



# Statement of Environmental Objectives (SEO)

## Northern Battery

420 Northern Power Station Road,  
Port Paterson

January 2026

# **Statement of Environmental Objectives (SEO)**

## **Northern Battery**

Prepared for Davenport BESS Pty Ltd  
ATF Davenport BESS 2 Trust, a  
subsidiary of Green Gold Energy Pty  
Ltd

420 Northern Power Station Road,  
Port Paterson

January 2026



MasterPlan acknowledge the Traditional Custodians of Country across Australia, and recognise their continuing connection to land, waters and culture. We pay our respects to Elders past and present.

**MasterPlan SA Pty Ltd**

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## Executive Summary

Green Gold Energy Pty Ltd ('GGE' in conjunction with Davenport BESS Pty Ltd ATF Davenport BESS 2 Unit Trust, the 'Proponent') have applied to the Department for Energy and Mining for an Associated Infrastructure License (AIL) for the development of a Battery Energy Storage System (BESS) located on land located at 420 Northern Power Station Road, Port Paterson in South Australia (the 'subject land').

Located within the Port Augusta City Council boundaries, the subject land is located north of the Davenport substation, south-east of Port Augusta central business district, south-west of Stirling North and approximately 300km north of Adelaide. Located on land formerly accommodating the Northern Power Station, the subject land is now largely vacant with the exception of the Thomas Playford Substation and AB Switchyard located within proximity of the western site boundary, and the Hallett Group Green Cement Facility located on the north-western side of Northern Power Station Road, directly adjacent to the development site. The BESS development site is proposed on a relatively small portion of the subject land.

The Proponent is seeking to develop a BESS, substation, transmission line and related infrastructure. The project incorporates a BESS with a nameplate capacity of up to 270 MW, comprising approximately 208 batteries with nominal 1043.1 MWh capacity.

As an 'associated infrastructure activity' the proposed BESS licence application has been presented to the Minister for Energy and Mining for determination in accordance with Section 31 of the *Hydrogen and Renewable Energy Act 2023*.

This Statement of Environmental Objectives (SEO) has been prepared in accordance with the requirements of the *Hydrogen and Renewable Energy Act 2023* (HRE Act) and *Hydrogen and Renewable Energy Regulations 2024* (HRE Regs) and should be read in conjunction with the associated Environmental Impact Report (EIR) dated January 2026.

## 1 Introduction

### 1.1 Background

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).

The proposed Battery Energy Storage System (BESS) and ancillary transmission line, meets the criteria of an 'associated infrastructure activity' as defined in Regulation 3(2)(b) of the HRE Regs, which prescribes:

- (a) *an energy storage system that -*
  - (i) *is capable of -*
    - (1) *being charged; and*
    - (2) *storing and discharging energy; and*
  - (ii) *has a storage capacity of or above a nameplate capacity of 5MW; and*
  - (iii) *is connected to a transmission or distribution network through which energy (including energy generated or obtained from a renewable energy resource) is conveyed.*

In accordance with Regulation 62(1) of the HRE Act, an AIL can only be granted if there is an approved SEO in force. Thereby, this SEO has been prepared by the Department for Energy and Mining (DEM) to assist the approval process for activities undertaken under an AIL.

### 1.2 Purpose

The intent of the SEO is to outline the environmental objectives to which the associated license activities are deemed to be a regulated activity under the HRE Act, must conform, and the criteria upon which the achievement of these objectives will be assessed. An approved SEO must be in place prior to the granting of an Associated Infrastructure License (AIL) by the Minister for Energy and Mining (the 'Minister').

This SEO has been prepared as a site-specific document for the installation and operation of a BESS with reference to the surrounding environment and sets out the assessment and leading performance criteria to be applied to determine whether the objectives have been achieved. The immediately reportable and reportable incidents that will apply to the activities are also defined in this SEO.

The objectives of this SEO have been developed based on the information provided in the Environmental Impact Report (EIR) dated October 2025, and are in keeping with the objectives of the HRE Act, which include:

- *Land, air, water (including both surface and 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 and permissible land uses;*
- *Public health, safety and amenity;*
- *The heritage, aesthetic, Aboriginal, social and cultural values of an area; and*
- *The social or economic effects associated with regulated activities.*

Upon approval, an SEO must be reviewed at least once every five (5) years.

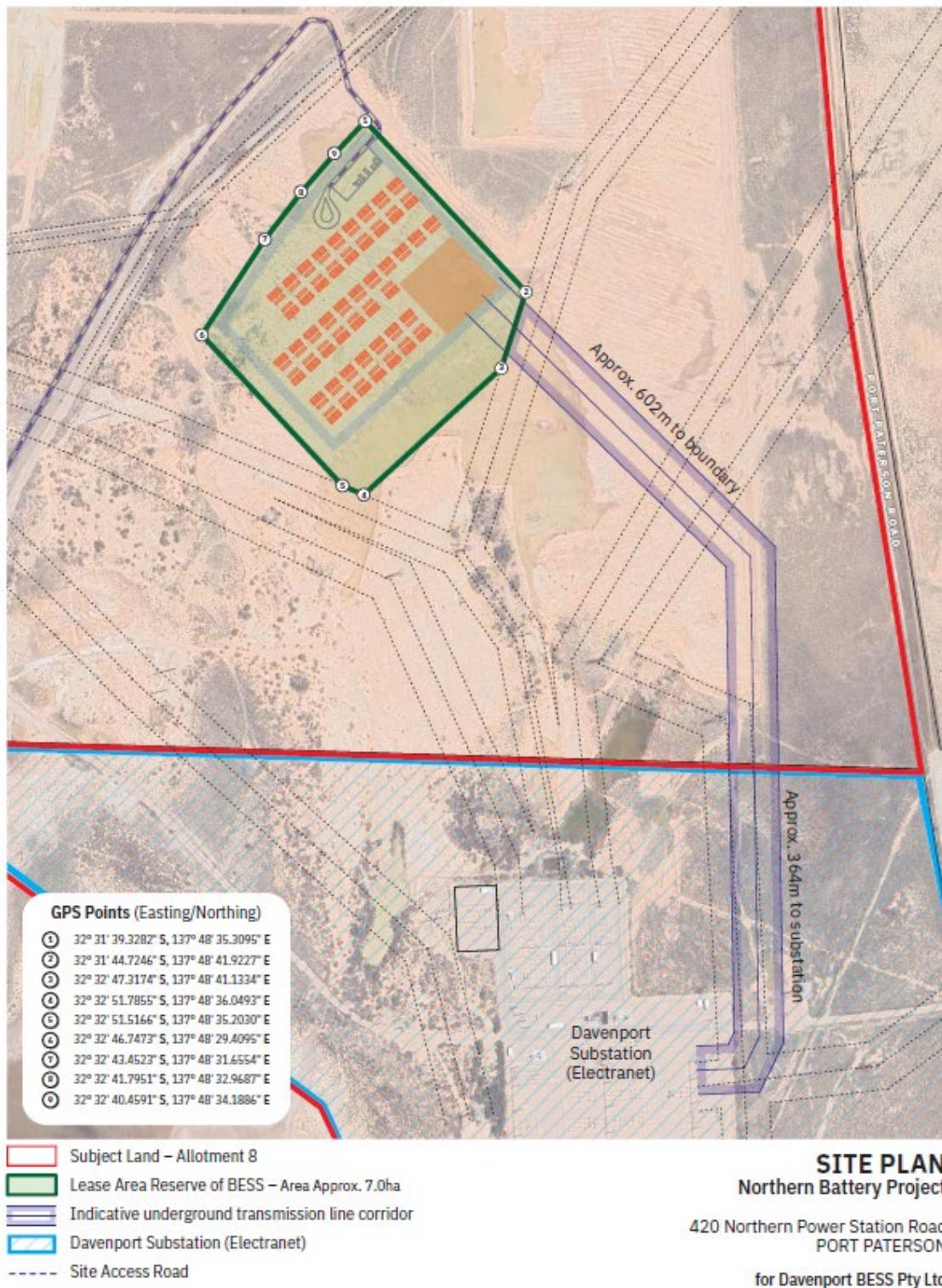
### **1.3 Scope**

This SEO applies to the associated infrastructure activities for the installation, operation, decommission and rehabilitation of land associated with a BESS by the Proponent on the land located at 420 Northern Power Station Road, Port Paterson, South Australia. Preliminary associated infrastructure activities covered by this SEO are outlined in the EIR.

This SEO does not apply to any of the subject land outside of the development site, as defined in **Figure 1** below, nor any transmission lines, cables or connections to the Davenport Substation. Activities excluded from the scope of the EIR and SEO include, but are not limited to:

- Upgrading existing access tracks or construction of new ones.
- Geotechnical investigations.
- Aerial surveys.
- Portable remote sensing devices (e.g., SoDAR or LiDAR).
- Vehicle based surveys (e.g., topographical or cadastral surveys, ecological surveys, heritage surveys, unexploded ordnance surveys, contaminated land assessments, geophysical surveys, traffic surveys).
- Other site surveys (e.g., installation of noise or air quality monitors, inspections associated with hydrological or visual impact assessments which may involve taking photographs from selected sites and installing photo point markers).

These activities may instead be undertaken in agreement with the landowner.



**Figure 1: Subject Land**

#### **1.4 Limitations**

The EIR and SEO have been prepared in accordance with the legislative requirements of the *Hydrogen and Renewable Energy Act 2023* and *Hydrogen and Renewable Energy Regulations 2024*, with reference to the Environmental Impact Assessment Criteria (Gazetted on 31 October 2024) and associated guidelines prepared and published by the Department for Energy and Mining. The technical reports utilised to inform this EIR and the SEO, have been prepared with information and data available and with reference to legislation and guidelines as applicable, at the time of writing.

## 2 Environmental Objectives and Assessment Criteria

HRE Regulation 34 (1) requires an SEO to provide:

- *the objectives that relate to dealing with the impacts on various elements of the environment associated with undertaking the regulated activities;*
- *the criteria to be applied to determine whether or not the stated environmental objective has been achieved in a particular case.*

### 2.1 Objectives

The broad objective of this SEO is to manage any impact of the proposed associated infrastructure activity on the environment, including the natural and built environments, social, cultural or economic values of the area, matters of public health, safety or amenity, existing/permisable land uses, or other land users within the locality of the site. Potential environmental hazards and consequences associated with these activities have been identified in the associated EIR dated October 2025.

The environmental objectives for AIL regulated activities are:

- *No significant dust generation/disturbance resulting from regulated activities in excess of the parameters outlined in the Environment Protection (Air Quality) Policy 2016.*
- *No injuries, deaths or health impacts to the public or third parties from regulated activities that could have been reasonably prevented by the operator.*
- *No encroachment of construction machinery into airport/airfield airspace.*
- *No damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places.*
- *No introduction or spread of weeds, pest animals, pathogens or diseases as a consequence of regulated activities.*
- *No clearance of native vegetation or disturbance to native fauna unless prior approval under the relevant legislation is obtained.*
- *No disturbance or contamination of soil by hazardous substances or materials.*
- *No significant changes in soil stability, structure, quality or composition resulting from regulated activities.*
- *No significant noise or vibration resulting from the regulated activities in excess of the parameters of the Environment Protection (Commercial and Industrial Noise) Policy 2023.*
- *Minimise disruption to local residents, community and road users during construction.*
- *No significant disturbance to surface drainage patterns and no adverse impacts to surface water and groundwater quality or quantity.*
- *Minimise visual impact of regulated activities.*
- *Remediate and rehabilitate operational areas, where required.*
- *Minimise disturbance to stakeholders, land use and associated infrastructure.*

## 2.2 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.*

The assessment criteria for each objective are set out in **Table 1** below which also outlines the controls that are planned to be implemented to ensure that environmental objectives are achieved.

**Table 1: Environmental Objectives, Assessment Criteria and Leading Performance Criteria**

Objective Number	Environmental Objectives	Assessment Criteria	Leading Performance Criteria	Controls Identified in the EIR
OBJ. 1	No significant dust generation/disturbance resulting from regulated activities in excess of the parameters outlined in the Environment Protection (Air Quality) Policy 2016.	<ul style="list-style-type: none"> <li>• Compliance with the following:           <ul style="list-style-type: none"> <li>– <i>Environment Protection Act 1993</i>.</li> <li>– Environment Protection (Air Quality) Policy 2016.</li> </ul> </li> <li>• Consultation with landowners and occupiers in the locality, the Council and other identified stakeholders to ensure potential impacts are identified and methodology to manage these are appropriately documented.</li> <li>• Stakeholder complaints are documented and steps taken to resolve them are demonstrated/document in a complaints register.</li> </ul>	<ul style="list-style-type: none"> <li>• Dust mitigation strategies are developed for inclusion in the CEMP and OMP.</li> <li>• Incorporate relevant EPA Air Quality objectives/policies into the CEMP and OMP.</li> <li>• Develop a community engagement strategy for construction and operational phases of the project, detailing ongoing consultation with landowners and occupiers in the locality, Port Augusta Community Reference Group, local suppliers and Council.</li> <li>• Establish and maintain a stakeholder complaints register.</li> </ul>	<ul style="list-style-type: none"> <li>• Air Quality (AQ1).</li> </ul>
OBJ. 2	No injuries, deaths or health impacts to the public or third parties from regulated activities that could have been reasonably prevented by the operator.	<ul style="list-style-type: none"> <li>• Compliance with manufacturer's instructions for installation and ongoing maintenance.</li> <li>• Fire prevention and firefighting equipment is present, certified and maintained in accordance with applicable standards.</li> <li>• Compliance with the following legislation:           <ul style="list-style-type: none"> <li>– <i>Bushfire Emergency Services Act 2005</i>.</li> <li>– <i>South Australian Fire and Emergency Services Act 2005</i></li> </ul> </li> <li>• Battery Management Systems (BMS) to be installed and maintained in accordance with manufacturer's instructions.</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporate monitoring and maintenance strategies in Fire and Emergency Management Plan of OMP.</li> <li>• Develop fire prevention and management procedures for inclusion in the OMP.</li> <li>• Develop Emergency Management Plan (EMP) and/or Incident Management Plan (IMP) for inclusion in the OMP.</li> <li>• Develop evacuation procedures for inclusion in the OMP.</li> </ul>	<ul style="list-style-type: none"> <li>• Air Quality (AQ2).</li> <li>• Fire Management (FM1).</li> <li>• Fire Management (FM2).</li> <li>• Fire Management (FM3).</li> <li>• Fire Management (FM4).</li> </ul>
OBJ. 3	No encroachment of construction machinery into airport/airfield airspace.	<ul style="list-style-type: none"> <li>• Restrict height of vehicles and machinery utilised during construction and maintenance to less than the existing structures on the subject land.</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporate equipment height restrictions and crane operation protocols in the CEMP and OMP.</li> </ul>	<ul style="list-style-type: none"> <li>• Aviation (AV1).</li> </ul>
OBJ. 4	No damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places.	<ul style="list-style-type: none"> <li>• Compliance with the following legislation:           <ul style="list-style-type: none"> <li>– <i>Aboriginal Heritage Act 1988</i>.</li> </ul> </li> <li>• Avoid damage, disturbance or interference to Aboriginal sites, objects or remains as required by the SA Aboriginal Heritage Act 1988.</li> <li>• Where damage or interference to Aboriginal heritage is unavoidable then application for authorisation in accordance with section 23 of the Aboriginal Heritage Act 1988 will be sought.</li> <li>• Where unexpected heritage discoveries occur, discoveries are to be reported to Aboriginal Affairs &amp; Reconciliation Attorney General's Department (AAR) as soon as reasonably practical in accordance with section 20 of the Aboriginal Heritage Act 1988.</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporate discovery protocols in the CEMP and OMP.</li> <li>• Development of and adherence to a cultural heritage management plan (if/as required).</li> </ul>	<ul style="list-style-type: none"> <li>• Cultural Heritage (CH1).</li> </ul>
OBJ. 5	No introduction or spread of weeds, pest animals, pathogens or diseases as a consequence of regulated activities.	<ul style="list-style-type: none"> <li>• Compliance with the following:           <ul style="list-style-type: none"> <li>– <i>Environment Protection and Biodiversity Conservation Act 1999</i>.</li> <li>– <i>Natural Resources Management Act 2004</i>.</li> <li>– <i>National Parks and Wildlife Act 1972</i>.</li> <li>– <i>Landscape South Australia Act 2019</i>.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Incorporate weed management and hygiene procedures in the CEMP and OMP.</li> <li>• Records demonstrate that all equipment and vehicles are inspected, and cleaned where required, before arrival at the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Declared, Pests, Plants and Animals (DP1).</li> </ul>

Objective Number	Environmental Objectives	Assessment Criteria	Leading Performance Criteria	Controls Identified in the EIR
OBJ. 6	No clearance of native vegetation or disturbance to native fauna unless prior approval under the relevant legislation is obtained.	<ul style="list-style-type: none"> <li>• Compliance with the following:           <ul style="list-style-type: none"> <li>– <i>Environment Protection and Biodiversity Conservation Act 1999.</i></li> <li>– <i>Native Vegetation Act 1991.</i></li> <li>– <i>National Parks and Wildlife Act 1972.</i></li> <li>– <i>Landscape South Australia Act 2019.</i></li> </ul> </li> <li>• Compliance with the NVC clearance approval and conditions.</li> <li>• Management and monitoring measures for any vegetation and or biodiversity impacts are documented in the Construction Environmental Management Plan, where required.</li> <li>• Records of audits/inspections carried out in accordance with the OMP demonstrate there has been no unauthorised clearing of native vegetation.</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporate weed management and hygiene procedures in the CEMP and OMP.</li> <li>• Records demonstrate that all equipment and vehicles are inspected, and cleaned where required, before arrival at the site.</li> <li>• Apply for NVC clearance approval.</li> <li>• Pay Significant Environmental Benefits (SEB) contribution fee.</li> <li>• Develop vegetation preservation and revegetation protocols for inclusion in the OMP.</li> <li>• Significant areas for native fauna are avoided.</li> <li>• Develop best practices for avoiding disturbance of fauna for inclusion in the OMP.</li> </ul>	<ul style="list-style-type: none"> <li>• Declared, Pests, Plants and Animals (DP1).</li> <li>• Ecology (E1).</li> <li>• Ecology (E2).</li> <li>• Ecology (E3).</li> <li>• Native Vegetation (NV1).</li> </ul>
OBJ. 7	Minimise disturbance or contamination of soil by hazardous substances or materials.	<ul style="list-style-type: none"> <li>• Compliance with the:           <ul style="list-style-type: none"> <li>– <i>Environment Protection Act 1993.</i></li> <li>– Environment Protection (Water Quality) Policy 2015.</li> <li>– Environment Protection Authority – Bunding and Spill Management Guidelines.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Develop a Hazard Management Plan for inclusion in the OMP.</li> </ul>	<ul style="list-style-type: none"> <li>• Hazardous Substances (HS1).</li> </ul>
OBJ. 8	No significant noise or vibration resulting from the regulated activities in excess of the parameters of the Environment Protection (Commercial and Industrial Noise) Policy 2023.	<ul style="list-style-type: none"> <li>• Compliance with the following:           <ul style="list-style-type: none"> <li>– <i>Environment Protection Act 1993.</i></li> <li>– Environment Protection (Commercial and Industrial Noise) Policy 2023.</li> </ul> </li> <li>• Guideline for the Management of Noise and Vibration: Construction and Maintenance Activities (Department of Infrastructure and Transport).</li> <li>• Australian Standard AS2436-2010: Guide to noise and vibration control on construction, demolition and maintenance sites.</li> <li>• An independent acoustical consultancy (other than the company that prepared the predictive acoustical report) must monitor noise levels at the identified receptors (in the Rural Living Zone), or other relevant noise sensitive receivers, to measure and assure compliance with the specified noise criteria.</li> <li>• Stakeholder complaints are documented and steps taken to resolve them is demonstrated/document in a complaints register.</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporate relevant EPA Noise objectives for construction in the CEMP/OMP.</li> <li>• Incorporate vehicle management techniques in the CEMP/OMP.</li> <li>• Incorporate recommendations of the Noise Modelling in the OMP.</li> <li>• Establish and maintain a stakeholder complaints register.</li> </ul>	<ul style="list-style-type: none"> <li>• Noise (N1).</li> <li>• Noise (N2).</li> <li>• Noise (N3).</li> </ul>
OBJ. 9	Minimise disruption to local residents, community and road users during construction.	<ul style="list-style-type: none"> <li>• Compliance with the following:           <ul style="list-style-type: none"> <li>– <i>Road Traffic Act 1961.</i></li> </ul> </li> <li>• Stakeholder complaints are documented and steps taken to resolve them is demonstrated/document in a complaints register.</li> </ul> <p>Management measures for provision of accommodation for workers are documented in the Construction Environmental Management Plan, where required.</p>	<ul style="list-style-type: none"> <li>• Develop traffic management measures for inclusion in the CEMP/OMP.</li> <li>• Develop a workers accommodation strategy</li> <li>• Establish and maintain a stakeholder complaints register.</li> <li>• Establish and operate a community benefit fund for the life of the project with a minimum annual contribution to the scheme of \$150/MWh indexed for CPI annually.</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic (T1).</li> <li>• Social (SOC2)</li> </ul>

Objective Number	Environmental Objectives	Assessment Criteria	Leading Performance Criteria	Controls Identified in the EIR
OBJ. 10	No significant changes in soil stability, structure, quality or composition resulting from regulated activities.	<ul style="list-style-type: none"> <li>Compliance with the following legislation:           <ul style="list-style-type: none"> <li><i>Environment Protection Act 1993.</i></li> <li>Environment Protection (Water Quality) Policy 2015.</li> <li>EPA: Stormwater Pollution Prevention, Code of Practice for the Building and Construction Industry.</li> </ul> </li> <li>Management and monitoring measures for erosion, sedimentation and surface water impacts documented in the CEMP/OMP.</li> </ul>	<ul style="list-style-type: none"> <li>Develop a SEDMP for inclusion in the CEMP/OMP.</li> <li>Sediment and erosion control measures installed in accordance with Stormwater Management Strategy by WGA.</li> <li>Develop a Hazard Management Plan (HMP) for inclusion in the CEMP/OMP.</li> </ul>	<ul style="list-style-type: none"> <li>Water, Quality, Erosion and Sedimentation (WQES1).</li> <li>Water, Quality, Erosion and Sedimentation (WQES2).</li> <li>Water, Quality, Erosion and Sedimentation (WQES3).</li> </ul>
OBJ. 12	Minimise visual impact of regulated activities.	<ul style="list-style-type: none"> <li>Due regard to the setback requirements of the Planning and Design Code outlined in <b>Table 6 of the EIR</b> as relevant to the <i>Planning, Development and Infrastructure Act 2016</i>.</li> <li>Ensure landscaping is planted and maintained in accordance with the approved plans.</li> <li>Stakeholder complaints are documented and steps taken to resolve them is demonstrated/document in a complaints register.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure final design incorporates appropriate boundary setbacks and suitable landscape screening particularly where activities are viewed from adjoining sensitive receivers.</li> <li>Develop a final landscaping plan for incorporation into the OMP.</li> <li>Ensure landscaping is planted and maintained in accordance with the approved plans.</li> </ul>	<ul style="list-style-type: none"> <li>Visual Impact (VI1).</li> <li>Visual Impact (VI2).</li> </ul>
OBJ. 13	Remediate and rehabilitate operational areas, where required.	<ul style="list-style-type: none"> <li>OMP includes a decommissioning and rehabilitation plan (or similar) that outlines how any infrastructure or equipment will be decommissioned and the land rehabilitated.</li> <li>Records of audits/inspections carried out in accordance with the decommissioning and rehabilitation plan demonstrates that land has been appropriately rehabilitated, including removal of surface structures and waste, re-contouring of the ground surface and revegetating (where required) consistent with pre-existing conditions (unless alternative agreement is reached with the regulator and landowner)</li> </ul>	<ul style="list-style-type: none"> <li>Develop a Decommissioning and Rehabilitation Plan for inclusion in the OMP.</li> <li>Final decommissioning and rehabilitation plan to be provided 6 months prior to decommissioning activities commencing. Plan to be approved by DEM.</li> <li>Rehabilitation is included in the projects time plan and budget.</li> </ul>	<ul style="list-style-type: none"> <li>Air Quality (AQ1).</li> <li>Aviation (AV1).</li> <li>Declared Pests, Plants and Animals (DP1).</li> <li>Ecology (E1).</li> <li>Ecology (E2).</li> <li>Ecology (E3).</li> <li>Fire Management (FM2).</li> <li>Noise (N1).</li> <li>Noise (N2).</li> <li>Water, Quality, Erosion and Sedimentation (WQES1).</li> <li>Water, Quality, Erosion and Sedimentation (WQES2).</li> <li>Visual Impact (VI2).</li> </ul>
OBJ. 14	Optimise waste management (in order of most to least preferable): avoidance; reduction; reuse; recycling; treatment; and disposal.	<ul style="list-style-type: none"> <li>Management measures for waste generated during the construction and decommissioning stages documented in the Construction Environmental Management Plan and decommissioning and rehabilitation plan.</li> <li>Records of audits/inspections carried out in accordance with the OMP demonstrate wastes have been segregated and transported to an EPA licensed waste disposal facility for recycling or disposal.</li> <li>Hazardous wastes (if generated) handled in accordance with relevant legislation and standards.</li> </ul>	<ul style="list-style-type: none"> <li>Waste is securely contained prior to removal from site.</li> <li>Waste management is undertaken in accordance with the EPA's Waste Hierarchy model, the <i>Environment Protection (Waste to Resources) Policy 2010</i> and the <i>Public Health (Wastewater) Regulations 2013</i>.</li> <li>Records of waste disposal to licensed contractors kept for proof of compliance.</li> </ul>	<ul style="list-style-type: none"> <li>Declared Pests, Plants and Animals (DP1)</li> <li>Visual Impact (VI1)</li> <li>Social environment, land use and infrastructure (#SOC1)</li> </ul>

## 2.3 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.

Most relevant to the leading performance control strategies is the development of a Construction Environmental Management Plan (CEMP) which must be in place prior to the commencement of any construction works on-site. The CEMP will include a range of control and monitoring measures that aims to manage and minimise environmental impacts during the construction phase of the project. Key aspects to be included are:

- Air quality
- Height restrictions
- Fire and emergency management
- Discovery protocols for cultural heritage
- Weed and hygiene management
- Vegetation preservation and revegetation
- Noise
- Stormwater
- Surface and/or groundwater
- Erosions control
- Traffic management

## 2.4 Operational Management Plan

Several of the identified assessment criteria refers to audits/inspections or management plans to be detailed 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 HRE Act. It is at this stage that the details of operations and activities are more refined which makes it suitable to capture these plans at the OMP stage.

To demonstrate compliance with this SEO and the achievement of relevant assessment criteria's, it is expected that the OMP will contain specific management plans that consider the controls identified in the EIR. This may include but is not limited to the following:

- Cultural Heritage Management Plan
- Fire Management Plan
- Emergency Management Plan
- Incident Management Plan
- Hazard Management Plan
- Weed/Pest/Pathogen Management Plan

- Soil Erosion and Drainage Management Plan
- Decommissioning and Rehabilitation Plan

Which plans are necessary is determined based on the individual project and the unique circumstances of the environment where the activities are proposed to be undertaken.

## **2.5 Consultation Requirements**

In accordance with the requirements under Section 63(3) of the HRE Act and HRE Regulation 33, the Proponent has undertaken consultation with relevant persons, including landowners, the Council, Government agencies and any potentially affected stakeholders on the information contained within this SEO and any potential impacts of the regulated activities and how the impacts will be adequately managed.

Consultation was undertaken during November 2025 in accordance with the associated Community Consultation Plan dated October 2025, submitted and approved by DEM, in conjunction with a draft SEO and draft EIR.

Following the consultation period, an Engagement Report has been prepared and incorporated in the final EIR (January 2026). The final EIR and SEO documents will be made available to the community and stakeholders. License holders are expected to engage and consult on any relevant management plans as necessary throughout the duration of the license period.

## 3 Reporting

### 3.1 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).

#### 3.1.1 *Immediately Reportable Incidents*

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

- (a) *An incident arising from activities conducted under a licence specified in the relevant statement of environmental objectives to be an immediately reportable incident; or*
- (b) *Any other matter brought within the ambit of this definition by the regulations.*
- (c) *Any event resulting in the activation of emergency response and/or evacuation procedures of an area or the need for emergency service personnel.*

#### 3.1.2 *Reportable Incidents*

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

*an incident (not being an immediately reportable incident) arising from activities conducted under a licence and specified in the statement of environmental objectives to be a reportable incident; or*

- (b) *an incident (not being an immediately reportable incident) arising from activities conducted under a licence and specified in the statement of environmental objectives to be a reportable incident; or*
- (c) *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

**Table 2** identifies the potential immediately reportable and reportable incidents relevant to associated licence activities, pursuant to Section 47 of the HRE Act.

**Table 2: Incident definitions for Associated Infrastructure Activities**

Immediately Reportable Incident	Reportable incident
<ol style="list-style-type: none"> <li>1. A person is seriously injured or killed.</li> <li>2. An imminent risk to public health or safety arises.</li> <li>3. Disturbance to Aboriginal and non-Aboriginal heritage without appropriate permits and approvals.</li> <li>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.</li> <li>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.</li> <li>6. Any removal of native flora and/or fauna without appropriate permits and approvals.</li> </ol> <p>Any event resulting in the activation of emergency response and/or evacuation procedures of an area or the need for emergency service personnel.</p>	<ol style="list-style-type: none"> <li>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).</li> <li>2. Malfunction or failure of critical plant or equipment that had (or still has) potential to cause an immediately reportable incident.</li> <li>3. Unresolved reasonable complaints from stakeholders regarding operations.</li> </ol> <p>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).</p>

### 3.2 Reporting Requirements

#### 3.2.1 Reporting Under the HRE Act

**Immediately Reportable Incidents** must be reported to the Minister within 24 hours after the licensee becomes aware of the occurrence of the incident, in accordance with Section 47(1) of the HRE Act. Additionally, in accordance with Section 47(b) and Regulation 30(1) and (2) a comprehensive report must be provided to the Minister within three (3) months (unless otherwise prescribed by the Minister) after the licensee becomes aware of the occurrence of the incident.

**Reportable Incidents** must be reported to the Minister on a quarterly basis (unless otherwise prescribed by the Minister) within 1 month after the end of each quarter in accordance with Section 47(2) of the HRE Act and Regulation 30(3).

#### 3.2.2 Reporting to the EPA

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

### **3.2.3 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 *South Australian Work Health and Safety Act 2012* (SA WHS Act).

### **3.2.4 Reporting Under Electricity Act**

Electricity safety incidents (death, incident requiring medical assistance, or other cases) must be reported to the Technical Regulator in accordance with regulation 70 of the *Electricity (General) Regulations 2012*, and section 63 of the *Electricity Act 1996*.

## 4 Abbreviations

Abbreviation	Meaning
AIL	Associated Infrastructure Licence
BESS	Battery Energy Storage System
BMS	Battery Management System
CEMP	Construction Environmental Management Plan
DEM	Department for Energy and Mining
EIR	Environmental Impact Report
EMP	Emergency Management Plan
EPA	Environment Protection Authority
EPA Act	<i>Environment Protection Act 1993</i>
FMP	Fire Management Plan
GGE or 'the Proponent'	Green Gold Energy
HMP	Hazard Management Plan
HRE Act	<i>Hydrogen and Renewable Energy Act 2023</i>
HRE Regs	<i>Hydrogen and Renewable Energy Regulations 2024</i>
IMP	Incident Management Plan
MW	Megawatts
MWH	Megawatt Hours
NVC	Native Vegetation Council
OMP	Operational Management Plan
SA WHS Act	<i>South Australian Work Health and Safety Act 2012</i>
SEB	Significant Environmental Benefit
SEDMP	Soil Erosion and Drainage Management Plan
SEO	Statement of Environmental Objectives

## 5 References

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