Hughes Gap BESS Project

Statement of Environmental Objectives

Application for HRE Licence

Rev Ref	Date	Details
V1	19/11/2025	Working Draft
V2	20/01/2025	Final Draft for Submission
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		Draft for Licence Application
		Final for Licence Application

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1. Introduction

This Statement of Environmental Objectives (SEO) has been prepared to accompany an application for an Associated Infrastructure licence under the Hydrogen and Renewable Energy Act, 2023.

This document has been prepared to meet the requirements for preparation of a Statement of Environmental Objectives (SEO) set out in section 62 of the *Hydrogen and Renewable Energy Act 2023* (HRE Act), and Regulation 34 of the *Hydrogen and Renewable Energy Regulations 2024* (HRE Regulations).

1.1 Purpose of this Document

This SEO has been prepared, based on the information and findings of the EIR and sets out how the licence holder will deliver the project so that it:

- Minimises environmental damage during the three phases of construction, operation and decommissioning;
- Conforms with all relevant design requirements including meeting safety standards, and industry specific design standards, and obtains all required approvals and permits;
- Minimises impacts on communities.

For each confirmed impact event the approach to impact management is defined by stating:

- the proposed environmental objective or outcome that will be sought (environmental objectives)
- the criteria to be used to determine whether the project complies with the objective (assessment criteria)
- the measures which might give early indication of non-compliance (leading performance criteria)

The immediately reportable and reportable incidents that will apply to the activities are also defined in the SEO.

It is noted that 'Environment' is broadly defined in the HRE Act and includes:

- land, air, water (including surface, underground water and sea water), organisms, ecosystems, flora, fauna and other features or elements of the natural environment
- buildings, structures and other forms of infrastructure, and cultural artefacts
- existing or permissible land use
- public health, safety or amenity
- heritage, aesthetic, Aboriginal, social and cultural values of an area
- social or economic effects associated with regulated activities

1.2 Scope

This SEO applies to all activities regulated under the HRE Act and authorised by the Associated Infrastructure Licence, that are required to construct, operate and decommission the BESS. It facilitates these licenced activities only within the defined licence area. The Licence area and project layout is identified in Figure 1.

The activities covered by this SEO are set out in Chapter 2: Project Description in the EIR which covers all elements of a BESS facility, substation and associated infrastructure as well as the activities that occur during construction, operation and decommissioning phases.

Figure 1 – Licence Area and Preferred Site Location

2. Overview

This document includes the information that meets the requirements of Section 62 of the Act and Regulation 34 under the Act.

Regulation 34(1)(a) requires that objectives must be included within the Statement of Environmental Objectives (SEO) that relate to dealing with the impacts on various elements of the environment associated with undertaking the authorised operations.

Regulation 34(1)(b) requires that criteria (assessment criteria) be applied to determine whether or not the stated environmental objective has been achieved in a particular case.

The licensee must develop objectives and assessment criteria for each impact event confirmed under Criteria 3.

Section 62(2)(b)(ii) of the Act, requires that an SEO must also set out leading performance criteria, which give an early warning that a control measure strategy may be absent, fail, or be failing.

Where there is a high level of reliance on control measure strategies (as described in Criteria 4 to achieve an environmental objective), corresponding leading performance criteria must be developed.

2.1 Summary of Objectives

The Environmental Impact Report identified the potential impacts of this project and the approach proposed to manage impacts. This SEO picks up those issues and sets out how the licence holder will address these.

Table 1 Summary of Objectives

No	Phase	Objective
LF1	CD	Activities are managed to minimise adverse impacts on landform and rehabilitated as soon as practical.
NV1	CD	Native vegetation clearance is minimised and limited to authorised clearance only.
F1	CD	On site impacts on native fauna to avoid injury or death that could have been reasonably prevented by the operator
WC1	CDO	Water courses are not degraded by contaminated or excessive stormwater runoff that could have been reasonably prevented by the operator
N1	CD	No unacceptable noise and vibration impacts on residents.
N2	O	No exceedance of EPA noise policy over the life of the operation
T1	CD	No traffic accidents in the vicinity of the site that could be reasonably prevented by the operator.
H1	C	Construction activities minimise the potential impact on unexpected archaeology
WPP1	CD	Minimise the impact of imported weeds, pathogens and pests on native species and farming.

AQ1	CD	No excessive dust generated that causes nuisance to neighbours that could be reasonably prevented by the operator.
MW1	CDO	No degradation of air, water or soil quality as a result of fugitive waste or materials.
VI1	O	Minimise the visual impact from the highways and local viewpoints.
ER1	CD	No unacceptable increase in danger levels that could be reasonably prevented by the operator.
PS1	CDO	Site security is established to prevent unauthorised access that could be reasonably prevented by the operator
FR1	O	All uncontrolled fires are contained within the site, and the public are protected from impacts that could be reasonably prevented by the operator
EI1	CD	Project demands for short term accommodation is planned to avoid competition with local tourism needs.
CI1	CDO	A Community Benefit Scheme is established to recognise the incremental impacts on the local community

2.2 Management Controls

Controls associated with many of the Objectives include references to management plans that set out detailed techniques, inspection programs and reporting/response protocols. These are well established in the industry as a means of management.

The overall approach to how these plans will be prepared and implemented will be addressed in the Operational Management Plan (OMP). The OMP must be submitted and approved by the Minister prior to commencement of operations in accordance with section 66 of the Act.

To demonstrate compliance with this SEO and the achievement of relevant assessment criteria's, it is expected that the OMP will reference specific techniques and management plans at key stages that consider the controls identified in the EIR. It is intended that this will include (but not limited to) the following:

Construction	Operation	Decommissioning
Micro-siting process	Operation Environment Management Plan	Review Industry Practice
Construction Environment Management Plan	Safety, Reliability, Maintenance and Technical Management Plan	Decommissioning Management Plan

The SRMTMP is a very well-established mechanism for ensuring that all electrical infrastructure and equipment is designed and maintained to a suitable standard to avoid a range of safety and technical problems. This SEO does not affect the requirements or content associated with the SRMTMP.

Where there is a conflict between an aspect of the OEMP and the SRMTMP, the requirements of the SRMTMP will prevail.

2.3 Assessment Criteria

The environmental objectives identified above are subject to an assessment to measure the level of achievement. HRE Regulation 34(2) sets out the criteria for assessment required to be incorporated in the SEO:

- a description of what is to be measured and the manner and form of the measurement to be used
- the locations at which the relevant measurements are to be taken, or the manner in which such locations are to be determined
- the frequency of any measurement or monitoring
- any background or control data that is to be used, or the manner in which such data is to be acquired
- what is proposed to be taken to constitute the achievement of a relevant environmental outcome (with consideration being given to any inherent errors of measurement)
- if required by the Minister - provisions with respect to assessing the ongoing fitness for purpose of facilities, plant, equipment, machinery or other infrastructure and management systems
- if relevant -
    - the gathering of information and the conduct and timing of studies
    - the conduct and timing of management system audits.

2.4 Leading Performance Criteria

Leading performance criteria have been provided for each impact event that relies significantly on a control strategy to reduce the potential environment impact identified in the EIR. These criteria are intended to give early warning that a control measure may fail or is failing, and that the environmental objective or relevant assessment criteria is at risk of not being achieved, allowing time to respond accordingly.

3 Objectives and Criteria

LF1	Landform	Phase: C D
Environmental Objective	Activities are managed to minimise adverse impacts on landform and rehabilitated as soon as practical.	

Proposed Controls/Management Approach

- Earthworks undertaken by qualified and experienced operators in accord with engineering plans.
- Site activities, including storage, planned and managed to minimise impact on landform by minimising the impact footprint, protecting sensitive receptors and undertaking rehabilitation as soon as practical.
- CEMP/DMP to include an Erosion and Sediment Control Plan and a Rehabilitation Plan and ensure:
    - Areas subject to earthworks are appropriately managed to minimise impacts;
    - The impact footprint is minimised and clearly delineated, including land for laydown, vehicle parking and manoeuvring and materials storage;
    - Areas impacted are rehabilitated as soon as practical;
    - Inspections of impacted and rehabilitated areas will be undertaken at appropriate intervals;
    - Implement relevant induction/training.

Assessment Criteria	Leading Performance Criteria
No impact on landform outside designated areas Activity footprint is clearly defined Rehabilitation strategies are implemented to prevent erosion and degradation of land. Ecological data provided to the project is collected by an appropriately qualified professional An Erosion and Sediment Control Plan and a Rehabilitation Plan are prepared as part of the CEMP/DMP Incidents of accidental impact are investigated in accord with a relevant management plan	Advice is sought from an appropriately qualified civil engineer regarding earthwork requirements Earthworks are undertaken by qualified and experienced operators and managed using an Erosion and Sediment Control Plan A Rehabilitation Plan guides progressive and effective rehabilitation including timely strategies to prevent erosion Both Plans include an appropriate monitoring/inspection program Training and induction is provided to all relevant employees and contractors

NV1	Native Vegetation	Phase: C D
Environmental Objective	Native vegetation clearance is minimised and limited to authorised clearance only.	

Proposed Controls/Management Approach

- Micro siting of the development, associated infrastructure and land required for temporary construction/ decommissioning activities to avoid or minimise impact on native vegetation.
- No clearance of native vegetation to occur without the relevant approval under the Native Vegetation Act.
- An appropriately qualified ecologist to be appointed to survey the impact area (including access) and prepare an application for Native Vegetation Clearance.
- CEMP/DMP to include a Flora and Fauna Management Plan and ensure:
    - Site impact footprint to be clearly delineated, including land for laydown, vehicle parking and manoeuvring and materials storage;
    - Areas approved for clearance will undergo a pre-clearance check by an appropriately qualified ecologist;
    - Inspections of protected areas will be undertaken at appropriate intervals.
    - Implement relevant induction/training

Assessment Criteria	Leading Performance Criteria
No unauthorised clearance of native vegetation No reduction in the health or quality of native vegetation as a result of the activity	Advice is sought from an appropriately qualified professional regarding compliance with the Native Vegetation Act and management plans Clearance is undertaken in accord with relevant approval or Regulations

Micro-siting process is documented and includes consideration of minimising impact on native vegetation Ecological data provided to the project is collected by an appropriately qualified professional A Flora and Fauna Management Plan is prepared as part of the CEMP/DMP and OEMP Incidents of accidental clearance are investigated in accord with a relevant management plan	Activities are managed using a Flora and Fauna Management Plan Management Plan includes appropriate monitoring/inspection program Approved clearance areas are delineated, and sensitive protected vegetation is roped off to prevent accidental clearance Vehicle access confined to designated tracks and areas Training and induction is provided to all relevant employees and contractors

F1	**Fauna**	**Phase: C D**
Environmental Objective	Avoid fauna injury or death that could have been reasonably prevented by the operator.	

Proposed Controls/Management Approach

- Perimeter fencing to be installed to prevent larger fauna incursions and internal barriers designed to prevent access to location/features that could result in entrapment
- CEMP/DMP to include a Flora and Fauna Management Plan including:
    - identify fauna that could be impacted by activities in consultation with landowner and National Parks.
    - regular inspections to identify trapped or injured fauna.
    - new activity locations within the site to undergo a fauna inspection.
    - Protocol for fauna injury response and incident reporting
    - Implement relevant induction/training.

Assessment Criteria	**Leading Performance Criteria**
No fauna injury or death that could have reasonably been prevented by operator. No breach of the National Parks and Wildlife Act A Flora Fauna Management Plan is prepared as part of the CEMP/DMP Incidents are reported and investigated in accord with a relevant management plan.	Advice on native fauna and stock behavior and response protocols is sought and included in relevant management plans Activities are managed using a Flora and Fauna Management Plan Management Plan includes appropriate monitoring/inspection program Security fencing is installed prior to high-risk activities

WC1	**Water course**	**Phase: C D O**
Environmental Objective	Water courses are not degraded by contaminated or excessive stormwater runoff that could have been reasonably prevented by the operator.	

Proposed Controls/Management Approach

- A stormwater management system is designed by a suitably qualified person to contain contaminated water and manage water flows during operation.
- Appropriate bunding to be included in the site design to contain accidental incidents.
- Cleared areas to be stabilised / rehabilitated promptly and progressively.
- The CEMP/DMP to include Water Quality Protection and Soil Management, Erosion and Sediment Control plans to manage stormwater during site works and address:
    - Minimising areas of vegetation cover loss;
    - Erosion and sedimentation control devices installed prior to commencement of site clearing and construction/works;
    - Limiting site access to designated routes and controlled areas;
    - Existing natural drainage paths and water course must not be blocked or restricted unless approved (as required)
    - Runoff from unsealed areas at the construction site must not enter natural drainage lines.
    - Control surface run-off entering and leaving the work areas:

- Locate and secure all stockpiles areas away from watercourses and concentrated water flow paths;
- Stormwater to be diverted around stockpiles.
- Consider impact of access tracks on surface drainage path and manage/ mitigate potential effects;
- Assess the impact of the proposed stormwater drainage systems on the adjacent properties;

- The OEMP to include a Stormwater Management Plan that establishes an inspection and maintenance regime to ensure that the stormwater infrastructure prevents the degradation of the water courses.

Assessment Criteria	Leading Performance Criteria
No breach of the Landscape SA or Environment Protection Acts A Water Quality Protection and Soil Management, Erosion and Sediment Control Management Plans are prepared as part of the CEMP/DMP Incidents are reported and investigated in accord with a relevant management plan A stormwater management system is designed and established and managed in accord with accepted standards.	Stormwater design and management plans are informed with advice from suitably qualified professionals Stormwater management is designed and implemented for all phases. The operational stormwater management system meets the requirements of Council Management Plans include appropriate monitoring/inspection and maintenance program

N1	Noise	Phase: C D
Environmental Objective	No unacceptable noise and vibration impacts on residents.	

Proposed Controls/Management Approach

- The CEMP/DMP to include a Construction Noise and Vibration Management Plan that will include the following:
  - Activities that cause adverse noise and vibration impacts on residents will be confined to the hours of 7am to 7pm Monday to Saturday (excluding Public Holidays).
  - Activities that must occur outside these times (e.g. concrete pours, shutdowns, cutovers and emergency work) must obtain written approval from Council or the EPA.
  - Nearby residents (within 2km) will be notified of construction activities, including approval for out of hours noise generating activity.
  - Construction contractor shall establish a mechanism for making complaints and, in the event that a complaint is made, all reasonable measures will be taken to investigate the complaint in a timely manner.

Assessment Criteria	Leading Performance Criteria
No breach of the *Local Nuisance and Litter Control Act* or the *Environment Protection Act* and its Polices. Approval is obtained for all out of hours activity. A Construction Noise and Vibration Management Plan is prepared as part of the CEMP/DMP Complaints are investigated in accord with a relevant management plan.	Construction Noise and Vibration Management Plan is informed with advice from suitably qualified professionals Activities are undertaken in accord with relevant management plans Affected residents are given notice of activities and reasonable warning of out of hours activity

N2	Noise	Phase: O
Environmental Objective	No exceedance of EPA noise policy over the life of the operation.	

Proposed Controls/Management Approach

- Selected BESS and associated equipment will meet operational noise limits (and may include engineered noise attenuation, if required);
- A final noise assessment will be undertaken by a qualified, acoustic engineer (prior to construction) which accounts for the final layout, final battery, inverter and transformer equipment, final noise control measures incorporated by the manufacturers of the equipment, actual cooling system requirements tailored to the discharge and temperature profiles during the day and night, and any adjustment for tonality;

- Battery and inverter systems will achieve the Environment Protection (Commercial and Industrial Noise) Policy 2023 (the Policy) noise (including noise control measures if required);
- Operating restrictions will be adopted if noise exceeds the Policy limits at sensitive receptors over the lifetime of the BESS;
- The maintenance and management requirements of the SRMTMP shall be adopted to ensure that all equipment is operating to required performance standards;
- The OEMP shall establish a mechanism for making complaints and, in the event that a breach is identified, all reasonable measures will be taken to resolve the breach.

Assessment Criteria	**Leading Performance Criteria**
No breach of the *Environment Protection Act* Policy. A final noise assessment of the final design and equipment is undertaken prior to construction and submitted to DEM to demonstrate compliance with the Policy. Complaints are investigated in accord with a relevant management plan. Noise testing during commissioning is undertaken in accord with EPA requirements and demonstrates no breach of the Policy. All equipment maintained and operated in accord with the SRMTMP.	Final technology and equipment selection is informed with advice from a suitably qualified acoustic professional. A final noise assessment is undertaken based on final equipment and final detailed layout, which demonstrates that the activity will comply with the *Environment Protection (Commercial and Industrial Noise) Policy 2023*. OEMP/SRMTMP includes appropriate monitoring/inspection and maintenance program. Operating noise levels are tested by a qualified, acoustic engineer during commissioning and prior to operation and do not exceed the policy at receptors. OEMP includes a mechanism for making and investigating complaints and resolving breaches.

T1	**Traffic**	**Phase: C D**
Environmental Objective	No traffic accidents on local roads that could be reasonably prevented by the operator	

Proposed Controls/Management Approach

- Prepare a Traffic Management Plan to be agreed with DIT and the Port Pirie Regional Council prior to the commencement of activities which includes
  - Provision of the projected traffic information required by DIT and Council including timing;
  - Identification of any up-grades/modifications/structural improvements needed to accommodate traffic and meet safety standards
  - A dilapidation assessment report
  - Designate preferred/safe routes, access points and speed limits and exclude undesirable routes and identify operational management measures (e.g. detours)
  - Identify risks associated with local traffic activity (e.g. harvest) and vehicle types (e.g. slow moving vehicles), fauna types and habits (native, pests and stock)
  - Driver behaviour, risk management and access to site training and induction for employees, contractors and visiting drivers as required.
- Construction contractor shall establish a mechanism for making complaints and, in the event that a complaint is made, all reasonable measures will be taken to investigate the complaint in a timely manner.
- Construction contractor shall establish a mechanism for reporting incidents and near miss incidents, All reasonable measures will be taken to investigate incidents in a timely manner.

Assessment Criteria	**Leading Performance Criteria**
No traffic accidents on local roads that could be reasonably prevented by the operator. No breach of the Road Traffic Act. A Traffic Management Plan is prepared to the satisfaction of DIT and Council. Road infrastructure that has suffered wear and tear as a direct result of the traffic generated by the project is repaired to a recognised and safe standard.	Traffic management and WHS plans are informed with advice from suitably qualified professionals. Activities are undertaken in accord with relevant management plans. Employees, contractors and visitors are provided with relevant safe access instructions and induction/training. Management plans include a mechanism for reporting incidents and near miss incidents.

H1	Heritage	Phase: C
Environmental Objective	Construction activities minimise impact on unexpected archaeology	

Proposed Controls/Management Approach

- Consultation with the Traditional Custodians occurs prior to site works to evaluate the likelihood of indigenous archaeology.
- The CEMP/DMP to include an Archaeological and Cultural Heritage Management Plan that will include:
  - a "Heritage Stop Work Procedure" for unexpected finds
  - appropriate induction and training for relevant site workers and equipment operators
- In the event that archaeology is revealed during the course of the works, works must stop in the immediate location, and the site discovery procedure must be followed, including required reporting.

Assessment Criteria	Leading Performance Criteria
No breach of Aboriginal Heritage Act or Heritage Places Act. No impact on heritage without the relevant authorisation. An Archaeological and Cultural Heritage Management Plan is prepared as part of the CEMP/DMP	The Archaeological and Cultural Heritage Management Plan is informed with advice from suitably qualified professionals Activities are undertaken in accord with relevant management plans and procedures Employees and contractors are given relevant induction and training

WPP1	Weeds, pathogens and pests	Phase: C D
Environmental Objective	Minimise the impact of imported weeds, pathogens and pests on native species and farming.	

Proposed Controls/Management Approach

- The CEMP/DMP to include a Weed, Pathogen and Pest Control Management Plan that will include:
  - Manage and control existing weeds on site to minimise spread
  - Monitor the site for any outbreaks of declared animal, declared plant or environmental weed resulting from activities
  - Ensure that raw materials, such as rubble, gravel, sand and water brought to site are free of weeds, pathogens and pests
  - Vegetation including weed species are disposed of separately at a licensed waste depot.
  - Apply effective vehicle, plant and equipment hygiene practices
  - Establish communication protocols with adjacent farmers to facilitate management of outbreaks
  - A biosecurity risk assessment

Assessment Criteria	Leading Performance Criteria
No spread of declared weeds, pathogens or pests to or beyond the Licence area Management of declared weeds and pests in accord with the Landscape SA Act. A Weed, Pathogen and Pest Control Management Plan is included in the CEMP/DMP An incident and response reporting system is established and maintained.	Activities are conducted in accord with the Weed, Pathogen and Pest Control Management Plan The management plan includes an appropriate monitoring/inspection program and response protocols The source of materials and origin of equipment is known and assessed for risk A vehicle and equipment cleaning station is established on site. A biosecurity risk assessment is undertaken.

AQ1	Air Quality	Phase: C D
Environmental Objective	No excessive dust generated that causes nuisance to neighbours that could be reasonably prevented by the operator.	

Proposed Controls/Management Approach

- The CEMP/DMP to include an Air Quality Control Plan that will include
  - Protocols for dust management
  - Identification of high-risk situations including responding to climatic conditions and specific construction site activities

- Construction contractor shall establish a mechanism for making complaints and, in the event that a complaint is made, all reasonable measures will be taken to investigate the complaint in a timely manner.

- Establish communication protocols with neighbours and farmers to provide warning of high-risk situations

Assessment Criteria	Leading Performance Criteria
No breach of the *Local Nuisance and Litter Control Act* or the *Environment Protection (Air Quality) Policy* An Air Quality Control Plan is included in the CEMP/DMP An incident and response reporting system is established and maintained.	Activities are conducted in accord with the Air Quality Control Plan The control plan includes an appropriate monitoring/inspection program and response protocols High-risk situations are communicated to relevant neighbours and farmers All reasonable complaints are resolved within a timely manner.

MW1	Materials and Waste	Phase: C D O
Environmental Objective	No degradation of air, water or soil quality as a result of fugitive waste or materials.	

Proposed Controls/Management Approach

- The BESS will be designed by a suitably qualified professional to ensure appropriate storage and bunding is provided.
- The CEMP/DMP to include a Materials, Waste and Dust management plan that will include:
  - All materials, liquids and waste to be stored in a manner that prevents uncontrolled dispersal
  - Fuel and chemicals are stored and handled in accordance with relevant standards and guidelines, including AS 1940, EPA guideline 080/16 Bunding and Spill Management and the Australian Dangerous Goods Code (ADG).
  - Regular inspections undertaken to identify fugitive waste or spills.
- Construction contractor shall establish a mechanism for making complaints. All reasonable measures will be taken to investigate the complaint in a timely manner.

Assessment Criteria	Leading Performance Criteria
No breach of relevant legislation or legislated policy A Materials, Waste and Dust management plan is included in the CEMP/DMP An incident and response reporting system is established and maintained.	The design of the BESS and the Materials, Waste and Dust management plan is informed with advice from suitably qualified professionals. Activities are conducted in accord with the Materials, Waste and Dust management plan The management plan includes an appropriate monitoring/inspection program and response protocols All reasonable complaints are resolved within a timely manner.

V1	Visual Impact	Phase: O
Environmental Objective	Minimise the visual impact from the highways and local viewpoints	

Proposed Controls/Management Approach

- Establish effective visual screens on the northern, southern and western boundaries of the site;
- Consult the residents to the east to clarify the likely extent of visual impact and explore effective and reasonable mitigation options if needed;
- The OEMP to include a Site Maintenance and Management Plan that includes:
  - Regular inspections of whole licence area to monitor site conditions (rubbish, weeds, erosion, land cover)
  - Land management regime established to maintain land cover, avoid dust, manage weeds, manage fire risk and maintain a well-kept appearance
- The OEMP shall establish a mechanism for making complaints and, in the event that a complaint is made, all reasonable measures will be taken to investigate the complaint in a timely manner.

Assessment Criteria	Leading Performance Criteria
Effective, native vegetation screening mitigation is applied along road boundaries. A Site Maintenance and Management Plan is included in the OEMP. No reasonable complaints made to the Council.	When the layout and detailed design is available, undertake a visual impact assessment using a qualified visual assessment specialist and in consultation with an ecologist. Consult Council on screening requirements. Prepare and implement native vegetation visual screening (preferably integrated with other native vegetation rehabilitation actions). The site is managed in accord with the OEMP – Site Maintenance and Management Plan. The management plan includes an appropriate monitoring/inspection program and response protocols. All reasonable complaints are resolved within a timely manner.

ER1	Emergency Response	Phase: C D
Environmental Objective	No unacceptable increase in danger levels that could be reasonably prevented by the operator.	

Proposed Controls/Management Approach

- The CEMP/DMP to include a Fire and Emergency Management Plan which will include:
  - Protocols for days of extreme danger
  - Induction and training provided to all employees, contractors and visitors
  - Emergency communication and response protocols with emergency services, Council, local residents and farmers

Assessment Criteria	Leading Performance Criteria
No human injury or death that could have been reasonably prevented by the operator A Fire and Emergency Management Plan is included in the CEMP/DMP	The Fire and Emergency Management Plan and relevant OHS policies and procedures are informed with advice from suitably qualified professionals. Local emergency services, Council, local residents and farmers are consulted as part of the preparation of management and response plans. Emergency communication and response protocols are shared with local emergency services, Council, local residents and farmers Employees and contractors are given relevant induction and training.

PS1	Public Safety	Phase: C D O
Environmental Objective	Site security is established to prevent unauthorised access that could be reasonably prevented by the operator	

Proposed Controls/Management Approach

- The site shall establish appropriate security prior to the commencement of construction and include warning signage, security fencing and regular security monitoring
- Appropriate site security will be considered and included in the final BESS design and may include accepted industry techniques such as warning/hazard signage, security fencing, surveillance cameras and lighting (focussed on the site and equipment)
- Security management will be included in the SRMTMP and OEMP

Assessment Criteria	Leading Performance Criteria
No unauthorised access that could have been reasonably prevented by the operator. Security management is included in management plans.	The security aspects of the BESS facility is informed with advice from suitably qualified professionals.

An incident and response reporting system is established and maintained	The design and maintenance of security is undertaking in accord with relevant management plans. Communications protocols are established with neighbors and famers to facilitate reporting of observations.

FR1	Fire Risk	Phase: O
Environmental Objective	All uncontrolled fires are contained within the site, and the public are protected from impacts that could be reasonably prevented by the operator	

Proposed Controls/Management Approach

- Undertake a hazard study to inform the final design and determine the requirements for on-site equipment and firefighting suppression, operational systems and controls, management techniques, extent of asset protection zones and on-site access;
- Detailed layout plans to include consideration of the SA CFS Bushfire planning for Energy Infrastructure design requirements;
- Detailed design is prepared by qualified professionals and includes all electrical industry design standards;
- Installation and maintenance of equipment to the manufacturer's specifications and relevant Australian standards;
- Appropriate safety testing and commissioning occurs in accord with industry requirements;
- SCADA systems used to monitor all system alerts and sensors that indicate the early stages of a fault or emergency event and provides the ability to commence shut down procedures remotely;
- OH & S policies and procedures to address high risk activities such as hot works, use of naked flames, smoking management and induction/training of staff and contractors;
- SRMTMP and the OEMP to include a Fire and Emergency Response Management Plan;
- Establish emergency communication and response protocols with local residents and farmers.

It should be noted that the electrical industry has well established and extensive requirements relating to electrical infrastructure and minimising the risk of generating fire incidents

Assessment Criteria	**Leading Performance Criteria**
Uncontrolled fires originating from the site are contained within the site Design and operation conforms to the requirements of the *Electricity Act* Operate in accord with the requirements of the SRMTMP. Management plans are prepared to address fire risk and establish response protocols	A hazard study is undertaken by a suitably qualified professional to inform the final design. The detailed design is prepared by a recognized, qualified electrical engineer. The layout and detailed design incorporates all required design standards and separation requirements to address fire risk. Activities are conducted in accord with all relevant management plans. Communication and response protocols are established with neighbors and famers.

EI1	Economic Impact - Accommodation	Phase: C D
Environmental Objective	Project demands for short term accommodation is planned to avoid competition with local tourism needs.	

Proposed Controls/Management Approach

An accommodation inventory for the region is undertaken, including information on peak demand times.
The construction contractor will be required to:

- Develop a workforce profile and undertake demand forecasting
- Understand market impacts and identify potential mitigations
- Prepare an accommodation strategy that meets the needs of the workforce for each key phase of construction
- Consider accommodation options (types and standards) within a 45 min radius of the site to minimise fatigue and achieve safe travel times

- Consider complimentary access strategies if required to minimise traffic impacts, manage fatigue risk and ensure safe journey management
- Confirm accommodation prior to the commencement of construction activities
- Avoid competing for local accommodation that caters for local tourism activity.
- Demonstrate local first procurement of beds and services, advance block-booking aligned to peak seasons, and collaboration with Council and key tourism bodies

Assessment Criteria	Leading Performance Criteria
An accommodation strategy is prepared to address accommodation needs for the relevant construction phase. Accommodation is secured prior to commencement of relevant stage of construction.	Contractual arrangements require the Contractor to prepare an accommodation and access strategy. Survey of available accommodation demonstrates that sufficient accommodation and safe access arrangements are available to support the project.

CI1	Community Impact - Incremental	Phase: C D O
Environmental Objective	A Community Benefit Scheme is established to recognise the incremental impacts on the local community.	

Proposed Controls/Management Approach

Establish a scheme based on the following:

- A Community Benefit Sharing Fund of $60,000 (indexed to CPI) will be available for local community and First Nation People initiatives.
- The Fund will run annually for the duration of the Project, commencing at the beginning of construction of the Project and remain in place until decommissioning of the Project is complete.

To be eligible, the organisation must show strong connection to at least one of the focus areas identified below:

- Fund allocated specifically to the Nukunu People and First Nations partners: Funds for heritage conservation and self-determined initiatives on Nukunu Country.
- Early Learning and Family Support: Strengthening access to quality childcare, early education, and family services to support children's development and enable workforce participation.
- Mental Health and Wellbeing: Enhancing community mental health and awareness, as well as general community wellbeing.
- Sport and Recreation: Inspiring participation in community-based sport and recreational activities.
- Disaster Relief and Emergency Services: Aiding local communities impacted by natural disasters or initiatives that support local emergency service groups.
- Community Pride and Connections: Supporting initiatives that foster community engagement, connection and a sense of pride.

Assessment Criteria	Leading Performance Criteria
A Community Benefit Scheme is developed to share the benefit of the Project with the local community. A Community Benefit Scheme that recognises the incremental impacts the Project has on the local community.	The contributions to the scheme may include financial contributions, on-ground works and programs such as training, revegetation and projects as agreed with stakeholders. The approach to management and distribution of funds is agreed with Council. A suitable arrangement is identified to administer the Scheme.

4 Reporting

4.1 Incident Definitions

Section 62 of the HRE Act requires an SEO to set out immediately reportable incidents and reportable incidents (both within the meaning of Section 47 of the Act).

Immediately reportable incidents

Section 47(3) of the HRE Act defines an immediately reportable incident as:

- an incident arising from activities conducted under a licence specified in the relevant statement of environmental objectives to be an immediately reportable incident
- any other matter brought within the ambit of this definition by the HRE Regulations.

Reportable incident

Section 47(3) of the HRE Act defines a reportable incident as:

- an incident (not being an immediately reportable incident) arising from activities conducted under a licence specified in the relevant statement of environmental objectives to be a reportable incident
- any other matter brought within the ambit of this definition by the Regulations.

The HRE Regulations do not currently bring any other matters within the ambit of the immediately reportable or reportable incident definitions

The table below sets out the potential immediately reportable and reportable incidents relevant to BESS regulated activities.

Table 2 Incident definitions for REFL regulated activities

Immediately reportable incident	Reportable incident
1. A person is seriously injured[1] or killed. 2. An imminent risk to public health or safety arises. 3. Disturbance to Aboriginal and non-Aboriginal heritage without appropriate permits and approvals[2]. 4. An escape of a chemical, fuel or other potential contaminant to a water body, or to land in a place where it is reasonably likely to enter a water body by seepage or infiltration, or onto land that affects the health of native flora and fauna species[3]. 5. Detection of a declared weed, animal / plant pathogen or plant pest species that has been introduced or spread as a direct result of activities[6]. 6. Any removal of native flora and/or fauna without appropriate permits and approvals[4]. 7. Any event resulting in the activation of emergency response and/or evacuation procedures of an area or the need for emergency service personnel.	1. An escape of a chemical, fuel or other potential contaminant that affects an area that has not been specifically designed to contain such an escape (other than an immediately reportable incident). 2. Malfunction or failure of critical plant or equipment that had (or still has) potential to cause an immediately reportable incident. 3. Unresolved reasonable complaints from stakeholders regarding operations. 4. An event where an excursion outside a culturally cleared area has occurred or the conditions of a cultural heritage clearance have not been complied with (other than an immediately reportable incident).

[1] As per the definition in Section 36 of the *Work Health and Safety Act 2012*

[2] Pursuant to *Aboriginal Heritage Act 1988* and *Heritage Places Act 1993*

[3] For reporting purposes, the assessment of 'reasonably likely to enter a water body by seepage or infiltration' may require further intrusive assessment. Should delineation of the extent of the release not be achieved within one week of becoming aware of the incident, DEM will be notified of the incident and the proposed site investigation methodology, including timeframes.

[4] Pursuant to *Native Vegetation Act 1991* (flora) and *National Parks and Wildlife Act 1972* (fauna) and *Environment Protection and Biodiversity Conservation Act 1999*

[6.] Pursuant to the *Plant Health Act 2009, Livestock Act 1997* and *Landscape SA Act.*

4.2 Reporting requirements

The following sets out reporting requirements under key legislation.

Reporting under the HRE Act

Immediately reportable incidents must initially be reported to the Minister within 24 hours after the licensee becomes aware of the occurrence of the incident, as described in Section 47 of the HRE Act and HRE regulation 30. A comprehensive report must be provided within 3 months or as otherwise specified by the Minister.

Reportable Incidents must be reported to the Minister on a quarterly basis within 1 month after the end of each quarter, as per HRE regulation 30.

Reporting to the EPA

Where applicable, incidents causing or threatening serious or material environmental harm under the *Environment Protection Act 1993* (EP Act) must be reported to the South Australian Environment Protection Authority (EPA) in accordance with section 83 or 83A of the EP Act.

Reporting to SafeWork SA

Notifiable incidents (i.e. death, serious injury or illness, or dangerous incidents) must be reported to SafeWork SA in accordance with Part 3 of the *Work Health and Safety Act 2012*.

Abbreviations and Key Terms

AEP	Annual Exceedance Probability
AHD	Australian Height Datum
AIL	Associated Infrastructure Licence
BAM	Bushland Assessment Method
BATEA	Best available technology economically achievable
BDBS	Biological Database of South Australia
BESS	Battery energy storage system
BoM	Bureau of Meteorology
CEMP	Construction Environmental Management Plan
CFS	Country Fire Service
Criteria	Environmental Impact Assessment Criteria
DEM	Department for Energy and Mining
DIT	Department for Infrastructure and Transport
DMP	Decommissioning Management Plan
EIR	Environmental Impact Report
EP Act	Environment Protection Act 1993
EPA	Environment Protection Authority
HRE Act	Hydrogen and Renewable Energy Act 2023
HRE	Regulations Hydrogen and Renewable Energy Regulations 2024
MNES	Matter of National Environmental Significance
NCC	National Construction Code (includes Building Code)
Noise Policy	Environment Protection (Commercial and Industrial Noise) Policy 2023
NV Act	Native Vegetation Act 1991
NVC	Native Vegetation Council
NVCA	Native Vegetation Clearance Approval
OEMP	Operation Environment Management Plan
OH&S	Occupational Health and Safety
OMP	Operational Management Plan
P&D Code	Planning and Design Code
PDI	Planning, Development and Planning Act 2016
Project	Plains BESS
Regulator	DEM
Regulatory Guidelines	various Guideline documents issued by DEM
SCADA	Supervisory Control and Data Acquisition
SEB	Significant Environmental Benefit
SEO	Statement of Environmental Objectives
Site	Extent of land that the development is situated on
SRMTMP	Safety, Reliability, Maintenance and Technical Management Plan
TMP	Traffic Management Plan

Activity footprint: refers to all the land within the site that may be used for licensed activities including temporary activities associated with construction and decommissioning

Construction Environment Management Plan and Decommissioning Management Plan: documents that describe how temporary activities will be undertaken and managed to avoid or minimise impacts on the environment and neighbours. Includes communication, complaints and reporting mechanisms

ElectraNet: the organisation responsible for the design, operation and management of South Australia's high voltage electricity transmission network and infrastructure

Licence: A licence issued under the HRE Act that authorises the licensee to construct, install, operate, maintain and decommission infrastructure associated with authorised operations on the site

Operational footprint: refers to the land within the site upon which operational facilities and activities will be located

Operational Management Plan: a document that describes how the operation will be managed to avoid or minimise impacts during the operational phase.