushfire Management Plan being developed. • Section 12.1: <ul style="list-style-type: none"> ○ Updated reference from C18 to C17 in Table 4.

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Abbreviations and definitions

Term	Abbreviation/definition
ACHMP	Aboriginal Cultural Heritage Management Plan
BCS	Biodiversity, Conservation and Science
BESS	Battery Energy Storage System
Council	Mid-Western Regional Council
CPESC	Certified Professional in Erosion and Sediment Control
CRAW	Construction Risk Assessment Workshop
CWO REZ	Central-West Orana Renewable Energy Zone
Development Consent	SSD-33344237
The Department/DPHI	Department of Planning, Housing and Infrastructure
EMP	Emergency Management Plan
EMS	Environmental Management Strategy
HSSE	Health, Safety, Security and Environment
IMS	Integrated Management System
IAP	International Association for Public Participation
MNES	Matters Of National Environmental Significance
MW	Megawatt
MWh	Megawatt Hours
O&M	Operations and Maintenance
SEP	Stakeholder Engagement Plan
SiD	Safety In Design
SSD	State Significant Development
The Development/Project	Bellambi Heights BESS
TfNSW	Transport for New South Wales
Vena Energy	Vena Energy Services (Australia) Pty Ltd

1. Introduction

1.1. Development Overview

Vena Energy Services (Australia) Pty Ltd (Vena Energy) proposes to construct and operate a grid-scale Battery Energy Storage System (BESS) with a generation capacity of approximately 408 megawatts (MW) comprising two, 204 MW (two hour) BESS generating units, and energy storage capacity of approximately 816 megawatt hours (MWh) (approximately two hours of storage). The approved development layout is shown in Figure 1 Project layout.

Bellambi Heights BESS (the Development/Project) is in the Central West of New South Wales (NSW) in the locality of Beryl, approximately 6.5 km north-west of the township of Gulgong, in the Mid-Western Regional Council local government area and Central-West Orana Renewable Energy Zone (CWO REZ).

This Environmental Management Strategy (EMS) has been prepared to satisfy Condition C1 in Development Consent SSD-33344237.

1.2. Scope and Structure

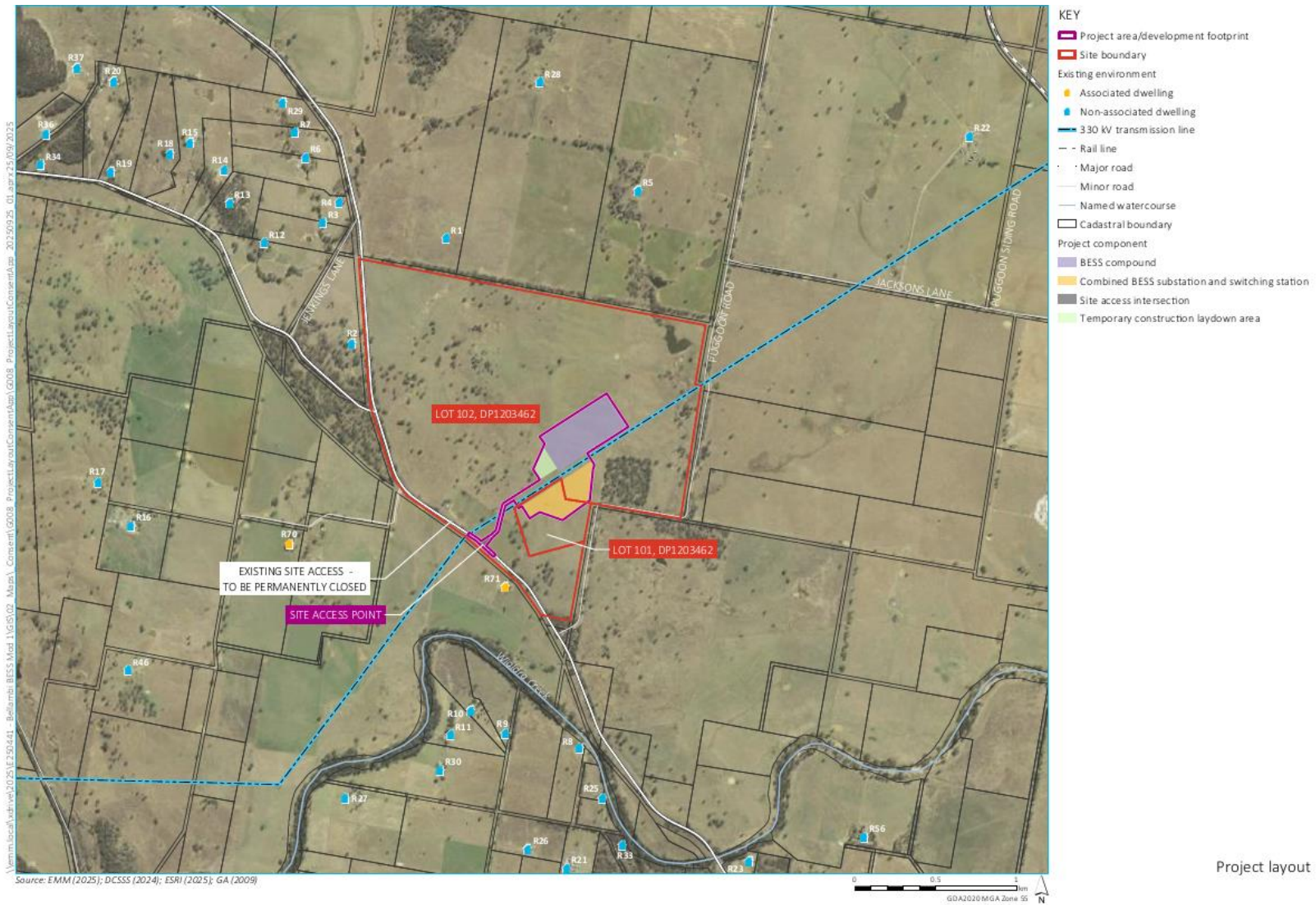
The purpose of this EMS is to provide a framework for the management of environmental aspects during construction, operations and decommissioning of the development. The scope and structure of this EMS is presented in Table 1.

Table 1 EMS Structure

Environmental Management Strategy	Section Reference
Strategic framework for environmental management	Section 2
Applicable statutory approvals	Section 3
Roles, responsibilities, authorities and accountabilities of key personnel	Section 4
Community and stakeholder engagement	Section 5
Procedures to receive, handle, respond to, and record complaints	Section 6
Dispute resolution	Section 7
Non-compliance management	Section 8
Responses to emergencies	Section 9
Incident reporting	Section 10
Strategies, plans and programs	Section 11
Monitoring and reporting	Section 12

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Project layout

Figure 1 Project layout

2. Environmental Management Framework

2.1. Health, Safety, Security and Environment Policy

Health, Safety, Security and Environment Policy

At Vena Group, we are deeply committed to prioritizing the health, safety, security, and environmental well-being of all individuals and assets throughout the entire lifecycle of our renewable energy projects. We recognize the critical importance of fostering a healthy, safe, secure, and sustainable working environment, and we strive to meet and exceed the highest standards in these areas across all our assets' lifecycle.

Robust Commitment to Health, Safety, Security, and Environment

We are dedicated to creating a healthy, safe, secure, and sustainable environment for our employees, contractors, visitors, and the communities in our projects. Health, safety, security, and environmental stewardship are core values that guide every decision and action we take throughout our renewable projects.

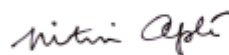
Compliance and Enforcement of Policy

We are all responsible for adhering to this policy and for following supporting corporate Manual, Standards, and Guidelines.

We have established an extensive Health, Safety, Security, and Environmental Management System that covers all aspects of our renewable business and includes comprehensive Golden Safety Rules prioritizing key safety aspects. This system undergoes continuous review and improvement to ensure its effectiveness and relevance.

We shall comply with our management system, Golden Safety Rules, and relevant standards.

We commit to all applicable health, safety, security, and environmental regulations locally, nationally, and internationally. Our operations will align with legal requirements, recognized principles, and industry best practices.



Nitin Apte
Chief Executive Officer
June 1, 2025



Leadership Commitment

- Our leadership team actively supports our health, safety, security, and environmental initiatives.
- By leading by example and fostering accountability, they inspire the organization to prioritize these values.
- We encourage workforce engagement and feedback, ensuring transparent decision-making and continuous improvement.

Communication

- Open and transparent communication is vital for maintaining a healthy, safe, secure, and environmentally sound workplace.
- We encourage the reporting of health, safety, security, and environmental concerns, hazards, and incidents, ensuring that information flows freely throughout the organization.
- We are committed to continuous improvement through regular communication of job hazards and sharing lessons learned from incidents.

Employee Training and Awareness

- We invest in comprehensive training to equip our employees with the skills to work safely, maintain health, secure properties, and protect the environment.
- Ongoing awareness initiatives reinforce a culture of health, safety, security, and environmental consciousness.
- By integrating international best practices and innovative tools, we ensure our employees can manage risks effectively and foster proactive safety and environmental stewardship.

Hazard Identification and Risk Management

- We proactively identify and assess potential hazards related to our activities, to prevent incidents and fosters a proactive safety culture.
- By applying a structured work authorization process supported by systematic risk assessments and a robust permit-to-work system, we implement effective controls to eliminate or mitigate risks.

Emergency Preparedness and Response

- We shall develop and maintain robust emergency preparedness plans to ensure swift and effective responses to unforeseen health, safety, security, and environmental incidents.
- Regular simulations and drills shall be conducted to enhance our emergency response and recovery capabilities.

Incident Management

- We ensure that all incidents are addressed immediately and reported promptly.
- Competent investigators conduct thorough investigations when necessary, and we implement corrective actions while sharing lessons learned to prevent recurrence.
- Transparency and accountability are fundamental to our incident management approach.

Performance Measurement and Improvement

- We shall establish key performance indicators (KPIs) to measure our health, safety, security, and environmental performance.
- Regular audits, inspections, and reviews shall identify areas for improvement, and we shall implement corrective actions promptly across all our processes and management systems.

2.2. Integrated Management System

Vena Energy’s HSSE Integrated Management System (IMS) is a combination of health, safety, security and environment requirements and consolidates these practices into one system, linking to form an integral part of the Vena Energy management structure. An overview of the components in the HSSE IMS and their hierarchy can be seen in Figure 2. Construction and operations of the Development must be in compliance with relevant statutory requirements and the HSSE IMS. The corporate Environmental Policy seen in Section 2.1 governs environmental performance on Vena Energy development sites.

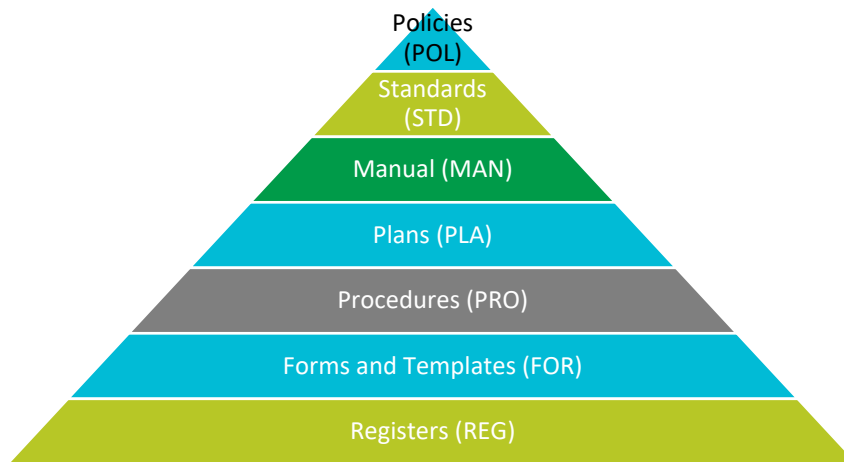


Figure 2 HSSE IMS Pyramid Structure

2.3. Risk management framework

Vena Energy adopts a systematic risk management approach that meets the requirements of AS/NZS ISO 31000:2018 Risk Management Guidelines, which include:

- Adopting a structured approach to project planning to identify, assess, and treat key project risks and opportunities that may affect Vena Energy’s project team, environment, compliance, safety, stakeholders (internal and external), reputation, project objectives, quality and performance.
- Use of Risk Registers to document and focus risk treatment, individual risk owners and opportunity planning efforts
- consistent application of project management methods and controls including the management of risk at all stages of the project lifecycle.
- Procedures that are regularly reviewed for appropriateness and compliance.
- Internal compliance checks and control self-assessment to monitor risk management performance.

Risk will be managed in accordance with the Vena Energy *HSSE Risk Management Procedure (IMS_01_HSE_PRO_007)*, and the standard hierarchy of controls shall be applied to develop, maintain and update a risk treatment plan during all project phases.

2.3.1. Risk assessment

Risk assessments shall be conducted in the form of facilitated workshops with relevant stakeholders in attendance. Specific workshops are undertaken as per the project phase to assess upcoming risks. As an example, prior to construction a Safety in Design (SiD) risk workshop and Construction Risk Assessment Workshop (CRAW) will assess risks associated with the early design process and construction phase.

The risk assessment shall consider all types of risks, be transparent, involve relevant stakeholders and be collaborative (i.e. workshop based) and shall be captured within a site risk register in accordance with the Vena Energy *Risk Management Procedure*.

2.3.2. Risk evaluation

The purpose of risk evaluation is to make decisions about which risks require further treatment. Each risk assessment workshop shall compare the level of risk found with nominated risk criteria and prioritise the risks for attention according to risk ranking, potential exposure and control effectiveness.

2.3.3. Risk treatment

Risk treatment involves selecting one or more options for modifying risks and implementing those options in accordance with the residual risk criteria.

The hierarchy of controls as shown in the Vena Energy Risk Management Procedure and in Figure 3 below shall be applied to develop a risk treatment plan.

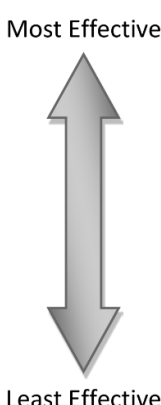
 <p>Most Effective</p> <p>Least Effective</p>	Elimination	Removing the hazard or hazardous work practice from the workplace.
	Substitution	Substituting or replacing a hazard or hazardous work practice with a less hazardous one.
	Isolation	Isolating or separating the hazard or hazardous work practice from people involved in the work or people involved in the general work areas from the hazard. This can be achieved by installing screens or barriers or marking off hazardous areas.
	Engineering Control	This may include modifications to equipment or providing guarding to machinery.
	Administrative Control	Includes introducing work practices that reduce the risk. This could include limiting the amount of time a person is exposed to a particular hazard.
	PPE	Should be considered only when other control measures are not practicable or to increase protection.

Figure 3 Standard hierarchy of control

2.3.4. Monitor and review of risks

The purpose of monitoring and review is to ensure that changes to the risk, its causes and consequences, are monitored and updated as required and that current controls remain relevant, and their effectiveness has been assessed.

Learning’s from significant events are to be analysed, recorded and communicated to relevant stakeholders.

3. Statutory Approvals

The statutory approvals applicable to the Development are listed below in Table 2.

Table 2 Applicable statutory approvals

Approval	Legislation	Authority	Trigger
Development Consent SSD-33344237-Mod-1	Environmental Planning and Assessment Act 1979	Department of Planning, Housing and Infrastructure	Slight increase to the approved development footprint to facilitate a revision of the layout of the substation and the switching yard, inclusion of a new transmission tower and relocation of one existing electrical transmission tower for a State Significant Development.
Development Consent SSD-33344237	Environmental Planning and Assessment Act 1979	Department of Planning, Housing and Infrastructure	State Significant Development.
Construction Certificates	Environmental Planning and Assessment Act 1979	Principal Certifying Authority	Construction of buildings and structures.
Occupation Certificates	Environmental Planning and Assessment Act 1979	Principal Certifying Authority	Occupancy of buildings and structures.
Section 138	Roads Act 1993	Transport for NSW Mid-Western Regional Council	Works in, on or over a public road. This will include the construction of the site access off the Castlereagh Highway.
Section 68	Local Government Act, 1993	Mid-Western Regional Council	To operate a system of sewage management. Required if on-site treatment and irrigation of construction workforce sewage effluent is proposed.

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Approval	Legislation	Authority	Trigger
Section 90	Water Management Act	NSW Department of Climate Change, Energy, Environment and Water	Use of Barbadoon bore during construction. Reissue of the Works Approval as a miscellaneous work for commercial usage.
Heavy vehicle permit	Heavy Vehicle National Law (NSW)	National Heavy Vehicle Regulator	Heavy vehicles requiring escort.

4. Roles and Responsibilities

All employees, contractors and sub-contractors must be aware of and comply with the conditions of consent for SSD-33344237, relevant to the activities they carry out in respect to the development. A copy of the conditions of consent will be placed in the site office.

The role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development is defined in this section.

4.1. Country Head

- Responsible for ensuring that the Vena Energy risk management processes are followed during the life cycle of Vena Energy projects and operations.
- Responsible for ensuring appropriate budget and headcount are in place for each of the projects and scopes of work Vena Energy undertake their respective country.

4.2. Group Head HSSE

- Responsible for creating, reviewing and implementing new HSSE documentation.
- Responsible for maintaining the Vena Energy HSSE IMS.
- Responsible for HSSE compliance and ensuring personnel are trained and competent.

4.3. Head of Department/General Manager

- Responsible for assuring the appropriate level of rigour is applied during the risk management process.
- Responsible for ensuring the current controls and treatment plans are monitored and reviewed.
- Coordinates the delivery of HSSE controls with the Project, Construction, O&M and HSSE Managers in accordance with Vena Energy HSSE IMS and Development Consent conditions.
- Notifies the Department of the commencement of construction and operations phases and any incidents of non-compliance.
- Reviews internal and external audit reports.

4.4. Development, Project, Construction, O&M Managers

- Creates an environmental risk awareness culture that allows for open conversations which align with project objectives.
- Ensures compliance with the EMS and Development Consent.
- Accurate and timely identification, mitigation and review of environmental risks.
- Diligent use of the Vena Energy HSSE IMS.
- Participates in risk management workshops. Coordinates training and mentoring to assure consistent risk management practices are embedded during the respective project phase.
- Providing assurance that the Vena Energy associated processes are complied with, including review and reporting activities.
- Participates in internal and external audits. Reviews internal and external audit reports.
- Manages any emergency response or incident notification requirements.
- Influences continual improvement of risk management within Vena Energy.
- Engages suitably qualified sub-contractors to manage each phase of the project lifecycle.

- Liaises with Mid-Western Regional Council and other regulators as required.
- Responsible for obtaining any permits or licences required for construction or operation of the development.
- Supervises any emergency response or incident notification requirements.
- Reviews internal and external audit reports.

4.5. HSSE Manager

- Maintains the Vena Energy Australia HSSE IMS.
- Ensures compliance with the EMS and Development Consent.
- Responsible for implementation of Vena Energy risk management processes for the project.
- Responsible for ensuring all aspects of risk management are applied during environmental inspections, audits and reporting.
- Providing risk management workshop facilitation, training and mentoring to assure consistent risk management practices are embedded at the project and operations level.
- Undertakes internal audits. Reviews external audit reports.
- Coordinates the delivery of HSSE controls in accordance with Vena Energy HSSE IMS and Development Consent conditions.
- Coordinates any emergency response or incident notification requirements.
- Assess any gaps between Vena Energy HSSE IMS and the Contractors management system. Manages the gaps with any additional procedures needed or amendments to Contractor procedures.

4.6. Stakeholder and Communications Manager

- Designs, develops and delivers stakeholder strategies, plans and engagement activities.
- Maintains and manages the Project webpage, media collateral and feedback mechanism.
- Coordinates with internal team members to manage and respond to feedback or complaints.
- Responsible for communications with all non-regulatory external stakeholders.

4.7. Contractors

- Undertakes works in compliance with this EMS, the Development Consent Conditions, Vena Energy HSSE IMS and other management plans and strategies.
- Maintains a working knowledge of this EMS and associated management plans.
- Attains training and certification which is current and relevant for their scope of work.
- Participates in audits and inspections.
- Ensures that environmental monitoring is undertaken.
- Notify the Construction/O&M Managers of any non-compliance or incidents.

4.8. Visitors

- Complete and comply with all aspects of the site induction.

5. Community and Stakeholder Engagement

Procedures that will be implemented to keep the local community and relevant agencies informed about the construction, operation and environmental performance of the development include community notices, information, engagement opportunities and a feedback mechanism communicated via the Development webpage which can be accessed here > https://www.venaenergy.com.au/all_projects/bellambi-heights-bess/.

Vena Energy’s community and stakeholder engagement will be informed by an internal project Stakeholder Engagement Plan (SEP) to effectively implement and manage the engagement and communications practices for the life of the Development. The SEP includes identification and analysis of relevant stakeholders, and the procedures and tools to inform and consult with stakeholders. The aim of this plan is to facilitate ongoing transparent, fair, and educational engagement during the construction, and operational phases of the Development.

The specific procedures that Vena Energy will employ to keep the local community and relevant agencies informed about the operation and environmental performance of the development is outlined in Table 3 below.

Table 3 Compliance with Condition C1 (d)(i)

	Local community	Agencies
Purpose	<ul style="list-style-type: none"> Continue engagement with the local community throughout the construction and operational phases via established channels. Raise awareness of the development objectives, key milestones and methods to connect with the project team. Introduce key project partners and communicate opportunities for collaboration. Highlight opportunities for partnerships with local industry and employment seekers. Communicate the complaints reporting system. 	<ul style="list-style-type: none"> Keep relevant agencies informed of key development milestones. Demonstrate compliance against conditions of the Development Consent and legislative requirements. Non-compliance regulatory notification.
Procedure	<ul style="list-style-type: none"> Share newsletters, project factsheets and more in-depth project information as required. Including information on registering complaints and feedback. Host community information sessions. Conduct 1:1 in-person or virtual sessions. Conduct procurement workshops, business workshops, and provide information on how local businesses may provide services relevant to the Development. Utilise the internal Feedback Management system to respond to any concerns or feedback that are raised. Maintain an active social media presence across local platforms to provide consistent 	<ul style="list-style-type: none"> Share newsletters, project factsheets and more in-depth project information where required. Conduct 1:1 in-person or virtual sessions. Submit management plans/designs/audit reports/notices to relevant agencies to comply with conditions of the Development Consent and legislative requirements. Submit non-compliance notifications to regulator via phone/email/Major Projects/EPA or other relevant portal.

	<p>and relevant Development updates, contact points and details on upcoming activities.</p> <ul style="list-style-type: none"> • Collaborate with relevant construction partners to generate local content and employment opportunities, providing facilitation support wherever necessary. 	
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¹Vena Energy commits to making the following information publicly available on the Development website

- The Environmental Impact Statement.
- The final layout plans for the development.
- Current statutory approvals for the development.
- Approved strategies, plans or programs required under the conditions of this consent (other than the Fire Safety Study and Emergency Plan).
- The proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged.
- 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 consent.
- How complaints about the development can be made.
- Any independent environmental audit, and the Applicant’s response to the recommendations in any audit; and any other matter required by the Planning Secretary.

This information will be kept up to date and the website will be maintained for the life of the development.

¹ Development Consent (SSD-33344237) Condition C20

6. Complaints Management

The below sets out the procedures that will be implemented to receive, handle, respond to and record complaints.

Vena Energy's *Feedback Management Procedure* sets out the procedure that will be undertaken to review, respond and report on the feedback, including grievances, see Figure 4. A specific feedback mechanism has been established to provide a clear and transparent framework for documenting and addressing feedback or complaints relating to the development.

Vena Energy's *Feedback Management Procedure* is an integral part of the SEP and a key platform that enables us to meet our stakeholder engagement objectives and obligations. Through the feedback mechanism, Project stakeholders can raise general feedback, enquiries, or potential non-compliance or human rights concerns as they relate to the Bellambi Heights BESS.

Enquiries can be submitted via Vena Energy Australia's website, direct contact with employees or through our construction and O&M partners. A range of mechanisms are available to stakeholders to facilitate the lodgement of enquiries and feedback, including:

- The Project hotline.
- The Project mailing address.
- Employee's mobile phone or office line.
- Individual employee's specific email addresses.
- Feedback Mechanism links, available on the website, Project page and Project media material.
- Contact forms are available across several pages of the Vena Energy Australia website and Project webpage.

The feedback mechanism as advertised on the Project webpage is outlined below.

Bellambi Heights BESS Project Team
Phone: 1800 841 229
Email: bhrp.mailbox@venaenergy.com
Feedback Form: [here](#) or via QR code



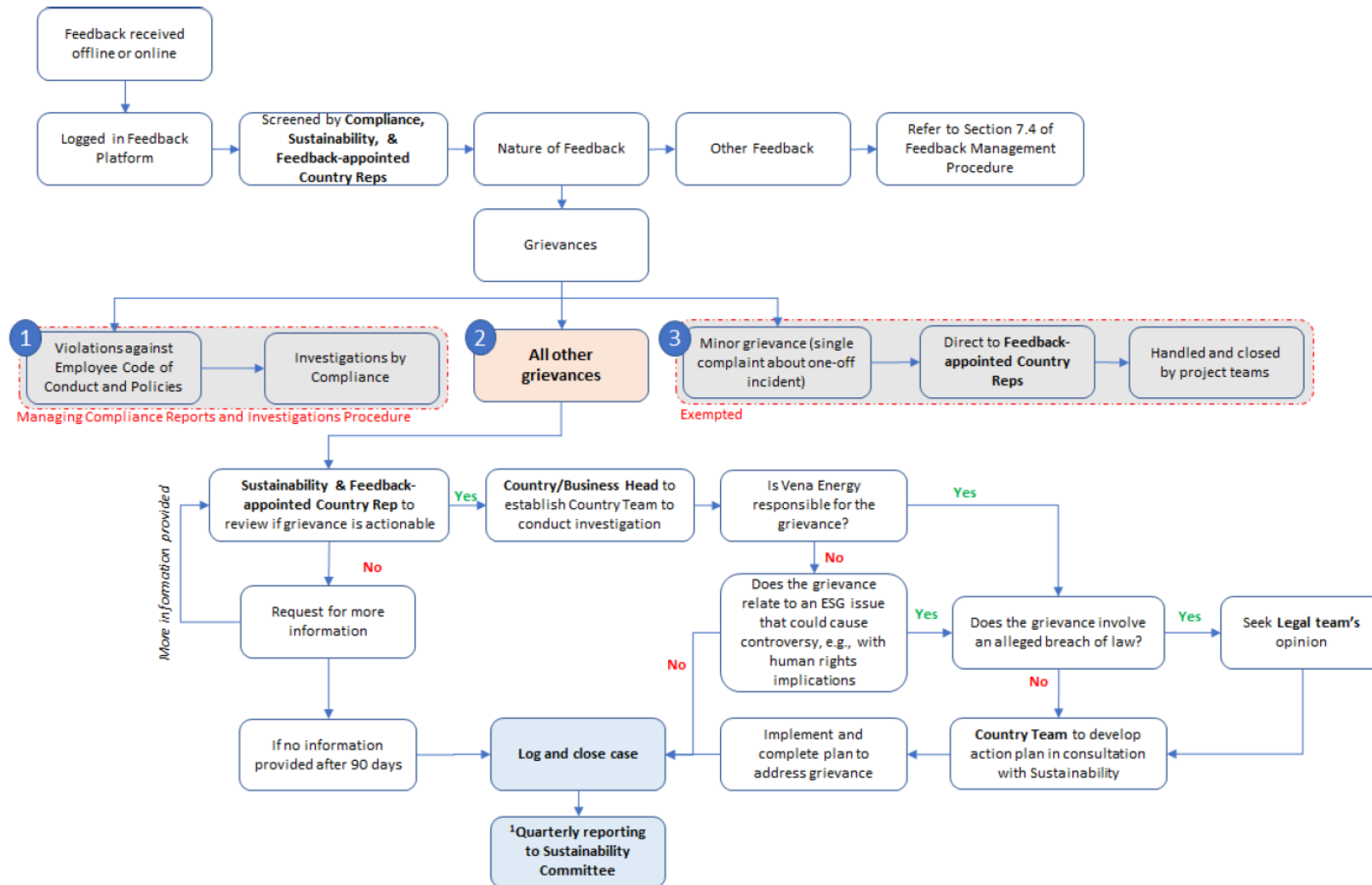


Figure 4 Feedback management procedure

7. Dispute Resolution

Vena Energy is committed to being approachable and reasonable in addressing feedback or concerns that may be raised by any stakeholder and resolving the issue. All disputes will be managed in accordance with Vena Energy's *Feedback Management Procedure*.

If a dispute is unable to be resolved, Vena Energy will provide the following information to the Planning Secretary for consideration.

- Detail on the nature of the dispute.
- Evidence of consultation undertaken, and the measures implemented to resolve the dispute.
- Measures proposed to manage the matters not resolved.

If required, Vena Energy will participate in an independent third-party specialist mediation.

Following the mediation, Vena Energy will develop an Action Plan which outlines the history of the dispute, agreed resolution and its delivery, timelines and roles and responsibilities to resolve the grievance.

8. Non-compliance Management

A non-compliance is an occurrence, set of circumstances or development that is a breach of consent but is not an incident².

Vena Energy will notify the Planning Secretary in writing via the Major Projects website within seven days after becoming aware of any non-compliance³. The notification will include the development name, development application number, relevant consent condition or conditions which are in non-compliance, the way in which it is non-compliant, the reasons for non-compliance (if known), and what actions have or will be taken to address the non-compliance⁴.

Corrective and preventative actions will also be documented and managed in accordance with the Vena Energy *Corrective Action Management Procedure (IMS_01_HSE_PRO_072)*.

A non-compliance which has been notified as an incident will not need to also be notified as a non-compliance⁵.

² Definition sourced from Development Consent SSD-33344237 Definitions.

³ Development Consent (SSD-33344237) Condition C11.

⁴ Development Consent (SSD-33344237) Condition C12.

⁵ Development Consent (SSD-33344237) Condition C13.

9. Emergency Management

An Emergency Plan will be developed to manage project related emergency scenarios. Emergency management during construction and operation of the development will be governed by the requirements of Vena Energy's HSSE IMS, regulatory requirements, site specific requirements and the results of the Fire Safety Study.

Procedures to respond to an emergency are outlined in Vena Energy's *Emergency Preparedness and Response Plan (IMS_01_HSE_PLA-006)*. These procedures will be reviewed and refined to develop a project specific Emergency Plan to the satisfaction of NSW RFS Cudgegong Fire Control Centre and FRNSW, prior to commissioning.

The Emergency Plan will meet the requirements of Conditions B30 and B31 which includes:

- The findings of the Fire Safety Study.
- Consistency with the Department's *Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'* and RFS's *Planning for Bushfire Protection (2019)*.
- Details on how the battery storage and sub-systems can be safely isolated in an emergency.
- Details on bushfire emergency management planning:
 - The location, management and maintenance of the Asset Protection Zone.
 - Prohibited worked during total fire bans.
 - Notification requirements for the RFS and procedures relating to fires on-site or within the vicinity, activities that may result in igniting surrounding vegetation and proposed activities to be carried out during the bushfire danger period.
- An Emergency Services Information Package prepared in accordance with *Emergency services information and tactical fire plan (2019)*.
- When the plan is approved by NSW RFS and FRNSW, Vena Energy will implement the Emergency Plan and the Emergency Services Information Package for the lifetime of the development.
- Prior to commencement of commissioning, Vena Energy will keep a copy of the Emergency Services Information Package on-site, in a prominent position adjacent to the site entry point at all times.

10. Incident Reporting

An incident is a set of circumstances that causes or threatens to cause material harm to the environment. Material harm is harm that:

- involves actual or potential harm to the health and safety of human beings or to ecosystems that is not trivial; or
- results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment⁶).

In accordance with Condition C10, Vena Energy will notify DPHI immediately after it becomes aware of a project related incident via the Major Projects website. As part of the notification, Vena Energy will include the location and nature of the incident, application number and name of the development.

Vena Energy will provide written incident notification addressing the incident to the Planning Secretary via the Major Projects website within seven days of an incident. Written notification of an incident must:

- Identify the development and application number.
- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident).
- Identify how the incident was detected.
- Identify when the applicant became aware of the incident.
- Identify any actual or potential non-compliance with conditions of consent.
- Describe what immediate steps were taken in relation to the incident.
- Identify further action(s) that will be taken in relation to the incident.
- Identify a project contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, Vena Energy must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested. The Incident Report must include:

- A summary of the incident.
- Outcomes of an incident investigation, including identification of the cause of the incident.
- Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence.
- Details of any communication with other stakeholders regarding the incident.

Under section 148 of the *Protection of the Environment Operations Act 1997*, Vena Energy and its contractors have a duty to notify the relevant authorities for pollution related incidents causing or threatening material harm to the environment.

As soon as practicable (but not more than 24 hours) after becoming aware of an incident, the NSW EPA 24/7 Pollution Hotline shall be contacted on 131 555 or (02) 9995 555 (outside NSW).

⁶ Definition sourced from Development Consent SSD-33344237 Definitions.

11. Strategies, Plans and Programs

11.1. Accommodation and Employment Strategy

Vena Energy will implement the project Accommodation Strategy to ensure there is sufficient accommodation for the workforce, consider cumulative impacts, investigate options for prioritising the employment of local workers, and include a program to monitor and review the effectiveness of the strategy over the life of the development⁷.

11.2. Management Plans

Workforce Accommodation Plan

Prior to construction commencing, consultation will be undertaken with Mid-Western Regional Council with respect to the approved Workforce Accommodation Plan. Any change to this Plan requires approval by Mid-Western Regional Council and must be consistent with the Accommodation Strategy.

Aboriginal Cultural Heritage Management Plan

Prior to construction commencing, an Aboriginal Cultural Heritage Management Plan will be prepared in consultation with Aboriginal stakeholders and Heritage NSW, inclusive of a Chance Finds Protocol⁸.

Construction Bushfire Management Plan

Prior to commencing construction, a Construction Bushfire Management Plan will be prepared in consultation with Fire and Rescue NSW and the NSW Rural Fire Service Cudgegong Fire Control Centre.

Construction, Operations and Decommissioning Environmental Management Plans

Vena Energy will implement a Construction Environmental Management Plan prior to construction commencing, an Operations Environmental Management Plan prior to commencing operations, and a Decommissioning and Rehabilitation Plan within 18 months of cessation of operations.

Traffic Management Plan

Traffic Management Plans will be prepared in consultation with TfNSW and Mid-Western Regional Council prior to commencing construction⁹.

Soil and Water Management Plan

Prior to construction commencing, a Soil and Water Management Plan will be prepared by a Certified Professional in Erosion and Sediment Control (CPESC).

Biodiversity Management Plan

Prior to construction commencing, a Biodiversity Management Plan will be prepared in consultation with the NSW Biodiversity, Conservation and Science¹⁰.

⁷ Development Consent (SSD-33344237) Condition B33.

⁸ Development Consent (SSD-33344237) Condition B23.

⁹ Development Consent (SSD-33344237) Condition B9.

¹⁰ Development Consent (SSD-33344237) Condition B13.

Waste and Resource Management Plan

Prior to construction commencing, a Waste and Resource Management Plan will be prepared.

Emergency Plan

Prior to commencing commissioning, an Emergency Plan (including an emergency responders induction plan) will be prepared in consultation with Fire and Rescue NSW and the NSW Rural Fire Service Cudgegong Fire Control Centre¹¹.

11.3. Programs

Vena Energy commits to the NSW Government's *Independent Audit Post Approval Requirements (2020)* with the first independent audit required within 3 months of commencing construction and a second within 3 months of commencing operations.

Vena Energy commits to a program to monitor and review the effectiveness of the Accommodation and Employment Strategy to ensure there is sufficient accommodation for the workforce, cumulative impacts are considered and options for prioritising the employment of local workers are investigated, particularly during construction.

Vena Energy commits to a program to monitor and report on the effectiveness of mitigation measures of the Biodiversity Management Plan after approval by DPHI.

11.4. Reviews

If required, Vena Energy will update the strategies, plans and programs in this EMS within 1 month of submission of either an incident or independent audit report, or any modification to the conditions of this consent, to the satisfaction of the Planning Secretary.

¹¹ Development Consent (SSD-33344237) Condition B30.

12. Monitoring and Reporting

12.1. Consent Obligations

Provided below is a summary of all the monitoring and reporting obligations under the conditions of the Development Consent.

Table 4 Monitoring and reporting obligations

Consent condition	Issue	Monitoring and reporting obligation
A13	Consultation	Where conditions of the project consent require consultation with an identified party, Vena Energy will report details of the consultation undertaken, including the outcome of that consultation, matters resolved and unresolved; details of any disagreement remaining between the party consulted and Vena Energy and how the matters not resolved have been addressed.
B2	Heavy Vehicle Restrictions	Vena Energy will 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.
B12	Biodiversity	Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, Vena Energy will provide evidence to the Planning Secretary that biodiversity credits have been retired.
B13	Biodiversity	Prior to commencing construction, Vena Energy will prepare a Biodiversity Management Plan, in consultation with BCS, and to the satisfaction of the Planning Secretary that includes a program to monitor and report on the effectiveness of mitigation measures.
B18	Noise Amenity	Unless the Planning Secretary agrees otherwise, within 3 months of the commencement of operation, Vena Energy will prepare and submit a Noise Monitoring Report for the development to the satisfaction of the Planning Secretary.
B29	Hazards	Vena Energy will notify the relevant Local Emergency Management Committee following construction of the development, and prior to commencing operations.
B33	Accommodation and Employment	Prior to commencing construction an Accommodation and Employment Strategy will be prepared and implemented in consultation with Mid-Western Regional Council. This strategy will 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.
C7	Progress Notification	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, Vena Energy will notify the Department in writing via the Major Projects website of the

		date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then Vena Energy will 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.
C10	Incident Notification	Vena Energy will notify the Department in writing via the Major Projects website immediately after becoming aware of an incident. A more comprehensive written incident notification will be submitted via the Major Projects website within 7 days after becoming aware of the incident. Within 30 days of the date on which the incident occurred Vena Energy will submit a detailed report on the incident to the Planning Secretary and any relevant public authorities.
C11	Non-Compliance Notification	The Planning Secretary must be notified in writing via the Major Projects website within seven days after becoming aware of any non-compliance. A non-compliance is an occurrence, set of circumstances or development that is in breach of this consent but is not an incident.
C17	Independent Audits	Vena Energy will make Independent Audit Reports and Vena Energy’s response to audit findings publicly available on the project webpage within 60 days of submission to the Planning Secretary.
C20	Access to Information	Vena Energy will, on its website as relevant to the stage of the development, include a comprehensive summary of monitoring results required by the various plans approved under the conditions of the Development Consent.

12.2. Compliance Audits

Environmental compliance audits and inspections will be undertaken throughout the construction, operation and decommissioning phases of the development. Inspections will be carried out by the HSE Manager, Construction/O&M Manager or a delegated representative.

Audits will be undertaken in accordance with the Vena Energy *Internal Audit Standard (IMS_01_HSE_STD_007)*. The frequency of auditing will reflect the project phase and associated risk profile.

Audit scopes will include compliance checks against consent conditions, as well as the monitoring and reporting requirements specified in approved environmental management plans.

12.3. Independent Environmental Audit

Independent environmental audits will be undertaken to meet Development Consent Conditions C14-C19, which is summarised below.

Independent environmental audits will follow the requirements of *Independent Audit Post Approval Requirements (2020)*. Prior to the commencement of independent audits, proposed independent auditors will be agreed to in writing with the Planning Secretary.

Independent audits will be undertaken within 3 months of commencing construction and within 3 months of commencing operations. The Planning Secretary may modify the timings of the initial and subsequent Independent Audits upon giving at least 4 weeks' notice to Vena Energy from the date upon which the audit must commence.

Vena Energy will review and respond to each Independent Audit Report. Independent Audit Reports and Vena Energy's responses to audit findings will be provided to the Planning Secretary within two months of undertaking the audit site inspection. Vena Energy will make the Independent Audit Reports and its responses publicly available on the project webpage within 60 days of submission to the Planning Secretary.

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.