

16 January 2026

NSW Department of Planning, Industry and Environment
Attn: Ann Hagerthy
516 High Street
Maitland NSW 2320

**Goulburn River Solar Farm (SSD 33964533)
Response to Independent Environmental No.2 Audit Findings (19 November 2025)**

Dear Ann,

In accordance with Condition C17 of State significant development consent (SSD 33964533) for the Goulburn River Solar Farm (the Project), I am writing to the Department of Planning, Housing and Industry (DPHI) to detail Lightsource bp's response to the findings of the Project's second construction Independent Environmental Audit.

This response should be read in conjunction with the Independent Audit Report (file name SSD33964533_IEA#2_Audit_Report_Nov25).

During the audit period, Lightsource bp self-reported thirty-six (36) non-compliances to DPHI (refer to *Table 1: Self-Reported Non-Compliance*), each of which also constituted a non-compliance with Condition A3. 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.*

In addition to the self-reported matters, the audit identified two further non-compliances against the following Conditions:

B16. Prior to carrying out any development that could directly or indirectly impact biodiversity values, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:

- (i) be prepared in accordance with the Biodiversity Development Assessment Reports dated 11 January 2024 and 18 January 2024 provided in the Amendment Report;*
- (ii) include a description of the measures and timeframes that would be implemented for:*
- (viii) controlling weeds, feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans;*

B21. The Applicant must minimise the dust generated by the development

Please refer *Table 2: Audit Identified Non-Compliances*.

The audit also recorded two Opportunities for Improvement and three Observations during the site inspection, refer to *Table 3: Opportunities for Improvement (OFI) and Observations (OBS)*.

The Independent Environment Audit Report and this response to the audit findings will be made available on the Project's public website within 60 days of submission to the Planning Secretary, in accordance with Condition C16(c) of the consent.

Please do not hesitate to get in touch if you require any additional information.

Kind regards,

Michelle Housego
Senior HSE Advisor

Table 2: Self-Reported Non-Compliance

ID:	Condition No.	Compliance Requirement	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action Taken/Response.	Proposed Action Due Date
GRSF - 02_N C-01:	A3.	The development may only be carried out: <ul style="list-style-type: none"> (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. 	<p>Thirty-six (36) non-compliances were self-reported within the audit period, captured in 34 self-reported non-compliance notifications. These were across a number of conditions, including:</p> <ul style="list-style-type: none"> • B1(a)(i)- one (1) • B3 – two (2) • B4(a) – twenty-two (22) • B4(b) – two (2) • B5 – six (6) • B17 - one (1) • B26 – one (1) • B29(b) – one (1) <p>Refer to each condition in Appendix E of the IEA#2 Report for more details</p>	All self-reported non-compliances have been reviewed by DPHI. Lightsource bp has received notification from DPHI that majority require no further action. With the exception as noted below.	N/A
	B3.	Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway /Ringwood Road intersection as shown in Figure 3 and Figure 4 in Appendix 4.			
	B4.	All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. 			

ID:	Condition No.	Compliance Requirement	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action Taken/Response.	Proposed Action Due Date
	B5.	All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4.			
	B17.	Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities 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.			
	B26.	Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development and to the satisfaction of the Planning Secretary. Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.		Request for information submitted to DPHI 26/11/25, inclusive of consultant's inspection report (SSD-33964533-PA-48).	
	B29.	The Applicant must: (b) ensure that 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 <i>Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual and the Managing Urban Stormwater: Soils and construction - Volume 2A manual (Landcom, 2008), or their latest versions;</i>			

Table 2: Audit Identified Non-Compliances

ID:	Condition No.	Compliance Requirement	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action Taken/Response	Proposed Action Due Date
GRSF-02_NC-02:	B16.	<p>Prior to carrying out any development that could directly or indirectly impact biodiversity values, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared in accordance with the Biodiversity Development Assessment Reports dated 11 January 2024 and 18 January 2024 provided in the Amendment Report;</p> <p>(b) include a description of the measures and timeframes that would be implemented for:</p> <p>(viii) controlling weeds, feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans;</p>	<p>This condition requires not only that the BMP is prepared in consultation with BCS and approved by the Planning Secretary, but that it <i>"includes a description of the measures and timeframes that would be implemented for controlling weeds, feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans."</i></p> <p>Although pre-clearing ecological surveys were undertaken by the project ecologists in the early stages of the project, recent weed surveys conducted in September 2025 identified invasive weed species within Stage 1 and Stage 8. The surveys undertaken were utilised to identify areas requiring management, identifying areas of Priority and High Threat Weeds requiring management.</p> <p>The survey report provides treatment recommendations in Section 4.4.3 however there is no evidence of these recommendations being implemented.</p> <p>The audit recognises that the procurement of a weed sub-contractor has been challenging, with one only recently procured, and treatment to commence in early 2026. However, the procurement process should have commenced much earlier in order for the project to implement Biodiversity Mitigation and Management Measures for the Project (as per Table 6.1 of the BMP) within required timeframes.</p>	<p>The Project notes the auditor's observation regarding the timing of weed treatment and the engagement of a specialist contractor, which remains the responsibility of DTI. However, DTI at the time of audit had implemented a staged, risk-based approach, including the slashing of 240 hectares (30% of the site) to suppress biomass and seed set, along with targeted removal of high-risk species such as Prickly Pear. Additional actions are underway to further strengthen weed management across the site.</p> <p>Actions:</p> <ul style="list-style-type: none"> • Implementation of the chemical treatment program by the newly engaged specialist weed contractor (early 2026), inclusive of seasonal conditions. • Continue ongoing mechanical controls, including large-scale slashing, to suppress biomass, manage seed set, and reduce competitive pressure. • Continued monitoring and targeted management of priority/high-threat weeds. • Ongoing vehicle hygiene, access controls, and inspection to prevent weed spread. 	<p>Ongoing inspection and monitoring</p> <p>Evidence of implementation to be provided at IEA#3 -May 2026.</p>

ID:	Condition No.	Compliance Requirement	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action Taken/Response	Proposed Action Due Date
			<p>In particular, BMP Mitigation Measures 13 & 14 (BMP-13 and BMP-14) have not been implemented.</p>		
GRSF-02_NC-03	B21.	The Applicant must minimise the dust generated by the development.	<p>The Applicant is not minimising dust generation across the project.</p> <p>During the site inspection, multiple separate instances of dust generation from light vehicles, semi-trailers and Moxy's was witnessed across site. Wheel generated dust and wind generated dust from loads was clearly visible and remained suspended in the air for extended periods. There was no evidence of any loads being covered despite hot, dry and windy conditions on the day. The contractor advised that there were five water carts in constant circulation, however only one water cart was sighted during the entire site inspection. They also advised that a 20km/h speed limit had been enforced that day.</p> <p>The contractor also advised that polymer trials for haul road treatments had been discussed, however there is no evidence of these trials being investigated for implementation in December 2025, as advised by the contractor.</p> <p>The auditor notes that a Notice to Furnish Information and Records request was sent to DTI on 12/11/25 with regards to site observations relevant to dust management made by DPHI during a site inspection on 05/11/25. The notice highlights similar dust management issues as the audit site inspection.</p>	<p>At the time of the audit, the Project was subject to exceptional weather conditions, including prolonged dry periods, below-average rainfall, and sustained strong winds, which significantly increased regional dust risk across the site.</p> <p>The auditor observed that, while reasonable and feasible measures were implemented, some controls were not applied consistently across all areas in full compliance with Condition B21.</p> <p>Controls in place at the time of the audit included:</p> <ul style="list-style-type: none"> • Only one water cart was observed by the auditor during the inspection. This has been subsequently verified during the Lightsource bp site inspection in December, where multiple water carts were visibly deployed across the site, with numbers and circulation patterns adjusted to conditions. Deployment at this level is ongoing and continues to be monitored. • Speed restrictions on unsealed roads, reduced to 20 km/h during dry/windy periods. • Pre-wetting of haul roads and high-traffic areas before and during vehicle movements. • Operational throttling, resequencing, and suspension of dust-generating activities during elevated wind events. • Staging works to reduce exposed soil areas. • Supervisor-led monitoring with authority to slow or stop traffic where visible dust was observed. 	<p>Ongoing inspection and monitoring</p> <p>Evidence of implementation to be provided at IEA#3 -May 2026.</p>

ID:	Condition No.	Compliance Requirement	Independent Audit Findings and Recommendations	Proponent's Proposed Action/Action Taken/Response	Proposed Action Due Date
				<p>Actions:</p> <ul style="list-style-type: none"> • Continue to apply multiple dust suppression measures, including the deployment of water carts, with operational patterns matched to site and weather conditions. • Maintain speed restrictions, pre-wetting, and activity adjustments during high-risk dust periods. • Provide improved visual records/logs of water cart deployment for audit verification. • Progress ongoing Dust Action Plan and Dust Monitoring Plan implementation, including polymer suppressant trials. 	

Table 3: Opportunities for Improvement (OFI) and Observations (OBS)

ID:	Condition No.	Compliance Requirement	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
GRSF-02_OFI-01	B39.	B39. Prior to commencing construction of the accommodation camp, the Applicant must prepare an Accommodation Camp Management Plan in consultation with Council. The Applicant must implement the Accommodation Camp Management Plan	The Camp Management Plan has not been updated since operation commenced. It is strongly recommended that DTI review & update Camp Management Plan as soon as possible.	Camp Management Plan to be reviewed and updated where required. Revised plan to be submitted to Upper Hunter Shire Council for their review/comment.	27 February 2026
GRSF-02_OFI-02	C19.	The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (viii) a complaints register	A complaints register is kept up to date for the project; however, it is lacking information on what each complaint was/is, and the actions taken to resolve each complaint and close out. Recommend providing a more detailed complaints register on the website.	Complaint register has been revised to include additional information. Current register is located on Lightsource bp Goulburn River Solar Farm public website: https://lightsourcebp.com/au/project/goulburn-river-solar/	Completed
GRSF-02_OBS-01			It was noted that the former go-line used by DTI sub-contractor A One was being gradually decommissioned and relocated to the BESS pad area. Evidence of minor maintenance and resultant minor spills were noted here. It is recommended that once full demobilisation has been completed, soil analysis be undertaken to ascertain whether any contamination has occurred.	At the time of the site inspection, the go-line was in the process of progressive demobilisation and relocation. Minor maintenance activities were undertaken with standard environmental controls in place. No evidence of significant spills, off-site migration, or impacts to drainage lines or waterways was identified. The observed marks were limited in extent and consistent with low-volume maintenance activities rather than a pollution incident. Action: <ul style="list-style-type: none"> • Complete the demobilisation and removal of all go-line infrastructure. • Undertake a targeted visual inspection of the former footprint once the area is fully accessible. 	Completed

ID:	Condition No.	Compliance Requirement	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
GRSF-02_OBS-02:			Wind-blown rubbish was noted across site. There are a number of skips on site. Recommend changing these over to lidded bins if possible or cover open skips to reduce wind-blown rubbish.	Site housekeeping is actively managed, and regular clean-ups are undertaken across work fronts. In response to the observation, DTI will further strengthen waste controls by: <ul style="list-style-type: none"> • Progressively replacing open skips with lidded bins where practicable. • Ensuring open skips are covered or netted when not in active use. • Reinforcing housekeeping expectations with subcontractors through toolbox talks and site supervision; and • Increasing the frequency of waste inspections during high-wind conditions. 	Ongoing inspection and monitoring
GRSF-02_OBS-03:			It was noted that two large stockpiles >2m high are situated near the DTI/LSbp site office. These stockpiles are not stabilised. It is recommended that these stockpiles are reduced or treated with a suitable stabilising agent or seed to prevent erosion and/or dust issues.	EPC Contractor, DTI will reduce stockpile heights to a maximum of 2 metres with side slopes graded to 2H:1V. Additional controls will include maintaining appropriate profiles for short-term storage, applying temporary stabilisation measures during dry or windy conditions, progressively utilising materials for rehabilitation as construction sequencing allows, and continuing routine inspections in accordance with the approved Soil and Water and Biodiversity Management Plans.	Ongoing inspection and monitoring