

Jemena Gas Networks (NSW) Ltd

Operational Compliance Report

Western Sydney Green Hydrogen Hub



An appropriate citation for this paper is:


Operational Compliance Report - Western Sydney Green Hydrogen Hub

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Authorisation

Name	Job Title	Date	Signature
Reviewed by:			
Michael Hamill	Field Manager	19/12/22	<i>Michael Hamill</i>
Alhoush Elshahomi	Senior Engineer – Renewable Gas	16/12/2022	
Approved by:			
Peter Harcus	GM Asset Management and Operations – Gas Distribution	19/12/2022	<i>Peter Harcus</i>

History

Rev No	Date	Description of changes	Author
1	16/12/2022	Issued for Use	L. McCluskey

Owning Functional Area

Business Function Owner:	Gas Distribution
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Acronyms

Acronym	Definition
AS/NZS	Australian Standard / New Zealand Standard
ACS	Asset Class Strategy
BOP	Balance of Plant
CEMP	Construction Environmental Management Plan
CLM	Community Liaison Manager
CSS	Construction Safety Study
DBYD	Dial Before You Dig
DPE	Department of Planning and Environment
EGP	Eastern Gas Pipeline
EIS	Environmental Impact Statement
ESD	Emergency Shutdown
FHA	Final Hazard Analysis
FOMS	Field Operation and Maintenance Specification
FSS	Fire Safety Study
HAZID	Hazard Identification
HAZOP	Hazard and Operability Study
HSE	Health, Safety and Environment
HSMP	Health and Safety Management Plan
HV	High Voltage
JGN	Jemena Gas Networks (NSW) Ltd
LV	Low Voltage
NDT	Non Destructive Testing
NSW	New South Wales
OEMP	JGN NSW Distribution Network Operational Environmental Management Plan (OEMP)
OCR	Operational Compliance Report
PHA	Preliminary Hazard Analysis
PLC	Programmable Logic Controller
SAOP	Jemena Safety and Operating Plan
SCADA	Supervisory Control and Data Acquisition
SDS	Safety Data Sheet
SMS	Safety Management Study
SSD	State Significant Development
SWMS	Safe Work Method Statement(s)
TRS	Horsley Park Trunk Receiving Station
WSGHH	Western Sydney Green Hydrogen Hub (the Facility)

1. Compliance Report Declaration Form

Compliance Report Declaration Form

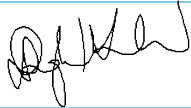
Project name	Western Sydney Green Hydrogen Hub
Project Application Number	SSD 10313
Description of Project	Trialling Power-to-Gas (P2G) technology by converting purchased green energy from the electricity mains network into hydrogen gas and injecting it into its secondary gas distribution network over a 5-year period.
Project Address	202-214 Chandos Road, Horsley Park (Lot 1, DP 499001)
Proponent	Jemena Gas Networks (NSW) Limited (Jemena)
Title of Compliance Report	Operations Compliance Report
Date	16/12/2022

I declare that I have reviewed relevant evidence and prepared the contents of the attached Compliance Report and to the best of my knowledge:

- The Compliance Report has been prepared in accordance with all relevant conditions of consent.
- The Compliance Report has been prepared in accordance with the Compliance Reporting Post Approval Requirements.
- The findings of the Compliance Report are reported truthfully, accurately and completely.
- Due diligence and professional judgement have been exercised in preparing the Compliance Report.
- The Compliance Report is an accurate summary of the compliance status of the development.

Notes:

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

Name of authorised reporting officer	Rahul Dorairaj
Title	Environmental Team Leader
Signature	
Qualification	Master of Environmental Management
Company	Jemena Gas Networks (NSW) Limited
Company Address	Level 16, 567 Collins Street MELBOURNE VIC 3000

2. Introduction

Jemena Gas Networks (NSW) Limited (Jemena) is undertaking the Western Sydney Green Gas Project (WSGGP) (the Project), which involves trialling Power-to-Gas (P2G) technology by converting purchased green energy from the electricity mains network into hydrogen gas and injecting it into its secondary gas distribution network over a 5-year period. The Project would potentially facilitate ongoing development of commercially viable P2G systems in Jemena's NSW gas network.

The Project is located at the existing Jemena high pressure gas facility in Horsley Park (Horsley Park Facility), located in Western Sydney. The P2G facility will use renewable electricity to generate hydrogen, which can be injected into the natural gas network, used for mobility purposes through a compression and cylinder filling facility to supply to a third party or used to generate electricity back to the grid by means of a hydrogen-powered micro-turbine and fuel cell.

The Project is subject to an environmental assessment and approval process under the *Environmental Planning and Assessment Act 1979* (EP&A Act) and is classified as State Significant Development (SSD).

The delegate for the Minister for Planning and Public Spaces granted development consent on the 10 August 2020, requiring that the Project be carried out in general accordance with:

- Western Sydney Green Gas Project – Environmental Impact Statement (EIS), dated December 2019;
- Western Sydney Green Gas Project – Response to Submissions, dated May 2020;
- Additional information in a letter from Jemena dated 16 June 2020;
- Western Sydney Green Gas Project Instrument of Consent (Application no. SSD 10313), dated 10 August 2020;
- Western Sydney Green Gas Project - EIS modification (MOD 1) approval dated December 2021
- Western Sydney Green Gas Project - EIS modification (MOD 2) approval dated August 2022

Jemena has engaged their delivery partner Zinfra for commissioning, operation and ongoing maintenance of the Western Sydney Green Hydrogen Hub (Facility).

2.1 Purpose

The purpose of this OCR is to demonstrate the development is compliant with Schedule 4, Conditions C5 of the Development Consent.

The OCR has also been documented to cover the requirements of the NSW Government Requirement 1, Compliance Reporting Post Approval Requirements, May 2020, Department Planning and Environment (DPE).

2.2 Objective

The objective of this Operational Compliance Report (OCR) is to ensure the operation of the WSGHH is compliant with the Conditions of Consent.

2.3 Project Approvals

This OCR has been developed specifically to address the requirements of Condition C5 of the Development Consent. The requirements of Condition C5 are:

The Applicant must provide regular compliance reporting to the Department on the development in accordance with the relevant Compliance Reporting requirements (DPE May 2020), or its latest version.

This is the first and initial Operational Compliance Report for the Western Sydney Green Hydrogen Hub. Any findings arising out of this audit will be listed in next year's Compliance Report with proposed actions and completion dates. This compliance report covers the operation period between 30th December 2021 and 16th December 2022.

2.4 Timing and Project Phases

The Project has been split into four specific phases of works consisting of construction, commissioning, operation and decommissioning. The current indicative project timeline is presented in Figure 2–1. Construction works commenced in 3 January 2021 and Commissioning commenced 23 May 2021 for the main works, following approval of the required management plans.

Figure 2–1: Indicative Project timing

	CY 2020	CY 2021	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Oct 23
Main Works Pre-Construction	✓														
Main Works Construction		✓													
Main Works Commissioning		✓													
Operation and Maintenance ^[1]		→													
Additional Scope ^[2] Pre-Construction			✓												
Additional Scope ^[2] Construction															
Additional Scope ^[2] Commissioning															

Notes

[1] 5 year operation in accordance with condition of approval Condition of Approval (CoA) A8

[2] Microturbine in Hydrogen Service and Fuel Cell and Compressor integration

Decommissioning has not been included in the schedule as this will occur approximately five years from the commencement of operations.

3. Project Description

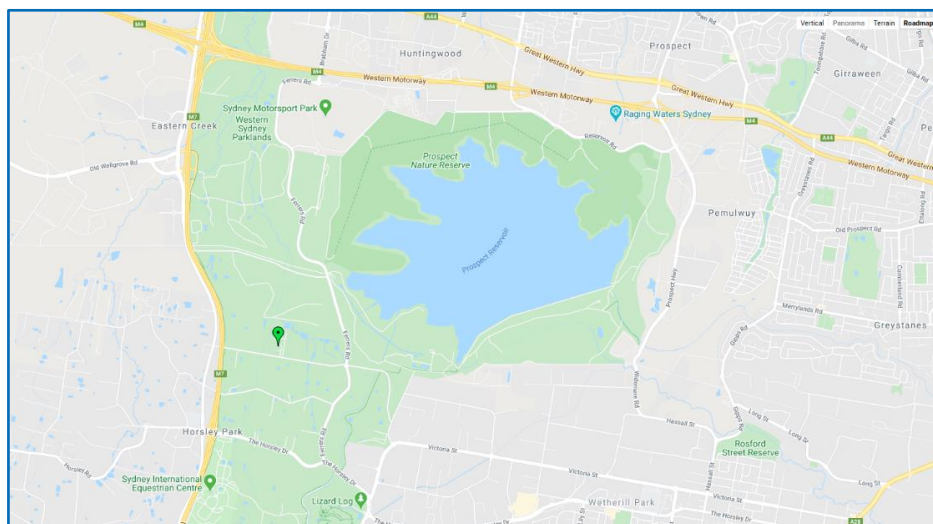
The Western Sydney Green Hydrogen Hub power to gas trial is one of the most comprehensive demonstration projects in Australia to date. It will produce 10.5 kg/h of green hydrogen from a 500 kW Polymer Electrolyte Membrane (PEM) electrolyser using renewable electricity supplied by wind and solar which is then stored in a 340 meter purpose built DN500 X52 carbon steel buffer storage pipeline (capacity to store approximately 4 MWh of energy). The hydrogen stored within the pipeline can then be utilised across multiple applications including:

- controlled direct injection into the existing natural gas distribution network at up to 2% by volume;
- utilisation by a fuel cell package and/or hydrogen microturbine to generate power for export to the grid;
- use in research and development opportunities including trialling compositions of natural gas and hydrogen blends; and
- refilling of transportable hydrogen cylinders for off-site use of green hydrogen for transport in fuel cell electric vehicles (FCEVs).

3.1 Location

The Horsley Park Facility is located at 194 – 202 Chandos Road, Horsley Park (Lot 1 DP 499001 and Lot 3 DP 1002746) in Western Sydney, NSW (refer to Figure 3–1).

Figure 3–1: Site Location

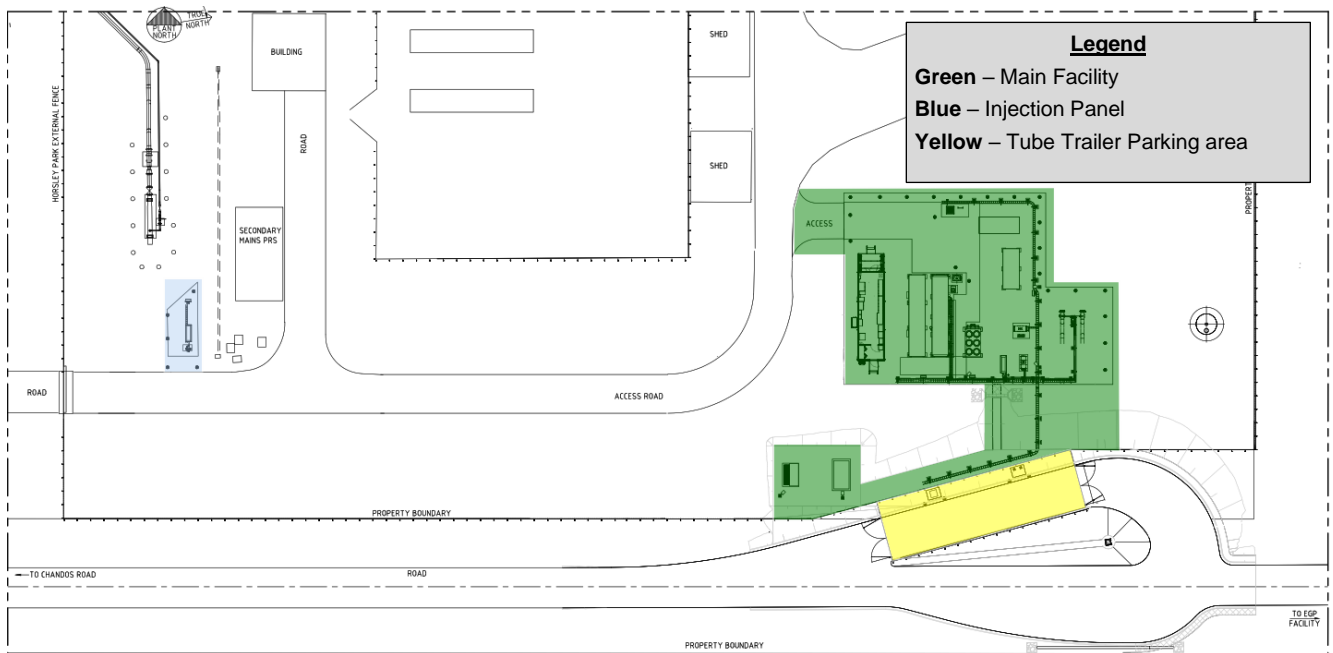


The general layout of the site is shown in Figure 3–2 below and the WSGG Facility layout presented in Figure 3–3 below.

Figure 3–2: General Layout of Development



Figure 3–3: WSGG Facility



3.2 Key Features

The WSGHH facility includes the following plant and infrastructure:

Table 3-1: Key Facility Features

Feature	Details
Electrolyser	<ul style="list-style-type: none"> Package – Three main packages consisting of electrolyser stack, power container and cooling unit Production – 10.5 kg/h of green hydrogen Standard Operation – 12 hours per day
Hydrogen buffer storage pipeline	<ul style="list-style-type: none"> Location – Buried below ground, with two risers located at the facility Length – ~340 m Material – X52 Carbon Steel Operating Pressure – 3,200 kPag Maximum Allowable Operating Pressure (MAOP) – 3,800 kPag Hydrogen Stored – ~100 kg Emergency Operation – Blowdown vent located on the southern riser
Site Control Hut	<ul style="list-style-type: none"> Purpose: <ul style="list-style-type: none"> Management of high voltage (HV), medium voltage (MV) and low voltage (LV) supply; Data and communication between packages and NSW Control Room; Remote operations and field desk Criticality – Provides power to the TRS facility through LV to TRS switchboard at the front of site.
Gas Control Panel	<ul style="list-style-type: none"> Two gas panels: <ul style="list-style-type: none"> one located within the main facility area. one located at the injection to the secondary main. Monitoring – Hydrogen monitoring in place
Hydrogen Microturbine	<ul style="list-style-type: none"> Production – 65kWh

	<ul style="list-style-type: none"> • Operation – 7 am – 10 pm only • Supply – Natural gas until changeover to 100% hydrogen in CY2022
Fuel Cell	<ul style="list-style-type: none"> • Production – 30kWh • Operation – 7am - 10pm only • Supply - Hydrogen
Cylinder Filling Compressor	<ul style="list-style-type: none"> • Production – 7.1 kg/h • Standard Operation – 24hrs per day when in use periodically
Electrical	<ul style="list-style-type: none"> • HV Transformer – 2.5 mVA • HV Switchgear

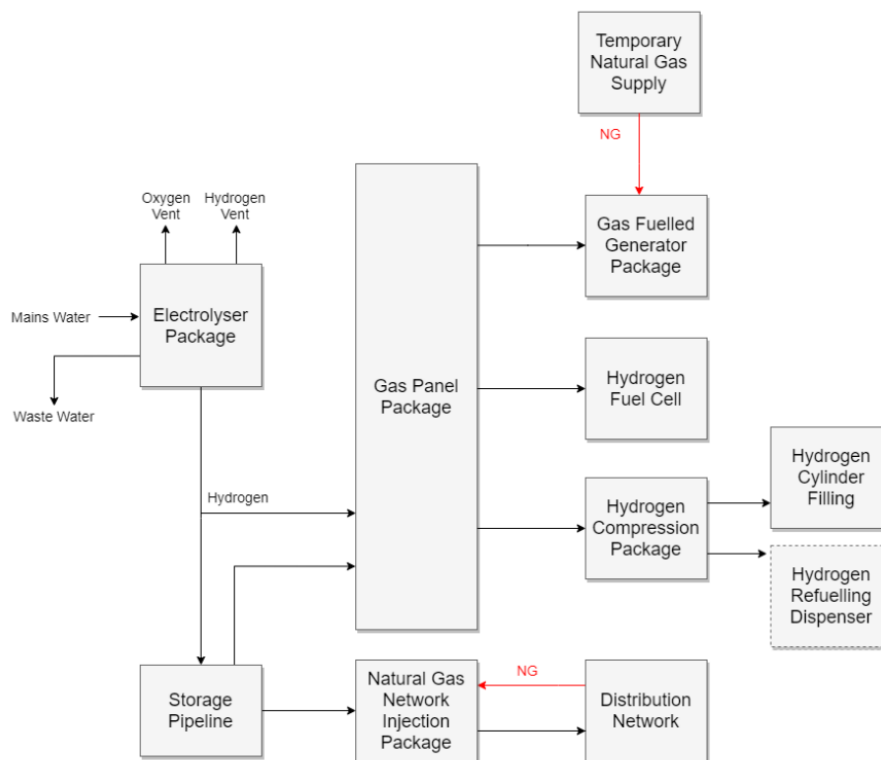
3.3 Facility Primary Function

The facility will perform the following key functions:

- convert mains water into hydrogen gas using grid (renewable) electricity through electrolysis;
- store hydrogen gas in a buried on-site carbon steel pipeline (this will be used for buffering the various produced hydrogen gas usage options);
- control and safely manage hydrogen gas pressures, temperatures and flow rates for injection into Jemena’s Secondary Mains gas pipeline and downstream medium and low pressure network; and
- provide a hydrogen microturbine generator to convert stored hydrogen into electrical energy for supply to the grid.
- provide a hydrogen fuel cell, to convert stored hydrogen into electrical energy for supply to the grid; and
- provide hydrogen compression and dispensing facilities to allow the filling of transportable hydrogen cylinders.

A general flow diagram of the facility operation is provided in **Figure 3–4** below.

Figure 3–4: Flow Diagram and General Facility



3.4 Construction Activities

Construction activities for the Project were undertaken over an approximate six-month period. The construction activities undertaken as part of the facility construction are summarised in Table 3–2.

Table 3–2: Summary of Construction Activities

Construction Stage	Details
Preliminaries	<ul style="list-style-type: none"> • Long lead item procurement; • Construction planning; • Construction documentation; • Post approval documentation submissions; • Workshop fabrication; • Weld and weld qualifications; • Procurement of contractor-supplied equipment and sub-contractors.
Mobilisation and Site Establishment	<ul style="list-style-type: none"> • Mobilisation to site; • Construction and HSE signage installation; • Establishment of lay-down area, fencing and facilities; • Site Security establishment; • Housekeeping and set up of disposal/removal of waste facilities; • Relocation of services, where required; • Removal of fencing; • Demarcation of construction area; • Set up of environmental controls.

Construction Stage	Details
Site Civil Construction	<ul style="list-style-type: none"> • Topsoil removal and stockpiling; • Access road and truck wash facilities; • Piling installation; • Material importation/re-use of material for facility areas; • Pipe and cable installation and trenching; • Hardstand construction; • Spoil and waste management; • Ongoing site restoration (as required).
Hydrogen Buffer Storage Pipeline	<ul style="list-style-type: none"> • Excavation of pipeline trench and tie-in bell-holes; • Transport, stockpiling and backfilling; • Welding of pipeline strings; • NDT and field-joint coating of welds; • Lowering in of pipeline; • Backfill of pipeline trench; • Cleaning, hydro-testing and drying of pipeline.
Major Equipment Packages	<ul style="list-style-type: none"> • Receipt of equipment, off-loading and storage (as required); • Installation of packages including: <ul style="list-style-type: none"> – Electrolyser Package (process and electrical containers and separate cooler system), – Microturbine and Fuel Cell Package, – Gas Panel Packages, – Gas Injection Panel Package, – Electrical Equipment Room, – High Voltage Switchgear and Kiosk Transformer (HV substation), – Waste water tank & irrigation system. – Cylinder filling compressor and dispenser package. • Trenching between packages; • Electrical and instrumentation wiring of packages and connections.
Electrical Works	<ul style="list-style-type: none"> • Trenching all electrical inter-connections; • HV electrical cable installation up to and including termination on to the Utility Switching Station; • Installation of all Electrical (HV and LV), Control and Instrumentation cables with the required labelling, including terminations; • Inspections and testing; • Installation of lightning and cathodic protection systems; • Installation of facility safety signage and electrical labelling as required.
Mechanical and Structural Works	<ul style="list-style-type: none"> • Installation, connection and testing of: <ul style="list-style-type: none"> – Facility tubing and valves, – Water piping system, – Nitrogen cylinders and network. • Installation of facility safety signage and applicable labelling as required.

The works noted above will be completed in a manner consistent with relevant laws, policies and guidelines.

3.5 Commissioning Activities

For testing and commissioning activities, the facility was separated into isolatable sub-sections to allow for a staged commissioning approach. Commissioning was completed at different stages for each sub-section. The separation of the facility into isolatable sub-systems was done to:

- allow a progressive transition from the construction to commissioning phase;
- allow for the earliest possible commencement of commissioning for critical path systems;
- allow for the manageable, efficient and safe execution of the commissioning phase by having smaller, simpler, isolatable sub-systems for the commissioning team to focus on one at a time; and
- allow for clear and transparent commissioning progress reporting to the Project Manager and other key project stakeholders.

The sub-sections and associated systems completed as part of the commissioning are listed in Table 3–3 below.

Table 3–3: Commissioning System Breakdown

#	System title	Primary function	Main equipment
1	Power	Provides power to the facility via the electrical equipment room.	High voltage (HV) switchgear; HV Transformer; Motor Control Centre.
2	Instrument air	Instrument air distribution to the blowout preventer (BOP) for valve actuation, external to the electrolyser (Instrument air for BOP is supplied from the electrolyser).	Instrument air compression (Within electrolyser).
3	Control system	Provides control of all the facilities on site.	Facility PLC and SCADA systems
4	Water	Provides water to the electrolyser water treatment system. Provide waste water from the electrolyser for irrigation.	Water storage tank; Irrigation pump.
5	Nitrogen	Provides nitrogen from bottle storage to the electrolyser for purging.	Nitrogen bottle storage; Nitrogen filtration, regulation and isolation skid.
6	Hydrogen production	Production of hydrogen from mains water and power.	Electrolyser Power and Process container including the: <ul style="list-style-type: none"> • demineralised water system; • gas generation system; • hydrogen purification system; • reverse osmosis system; • closed loop cooling systems; and • Dry Cooler.
7	Hydrogen Storage	Bulk hydrogen storage.	Pipeline buffer storage; Pipeline isolation valves; Pipeline blowdown vent.
8	Hydrogen Injection	Controls the injection of hydrogen into the secondary mains.	Secondary mains injection panel; Secondary main hot taps.

9	Hydrogen distribution	Regulates and controls the flow of hydrogen from the buffer store pipeline to various users on site.	The Gas Panel.
10	Power Generation	Generates electrical energy by consuming hydrogen	The fuel cell package. The micro-turbine.
11	Hydrogen Cylinder Filling	Refilling of transportable hydrogen cylinders for off-site use by FCEV's	Cylinder filling compressor and dispenser.

3.5.1 Commissioning Sequence

The commissioning sequence generally followed the order listed in Table 3–3 above. The commissioning sequence was altered at the discretion of the Commissioning Team, which was subject to timing of construction completion of each system, availability of materials and resources, timing of relevant approvals are, provided the alternate sequence can be executed safely and efficiently.

3.5.2 Commissioning Documentation

The commissioning works were completed in accordance with the following pre-commissioning deliverables, including the following:

- Emergency Response Plan;
- Jemena Safety and Operating Plan (SAOP) (GAS-999-PA-HSE-002);
- Traffic Management Plan; and
- Environmental Management Strategy,

3.6 Operational Activities

The Western Sydney Green Hydrogen Hub is an unmanned facility, with the primary operation via local control systems monitored through telemetry linked to Jemena's NSW Control Room (24x7 operation). The telemetry will provide data via Supervisory Control and Data Acquisition (SCADA), which in turn will alert the control room staff of the condition of the site prompting a response in line with the response sheet for the facility. The SCADA provides the functionality to override the local control systems.

In the event of equipment failure the system is designed to automatically isolate, and not impact upon the existing natural gas facilities.

The primary objective of the control system during operation will be to provide control over processing functions, protect plant, equipment and personnel, and enable simple and reliable plant shutdown, depressurisation, and isolation of equipment. The facility will be occasionally manned, with minimal operator involvement required, including for start-up, shutdown, and restart. The systems shall therefore monitor and control the facilities on a continuous basis under all operating and environmental conditions.

The facility will be provided with a local Programmable Logic Controller designed to control all major process functions, and a safety instrumented system (SIS) that will shut down (trip) a range of equipment and equipment packages, and close major isolation valves during emergency events or process trips. Hydrogen gas quality will be measured by a gas analyser, with data visible to the facility SCADA to enable plant adjustments to be made, if necessary.

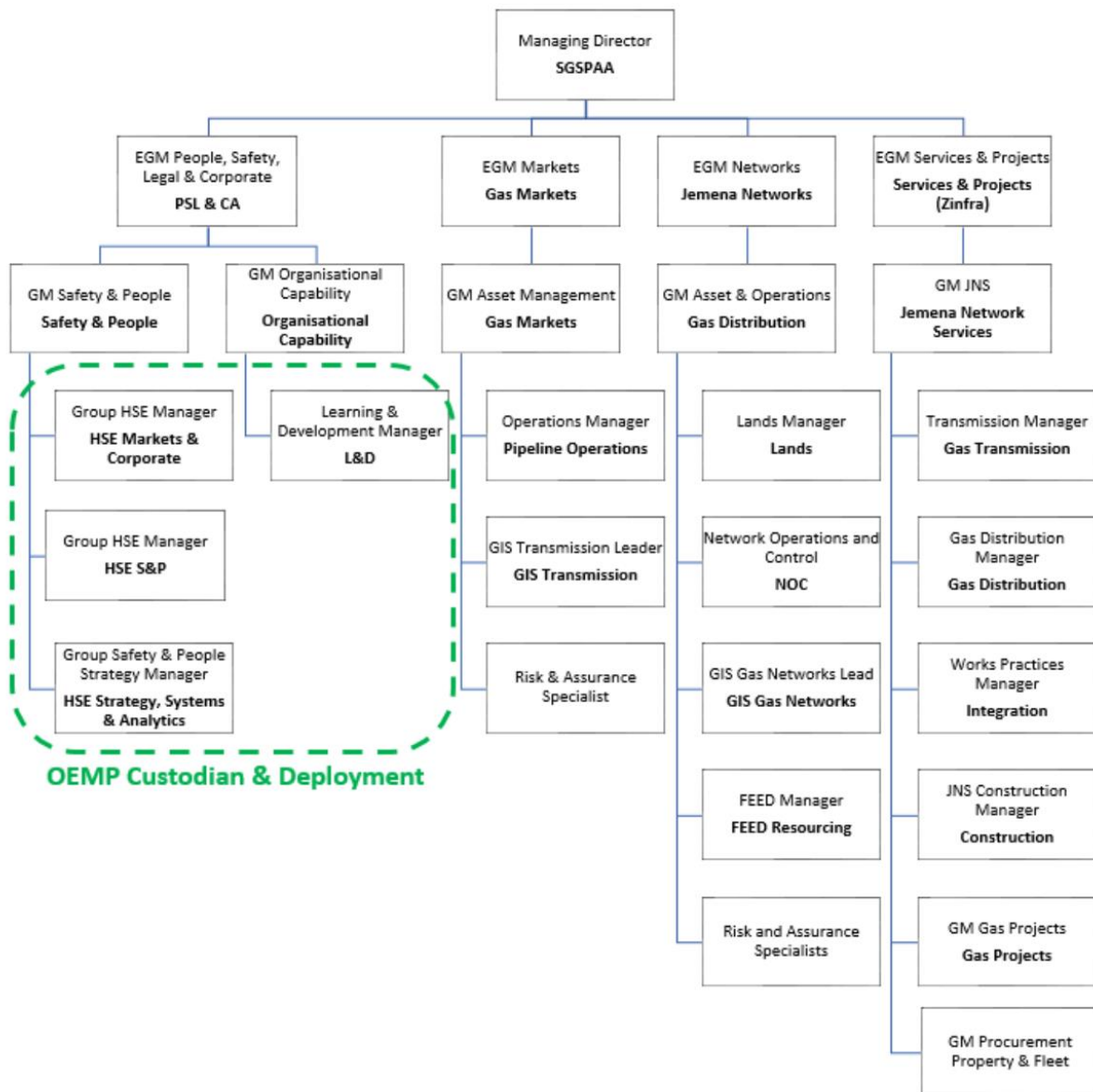
3.6.1 Roles and Responsibilities

Jemena as asset owner and manager, forms part of the SGSP (Australia) Assets Pty Ltd group of companies. Zinfra our delivery partner is associated with the operation and maintenance of assets. Collectively these companies are known here as “the Group”.

In accordance with the Group Gas Operational Environmental Management Plan (OEMP) (GAS-999-PA-EV-002), relevant functional groups with environmental responsibilities within the Group which cover the Network and this Facility are detailed in Figure 3–5. All Group personnel, regardless of position are responsible for the environmental performance of their activities, for reporting of environmental incidents and implementation of requirements of the Environmental Management Strategy and the OEMP.

For additional information about the Group Organisational Structure and Responsibilities in operating and maintaining the pipeline, refer to the JGN Network Safety and Operating Plan (SAOP).

Figure 3–5: Roles and Responsibilities (from JGN Network OEMP, dated 6 Dec 2021)



4. General Compliance Information

This section of the OCR has been documented to meet general reporting compliance requirements as detailed in the NSW Government Requirement 1, Compliance Reporting Post Approval Requirements, May 2020, DPE, such as previous actions, non-compliances, incidents and complaints.

4.1 Previous Compliance Report Actions

As per Schedule 4 Condition C9, an Independent Audit is required to be performed 12 months after commencement of operations then 3 yearly. There are no previous actions to report on.

4.2 Non compliances

A summary of non-compliances to Development Consent conditions up to the completion of this OCR are detailed in Table 4–1 below.

Table 4–1: Development Consent non-compliances

Condition	Compliance requirement	Non-Compliance Reason	Further Information / Improvement Measures
N/A	Nil	Nil	Nil

4.3 Incidents

The only incidents recorded were trivial and non-consequential to the community or environment. Notification to the Department (DPE) as a non- conformance was not required.

A summary of historical incidents (prior to operational phase) leading up to the OCR are detailed in Table 4–2.

Table 4–2: WSGGP incidents

Date	Reporting pathway	Summary	Response	Status
25/11/2020	Internal*	Pad foot (mat) used to spread load of the cranes outrigger damaged the access road surface as the crane took the containers load.	Larger mats to be used. Access road surface to be addressed as part of final works (i.e. spray seal).	Closed
02/12/2020	Internal*	Trench excavation crew along the JGN/EGP boundary contacted buried 1/2" electrical conduit (2mm cable within the conduit broken). Not on DBYD, no maker tape installed above conduit and no surface markers in the area.	Additional requests for information to be sought for future trenching works in the area.	Closed
28/01/2021	Internal*	Power outage at JGN TRS facility as a result of cable strike due to construction of temporary pad (Note: Stand-by officer in place, cables exposed, timber skids used as protection).	Damaged cable section repaired. Steel road plates to be used in future and stop works to be initiated to re-assess risks should methodology required to be altered.	Closed

03/02/2021	Internal*	Bottom split on plastic jerry can causing a diesel spill (20L).	Area cleaned up with spill kit and defective jerry can replaced.	Closed
24/02/2021	Internal*	Bell hole being pumping out (due to wet weather) resulting in slight trench collapse dislodging a CP cable which was then hit by 8T excavator bucket.	CP cable repaired. Toolbox held about wet weather and implications of trenches / bell holes shifting and any cables in these areas.	Closed
05/03/2021	Internal*	EGP NBN cable damaged during cable relocation activities due to excessive folding of the cable.	Works stopped. Optus repaired the cable. Toolbox held.	Closed
24/03/2021	Internal*	Near miss – Gust of wind below electrolyser door open as it was not secured / latched. Door caught by worker.	Door latches installed.	Closed
31/03/2021	Internal*	Telstra cable struck during excavation of stormwater pit. Subcontracted permit officer in place did not identify.	Cable repaired. Subcontracted permit officer removed from site. Principal Contractor personnel to be designated spotter for all future excavation permits / works.	Closed

* Internal report only. The threshold for incident reporting did not meet the definition as detailed in Development Consent Definitions.

4.4 Complaints

A summary of complaints recorded during the reporting period are detailed in Table 4–3 below.

Table 4–3: Project Complaints Received

Category	Via	Date	Summary	Actions/Mitigation	Status
December 2020 - No complaints received.					
January 2021 – No complaints received.					
February 2021					
Noise	Jemena Customer Service	09/02/2021	Resident called to advise the Site Alarm system was going off in the early mornings (past 3 days). The Resident also said that there had been a few truck movements in the early hours of the morning which had woken them.	The Community Liaison Manager (CLM) called the Resident at 12.30pm – and apologized for the Project impacts – advising the alarm had been reset. The CLM offered to advise in advance of any future outside of work hours truck movements (including a couple occurring the next day around 5am). The Resident was reasonable and grateful of the return call and opportunity to connect with the CLM.	Closed
March 2021					
Noise	1800 No.	11/03/2021	Resident called to advise that large trucks had arrived on site at 11.30pm and 6.15am. They were noisy and create dirt & dust and resident said this was unpleasant.	The CLM apologized for the impacts and agreed to advise in advance of any future large truck movements outside normal work hours. Resident was pleasant and appreciative of the offer.	Closed.
April 2021					
Noise	1800 No.	12/04/2021	Resident called to advise the alarm had tripped over the weekend and created unnecessary noise. CLM immediately apologized and explained she had just been about to call to proactively say sorry – as she had heard this news a few minutes prior. Resident was grateful we were aware and	CLM apologized and advised we were reducing the sound level on the alarm, as well as checking the procedure to ensure alarm doesn't stay 'on' for any longer than absolutely necessary.	Closed.

			had planned to take action, including lowering the sound on the alarm system.		
May 2021 – No Complaints received.					
June 2021					
Noise	1800 No.	5/06/2021	Resident hear a noise all through the night – sounded like a valve being released, and wanted to know if this was the ‘new norm’ ?	CLM investigated and advised the resident (by return text on Sunday 5pm) that it was due to an equipment failure at an adjacent site and not the WSGGP. Zinfra technicians were on-site to rectify the issue.	Closed
July 2021 – No Complaints received.					
August 2021 – No Complaints received.					
September 2021 – No Complaints received.					
October 2021 – No Complaints received.					
November 2021 to December 2022 – No Complaints received.					

5. Operational Compliance

This section of the OCR specifically addresses Schedule 4, Condition C5 requirements.

5.1 Compliance Status Summary

The status of each compliance requirement for the project were assessed using the following descriptors in Table 1 below.

Table 1 Compliance status descriptors

Status	Description
Compliant	The proponent has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with.
Non-compliant	The proponent has identified a non-compliance with one or more elements of the requirement.
Not triggered	A requirement has an activation or timing trigger that has not been met at the phase of the development when the compliance assessment is undertaken, therefore an assessment of compliance is not relevant.

No non-compliances have been recorded or reported by project management in the Operational period post commissioning.

Appendix A (6.1) contains the Compliance Table to Operational Conditions contained in the Project Conditions of Consent (Department of Planning and Environment).

Note: Consistent with Condition of Consent C9 “**INDEPENDENT ENVIRONMENTAL AUDITS** “ an Independent Environmental Audit that includes all Operation conditions of consent is currently underway and the audit report is due in January 2023.

5.2 Incidents

No incidents have been recorded or reported with regards to the operation of the facility.

5.3 Complaints

No complaints have been recorded or reported with regards to the operation of the facility. The rural and parkland areas in close proximity the site has resulted in very few sensitive receivers within 300 metres of the facility. Only one residential dwelling is within 100 metres of the WSGG facility.

There is a sign on the fence of the property showing contact details for any inquiries or complaints (phone 131 909) as per the Jemena website.

6. References

6.1 Internal

Final Hazard Analysis Jemena - Detailed Design for Hydrogen Generation (Western Sydney Green Gas Project), Rev A, 3/09/2020 (P2G-2099-RP-HZ-005)

Jemena Asset Management Pty Ltd, Safety Case Pipeline Management Plan Jemena Gas Pipelines 1, 2, 3, 7, 8 Jemena Colongra Lateral Pipelines 33, Rev 5, dated 25 September 2020

Jemena Gas Networks (NSW) Ltd Asset Class Strategy : Facilities 2021-2027, Rev 3, 27 April 2021 (GAS-999-PA-FA-001)

Jemena Gas Networks (NSW) Ltd, Commissioning Safety Study Report, Western Sydney Green Gas Project, Rev 0, 5 May 2021

Jemena Gas Networks (NSW) Ltd, Emergency Response and Management Plan, Western Sydney Green Gas Facility Rev 1, 28/03/2021

Jemena Gas Networks (NSW) Ltd Asset Class Strategy : Facilities 2021-2027, Rev 3, 27 April 2021 (GAS-999-PA-FA-001)

Jemena Gas Network (NSW) Ltd Safety Management System Western Sydney Green Gas Project, Rev 0, 19/03/2021

Jemena Gas Transmission - Permit to Work Form Rev 2 (GAS-999-FM-HSE-026)

Jemena Permit to Work Procedure (GAS-999-PR-HSE-006)

Jemena Safe Work System Manual (GAS-999-OM-HSE-002)

Jemena Western Sydney Green Gas Project, Construction Safety Study Report, Rev 0, 08/10/2020 (P2G-2099-PA-HS-005).

Jemena Western Sydney Green Gas Project Traffic Management Plan, Rev 3, 20/11/2020

Western Sydney Green Gas Trial HAZOP Report Rev 1, 17/08/2020 (P2G-2099-RP-HZ-002).

WSGGP Health and Safety Management Plan (HSMP), Rev 2 (P2G-2099-PA-EV-003 WSGGP)

WSGGP Operations and Maintenance Specification, Rev 0, 31/03/2021

6.2 External

NSW Government Requirement 1, Compliance Reporting Post Approval Requirements, May 2020, DPE

A1. Appendix A— Compliance Table

Condition of consent number	Compliance Requirement/ description	Development phase	Evidence and comments	Compliance status
A1	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent, and if prevention is not reasonable or feasible, minimise any material harm to the environment that may result from the construction and operation of the development, and any decommissioning of the development and/or rehabilitation required under this consent.	At all times	Noted	Compliant
A2	The Applicant must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent.	At all times	Noted	Compliant
A3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent prevail to the extent of any inconsistency.	At all times	Noted	Compliant
A4	The Applicant must comply with any requirement/s of the Secretary arising from the Department's assessment of: (c) any strategies, plans or correspondence that are submitted in accordance with this consent; (d) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and (e) the implementation of any actions or measures contained in these documents.	At all times	Noted	Compliant
A5	A maximum of 87,600 kilograms of hydrogen gas may be produced at the site in any calendar year.	Operational phase	A maximum of 87,600 kilograms of hydrogen gas has not been exceeded	Compliant
A6	A maximum of 2% by volume of hydrogen gas may be injected into the Applicant's natural gas distribution network.	Operational phase	The volume of hydrogen has not exceeded 2% of the total gas injected into the network	Compliant
A7	On-site storage of full hydrogen cylinders, compressed natural gas vehicles when not in-use and high-pressure hydrogen storage facility are not permitted..	Operational phase	Noted	Not triggered
A8	The Applicant may carry out operations for 5 years from the date of commencement of operations.	Operational phase	Noted	Compliant until December 2026
A9	The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia.	At all times	Occupation certificate dated 8/09/2021 (certification number CC/0161822)	Compliant
A10	The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	At all times	Noted	Not triggered
A11	The Applicant must: (a) rehabilitate the site progressively, as soon as reasonably practicable following disturbance; (b) minimise the disturbance area at any time; (c) employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion on parts of the site that cannot yet be permanently rehabilitated; and (d) within 18 months of the cessation of operations decommission and remove project infrastructure, unless the Secretary agrees otherwise.	At all times	DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1, dated 12 November 2020) on 27/11/2020	Compliant
A12	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	At all times	Noted	Not triggered
A13	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and	At all times	Noted	Compliant

	(b) operated in a proper and efficient manner.			
B1	<p>Unless the Secretary agrees otherwise, the Applicant must prepare the following documents at least one month prior to commencing construction of the development to the satisfaction of the Secretary:</p> <p>(a) a Construction Safety Study that is consistent with the Department's Hazardous Industry Planning Advisory Paper No. 7, 'Construction Safety';</p> <p>(b) a Hazard and Operability Study, prepared by a suitably qualified, experienced and independent expert whose appointment has been endorsed by the Secretary, that is consistent with the Department's Hazardous Industry Planning Advisory Paper No. 8, 'HAZOP Guidelines', and must be accompanied by a program for the implementation of all recommendations made in the report. The study must include a suitably designed firewall with Fire Resistance Level (FRL) of at least 240/240/240 to mitigate potential fire-related impacts from the high-pressure hydrogen storage facility. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented;</p> <p>(c) a Final Hazard Analysis based on the final design of the development that is consistent with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'; and</p> <p>(d) a Fire Safety Study that is consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's 'Best Practice Guidelines for Contaminated Water Retention and Treatment Systems', and in consultation with FRNSW and RFS.</p> <p><i>Following the Secretary's approval, the Applicant must operate the development in accordance with the approved Construction Safety Study, Hazard and Operability Study, Final Hazard Analysis, and Fire Safety Study. Notes:</i></p> <ul style="list-style-type: none"> • Construction, other than preliminary works that are outside the scope of the hazard studies, must not commence until study recommendations have been considered and, where appropriate, acted upon. • For developments in which the construction period exceeds six months, the commissioning portion of the Construction Safety Study may be submitted two months prior to commencement of commissioning. 	Pre-construction	<p>DPE Planning Secretary has approved the Construction Safety Study (Revision 0, dated 8 October 2020)</p> <p>DPE Planning Secretary has approved the Hazard and Operability Study (Revision 1, dated 17 August 2020)</p> <p>DPE Planning Secretary approved the appointment of Francois Lambrechts to prepare the Hazard and Operability Study (14/09/2020)</p> <p>Western Sydney Green Gas Project (SSD-10313) Final Hazard Analysis approved by DPE 19/11/2020</p> <p>Western Sydney Green Gas Project (SSD-10313) Fire Safety Study approved by DPE 27/11/2020</p>	Compliant
B2	<p>Unless the Secretary agrees otherwise, the Applicant must prepare a revised Safety and Operating Plan (SAOP) at least one month prior to commencing construction of the development to the satisfaction of the Secretary – Authorising in relation to all the assets and equipment located within the development footprint, as shown in Appendix 2.</p>	Pre-construction	<p>Revised version requested by DPE for the Western Sydney Green Gas Project (SSD10313) Safety and Operating Plan approved by DPE Planning Secretary 11 November 2020</p>	Compliant
B3	<p>Unless the Secretary agrees otherwise, the Applicant must develop the following documents at least one month prior to commencement of commissioning of the development to the satisfaction of the Secretary:</p> <p>(a) a comprehensive Emergency Plan. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry points at all times The Emergency Plan must:</p> <ul style="list-style-type: none"> • be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'; • identify the fire risks and controls of the development; • include procedures that would be implemented if there is a fire on-site or in the vicinity of the site; and • include an Evacuation Plan for flooding and bushfire events, in consultation with Council and the NSW SES; and <p>(b) a comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. The Safety Management System must:</p> <ul style="list-style-type: none"> • consistent with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'; and • identify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records must be kept on-site and must be available for inspection by Secretary upon request. <p><i>Following approval, the Applicant must implement the Emergency Plan and Safety Management System. Notes:</i></p> <ul style="list-style-type: none"> • The update of a relevant existing site document may satisfy the condition where all the relevant requirements are addressed in the updated document. 	Pre-commissioning	<p>Western Sydney Green Gas Project (SSD-10313) - Emergency Plan approved on 03/05/2021 by DPE Planning Secretary (Revision 1, dated 28 March 2021).</p>	Compliant

B4	<p>The Applicant must prepare a Pre-start up Compliance Report for the development to the satisfaction of the Secretary. This report must be submitted to the Secretary for approval at least one month prior to carrying out any operations under this consent, and detail the development's compliance with the documents required under condition 1 of schedule 3 of this consent, including:</p> <p>(a) date of document preparation;</p> <p>(b) date that construction and commissioning commenced; and</p> <p>(c) actions proposed and/or taken in order to implement the recommendations made in the documents.</p>	Pre-operations	Western Sydney Green Gas Project (SSD-10313) Pre-start up Compliance Report (Jemena, Revision 0, 30 September 2021; Report) approved by DPE Planning Secretary 29/10/2021	Compliant
B5	<p>The Applicant must ensure that all dangerous goods and hazardous materials storage and handling undertake on-site is in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids, or its latest version.</p> <p><i>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</i></p>	At all times	<p>DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1, dated 12 November 2020) on 27/11/2020</p> <p>Works are carried out as per the approved Environmental Management Strategy.</p>	Compliant
B6	<p>The Applicant must:</p> <p>(a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;</p> <p>(b) ensure that the development complies with the relevant objectives in the RFS's Planning for Bushfire Protection 2019 (or latest version);</p> <p>(c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(d) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.</p>	At all times	Western Sydney Green Gas Project (SSD-10313) Fire Safety Study approved by DPE 27/11/2020	Compliant
B7	<p>The Applicant must:</p> <p>(a) minimise the impacts of the site access upgrades for the development;;</p> <p>(b) maintain all footpaths, roads and utility-related infrastructure on site in a safe and serviceable condition;</p> <p>(c) upgrade the access road and turning circle to an all-weather sealed surface;</p> <p>(d) provide sufficient parking on site for all vehicles and ensure vehicles associated with the development do not park on the public road network;</p> <p>(e) ensure the frequency of cylinder refilling vehicles entering and leaving the site does not exceed four trips per week, unless otherwise agreed by the Secretary subject to the Final Hazard Analysis required under Schedule 3 Condition B1; and</p> <p>(f) minimise the traffic noise impacts of the development.</p>	At all times	<p>Traffic Management Plan (Revision 3, dated 10 November 2020) for the Western Sydney Green Gas Project (SSD-10313) approved on 27/11/2020 by DPE Planning Secretary</p> <p>DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1, dated 12 November 2020) on 27/11/2020</p>	Compliant
B8	<p>Prior to the commencement of construction, unless the Secretary agrees otherwise, the Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with GSP, Council and TfNSW;</p> <p>(b) describe the measures that would be implemented to comply with the transport management requirements in condition B7 above;</p> <p>(c) include details of the transport route to be used for all construction and operational traffic;</p> <p>(d) include details of the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport route/s during construction and operations;</p> <p>(e) include a protocol for undertaking independent dilapidation surveys to assess the existing condition of Chandos Road, prior to and following construction or decommissioning activities;</p> <p>(f) include a swept path analysis of entry and exit to the site and identify a schedule for access upgrades (if required) to the satisfaction of Council and TfNSW; and</p> <p>(g) include a program to:</p> <ul style="list-style-type: none"> • record and track any light and heavy vehicle movements associated with the development; and • monitor the effectiveness of these measures. <p><i>The Applicant must implement the approved Traffic Management Plan for the development.</i></p>	Pre-construction	Traffic Management Plan (Revision 3, dated 10 November 2020) for the Western Sydney Green Gas Project (SSD-10313) approved on 27/11/2020 by DPE Planning Secretary	Compliant
B9	<p>The Applicant must comply with the operating hours set out in Table 1.</p> <p>The following activities may be undertaken outside of the hours identified in Table 1 without the approval of the Secretary:</p> <p>(a) the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons;</p>	At all times	DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1, dated 12 November 2020) on 27/11/2020	Compliant

	<p>(b) emergency work to avoid the loss of life, property and/or material harm to the environment;</p> <p>(c) construction works that cause LAeq (15 mins) noise levels that are:</p> <ul style="list-style-type: none"> • no more than 5 dB(A) above the rating background level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009), or its latest version; and • no more than the noise management levels specified in Table 3 of the Interim Construction noise Guideline (DECC, 2009), or its latest version, at other sensitive land uses; and • for continuous or impulsive vibration values, measured at the most affected residence, no more than those for human exposure to vibration, specified in Table 2.2 of Assessing vibration: a technical guideline (DEC, 2006), or its latest version; and • for intermittent vibration values measured at the most affected residence, no more than those for human exposure to vibration, specified in Table 2.4 of Assessing vibration: a technical guideline(DEC, 2006), or its latest version; <p>(d) where a negotiated agreement has been reached with affected receivers; or</p> <p>(e) works as approved through the out-of-hours work protocol outlined in the Environmental Management Strategy under Schedule 4 of this consent.</p> <p><i>Table 1: Operating Hours</i></p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Operating Hours</th> </tr> </thead> <tbody> <tr> <td>Operations excluding microturbines, fuel cell and blowdowns</td> <td>24 hours a day 7 days a week</td> </tr> <tr> <td>Microturbines and fuel cell</td> <td>7 am to 10 pm 7 days a week</td> </tr> <tr> <td>Construction and decommissioning activities Blowdowns (excluding emergency work)</td> <td>7 am to 6 pm Monday to Friday 8 am to 1 pm Saturday at no time on Sundays and NSW public holidays</td> </tr> </tbody> </table>	Activity	Operating Hours	Operations excluding microturbines, fuel cell and blowdowns	24 hours a day 7 days a week	Microturbines and fuel cell	7 am to 10 pm 7 days a week	Construction and decommissioning activities Blowdowns (excluding emergency work)	7 am to 6 pm Monday to Friday 8 am to 1 pm Saturday at no time on Sundays and NSW public holidays			
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B10	<p>The Applicant must:</p> <p>(a) minimise the noise generated by any construction or decommissioning activities on site in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version;</p> <p>(b) implement all reasonable and feasible measures to minimise the operational noise of the development;</p> <p>(c) notify the occupants of residences within 200 metres of the site boundary and GSP 24 to 48 hours prior to undertaking blow downs (excluding emergency works); and</p> <p>(d) comply with the operational noise levels within the Noise Policy for Industry (NSW EPA, 2017), or its latest version.</p>	At all times	DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1,dated 12 November 2020) on 27/11/2020	Compliant								
B11	<p>The Applicant must minimise the:</p> <p>(a) dust emissions of the development, including wind-blown and traffic generated dust;</p> <p>(b) greenhouse gas emissions of the development;</p> <p>(c) surface disturbance of the development; and</p> <p>(d) other air emissions of the development.</p>	At all times	DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1,dated 12 November 2020) on 27/11/2020	Compliant								
B12	<p>The Applicant must ensure that no offensive odours are emitted from the development, as defined under the POEO Act.</p>	At all times	DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1,dated 12 November 2020) on 27/11/2020	Compliant								
B13	<p>The Applicant must:</p> <p>(a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection;</p> <p>(b) ensure the visual appearance of infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and</p> <p>(c) not mount any commercial advertising signs or logos on site, except where this is required for identification or safety purposes.</p>	At all times	Occupation certificate dated 8/09/2021 (certification number CC/0161822) No objects that have glare or reflection No commercial advertising signs or logos on site	Compliant								
B14	<p>The Applicant must:</p> <p>(a) minimise the off-site lighting impacts of the development; and</p> <p>(b) ensure that any external lighting associated with the development:</p> <ul style="list-style-type: none"> • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; and 	At all times	Occupation certificate dated 8/09/2021 (certification number CC/0161822) Consistent with Occupation certificate and Australian Standard AS4282 (INT) 1997	Compliant								

	<ul style="list-style-type: none"> complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version. 			
B15	<p>The Applicant must:</p> <p>(a) ensure that the development does not cause any water pollution, as defined under section 120 of the POEO Act;</p> <p>(b) ensure that stormwater runoff from the development is managed using Waster Sensitive Urban Design (WSUD) techniques consistent with the Western Sydney Parklands Design Manual and considers the Fairfield City Council Stormwater Management Policy; and</p> <p>(c) minimise any soil erosion associated with the construction of the development in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version.</p>	At all times	<p>DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1,dated 12 November 2020) on 27/11/2020</p> <p>No complaints and no non-conformances during the Operation Phase</p>	Compliant
B16	<p>The Applicant must:</p> <p>(a) minimise the waste generated by the development;</p> <p>(b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);</p> <p>(c) store and handle all waste on site in accordance with its classification;</p> <p>(d) not receive or dispose of any waste on site; and</p> <p>(e) remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal.</p>	At all times	<p>DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1,dated 12 November 2020) on 27/11/2020</p>	Compliant
B17	The Applicant must ensure the development does not cause any direct or indirect impacts on heritage items located outside the approved development footprint.	At all times	All works within the footprint	Compliant Not triggered
B18	If historical and/or Aboriginal archaeological heritage items are unexpectedly discovered during construction of the development, all works must cease, and a suitably qualified and experienced archaeologist be brought in to assess the find. Depending on the nature of the discovery, additional assessment, recording and management measures may be required prior to the recommencement of works in the affected area. Heritage NSW and/or members of the relevant Local Aboriginal Land Council must be notified of this discovery in writing.	Construction phase	DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1,dated 12 November 2020) on 27/11/2020	Compliant Not triggered
C1	<p>Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <p>(a) prepared in consultation with the Council and GSP;</p> <p>(b) provide the strategic framework for environmental management of the development;</p> <p>(c) identify the statutory approvals that apply to the development;</p> <p>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p> <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the development; receive, handle, respond to, and record complaints; resolve any disputes that may arise; respond to any non-compliance; and respond to emergencies; and <p>(f) include:</p> <ul style="list-style-type: none"> the following sub-plans: <ul style="list-style-type: none"> noise; air quality; stormwater management including erosion and sediment controls during construction; and heritage. copies of any strategies, plans and programs approved under the conditions of this consent; and a clear plan depicting monitoring to be carried out in relation to the development. <p><i>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</i></p> <p>Notes:</p>	Pre-construction	DPE Planning Secretary has approved the Environmental Management Strategy (Revision 1,dated 12 November 2020) on 27/11/2020	Compliant

	<p>• The update of a relevant existing site documents may satisfy the condition where all the relevant requirements are addressed in the updated document.</p>			
C2	<p>Within 3 months, unless otherwise agreed with the Secretary, of:</p> <p>(a) the submission of an incident report under condition C5 below;</p> <p>(b) the submission of an audit report under condition C9 below; and</p> <p>(c) the approval of any modification to the conditions of this consent; or</p> <p>(d) a direction of the Secretary under condition A4 of schedule 2;</p> <p>the Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</p> <p>Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i></p>	Operations	<p>'Independent Environmental Audit' currently underway for January 2023 finalisation</p> <p>There were 2 Modification approved by DPE</p> <p>Due to the DPE approved modification (2) and the dynamic nature of the project Jemena has been in continual contact with DPE.</p> <p>Due to the complexity of the nature of the project here has been ongoing review and lodgement of revised strategies and plan documents.</p> <p>While Jemena is not aware of any non-conformance with regards to Condition C2 the Independent Audit scheduled for Jan 2023 will further assess this condition.</p>	Compliant
C3	<p>The Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance. A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</p> <p><i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i></p>	At all times		Not triggered
C4	<p>Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</p> <p><i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i></p>	At all times		Not triggered
C5	<p>The Applicant must provide regular compliance reporting to the Department on the development in accordance with the relevant Compliance Reporting requirements (DPE May 2020), or its latest version.</p>	At all times		Compliant
C6	<p>Prior to commencing the construction, operations or decommissioning of the development or the cessation of operations, the Applicant must notify the Department and Council in writing of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department and Council in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	At all times	<p>Western Sydney Green Gas (WSGG) Project – SSD 10313 Notice of Commencement of construction phase by WASC0 Pty Ltd given on Wednesday 6 January 2021</p> <p>Western Sydney Green Gas (WSGG) Project – SSD 10313 Notice of Commencement of Operation given on 1 November 2021.</p> <p>Functional Operations started on December 16th 2021</p>	Compliant
C7	<p>Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary.</p>	Pre-construction	Civil layout Document reference P2G2099DWCV001	Compliant
C8	<p>Prior to commencing operations, the Applicant must submit work as executed plans of the development to the Secretary.</p>	Pre-operations	Civil layout Document reference P2G2099DWCV001	Compliant
C9	<p>Unless the Secretary agrees otherwise, 12 months after the commencement of operations of the development and every three years thereafter, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <p>(a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2020);</p> <p>(b) be conducted by a suitably qualified lead auditor and suitably qualified, experienced and independent team of experts in any field specified by the Secretary, whose appointment has been endorsed by the Secretary;</p>	Operations	<p>Appointment of Auditor approved by DPE on 27 Oct 2022.</p>	Compliant

	<p>(c) include consultation with Council and relevant agencies;</p> <p>(d) include a comprehensive Hazard Audit of the development in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines' and include a review of the site Safety Management System and a review of all entries made in the incident register since the previous audit;</p> <p>(e) review the adequacy of any strategies, plans or programs required under the abovementioned approvals;</p> <p>(f) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under the abovementioned approvals; and</p> <p>(g) be conducted and reported to the satisfaction of the Secretary.</p> <p><i>Note: A reference to Independent Audit Post Approval Requirements (2020) in this development consent also includes future amendments to this document.</i></p>			
C10	<p>Within 12 weeks of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report and a timetable for the implementation of these recommendations as required. The Applicant must implement these recommendations, to the satisfaction of the Secretary.</p>	Operations	'Independent Environmental Audit' is currently underway for January 2023 finalisation	Compliant
C10A	<p>The Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the <i>Independent Audit Post Approval Requirements (2020)</i>, upon giving at least 4 weeks' notice (or timing) to the Applicant of the date upon which the audit must be commenced.</p>	Operations	Noted	Not triggered
C10B	<p>In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements (2020)</i> (or as amended from time to time), the Applicant must:</p> <p>(a) review and respond to each Independent Audit Report prepared under condition C9 of this consent, or condition C10A where notice is given by the Secretary;</p> <p>(b) submit the response to the Secretary; and</p> <p>make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Secretary, unless otherwise agreed by the Secretary.</p>	Operations	'Independent Environmental Audit' is currently underway for January 2023 finalisation	Not triggered
C10C	<p>Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Secretary within 2 months of undertaking the independent audit site inspection, as outlined in the <i>Independent Audit Post Approvals Requirements (2020)</i> (or as amended from time to time) unless otherwise agreed by the Secretary</p>	Operations	'Independent Environmental Audit' is currently underway for January 2023 finalisation	Not triggered at this time
C10D	<p>Notwithstanding the requirements of the <i>Independent Audit Post Approvals Requirements (2020)</i>, the Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Secretary's satisfaction that independent operational audits have demonstrated operational compliance.</p>	Operations	Noted	Not triggered
C11	<p>Unless the Secretary agrees otherwise, from the commencement of development under this consent, the Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> • the EIS; • the final general arrangement plans for the development; • current statutory approvals for the development; • approved strategies, plans or programs required under the conditions of this consent; • the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; • how complaints about the development can be made; • a complaints register; • compliance reports; • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Secretary; and <p>(b) keep this information up to date.</p>	At all times	Jemena's Western Sydney Green Gas Project - Jemena	Compliant

C12	To ensure the studies, strategies and plans for the development are updated on a regular basis and incorporate any required measures to improve the environmental performance of the development, the Applicant may submit revised studies, strategies or plans required for the development under the conditions of consent at any time. With the agreement of the Secretary, the Applicant may also submit any study, strategy or plan required under the conditions of this consent on a staged basis.	At all times	Noted	Compliant
C13	The Secretary may approve a revised strategy or plan required under the conditions of consent, or the stage submission of these documents, at any time. With the approval of the Secretary, the Applicant may prepare the revised or staged strategy or plan without undertaking consultation with all parties nominated under the applicable condition in this consent	At all times	Noted	Compliant