



MOOREBANK PRECINCT WEST – SSD 5066

**INDEPENDENT AUDIT REPORT**

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<b>Job_Title</b>	1932_MPW Stage 1 Independent Audit Report			
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## Executive Summary

Moorebank Precinct West (MPW) is part of the broader Moorebank Intermodal Terminal (MIT) development. The MIT development involves the construction and operation of intermodal freight terminal facilities at Moorebank in south-west Sydney, linked to Port Botany and the interstate rail network, and is a staged development, requiring a number of development consents over its duration.

Consent was granted for the MPW Concept Proposal and Early Works (Stage 1) (the Project) on 3 June 2016 (SSD 5066).

Tactical have been appointed as the client representative on behalf of Moorebank Intermodal Company. Liberty Industrial are the principal contractor. Early works construction commenced in March 2017. Demolition is now complete and the project proponent continues to undertake housekeeping, site establishment for new compounds, remediation and rehabilitation.

The objective of this Independent Audit is to comply with the Compliance Tracking Program (CTP) required by CoC A2 to SSD 5066 and approved by the Department of Planning and Environment on 21 February 2017. In particular, CoC A2(d) requires that the CTP include a program for independent environmental auditing in accordance with *AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems*.

The Independent Audit seeks to verify compliance with the relevant CoCs and assess the effectiveness of environmental management on the Project.

This Audit Report presents the findings from the first Independent Audit conducted by WolfPeak, for the period from March 2019 to July 2019.

The overall outcome of the Independent Audit was positive. Compliance records were organised and available at the time of the site inspection and interview with Tactical, Liberty Industrial, Tactical, HBI, and ResourceCo personnel on 17 July 2019. Relevant environmental and compliance monitoring records are being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

There were 72 CoCs and 33 CEMP and Sub-plan mitigation measures assessed. No non-compliances were identified. There were three observations identified in relation to the CoC. These related to storage of materials, sediment control and noise control. The presence of logistics activities being carried out by ResourceCo on the site was also noted as a matter of interest by the auditor.

Detailed findings are presented in Section 3. Actions proposed by the Project team to address the findings of this Independent Audit are set out in Section 4.

The overall outcome of the Independent Audit was indicative of a commitment to compliance and environmental performance by SIMTA and its representatives. The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the Independent Audit.

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## 1. Introduction

### 1.1 The Project

The Moorebank Precinct West (Stage 1) project (Project), is part of the Moorebank Precinct West (MPW) development which, in turn, is part of the broader Moorebank Intermodal Terminal (MIT) development. The MIT development involves the construction and operation of intermodal freight terminal facilities at Moorebank in south-west Sydney, linked to Port Botany and the interstate rail network.

The MPW development site is centred on an approximately 220 hectare area of Commonwealth-owned land, which is adjacent to the Southern Sydney Freight Line, the East Hills Rail Line, the M5 Motorway and Moorebank Avenue (as depicted in Figure 1).

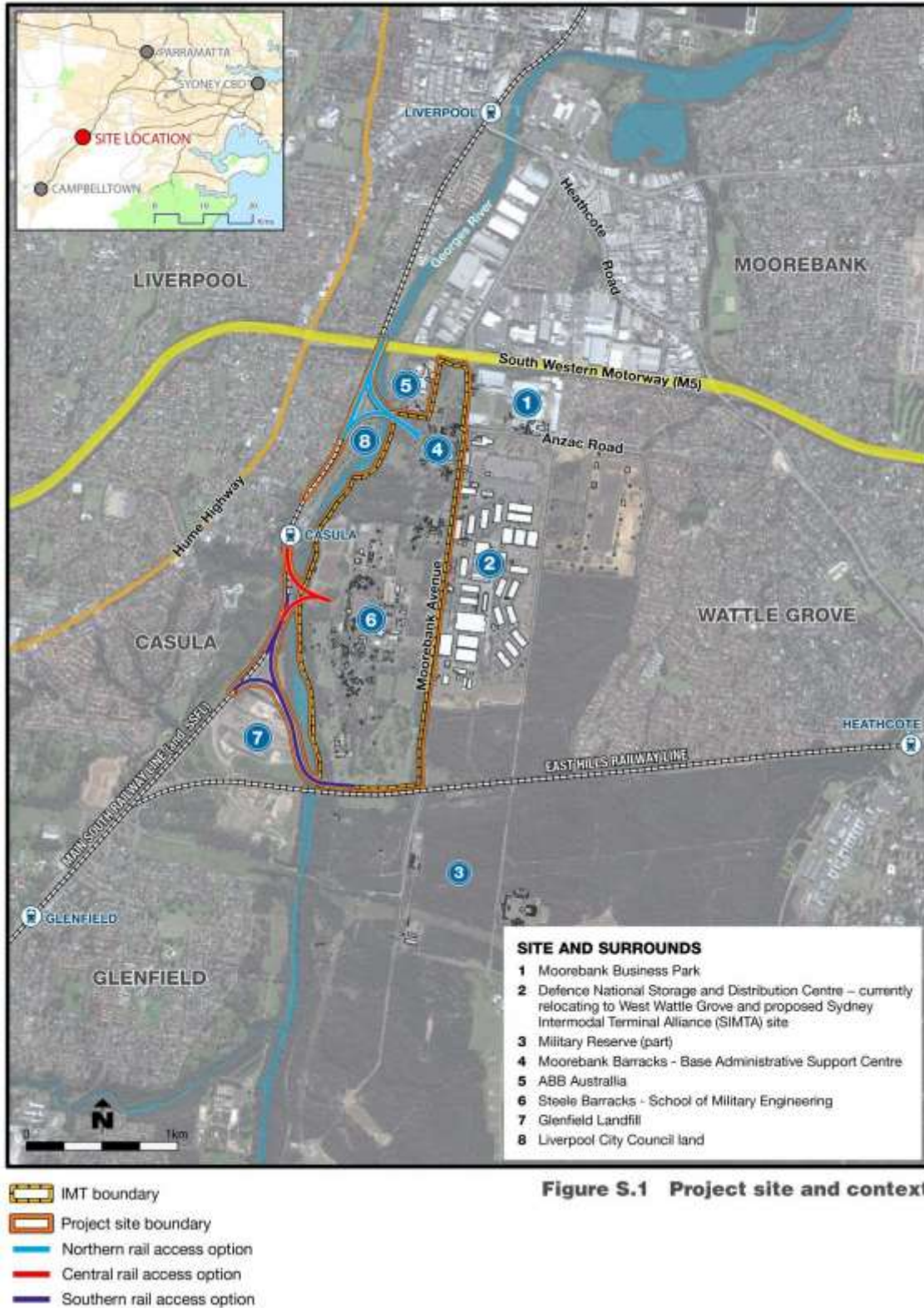
The MPW development is a staged development, requiring a number of development consents over its duration. The first of such consents, for the Concept Proposal and Early Works (Stage 1), was granted under section 89E of the *Environmental Planning and Assessment Act 1979* on 3 June 2016 (SSD 5066) subject to a number of conditions.

The approved Concept Proposal involved the use of the site as an intermodal facility, including a rail link to the Southern Sydney Freight Line, warehouse and distribution facilities, and associated works.

The approval for the MPW Early Works (Stage 1) involved the following works to the west of Moorebank Avenue:

- Demolition of buildings, including services termination and diversion
- Rehabilitation of the excavation/earthmoving training area
- Remediation of contaminated land
- Removal of underground storage tanks
- Heritage impact remediation works; and
- The establishment of construction facilities and access, including site security.

Early works construction commenced in March 2017. Demolition is now complete and the proponent continues to undertake housekeeping, site establishment for new compounds, remediation and rehabilitation.



**Figure S.1 Project site and context**

**Figure 1:** Project location (Moorebank Intermodal Terminal Project Environmental Impact Statement, Parsons Brinckerhoff, 2014)

## 1.2 Approval requirements

State Significant Development (SSD) 5066 Schedule 3, Condition of Consent (CoC) A2(d) requires that:

*The Applicant shall prepare and implement a **Compliance Tracking Program**, to track compliance with the requirements of this approval. The Program shall be submitted to the Secretary prior to the commencement of construction and operate for the duration of the Early Works stage.*

*The Program shall include, but not be limited to:*

...

- (d) *a program for independent environmental auditing in accordance with AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems*

...

A Compliance Tracking Program was prepared and approved by the Department on 3 February 2017.

It is WolfPeaks understanding that Independent Audits carried out under that CTP between March 2017 and March 2019 were managed by the demolition contractor under a separate Independent Audit Program.

The Independent Audit Program under that previous arrangement has now ceased and following the completion of those works, WolfPeak was engaged to prepare a further Independent Audit Program, in compliance with CoC A2(d), and to carry out the independent audits specified in that program. The new Independent Audit Program was finalised on 3 July 2019. This Independent Audit Report presents the findings from the first IA in accordance with the Program.

## 1.3 The audit team

The Audit Team comprises:

- Derek Low (Auditor Lead): Masters of Environmental Engineering Management, Exemplar Global Certified Principal Environmental Auditor (Certificate No 114283)
- Steve Fermio (Auditor): Bachelor of Science (Hons), Exemplar Global Certified Principal Environmental Auditor (Certificate No 110498).

Declarations of independent are presented in Appendix C.

## 1.4 The objectives of the audit

The objectives of this IA are to comply with the Independent Audit Program prepared in accordance with SSD) 5066 Schedule 3, Condition of Consent (CoC) A2(d), to verify compliance with the relevant CoCs and assess the effectiveness of environmental management on the Project.



## 1.5 The audit scope

The Project, having been granted consent in 2016, is not required to comply with the requirements of the 2018 Department of Planning and Environment guideline document *Independent Audit Post Approval Requirements* (IAPAR). However, for the sake of consistency and continuity with likely conditions within future consents, the Project has voluntarily elected to align its approach to Independent Audits with the IAPAR where appropriate, in addition to complying with *AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems*, as required by CoC A2(d).

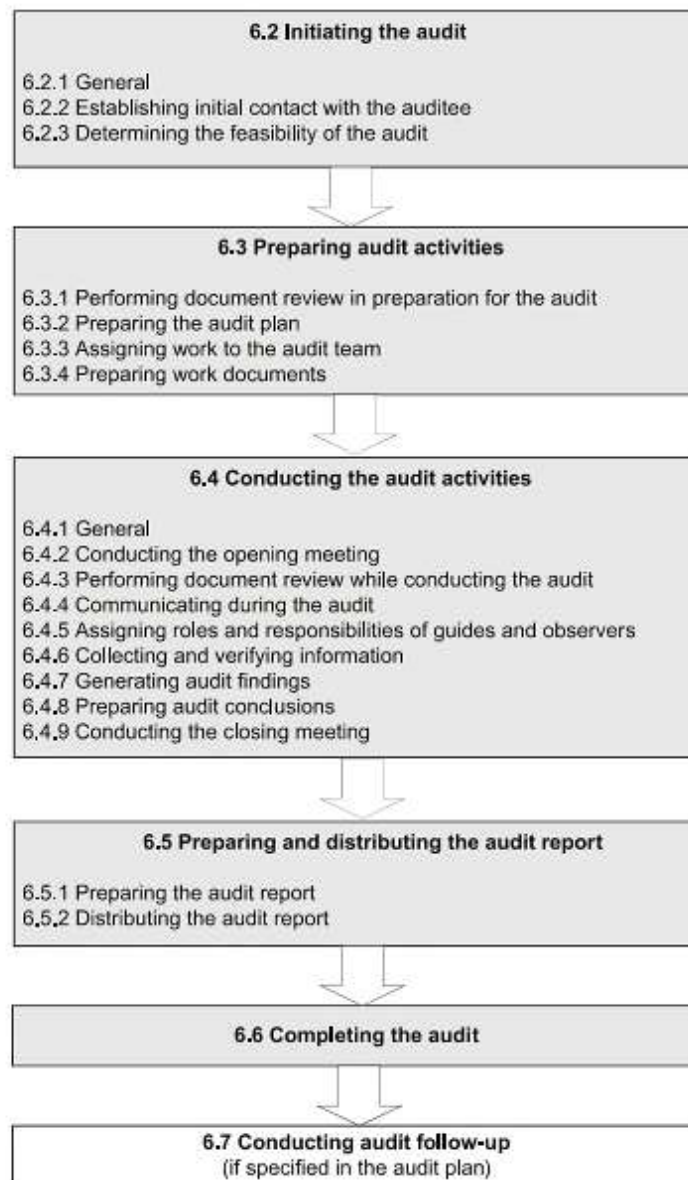
The scope of the IA comprises:

- an assessment of:
  - CoCs applicable to the phase of the development that is being audited
  - post approval documents prepared to satisfy the CoCs, including an assessment of the implementation of Environmental Management Plans and Sub-plans
  - all environmental licences and approvals applicable to the development (excluding environmental protection licences issued under the *Protection of the Environment Operations Act 1997*).
- an assessment of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - actual impacts compared to predicted impacts documented in the environmental impact assessment.
  - the physical extent of the development in comparison with the approved boundary, and any potential off-site impacts
  - incidents, non-compliances and complaints that occurred or were made during the audit period
  - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
  - feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period
- a review of the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
- a high-level review of the project's environmental management systems, including assessment of any third party certification of them, the type, nature and scope of the systems having regard to the nature and scale of the development, and the implementation of the systems.
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- details of any other matters considered relevant by the Auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

## 2. Audit methodology

### 2.1 Audit process

The IA was conducted in a manner consistent with AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems and the methodology set out in the Department’s IAPAR. An overview of the audit activities, as specified in the standard, is presented in Figure 2.



**Figure 2: Audit activities overview (AS/NZS ISO 19011:2014).** Subclause numbering refers to the relevant subclauses in the Standard.

### 2.1.1 Audit initiation and scope development

Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditee
- Confirm the audit team
- Confirm the audit purpose, scope and criteria.

### 2.1.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan, and prepared work documents (audit checklists) and distributed to the Project team in preparation for the IA.

The primary documents reviewed prior to the site visit are as follows:

- *Moorebank Intermodal Terminal Project Environmental Impact Statement, Parsons Brinckerhoff, October 2014 (the EIS)*
- *Development Consent SSD 5066, 3 June 2016 (the Consent)*
- *Moorebank Intermodal Terminal LPWDR Construction Environmental Management Plan, Rev I, Liberty Industrial, 13 December 2016 (the CEMP)*
- *Moorebank Intermodal Terminal Construction Traffic and Access Management Plan, Liberty Industrial, Rev 2, 15 November 2016 (the CTAMP)*
- *Moorebank Intermodal Terminal LPWDR Construction Air Quality Management Plan, Rev E, Liberty Industrial, 5 January 2017 (the CAQMP)*
- *Moorebank Intermodal Terminal Early Works Package: Construction Flora and Fauna Management Plan, Biosis, 10 February 2017 (the CFFMP)*
- *Moorebank Intermodal Terminal Early Works Package: Construction Heritage Management Plan, Biosis, 4 July 2017 (the CHMP)*
- *Noise & Vibration Management Plan; Early Works – Demolition and Remediation; Moorebank Intermodal Site; Moorebank Avenue, Moorebank, NSW, Rev F, Day Design Pty Ltd, 24 January 2017*
- *Moorebank Intermodal Terminal LPWDR Construction Soil and Water Management Plan, Rev H, Liberty Industrial, 18 January 2017 (the CSWMP)*
- *Moorebank Intermodal Terminal LPWDR Internal Construction Environmental Management Plan Audit, WSP, 28 February 2018*
- *Moorebank Precinct West – Early Works Per & Poly-Fluoroalkyl Substances (PFAS) Management Plan, Rev G, Construction and Remediation Advisory Services, 27 February 2018 (the PFASMP)*
- *Moorebank Precinct West; 6-Monthly Compliance Report; September 2018-February 2019, Arcadis, 19 June 2019*
- *Community Communication Strategy Sydney Intermodal Terminal Alliance, Rev 4, KJA, 1 February 2017.*

Audit checklists were reviewed and prepared. These comprised:

- Schedule 3 of SSD 5066 CoCs
- Select environmental management and mitigation measures as set out in the Project's CEMP and sub-plans.

### **2.1.3 Site personnel involvement**

The on-site audit activities took place on 17 July 2019. The following personnel took part in the audit:

- John Jagos, ResourceCo
- Brett Humphries, ResourceCo
- John Stefanovi, Environment Manager, Liberty Industrial
- Muhammad Fahmi Reza, Liberty Industrial
- Ian Irwin, Environment Manager, Tactical
- Rui Henriques, Environmental Representative, HBI
- Derek Low, Auditor, WolfPeak.

## **Meetings**

Opening and closing meetings were held with the Auditor and Project personnel.

During the opening meeting the objectives and scope of the IA, the resources required and methodology to be applied were discussed. At the closing meeting, preliminary audit findings must be presented, recommendations (if appropriate) must be made, and any post-audit actions were confirmed.

## **Interviews**

The Auditor conducted interviews with key personnel involved in Project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development.

### **2.1.4 Site inspection**

The on-site audit activities took place on 17 July 2019. The on-site audit activities included an inspection of the site and work activities. Photos are presented in Appendix D.

### **2.1.5 Document review**

The IA included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are included with Appendices A and B.

### **2.1.6 Generating audit findings**

IA findings were based on verifiable evidence. The evidence included:

- relevant records, documents and reports
- interviews of relevant site personnel
- photographs
- figures and plans; and
- site inspections of relevant locations, activities and processes.

WolfPeak notes that with respect to CoCs relating to compliance with the Building Codes of Australia (BCA) or satisfaction of the Certifying Authority, the IA relied on confirmation from the Certifying Authority that this is the case. The IA did not extend to an assessment of the Project against the BCA requirements themselves, nor did it examine what steps the Certifying Authority had undertaken to verify that the Project is BCA compliant or that the requirements of the CoCs had been met.

## **Compliance evaluation**

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR, being:

- **Compliant** – The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit
- **Non-compliant** – The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
- **Not triggered** – A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Observations and notes may also be made to provide context, identify opportunities for improvement or highlight positive initiatives.

#### **Evaluation of post approval documentation**

The Auditor assessed whether post approval documents:

- have been developed in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate; and
- have been implemented in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any).

The adequacy of post approval documents were determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document; and
- whether there are any opportunities for improvement.

#### **2.1.7 Completing the audit**

The IA Report was distributed to the proponent to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

### 3. Audit findings

#### 3.1 Approvals and documents audited and evidence sighted

The documents audited comprised all the conditions from Schedule 3 of SSD 5066 applicable to the works being undertaken, and selected mitigation measures and commitments from the following plans:

- CEMP
- CTAMP
- CAQMP
- CFFMP
- CHMP
- CNVMP
- CSWMP
- PFASMP.

The evidence sighted against each requirement is detailed within Appendices A and B.

#### 3.2 Compliance status

This Section presents the findings of the July 2019 IA.

Section 4 presents a summary of the findings from this IA and actions proposed or undertaken in response to the findings. The Audit Checklists provided in Appendices A and B present details of all the evidence collected, observed and provided in support of a finding.

##### 3.2.1 Summary

There were 72 CoCs and 33 CEMP and Sub-plan mitigation measures assessed. No non-compliances were identified against CoCs or mitigation measures and commitments within the CEMP and sub-plans.

##### 3.2.2 Non-compliances

Nothing to report.

##### 3.2.3 Corrective action requests and observations

There were three observations identified in relation to the CoCs.

##### **Observation in relation to CoC B10 and CoC D4**

CoC B10 requires that dangerous goods be stored and handled strictly in accordance with:

- (a) all relevant Australian Standards;

- (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and
- (c) the *Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin* (Environment Protection Authority, 1997).

CoC D4 requires that all chemicals, fuels and oils used on-site be stored in appropriately banded areas.

At the time of the site inspection on 17 July 2019, it was observed that there were several containers at the ResourceCo compound that were not in a banded location. It was unclear if these drums were in use or being stored.

#### **Observation in relation to CoC B12**

CoC B12 requires that, during Early Works, the Applicant to ensure that:

- (a) all vehicles on site do not exceed a speed limit of 30 kilometres per hour; and
- (b) all loaded vehicles entering or leaving the site have their loads covered; and all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads.

At the site inspection on 17 July 2019, it was observed that, whilst not attributable to any one project (IMEX, RALP, MPE Stg 2, MPW), the combination of works in the area has resulted in material tracking onto and along Moorebank Avenue.

However, on 25 July 2019 it was observed that Moorebank Avenue had been cleaned.

#### **Observation in relation to CoC D7**

CoC D7 sets out specific circumstances in which works may be undertaken outside the hours specified in conditions D5 and D6, including where works are construction works that cause LAeq (15 minute) noise levels that are:

- (a) No more than 5 dB above rating background level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009); and
- (b) no more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive landuses.

ResourceCo indicated that it operates truck movements prior to 7:00 am. This involves drivers starting their engines and exiting the site to other projects (via Moorebank Ave and M5). Basic predictions indicate that these would be <5dB(A) above the RBL. Nevertheless, it is observed that these works could generate complaints if not managed.

Refer to Section 3.6 regarding the Auditors consideration of the presence of ResourceCo operations on site.



### **3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents**

The adequacy of post approval documents must be determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document; and
- whether there are any opportunities for improvement.

A review was conducted of the

- CEMP
- CTAMP
- CAQMP
- CFFMP
- CHMP
- CNVMP
- CSWMP
- PFASMP.

The documents are adequate for the works being undertaken.

### **3.4 Project's EMS**

Liberty Industrial operate a Management System for the Project. In carrying out the IA, it was evident that the elements of AS/NZ ISO 14001-2016 Environmental Management Systems are being implemented via the CEMP and sub-plans. Evidence to support this include the documents sighted during the audit (detailed in Appendices A and B) and controls observed in the field.

### **3.5 Summary of notices from agencies**

The Auditor is not aware of any notices served on the Project by agencies during the audit period.

### **3.6 Other matters considered relevant by the auditor or DPE**

During the IA it was identified that ResourceCo were operating a logistics compound on site (comprising temporary sheds, laydown, maintenance and parking), that stationed approximately 30 x trucks on site for purposes not exclusive to the Project. Whilst the compound is limited in size and impacts on the environment and community would be expected to be less than that generated by the Project, the status of consent was not able to be confirmed.

SIMTA prepared an assessment identifying that the activity is consistent with the approved Project, and that the activity would be considered exempt or complying development. The auditor is of the opinion that the activity is not consistent with the approved Project. Whether or not the activity is considered complying development is outside the scope of this audit.

### **3.7 Complaints**

A complaints register is being maintained for the entire MIT development. Complaints in the register presented are not specific to the Project (i.e.: a complaint would be raised about the broader development, rather than any activity associated with the Project and Tactical would investigate accordingly). Tactical advise that no complaints were received for the Project during the audit period.

### **3.8 Incidents**

The Project has not identified any incidents as defined by the Consent during the audit period.

## 4. Actions

Item	Cond No	Type	Details of item	Proposed or completed action by the auditee	By whom and by when	Status
<b>JULY 2019 AUDIT FINDINGS</b>						
<b>Conditions of Consent SSD 5066 Schedule 3</b>						
1	CoC B10 and D4	Observation	<p>CoC B10 requires that dangerous goods be stored and handled strictly in accordance with:</p> <ul style="list-style-type: none"> <li>(d) all relevant Australian Standards;</li> <li>(e) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</li> <li>(f) the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (Environment Protection Authority, 1997).</li> </ul> <p>CoC D4 requires that all chemicals, fuels and oils used on-site be stored in appropriately bunded areas.</p> <p>At the time of the site inspection on 17/07/2019, it was observed that there were several containers at the ResourceCo compound that were not in a bunded location. It was unclear if these were in use or being stored.</p>	A portable chemical bund has been purchased and placed in the storage container to ensure compliance	18 August 2019	CLOSED
2	CoC B12	Observation	<p>CoC B12 requires that, during Early Works, the Applicant to ensure that:</p> <ul style="list-style-type: none"> <li>(a) all vehicles on site do not exceed a speed limit of 30 kilometres per hour; and</li> <li>(b) all loaded vehicles entering or leaving the site have their loads covered; and all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads.</li> </ul> <p>At the site inspection on 17/07/2019, it was observed that, whilst not attributable to any one project (IMEX, RALP, MPE Stg 2, MPW), the combination of works in the area has resulted in material tracking onto and along Moorebank Avenue.</p>	Moorebank Avenue was observed to have been cleaned after the site inspection.	-	CLOSED

3	CoC D7	Observation	<p>CoC D7 sets out specific circumstances in which works may be undertaken outside the hours specified in conditions D5 and D6, including where works are construction works that cause <math>L_{Aeq (15 \text{ minute})}</math> noise levels that are:</p> <ul style="list-style-type: none"> <li>(a) No more than 5 dB above rating background level at any residence in accordance with the <i>Interim Construction Noise Guideline (DECC, 2009)</i>; and</li> <li>(b) no more than the noise management levels specified in Table 3 of the <i>Interim Construction Noise Guideline (DECC, 2009)</i> at other sensitive landuses;</li> </ul> <p>ResourceCo indicated that it operates truck movements prior to 0700. This involves drivers starting their engines and exiting the site to other projects (via Moorebank Ave and M5). Basic predictions indicate that these would be &lt;5dB(A) above the RBL. Nevertheless, it is observed that these works could generate complaints if not managed.</p>	<p>An assessment was prepared for the ER on 13 August 2019. It identifies the installation of an acoustic bund adjacent to a dedicated access track as a reasonable and feasible measure to enable compliance to be demonstrated in accordance with CoC D7 and minimising the likelihood of a complaint being generated by imposing a line of site barrier between the most proximate residential receivers and the noise source. This acoustic bund will be utilised during the undertaking of MPW Stage 1 rehabilitation works of the earthmoving / excavation area.</p>	1 January 2020	OPEN
4	-	Observation	<p>During the IA it was identified that ResourceCo were operating a logistics compound on site (comprising temporary sheds, laydown, maintenance and parking), that stationed approximately 30 x trucks on site for purposes not exclusive to the Project. Whilst the compound is limited in size and impacts on the environment and community would be expected to be less than that</p>	-	-	CLOSED

			<p>generated by the Project, the status of consent was not able to be confirmed.</p> <p>SIMTA prepared an assessment identifying that the activity is consistent with the approved project, and that the activity would be considered exempt or complying development. The auditor is of the opinion that the activity (not exclusive to the SSD) is not consistent with the approved project. Whether or not the activity is considered complying development is outside the scope of this audit.</p>			
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## 5. Conclusions

The overall outcome of the IA was positive. The majority of compliance records were organised and available at the time of the site inspection and interview with PHS personnel on 19 June 2019.

Relevant environmental and compliance monitoring records are being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

There were 72 CoCs and 33 CEMP and Sub-plan mitigation measures assessed. No non-compliances were identified. There were three observations identified in relation to the CoC. These related to storage of materials, sediment control and noise control. The presence of logistics activities being carried out by ResourceCo on the site was also noted as a matter of interest by the auditor.

Detailed findings are presented in Section 3. Actions proposed by the Project team to address the findings of this IA are set out in Section 4.

The overall outcome of the IA was indicative of a good degree of compliance and environmental performance by SINSW, Mace and Taylor. The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the IA.

## 6. Limitations

This Document has been provided by WolfPeak Pty Ltd (WolfPeak) to the Client and is subject to the following limitations:

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## Appendix A. SSD 5066 Conditions of Consent

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Schedule 3</b>				
<b>Conditions to be met for Early Works (Stage 1)</b>				
<b>Part A Administrative conditions</b>				
<b>Subject Land</b>				
A1	The land subject to this part relates to the intermodal site (Lot 1 DP 1197707, Lot 100 DP 1049508, Lot 101 DP 1049508 and Lot 2 DP 1197707).	Interview with auditees 17/07/19  CEMP <a href="https://simta.com.au/wp-content/uploads/2018/04/Construction%20Environmental%20Management%20Plan%20(CEMP).pdf">https://simta.com.au/wp-content/uploads/2018/04/Construction%20Environmental%20Management%20Plan%20(CEMP).pdf</a>	The land remains unchanged from that approved	Compliant
<b>Compliance Monitoring and Tracking</b>				
A2	The Applicant shall prepare and implement a <b>Compliance Tracking Program</b> , to track compliance with the requirements of this approval. The Program shall be submitted to the Secretary for approval prior to the commencement of construction and operate for the duration of the Early Works stage.  The Program shall include, but not be limited to: <ul style="list-style-type: none"> <li>(a) provision for the notification to the Secretary prior to the commencement of construction;</li> <li>(b) provision for periodic review of the compliance status of the SSD against the requirements of this approval;</li> <li>(c) provision for periodic reporting of compliance status to the Secretary, including but not limited to: <ul style="list-style-type: none"> <li>(i) a Pre-Construction Compliance Report prior to the commencement of early works,</li> <li>(ii) Six-monthly, or other timing as agreed by the Secretary, Early Works Compliance Reports, for the duration of early works, and</li> <li>(iii) a Completion Compliance Report within one month of completion of the early works stage;</li> </ul> </li> </ul>	CTP <a href="https://simta.com.au/wp-content/uploads/2018/04/Compliance%20Tracking%20Program.pdf">https://simta.com.au/wp-content/uploads/2018/04/Compliance%20Tracking%20Program.pdf</a>	A CTP was prepared and approved by the Department on 03/02/17	Compliant



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	(d) a program for independent environmental auditing in accordance with <i>AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems</i> ; (e) mechanisms for recording environmental incidents during construction and actions taken in response to those incidents; (f) provision for reporting environmental incidents to the Secretary during construction, in accordance with conditions A3 and A4; (g) procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management; and (h) provision for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.			
<b>Incident Reporting</b>				
A3	<p>The Applicant shall notify the Secretary and relevant public authorities of any incident with actual or potential significant on-site or off-site impacts on human health or the biophysical environment within 24 hours of becoming aware of the incident. The Applicant shall provide full written details of the incident to the Secretary within seven days of the date on which the incident occurred.</p> <p><i>Note:</i></p> <ul style="list-style-type: none"> <li>Where an incident also requires reporting to the EPA and/or OEH, the incident report prepared for the purposes of notifying the EPA and/or OEH would meet this requirement.</li> </ul>	<p>Incident reports register.</p> <p>Incident report CO6528-219.</p> <p>EPA correspondence 04/07/19.</p>	<p>11 x incidents recorded. Only 1 environmental / human health related incident. This did not pose actual or potential significant on site or off site impacts.</p> <p>On 01/05/19 contaminated material was imported from Chatswood Metro dive site was contaminated with VOCs. It was reported to CO6528-219 to EPA as the material did not material import requirements of the project EPL.</p> <p>Subsequent investigation determined that the material met the import requirements. EPA provided written confirmation of compliance 04/07/19.</p>	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A4	The Applicant shall meet the requirements of the Secretary or relevant public authority (as determined by the Secretary) to address the cause or impact of any incident, as it relates to this approval, reported in accordance with condition A3, within such period as the Secretary may require.	Interview with auditees 17/07/19	None.	Not triggered
<b>PART B PRIOR TO CONSTRUCTION</b>				
This audit was conducted during the caretaker period of project works and does not assess conditions that relate to the period prior to construction or during construction (unless they extend into the caretaker period). For information pertaining to compliance during the earlier stages of work, the reader to refer to the previous Audit Report/s and the Compliance R				
<b>Demolition</b>				
B1	The Applicant shall ensure that all demolition work is carried out in accordance with <i>Australian Standard AS 2601:2001: The Demolition of Structures</i> , or its latest version.	-	This condition falls outside this Independent Audit period.	Not triggered
<b>Contamination</b>				
B2	The approved works (including any excavation required for remediation) must not occur below 5 metres AHD and lower the watertable below 1m AHD on adjacent class 1, 2, 3, 4 land in accordance with the Liverpool Local Environmental Plan 2008.	-	This condition falls outside this Independent Audit period.	Not triggered
B3	<p>The subject site is to be remediated in accordance with:</p> <ul style="list-style-type: none"> <li>(a) The approved Remedial Action Plan;</li> <li>(b) <i>State Environmental Planning Policy No. 55 - Remediation of Land</i>; and</li> <li>(c) The guidelines in force under the <i>Contaminated Land Management Act</i>.</li> </ul> <p>Amendments to the approved Remedial Action Plan required as a result of further site investigations must be approved by the site auditor, in consultation with the EPA.</p> <p>Within 3 months after the completion of the remediation works, a notice of completion, including a validation and/or monitoring report is to be provided to the Secretary. This notice must be consistent with <i>State Environmental Planning Policy No. 55 - Remediation of Land</i>.</p> <p>The validation and/or monitoring report is to be independently audited and a Site Audit Statement Issued. The audit is to be carried out by an independent auditor accredited by the Environment Protection Authority. Any conditions recorded on the Site Audit Statement are to be complied with.</p>	Correspondence from SIMTA to site auditor 05/02/19 and 14/03/19	SIMTA have provided the validation report and EMP to the auditor for review. The documents report delivery of the RAP and any long term requirements for the site. At the current point of time remediation works are no longer active. The need for any further remediation works will be determined by the Con Site Auditor. Once satisfied a SAR and SAS will be issued. DPIE will be advised at this time.	Compliant
<b>Soil, Water Quality and Hydrology</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B4	The Early Works shall be undertaken to comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> , which prohibits the pollution of waters.	Site inspection 17/07/19 Interviews with auditees 17/07/19	There were no incidents with the potential to pollute waters that occurred during the audit period.	Compliant
B5	All activities taking place in, on or under waterfront land, as defined in the <i>Water Management Act 2000</i> should be conducted generally in accordance with the NSW Office of Water's Guidelines for Controlled Activities.	-	This condition falls outside this Independent Audit period.	Not triggered
<b>Heritage</b>				
B6	The Applicant shall not harm, modify or otherwise impact any heritage items outside the subject site.	-	This condition falls outside this Independent Audit period.	Not triggered
B7	<p>B7 Prior to the commencement of Early Works affecting Aboriginal sites MA1, MA2, MA3, MA4 , MA5 and MA9, the Applicant shall:</p> <ul style="list-style-type: none"> <li>(a) develop a detailed salvage strategy, prepared in consultation with the OEH (Aboriginal heritage) and the Aboriginal stakeholders. The investigation program shall be prepared to the satisfaction of the Secretary; and</li> <li>(b) undertake any further archaeological excavation works recommended by the results of the Aboriginal archaeological investigation program.</li> </ul> <p>Within twelve months of completing the above work, unless otherwise agreed by the Secretary, the Applicant shall submit a report containing the findings of the excavations, including artefact analysis and Aboriginal Site Impacts Recording Forms (ASIR), and the identification of final storage location for all Aboriginal objects recovered (testing and salvage), prepared in consultation with the Aboriginal stakeholders, the OEH (Aboriginal heritage) and to the satisfaction of the Secretary.</p> <p><i>Note: where archaeological testing has occurred as part of the Environmental Assessment and the results are included in the documents listed in condition 4 the sites tested must still form part of the final report prepared under B7(b).</i></p>	-	This condition falls outside this Independent Audit period.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B8	<p>Prior to the commencement of Early Works affecting non-Aboriginal sites MHPAD1 and MHPAD2, the Applicant shall undertake any further archaeological excavation works recommended by the results of the non-Aboriginal archaeological investigation program.</p> <p>Within 12 months of completing the above work, unless otherwise agreed by the Secretary, the Applicant shall submit a report containing the findings of the excavations, including artefact analysis, and the identification of a final repository for finds, prepared in consultation with the OEH (Heritage branch) and to the satisfaction of the Secretary.</p> <p><i>Note: where archaeological testing has occurred as part of the environmental assessment and the results are included in the documents listed in condition 4, the sites tested must still form part of the methodology and final report prepared for the non-Aboriginal archaeological investigation program.</i></p>	-	This condition falls outside this Independent Audit period.	Not triggered
B9	<p>Prior to the commencement of Early Works affecting the CUST Hut, RAAF STRARCH Hangar, the Dog Cemetery and Commemorative Gardens, the Applicant shall prepare a report in consultation with the Heritage Council of NSW, the local Council and the local Historical Society which considers the options for mitigation of these items. In relation to the Dog Cemetery, consultation should also occur with the School of Military Engineering's Explosive Detection Dog's Unit. The report shall include the archival recordings and the historical research, where required, to the Secretary, the Heritage Council of NSW, the local Council and the local Historical Society.</p>	-	This condition falls outside this Independent Audit period.	Not triggered
<b>Dangerous Goods</b>				
B10	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with:</p> <ul style="list-style-type: none"> <li>(g) all relevant Australian Standards;</li> <li>(h) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</li> <li>(i) the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (Environment Protection Authority, 1997).</li> </ul> <p>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>	Site inspection 17/07/19	<p>Hazardous chemical storage was well managed, with adequate bunding and SDSs available.</p> <p><b>Observation: There were several containers at the ResourceCo compound that were not stored in a bunded location.</b></p>	Compliant
<b>Dust Management</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B11	The Applicant shall carry out all feasible and reasonable measures to minimise dust generated by the Development.	Site inspection 17/07/19 Information presented in response to review of implementation of AQMP (refer appendix B)	The Project appears to be implementing measure to minimise dust generation	Compliant
B12	During Early Works, the Applicant shall ensure that: (c) all vehicles on site do not exceed a speed limit of 30 kilometres per hour; and (d) all loaded vehicles entering or leaving the site have their loads covered; and all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads.	Site inspection 17/07/19  PIWW driver induction code of conduct	The code of conduct includes details relating to hours, material tracking, parking, idling and so forth.  Stabilised access and site speed limits were observed.  <b>Observation: Whilst not attributable to any one project (IMEX, RALP, MPE Stg 2, MPW), The combination of works in the area has resulted in material tracking onto and along Moorebank Avenue. Moorebank Avenue was observed to have been cleaned after this audit.</b>	Compliant
<b>Waste Management</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B13	The reuse and/or recycling of waste materials generated on site shall be maximised as far as practicable, to minimise the need for treatment or disposal of those materials off site.	Site inspection 17/07/19	The site is in caretaker mode. Some minor works are occurring near the main access gate to construct a more permanent access and haul road. This is being constructed of imported crushed sandstone. The material on site is predominantly top soil for rehab. The next stage of works requires substantial volumes of imported fill.	Compliant
B14	All liquid and/or non-liquid waste generated on the site shall be assessed and classified in accordance with <i>Waste Classification Guidelines</i> (Department of Environment, Climate Change and Water 2009).	Discharge water forms covering each month.	Discharge forms cover parameters, and authorisation. No issues.  25 x JBS&G PFAS water test reports completed.	Compliant
B15	All waste materials removed from the subject site shall only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Site inspection 17/07/19 Interview with auditees 17/07/19	The only wastes being generated by the Project during the caretake period are pre-classified general waste from compounds, liquid waste from compounds and so forth. Sighted skip bins and waste types. These are being sent to landfill. No s143 sites are being used. No issues.  <b>RFI: SIMTA to provide a copy of the MPW S1 waste register.</b>	Compliant
<b>Utilities and Services</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B16	Utilities, services and other infrastructure potentially affected by construction and operation shall be identified prior to construction to determine requirements for access to, diversion, protection, and/or support. Consultation with the relevant owner and/or provider of services that are likely to be affected by the Early Works shall be undertaken to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure as required. The cost of any such arrangements shall be borne by the Applicant, or as otherwise agreed between the parties.	-	This condition falls outside this Independent Audit period.	Not triggered
B17	The Applicant shall prepare dilapidation surveys and reports on the condition of local roads, footpaths, services and utilities affected by Early Works. The Applicant shall carry out rectification work at the Applicant's expense and to the reasonable requirements of the owners for damage resulting from the completion of Early Works.	-	This condition falls outside this Independent Audit period.	Not triggered
B18	The Applicant shall ensure that the construction and operation of the proposed development will not prevent the existing use of Moorebank Avenue as a public road to a standard commensurate to its current use prior to the development.  <i>Note: temporary closures or part closures and changes to operation of Moorebank Ave may occur for limited periods during construction as detailed in the Construction Traffic Management Plan.</i>	Site inspection 17/07/19	Moorebank Ave is not a public road. It is owned by Defence and provided to Qube as the operator.  The only interface is with the ABB access road. This access is maintained at all times other than crossing of the road under traffic control.  No issues observed.	Compliant
<b>PART C COMMUNITY INFORMATION AND REPORTING</b>				
<b>Community Communication Strategy</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C1	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a <b>Community Communication Strategy</b> to the satisfaction of the Secretary. The Strategy shall provide mechanisms to facilitate communication between the Applicant (and its contractor(s)), the Environmental Representative (see condition D1), the relevant Council and community stakeholders (particularly adjoining landowners) on the design and construction environmental management of the Early Works. The Strategy shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>(a) identification of stakeholders to be consulted as part of the Strategy, including affected and adjoining landowners, key community and business groups, and community and social service organisations;</li> <li>(b) procedures and mechanisms for the regular distribution of accessible information to community stakeholders on construction progress and matters associated with environmental management, including provision of information in appropriate community languages;</li> <li>(c) procedures and mechanisms through which the community stakeholders can discuss or provide feedback to the Applicant and/or Environmental Representative in relation to the environmental management and delivery of the SSD;</li> <li>(d) procedures and mechanisms through which the Applicant can respond to enquiries or feedback from the community stakeholders in relation to the environmental management and delivery of the SSD; and</li> <li>(e) procedures and mechanisms that would be implemented to resolve issues/ disputes that may arise between parties on the matters relating to environmental management and the delivery of the SSD, including but not limited to disputes regarding rectification or compensation for impacts to third party property and infrastructure. These procedures and mechanisms may include the use of a suitably qualified and experienced independent mediator.</li> </ul>	6-monthly Compliance Report	<p>Note that this is outside of the Audit period and therefore relies on information presented in the 6-monthly Compliance Report.</p> <p>The CCS was approved by the Secretary on 21/02/2017.</p>	Not triggered
<b>Complaints and Enquiries Procedure</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C2	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall ensure that the following are available for community enquiries and complaints for the duration of Early Works:</p> <ul style="list-style-type: none"> <li>(a) a 24 hour telephone number(s) on which complaints and enquiries about the SSD may be registered;</li> <li>(b) a postal address to which written complaints and enquires may be sent;</li> <li>(c) an email address to which electronic complaints and enquiries may be transmitted; and</li> <li>(d) a mediation system for complaints unable to be resolved.</li> </ul> <p>The telephone number, the postal address and the email address shall be published in newspaper(s) circulating in the local area prior to the commencement of construction and prior to the commencement of operation. This information shall also be provided on the website (or dedicated pages) required by this approval.</p>	<p>6-monthly Compliance Report</p> <p><a href="http://www.simta.com.au">www.simta.com.au</a></p>	<p>The Complaints Management System and protocols are included in the CCS. The CCS was approved by the Secretary on 21/02/2017.</p> <p>24hr info line 1800 986 465 www.simta.com.au simta@elton.com.au PO Box 1488 Bondi Junction NSW 2022.</p>	Compliant
C3	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a <b>Construction Complaints Management System</b> consistent with <i>AS ISO 10002-2006 Customer satisfaction - Guidelines for complaints handling in organisations (ISO 10002:2004, MOD)</i> and maintain the System for the duration of Early Works and up to 12 months following completion of this stage.</p> <p>Information on all complaints received, including the means by which they were addressed and whether resolution was reached, with or without mediation, shall be maintained in a complaints register and included in the construction compliance reports required by this approval. The information contained within the System shall be made available to the Secretary on request.</p>	<p>6-monthly Compliance Report</p> <p>Complaints register</p>	<p>Note that the preparation of the Complaints Management System is outside of the Audit period and therefore relies on information presented in the 6-monthly Compliance Report.</p> <p>The Complaints Management System and protocols are included in the CCS. The CCS was approved by the Secretary on 21/02/2017.</p> <p>The Complaints Register is precinct wide and appears to be implemented.</p>	Compliant
<b>Provision of Electronic Information</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C4	<p>Prior to commencement of the Early Works, or as otherwise agreed by the Secretary, the Applicant shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the SSD, for the duration of Early Works. The Applicant shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including, but not necessarily limited to:</p> <ul style="list-style-type: none"> <li>(a) information on the current implementation status of the SSD;</li> <li>(b) a copy of the documents listed in condition 4, and any documentation supporting modifications to this approval that may be granted from time to time;</li> <li>(c) a copy of this approval and any future modification to this approval;</li> <li>(d) a copy of each relevant environmental approval, licence or permit required and obtained in relation to the SSD;</li> <li>(e) a copy of each current report, plan, or other document required under this approval;</li> <li>(f) the outcomes of compliance tracking in accordance with condition A2 of this approval; and</li> <li>(g) details of contact point(s) to which community complaints and enquiries may be directed, including a telephone number, a postal address and an email address.</li> </ul>	<a href="http://www.simta.com.au">www.simta.com.au</a>	The website contains the information required by this condition	Compliant
<b>PART D CONSTRUCTION ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</b>				
<b>Environmental Representative</b>				
D1	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall appoint a suitably qualified and experienced Environmental Representative(s) that is independent of the design and construction personnel, and that has been approved by the Secretary. The Applicant shall employ the Environmental Representative(s) for the duration of construction of this stage, or as otherwise agreed by the Secretary. The Environment Representative(s) shall:</p> <ul style="list-style-type: none"> <li>(a) be the principal point of advice in relation to the environmental performance of the Early Works;</li> <li>(b) monitor the implementation of environmental management plans and monitoring programs required under this approval and advise the Applicant upon the achievement of these plans/programs;</li> <li>(c) have responsibility for considering, and advising the Applicant on, matters specified in the conditions of this approval, and other licences and approvals related to the environmental performance and impacts of the Early Works;</li> <li>(d) ensure that environmental auditing is undertaken in accordance with the Applicant's Environmental Management System(s);</li> </ul>	<p>6-monthly compliance report</p> <p>Site inspection 17/07/19</p> <p>Interview with auditees 17/07/19</p>	<p>Appointment of the ER occurred outside of the audit period.</p> <p>The nominated ER was approved by DP&amp;E on 19/07/2016.</p> <p>The ER attended the audit.</p> <p>The ER prepares and submits monthly reports (refer response to CoC D2)</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>(e) be given the authority to approve/reject minor amendments to the Construction Environment Management Plan. What constitutes a “minor” amendment shall be clearly explained in the Construction Environment Management Plan;</p> <p>(f) be given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts; and be consulted in responding to the community concerning the environmental performance of the Early Works where the resolution of points of conflict between the Applicant and the community is required.</p>			
D2	The Environmental Representative shall prepare and submit to the Secretary a three monthly report on the Environmental Representative’s actions and decision on matters specified in condition D1 for the preceding month. The reports shall be submitted within seven (7) days for the end of each month for the duration of Early Works, or as otherwise agreed by the Secretary. Notwithstanding, the Environmental Representative shall be given the independence to report to the Secretary at any time and/or at the request of the Secretary.	<p>ER Report 9, dated 12/12/2018, for period 01/09/2018-30/11/2018</p> <p>ER Report 10, dated 08/03/2019, for period 01/12/2018-28/02/2019</p> <p>ER Report 11, dated 07/06/2019, for period 01/03/2019-31/05/2019</p>	ER reports 9,10 and 11 establish compliance.	Compliant
<b>Construction Soil and Water Management</b>				
D3	Soil and water management measures consistent with <i>Managing Urban Stormwater - Soils and Construction Vols 1 and 2, 4th Edition</i> (Landcom, 2004) shall be employed during Early Works to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters.	Site inspection 17/07/19 ERSED plans PA1650/MA/1041	<p>Plans prepared by a CPESC and updated by a competent person.</p> <p>Controls in the field align with the plans and appear to be functioning well.</p> <p>Observation: previous occurrence of material tracking out on Moorebank Ave (observed during previous RALP) audit has been improved.</p>	Compliant
<b>Bunding</b>				
D4	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA’s Storing and Handling Liquids: Environmental Protection – Participants Handbook.	Site inspection 17/07/19	Chemical and fuels storage sighted during site visit. Storage appropriate. Spill kits	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			in place and stocked and SDS registers accessible.  <b>Observation: ResourceCo had 40L drums of oil stored outside bunding.</b>	
<b>Construction Hours</b>				
D5	Early works shall be undertaken during the following standard construction hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; and (b) 8:00am to 1:00pm Saturdays; (c) at no time on Sundays or public holidays.	Notice board sighted 17/07/19  Prestarts forms all include sign in times.	Works appear to be adhering to permissible hours. Hours are communicated to staff.	Compliant
D6	Activities resulting in impulsive or tonal noise emissions shall only be undertaken: (a) between the hours of 8:00 am to 5:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) in continuous blocks not exceeding three hours each with a minimum respite from those activities and works of not less than one hour between each block. For the purposes of this condition, 'continuous' includes any period during which there is less than a one hour respite between ceasing and recommencing any of the work the subject of this condition.	Interview with auditees 17/07/19  Site inspection 17/07/19	Only one mobile plant has tonal reverse beacon. All others have non-tonal reverse beacons.  No hammering occurred during the audit period as all demolition works were complete.	Compliant
D7	Notwithstanding conditions D5 and D6, works may be undertaken outside the hours specified under those conditions in the following circumstances: (c) construction works that cause $L_{Aeq(15\text{ minute})}$ noise levels that are: (i) No more than 5 dB above rating background level at any residence in accordance with the <i>Interim Construction Noise Guideline (DECC, 2009)</i> ; and (ii) No more than the noise management levels specified in Table 3 of the <i>Interim Construction Noise Guideline (DECC, 2009)</i> at other sensitive landuses; or (d) for the delivery of materials required by the police or other authorities for safety reasons; or (e) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; or (f) construction works approved through an <b>Out-Of-Hours Work Protocol</b> prepared as part of the Construction Noise and Vibration Management Plan required by condition D21(b), provided the relevant Council, local residents and	Interview with auditees 17/07/19  Point source noise calculation of truck SWL and closest receiver 17/07/19	The last OOHW were from April 2018 (outside audit period). This went through the OOHW protocol.  <b>Observation: ResourceCo indicated that it operates truck movements prior to 0700. This involves drivers starting their engines and exiting the site to other projects (via Moorebank Ave and M5). Basic predictions indicate that these would be &lt;5dB(A) above the RBL. Nevertheless, these works</b>	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	other affected stakeholders and sensitive receivers are informed of the timing and duration at least 48 hours prior to the commencement of the works; or (g) identified works approved by the Secretary.		could generate complaints if not managed.	
<b>Construction Noise and Vibration</b>				
D8	<p>The Applicant shall implement all feasible and reasonable noise mitigation measures with the aim of achieving the following construction noise management levels and vibration criteria:</p> <ul style="list-style-type: none"> <li>(a) construction noise management levels established using the <i>Interim Construction Noise Guideline</i> (DECC 2009);</li> <li>(b) vibration criteria established using the <i>Assessing Vibration: a Technical Guide</i> (DECC 2006) (for human exposure); and</li> <li>(c) the vibration limits set out in the <i>German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures</i> (for structural damage).</li> </ul> <p>Any construction activities identified as exceeding the construction noise management levels and/or vibration criteria shall be managed in accordance with the Construction Noise and Vibration Management Plan required by condition D22(b).</p> <p><i>Note:</i></p> <ul style="list-style-type: none"> <li>• <i>The Interim Construction Noise Guideline identifies ‘particularly annoying’ activities that require the addition of 5dB(A) to the predicted level before comparing to the construction Noise Management Level.</i></li> </ul>	<p>Sighted realtime noise monitoring results</p> <p>Sighted work activities 17/07/19</p> <p>Point source noise calculation of truck SWL and closest receiver 17/07/19</p>	<p>No premises within safe work distance for vibration.</p> <p>No significant noise sources on site. Since the previous audit, the works have been in caretaker mode.</p> <p>No premises are predicted to be affected above NMLs based on existing plant.</p>	Compliant
<b>Construction Traffic Noise</b>				
D9	The Applicant is to ensure that construction vehicle contractors operate so as to minimise any construction noise impacts from the subject site. Measures that could be used include toolbox talks, contracts that include provisions to deal with unsatisfactory noise performance for the vehicle and/or the operator, and specifying non-tonal movement alarms in place of reversing beepers or alternatives such as reversing cameras and proximity alarms, or a combination of these, where tonal alarms are not mandated by legislation.	PIWW driver induction code of conduct	The code of conduct includes details relating to hours, material tracking, parking, idling and so forth	Compliant
D10	No use of compression brakes shall be permitted for construction vehicles associated with the Early Works in the vicinity of the subject site.	<p>Site inspection 17/07/19</p> <p>PIWW driver induction code of conduct</p>	<p>Refer response to CoC D9.</p> <p>The site is effectively level and does not require compression braking</p> <p>The code of conduct includes details relating to hours,</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			material tracking, parking, idling and so forth	
<b>Transport and Access</b>				
D11	Construction heavy vehicle access to and from the site via Moorebank Avenue (south) / Cambridge Avenue during Early Works is not permitted, with the exception of heavy vehicles travelling to and from the Glenfield Waste Facility.	CTAMP figure 2 and appendix C  Interview with auditees 17/07/19	Traffic routes to M5 are documented and communicated to haulage contractors. There is no need to head south of the site.	Compliant
D12	The Early Works shall be carried out to, where feasible and reasonable, to avoid the use of local roads (through residential streets) by heavy vehicles to gain access to the site and/or ancillary facilities.	CTAMP figure 2 and appendix C  Interview with auditees 17/07/19	Traffic routes to M5 are documented and communicated to haulage contractors. There is no need to head south of the site.	Compliant
D13	Construction vehicles (including staff vehicles) associated with the Early Works shall be managed to: <ul style="list-style-type: none"> <li>(a) minimise parking or queuing on public roads;</li> <li>(b) minimise idling and queuing in local residential streets where practicable;</li> <li>(c) adhere to the nominated haulage routes identified in the Construction Traffic and Access Management Plan required under condition D22(a); and</li> <li>(d) ensure access and egress from construction compounds is undertaken in a safe and lawful manner.</li> </ul>	RFI – driver induction / code of conduct.  Site inspection 17/07/19  PIWW VMP	Sufficient parking is available on site and is identified on the VMP. There is no need to use off site locations.	Compliant
D14	Safe pedestrian and cyclist access through or around worksites shall be maintained during early works. In circumstances where pedestrian and cyclist access is restricted due to construction activities, a satisfactory alternate route shall be provided and signposted, including provision of permanent footpaths where pedestrian access is reliant on grassed verges.	CTAMP Appendix D	VMP is included in CTAMP identifying pedestrian and cyclist detours.  Note there are no cycle ways or footpaths on Moorebank Ave.	Not triggered
D15	Access to all properties affected by the carrying out of Early Works shall be maintained, where feasible and reasonable, unless otherwise agreed by the relevant property owner or occupier. Any access physically affected by the carrying out of Early Works shall be reinstated to at least an equivalent standard, unless agreed with by the property owner.	Site inspection 17/07/19.  CTAMP section 3.5  Bapaume road TCP	The only interface is with the ABB access road. This access is maintained at all times other than crossing of the road under traffic control.	Compliant
D16	Upon determining the haulage route(s) for construction vehicles associated with subject site, and prior to Early Works, a suitably qualified and experienced independent expert	Dilapidation report	The road dilapidation report has been prepared and is	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>shall prepare a <b>Road Dilapidation Report</b>. The Report shall assess the current condition of roads and describe mechanisms to restore any damage that may result due to its use by traffic and transport related to the Early Works. The Report shall be submitted to the Secretary for information and the relevant Council for review prior to the commencement of haulage.</p> <p>Following completion of Early Works, a subsequent Report shall be prepared to assess any damage to the road that may have resulted.</p> <p>Measures undertaken to restore or reinstate roads affected by the Early Works shall be undertaken in a timely manner, in accordance with the reasonable requirements of the relevant Council, and at the full expense of the Applicant.</p>		<p>available  <a href="https://simta.com.au/wordpress/wp-content/uploads/2017/03/DilapidationReportRevB-1.pdf">https://simta.com.au/wordpress/wp-content/uploads/2017/03/DilapidationReportRevB-1.pdf</a></p>	
<b>Biodiversity</b>				
D17	<p>Within 12 months of the commencement of Early Works, the Applicant shall develop and implement a Biodiversity Offset Package for the approval of the Secretary. The Package shall detail how the ecological values lost as a result of the SSD will be offset. The Package shall be consistent with the <i>NSW Biodiversity Offsets Policy for Major Projects</i> (OEH 2014), unless otherwise agreed by the Secretary.</p> <p>The Package shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>(a) the identification of the extent and types of habitat that would be lost or degraded as a result of the final design of the SSD;</li> <li>(b) the objectives and biodiversity outcomes to be achieved;</li> <li>(c) the final suite of the biodiversity offset measures selected and secured in consultation with OEH;</li> <li>(d) the management and monitoring requirements for compensatory habitat works and other biodiversity offset measures proposed to ensure the outcomes of the package are achieved, including:</li> <li>(e) the monitoring of the condition of species and ecological communities at offset (including translocation) locations;</li> <li>(f) the methodology for the monitoring program(s), including the number and location of offset monitoring sites, and the sampling frequency at these sites;</li> <li>(g) provisions for the annual reporting of the monitoring results for a set period of time as determined in consultation with the OEH; and</li> <li>(h) timing and responsibilities for the implementation of the provisions of the Package.</li> </ul>	<p>BOP  <a href="https://simta.com.au/wordpress/wp-content/uploads/2018/03/MPW%20Early%20Works%20Biodiversity%20Offset%20Package.pdf">https://simta.com.au/wordpress/wp-content/uploads/2018/03/MPW%20Early%20Works%20Biodiversity%20Offset%20Package.pdf</a></p> <p>Approval of BOP            23/3/18.</p>	<p>The BOP was approved on            23/03/18</p> <p>BOP states that no native veg affected by early works.</p> <p>All native veg observed to be retained, demarcated on site.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>Where land offsets cannot solely achieve compensation for the loss of habitat, additional measures shall be provided to collectively deliver an improved or maintained biodiversity outcome for the region.</p> <p>Where monitoring referred to in (e) above indicates that biodiversity outcomes are not being achieved, remedial actions shall be undertaken to ensure that the objectives of the Biodiversity Offset Package are achieved to the satisfaction of the Secretary. Such remedial actions shall be documented under an addendum to the Biodiversity Offset Package and the addendum be submitted for the approval of the Secretary, prior to the implementation of that addendum.</p>			
D18	Subject to future Development Applications, no threatened species or communities can be cleared other than that required for Early Works. Any hollow bearing trees shall be relocated to areas to be determined by a suitably qualified ecologist in areas identified for conservation.	BOP Site inspection 17/07/19	All EECs are marked, flagged and retained. No issues observed.	Compliant
D19	<p>The Applicant shall prepare and implement a 'Threatened Dragonfly Species Survey Plan' to determine the presence or absence of threatened dragonfly species listed under the <i>Fisheries Management Act 1994</i> on the Georges River, adjacent to the development site. The plan, including survey methodology, shall be prepared in consultation with DPI Fisheries prior to the commencement of Early Works.</p> <p>On implementing the plan, the survey results are to be forwarded onto DPI Fisheries. Should threatened dragonfly species be found at this site, DPI Fisheries should be contacted to agree on possible mitigation measures to avoid impacts in accordance with <i>NSW DPI Policy and Guidelines for Fish Habitat Conservation and Management (2013)</i>.</p>	TDSSP. <a href="https://simta.com.au/wp-content/uploads/2018/03/160926_DragonflySurveyReport_FINAL_compressed.pdf">https://simta.com.au/wp-content/uploads/2018/03/160926_DragonflySurveyReport_FINAL_compressed.pdf</a>	The TDSSP was prepared in consultation with DPI in 2016.  Survey and reporting is outside the audit period.	Compliant
<b>Construction Environmental Management Plan</b>				
D20	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP). The CEMP is to be prepared in consultation with the EPA, OEH, DPI Water, DPI Fisheries, and the relevant Council, for the approval of the Secretary. The CEMP shall outline the environmental management practices and procedures that are to be followed during construction. The CEMP is to be prepared in accordance with the <i>Guideline for the Preparation of Environmental Management Plans</i> (Department of Infrastructure, Planning and Natural Resources, 2004). The CEMP shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>(a) a description of activities to be undertaken during Early Works;</li> <li>(b) statutory and other obligations that the Applicant is required to fulfil during Early Works, including approvals, consultations and agreements required from authorities and other stakeholders under key legislation and policies;</li> </ul>	CEMP and sub-plans available on the website <a href="https://simta.com.au/mpw/">https://simta.com.au/mpw/</a>	<p>The preparation and approval of the CEMP and sub-plans occurred outside of the audit period. The CEMP and subplans were approved 3/2/17 (the CHMP was approved 29/05/17).</p> <p>SIMTA are going through a Request for Minor Amendment process for the shift from Liberty badged</p>	Compliant



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>(c) a description of the roles and responsibilities for relevant employees involved in the Early Works, including relevant training and induction provisions for ensuring that employees, including contractors and sub-contractors, are aware of their environmental and compliance obligations under these conditions of approval;</p> <p>(d) an environmental risk analysis to identify the key environmental performance issues associated with the Early Works; and</p> <p>(e) details of how environmental performance would be managed and monitored to meet acceptable outcomes, including what actions will be taken to address identified potential adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the CEMP:</p> <ul style="list-style-type: none"> <li>(i) measures to monitor and manage dust emissions including dust from stockpiles, traffic on unsealed internal roads and materials tracking from construction sites onto public roads;</li> <li>(ii) measures for the handling, treatment and management of hazardous and contaminated materials (including asbestos);</li> <li>(iii) measures to monitor and manage waste generated during construction including but not necessarily limited to: general procedures for waste classification, handling, reuse, and disposal; use of secondary waste material in construction wherever feasible and reasonable; procedures or dealing with green waste including timber and mulch from clearing activities; and measures for reducing demand on water resources (including potential for reuse of treated water from sediment control basins);</li> <li>(iv) measures to monitor and manage hazard and risks;</li> <li>(v) measures to monitor and rectify any impacts to third party property and infrastructure, including details of the process for rectification or compensation of affected landowners, and timeframes for rectification works or compensation processes; and</li> <li>(vi) the issues identified in condition D21.</li> </ul> <p>The CEMP shall include procedures for its periodic review and update (including the sub-plans required under condition D21), as necessary (including where minor changes can be approved by the Environmental Representative).</p> <p>The CEMP shall be submitted for the approval of the Secretary no later than one month prior to the commencement of Early Works, or as otherwise agreed by the Secretary. The CEMP may be prepared in stages; however, Early Works shall not commence until written approval of the relevant stage has been received from the Secretary.</p>		<p>document to SIMTA badged document.</p> <p>This Audit has not assessed the content of the CEMP and sub-plans against the requirements of the CoC. Refer to Appendix B for assessment of the implementation of the plan during the current audit period.</p>	

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	The approval of a CEMP does not relieve the Applicant of any requirement associated with this approval. If there is an inconsistency with an approved CEMP and the conditions of this approval, the requirements of this approval shall prevail.			
<b>Construction Environmental Management Plan — Sub Plans</b>				
D21	<p>As part of the CEMP for the SSD, the Applicant shall prepare and implement:</p> <p>(a) a <b>Construction Traffic and Access Management Plan</b> to ensure traffic and access controls are implemented to avoid or minimise impacts on traffic, pedestrian and cyclist access, and the amenity of the surrounding environment. The Plan shall be developed in consultation with the relevant Council, emergency services, road user groups, and relevant pedestrian and bicycle user groups, and include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>(i) identification of construction traffic routes and construction traffic volumes (including heavy vehicle/spoil haulage) on these routes;</li> <li>(ii) details of vehicle movements for construction sites and ancillary facilities including parking, dedicated vehicle turning areas, and ingress and egress points;</li> <li>(iii) discussion of construction impacts that could result in disruption of traffic, public transport, pedestrian and cycle access, access to public land, property access, including details of oversize load movements, and the nature and duration of those impacts;</li> <li>(iv) details of management measures to minimise traffic impacts, including temporary road work traffic control measures, onsite vehicle queuing and parking areas and management measures to minimise peak time congestion and measures to ensure safe pedestrian and cycle access;</li> <li>(v) details of measures to prevent construction heavy vehicles from using Moorebank Avenue south and Anzac Road, with the exception of heavy vehicles travelling to and from the Glenfield Waste Facility;</li> <li>(vi) details of measures to maintain or provide alternative safe and accessible routes for pedestrians throughout the duration of construction;</li> <li>(vii) details of measures to maintain connectivity for cyclists, with particular emphasis on providing adequate access between key existing cycle routes for commuter cyclists;</li> <li>(viii) details of measures to manage traffic movements, parking, loading and unloading at ancillary facilities during out-of-hours work;</li> <li>(ix) details of methods to be used to communicate proposed future traffic changes to affected road users, pedestrians and cyclists, consistent</li> </ul>	CEMP and sub-plans available on the website <a href="https://simta.com.au/mpw/">https://simta.com.au/mpw/</a>	<p>The preparation and approval of the CEMP and sub-plans occurred outside of the audit period. The CEMP and subplans were approved 3/2/17 (the CHMP was approved 29/05/17).</p> <p>SIMTA are going through a Request for Minor Amendment process for the shift from Liberty badged document to SIMTA badged document.</p> <p>This Audit has not assessed the content of the CEMP and sub-plans against the requirements of the CoC. Refer to Appendix B for assessment of the implementation of the plan during the current audit period.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>with the Community Communication Strategy required under condition C1;</p> <ul style="list-style-type: none"> <li>(x) an adaptive response plan which sets out a process for response to any traffic, construction or other incident; and</li> <li>(xi) mechanisms for the monitoring, review and amendment of this plan.</li> </ul> <p>(b) a <b>Construction Noise and Vibration Management Plan</b> to detail how construction noise and vibration impacts will be minimised and managed. The Plan shall be consistent with the guidelines contained in the <i>Interim Construction Noise Guidelines</i> (Department of Environment and Climate Change 2009). The plan shall be developed in consultation with the EPA and shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>(i) identification of the work areas, site compounds and access points;</li> <li>(ii) identification of sensitive receivers and relevant construction noise and vibration goals applicable to the SSD and stipulated in the conditions above;</li> <li>(iii) details of Early Works activities and an indicative schedule for works, including the identification of key noise and/or vibration generating construction activities (based on representative construction scenarios, including at ancillary facilities) that have the potential to generate noise and/or vibration impacts on surrounding sensitive receivers, particularly residential areas;</li> <li>(iv) an <b>Out-of-Hours Work Protocol</b> for the assessment, management and approval of works outside of standard construction hours as defined in condition D5 of this approval, for the Secretary's approval. The Out-of-Hours Work Protocol must detail: <ul style="list-style-type: none"> <li>a) assessment of out-of-hours works against the relevant noise and vibration criteria;</li> <li>b) detailed mitigation measures for any residual impacts (that is, additional to general mitigation measures), including extent of at receiver treatments; and</li> <li>c) proposed notification arrangements.</li> </ul> </li> <li>(v) identification of feasible and reasonable measures proposed to be implemented to minimise and manage noise impacts (including construction traffic noise impacts), including, but not limited to, acoustic enclosures, erection of noise walls (hoardings) and respite periods;</li> <li>(vi) identification of feasible and reasonable procedures and mitigation measures to ensure relevant vibration criteria are achieved, including</li> </ul>			

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	<p>applicable buffer distances for vibration intensive works, use of low vibration generating equipment/ vibration dampeners or alternative construction methodology, and pre- and post- construction dilapidation surveys of sensitive structures where blasting and/ or vibration is likely to result in damage to buildings and structures (including surveys being undertaken immediately following a monitored exceedance of the criteria);</p> <p>(vii) a description of how the effectiveness of mitigation and management measures would be monitored during the Early Works, clearly indicating how often this monitoring would be conducted, the locations where monitoring would take place, how the results of this monitoring would be recorded and reported, and, if any exceedance is detected, how any noncompliance would be rectified; and</p> <p>(viii) mechanisms for the monitoring, review and amendment of this plan.</p> <p>(c) a <b>Construction Heritage Management Plan</b> to ensure construction impacts on Aboriginal and non-Aboriginal heritage will be appropriately avoided, minimised and managed. The Plan shall be developed in consultation with OEH, the relevant Council, the NSW Heritage Council (for non-Aboriginal State heritage items) and the relevant Local Aboriginal Land Councils (for Aboriginal heritage), and include, but not necessarily be limited to:</p> <p>(i) in relation to Aboriginal Heritage:</p> <p>a) details of management measures to be carried out in relation to Aboriginal heritage, including a detailed methodology and strategies for protection, monitoring, and conservation of sites and items;</p> <p>b) procedures for dealing with previously unidentified Aboriginal objects (excluding human remains), including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures, including when works can recommence, by a suitably qualified and experienced archaeologist in consultation with the Secretary and Aboriginal stakeholders, assessment of the consistency of any Aboriginal heritage impacts against the approved impacts of the SSD, and, where relevant, registration in the OEH's Aboriginal Heritage Information Management System (AHIMS) register;</p>			

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	<p>c) procedures for dealing with human remains, including cessation of works in the vicinity, notification of Secretary, NSW Police Force, OEH and Aboriginal stakeholders, and commitment to cease recommencing any works in the area unless authorised by the OEH and/or the NSW Police Force;</p> <p>d) heritage training and induction processes for construction personnel (including procedures for keeping records of inductions) and obligations under the conditions of this approval including site identification, protection and conservation of Aboriginal cultural heritage; and</p> <p>e) procedures for ongoing Aboriginal consultation and involvement for the duration of the Early Works; and</p> <p>(ii) in relation to non-Aboriginal Heritage:</p> <p>a) identification of heritage Items directly and indirectly affected by the Early Works;</p> <p>b) consideration of methods to prevent damage to any retained heritage items, including:</p> <ol style="list-style-type: none"> <li>I. procedures for identifying minimum working distances to retained heritage items (including, at minimum, vibration testing and monitoring),</li> <li>II. detailed options for alteration of construction methodology should preferred values for vibration be exceeded, and</li> <li>III. commitment to implementing those options if preferred values for vibration are likely to be exceeded;</li> </ol> <p>c) details of management measures to be implemented to prevent and minimise impacts on heritage items (including further heritage investigations, archival recordings and/or measures to protect unaffected sites during construction works in the vicinity);</p> <p>d) details of monitoring and reporting requirements for impacts on heritage items;</p> <p>e) procedures for dealing with previously unidentified heritage objects, (including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures including when works can re-commence by a suitably qualified and</p>			

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	<p>experienced archaeologist in consultation with the OEH, NSW Heritage Council and the Secretary, assessment of the consistency of any heritage impacts against the approved impacts of the SSD, and, where relevant, notification of the Heritage Council of NSW in accordance with section 146 of the <i>Heritage Act 1977</i>; and</p> <p>f) heritage training and induction processes for construction personnel (including procedures for keeping records of inductions and obligations under this approval including site identification, protection and conservation of non-Aboriginal cultural heritage; and</p> <p>(iii) mechanisms for the monitoring, review and amendment of this plan.</p> <p>(d) <b>a Construction Flora and Fauna Management Plan</b> to detail how impacts on ecology will be minimised and managed. The Plan shall be developed by a suitably qualified and experienced ecologist and in consultation with the OEH, and shall include, but not necessarily be limited to:</p> <p>(i) plans for impacted and adjoining areas showing vegetation communities; important flora and fauna habitat areas; locations where threatened species, populations or ecological communities have been recorded; including preclearing surveys to confirm the location of threatened flora and fauna species and associated habitat features;</p> <p>(ii) the identification of areas to be cleared and details of management measures to avoid residual habitat damage or loss and to minimise or eliminate time lags between the removal and subsequent replacement of habitat such as:</p> <p>a) clearing minimisation procedures (including fencing),</p> <p>b) clearing procedures (including nest box plan),</p> <p>c) removal and relocation of fauna during clearing,</p> <p>d) habitat tree management, and</p> <p>e) construction worker education;</p> <p>(iii) rehabilitation details, including identification of flora species and sources, and measures for the management and maintenance of rehabilitated areas;</p> <p>(iv) <b>a Weed Management Strategy</b>, incorporating weed management measures focusing on early identification of invasive weeds and effective management controls (including for those related to aquatic and riparian zones);</p>			

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	<ul style="list-style-type: none"> <li>(v) a description of how the effectiveness of these management measures would be monitored;</li> <li>(vi) a procedure for dealing with unexpected EEC/ threatened species identified during construction, including cessation of work and notification to the OEH and DPI Fisheries, determination of appropriate mitigation measures in consultation with the OEH and DPI Fisheries (including relevant re-location measures) and updating of ecological monitoring and/ or biodiversity offset requirements; and</li> <li>(vii) mechanisms for the monitoring, review and amendment of this plan.</li> <li>(e) a <b>Construction Air Quality Management Plan</b> to detail how impacts on local air quality will be minimise and managed. The Plan shall be developed in consultation with the EPA, and shall include, but not necessarily be limited to:               <ul style="list-style-type: none"> <li>(i) identification of sources (including stockpiles and open work areas) and quantification of airborne pollutants;</li> <li>(ii) key performance indicators for local air quality during construction;</li> <li>(iii) details of monitoring methods, including location, frequency and duration of monitoring;</li> <li>(iv) mitigation measures to minimise impacts on local air quality;</li> <li>(v) procedures for record keeping and reporting against key performance indicators;</li> <li>(vi) provisions for implementation of additional mitigation measures in response to issues identified during monitoring and reporting; and</li> <li>(vii) mechanisms for the monitoring, review and amendment of this plan.</li> </ul> </li> <li>(f) a <b>Construction Soil and Water Management Plan</b> to manage surface and groundwater impacts during Early Works. The plan shall be developed in consultation with, EPA, DPI Water, DPI Fisheries, and relevant Councils, and include, but not necessarily be limited to:               <ul style="list-style-type: none"> <li>(i) details of construction activities and their locations, which have the potential to impact on water courses, storage facilities, stormwater flows, and groundwater, including identification of all pollutants that may be introduced into the water cycle;</li> <li>(ii) potential impacts on watercourse bank stability and the development of appropriate mitigation measures as required;</li> <li>(iii) an <b>Acid Sulfate Soils Management Plan</b>, if required, including measures for the management, handling, treatment and disposal of acid sulfate soils, including monitoring of water quality at acid sulfate soils treatment areas, should the project impact on acid sulfate soils;</li> </ul> </li> </ul>			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>(iv) a description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be undertaken, the locations where monitoring would take place, how the results of the monitoring would be recorded and reported, and, if any exceedance of the criteria is detected how any non-compliance can be rectified; and</li> <li>(v) mechanisms for the monitoring, review and amendment of this plan.</li> </ul>			
<b>SCHEDULE 4 CONDITIONS TO BE MET IN FUTURE DEVELOPMENT APPLICATIONS</b>				
<b>Operational Noise and Vibration</b>				
E1	<p>To ensure the operational noise impacts are appropriately managed, the following measures must be considered in future Development Applications:</p> <ul style="list-style-type: none"> <li>(a) Best practice plant for both the IMEX and interstate terminal, including electronic automated container handling equipment or equipment with equivalent sound power levels;</li> <li>(b) The use of automatic rail lubrication equipment in accordance with ASA Standard T HR TR 00111 ST Rail Lubrication and top of rail friction modifiers;</li> <li>(c) Measures to ensure the rail cross sectional profile is maintained in accordance with ETN-01-02 Rail Grinding Manual for Plain Track to ensure the correct wheel / rail contact position and hence to encourage proper rolling stock steering;</li> <li>(d) A noise barrier on the western side of the haul road;</li> <li>(e) A detailed assessment of sleep disturbance impacts, including: how often noise events occur; the time of day when the occur; and whether there are any times of day when there is a clear change in the noise environment; and</li> <li>(f) A risk assessment to determine if non-tonal reversing alarms can be fitted as a condition of site entry. Alternatively, site design may include traffic flow that does not require or precludes reversing of vehicles.</li> </ul>	-	This requirement does not relate to the current audit period	Not triggered
E2	<p>Development Applications for both the IMEX and interstate terminal shall include a report to identify:</p> <ul style="list-style-type: none"> <li>(a) The extent of wheel squeal across the fleet of rail vehicles that will frequently use the terminals. This should identify the number of occurrences of brake squeal, the typical noise levels associated with brake squeal (including the frequency content), and the operational conditions under which brake squeal occurs (e.g. under light braking, hard braking, low / medium / high speed, effects of temperature and weather, etc.);</li> <li>(b) The root cause of brake squeal, including the influence of the design, set-up and maintenance of both brake shoes and brake rigging;</li> <li>(c) Possible solutions to mitigate or eliminate brake squeal, including modifications to brake rigging and alternative brake shoe designs and compounds; and</li> </ul>	-	This requirement does not relate to the current audit period	Not triggered



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	(d) Any monitoring system proposed to capture brake squeal.			
<b>Locomotives</b>				
E3	Development Applications for the IMEX terminal shall detail how the expected port shuttle locomotives incorporate available best practice technologies.	-	This requirement does not relate to the current audit period	Not triggered
E4	Development Applications for either the IMEX or interstate terminal shall consider the effect of headlight glare on surrounding sensitive receivers.	-	This requirement does not relate to the current audit period	Not triggered
<b>Rail Link</b>				
E5	Any Development Application comprising the rail link must consider maximising curve radii of the rail connection, particularly the southern tie-in to the SSFL, to minimise the potential for wheel squeal.	-	This requirement does not relate to the current audit period	Not triggered
E6	Any Development Application comprising the rail link shall ensure the width of the rail link corridor is no greater than 20 metres in the Riparian Corridor.	-	This requirement does not relate to the current audit period	Not triggered
E7	Any Development Application comprising the rail link shall consider fauna movement in the bridge design.	-	This requirement does not relate to the current audit period	Not triggered
E8	Any Development Application comprising the rail link shall consider minimising potential impacts to the aquatic environment, aquatic habitats and fish passage, both in the design and construction of the bridge.	-	This requirement does not relate to the current audit period	Not triggered
E9	Any Development Application comprising the rail link shall include an assessment of the impacts of the rail link on the Glenfield Waste Facility, including: <ul style="list-style-type: none"> <li>(a) Targeted intrusive investigations to determine contamination pathways and to develop mitigation, management and/or remediation options based on those investigations;</li> <li>(b) details of the quantity of landfilled waste to be removed, the location from where it will be removed, the methodology to be utilised and the estimated timeframe for the removal and reburial;</li> <li>(c) proposed measures to mitigate odour impacts on sensitive receivers, including an undertaking to apply daily cover to any exposed waste in accordance with benchmark technique 33 of the document <i>Environmental Guidelines: Solid Waste Landfills</i>, NSW EPA 1996;</li> <li>(d) details of impacts on pollution control and monitoring systems including existing groundwater and landfill gas bores and their subsequent repair/ replacement;</li> </ul>	-	This requirement does not relate to the current audit period	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>(e) the methodology proposed to ensure that the landfill barrier system disturbed in the removal process is replaced/ repaired to ensure its ongoing performance. The Applicant shall detail matters such as sub grade preparation and specifications, liner installation/ reinstallation procedures and construction quality assurance (CQA) procedures;</li> <li>(f) a commitment to providing the EPA with a construction quality assurance report within 60 days of the completion of the works referred to in (d) above; and</li> <li>(g) an overview of any access and/or materials/ equipment storage arrangements with Glenfield Waste Facility in relation to the construction of the rail link,</li> <li>(h) details of any other expected or potential impacts to the licensed area and options for management and mitigation of those impacts (i.e. leachate management and surface water runoff, potential impacts on the Georges River during works, dust etc); and</li> <li>(i) details of and proposed mitigation measures for the long term management of the rail link.</li> </ul>			
<b>Traffic</b>				
E10	Development Applications for either the IMEX or interstate terminal shall include documentation demonstrating how Condition 14 of this approval has been satisfied.	-	This requirement does not relate to the current audit period	Not triggered
E11	All future Development Applications shall include a Traffic Impact Assessment based on background growth models developed by RMS for the Liverpool/Moorebank area (if applicable).	-	This requirement does not relate to the current audit period	Not triggered
E12	All future Development Applications shall demonstrate how the main access to the site has been designed to prevent heavy vehicles associated with the facility from using Moorebank Avenue south, and should be accompanied by a detailed engineering drawing(s).	-	This requirement does not relate to the current audit period	Not triggered
<b>Section 94 Contributions</b>				
E13	<p>E13. All future Development Application shall include:</p> <ul style="list-style-type: none"> <li>a) an assessment of the impacts of the project on local infrastructure, having regard to any relevant Council's Developer Contributions Plan (or equivalent document requiring developer contributions);</li> <li>a commitment to pay developer contributions to the relevant consent authority or undertake works-in-kind towards the provision or improvement of public amenities</li> <li>b) and services. <b>Note:</b> This requirement may be satisfied subject to the terms of any applicable Voluntary Planning Agreement; and</li> </ul>	-	This requirement does not relate to the current audit period	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	a commitment to undertake vehicle monitoring on Cambridge Avenue. Should any monitoring reveal the need for improvement works within the Campbelltown LGA as a result of the proposal, the Applicant may be required to contribute towards local road maintenance or upgrades.			
<b>Public Transport</b>				
E14	All future Development Applications shall consider the need for a bus stop on Moorebank Avenue (including direct pedestrian access from the warehousing to the bus stop), and associated turnaround facility suitable for a 14.5 metre long non-rear steer bus.	-	This requirement does not relate to the current audit period	Not triggered
<b>Biodiversity</b>				
E15	All future Development Applications shall consider measures to improve the condition of the riparian corridor along the western bank of the Georges River (known as the 'hourglass land').	-	This requirement does not relate to the current audit period	Not triggered
E16	All future Development Applications shall include the following riparian corridor widths (measured from the top of bank): (a) a minimum of 50 metres wide associated with the rail corridor; and (b) a minimum of 40 metres wide along the terminal site.	-	This requirement does not relate to the current audit period	Not triggered
<b>Landscaping</b>				
E17	All future Development Applications for new built form must include detailed landscape plans identifying the vegetation to be removed or relocated and the location of replacement and additional landscaping.	-	This requirement does not relate to the current audit period	Not triggered
E18	All future Development Applications shall include detailed landscape plans including relevant details of the species to be used in the various landscaped areas (preferably species indigenous to the area), including details of the informal native and cultural avenue plantings, and other soft and hard landscape treatments, including any pavement areas and furniture.	-	This requirement does not relate to the current audit period	Not triggered
<b>Heritage</b>				
E19	All future Development Applications relevant to MA6 and MA7 (Scarred Trees) shall include a consideration of the Aboriginal cultural value of the trees and options for avoiding impacts and ongoing conservation measures, including evidence of consultation with Aboriginal community representatives.	-	This requirement does not relate to the current audit period	Not triggered
E20	All future Development Application shall assess heritage impacts of the proposal. The assessment shall: (a) consider impacts to Aboriginal heritage (including cultural and archaeological significance), in particular impacts to Aboriginal heritage sites identified within or near the project should be assessed. Where impacts are identified, the assessment shall demonstrate effective consultation with Aboriginal communities in determining and assessing impacts and developing and	-	This requirement does not relate to the current audit period	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	selecting options and mitigation measures (including the final proposed measures); (b) consider impacts to historic heritage. For any identified impacts, the assessment shall: <ul style="list-style-type: none"> <li>(i) outline the proposed mitigation and management measures (including measures to avoid significant impacts and an evaluation of the effectiveness of the measures). Mitigation measures should include (but not be limited to) photographic archival recording and adaptive re-use of buildings or building elements on site);</li> <li>(ii) be undertaken by a suitably qualified heritage consultant(s); and</li> <li>(iii) include a statement of heritage impact.</li> </ul>			
<b>Soil and Water</b>				
E21	All future Development Application shall include an assessment of soil and water impacts. The assessment shall (where relevant): <ul style="list-style-type: none"> <li>(a) assess impacts on surface and groundwater flows, quality and quantity, with particular reference to any likely impacts on Georges River and Anzac Creek;</li> <li>(b) assess flooding impacts and characteristics, to and from the project (including rail link), with an assessment of the potential changes to flooding behaviour (levels, velocities and direction) and impacts on bed and bank stability, through flood modelling, including:               <ul style="list-style-type: none"> <li>(i) hydraulic modelling for a range of flood events;</li> <li>(ii) description, justification and assessment of design objectives (including bridge, culvert and embankment design);</li> <li>(iii) an assessment of afflux and flood duration (inundation period) on property; and</li> <li>(iv) consideration of the effects of climate change, including changes to rainfall frequency and/or intensity, including an assessment of the capacity of stormwater drainage structures.</li> </ul> </li> <li>(c) identify and assess the soil characteristics and properties that may impact or be impacted by the project, including acid sulfate soils;</li> <li>(d) include a contamination assessment in accordance with the guidelines made under the <i>Contaminated Land Management Act 1997</i> and in consultation with the EPA for the subject site including the Glenfield Waste Facility.</li> </ul>	-	This requirement does not relate to the current audit period	Not triggered
E22	All future Development Application which includes construction in the vicinity of Amiens Wetland shall include advice from an independent wetland expert to determine whether it is artificial or a natural lake basin, its significance, and any recommendations on mitigation measures (if appropriate).	-	This requirement does not relate to the current audit period	Not triggered
	<b>Hazards and Risks</b>			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
E23	<p>All future Development Application shall be accompanied by a preliminary risk screening completed in accordance with <i>State Environmental Planning Policy No. 33- Hazardous and Offensive Development</i> and <i>Applying SEPP 33</i> (DoP 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the proposal. Should preliminary screening indicate that the proposal is 'potentially hazardous,' a Preliminary Hazard Analysis (PHA) must be prepared in accordance with <i>Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis</i> (DoP 2011) and <i>Multi-Level Risk Assessment</i> (DoP 2011). The PHA should:</p> <ul style="list-style-type: none"> <li>(a) Estimate the risks from the facility;</li> <li>(b) Be set in the context of the existing risk profiles for the intermodal facility and demonstrate that the proposal does not increase the overall risk of the area to unacceptable levels; and</li> <li>(c) Demonstrate that the proposal complies with the criteria set out in the <i>Hazardous Industry Planning Advisory Paper No. 4 - Risk Criteria for Land Use Safety Planning</i>.</li> </ul>	-	This requirement does not relate to the current audit period	Not triggered
<b>Bushfire Management</b>				
E24	All future Development Application shall be accompanied by an assessment against the Planning for Bushfire 2006 (NSW Rural Fire Service).	-	This requirement does not relate to the current audit period	Not triggered
<b>Building Code of Australia</b>				
E25	All future Development Applications shall demonstrate compliance with the Building Code of Australia, as relevant.	-	This requirement does not relate to the current audit period	Not triggered

## Appendix B. CEMP and Sub-plans

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Construction Environmental Management Plan (Rev I, approved 03/02/17)</b>				
7.1 - Inductions	<p>All workers and visitors shall undergo the following inductions/trainings prior to commencing work:</p> <ul style="list-style-type: none"> <li>• Liberty Industrial Project Specific Induction;</li> <li>• Flora and Fauna Awareness;</li> <li>• Aboriginal and European Heritage Awareness;</li> <li>• Stormwater and Spills Awareness;</li> <li>• UXO Induction.</li> </ul> <p>All visitors will undergo a Visitors Induction prior to entering the site and will remain with a fully inducted person at all times.</p>	<p>Project induction Rev 2</p> <p>Project induction demo and remediation works package</p>	<p>Biodiversity awareness included</p> <p>Incidents included.</p> <p>Spill response included.</p> <p>UXO included</p> <p>Heritage included.</p>	Compliant
7.2 – Toolbox talks	<p>Toolbox talks will be undertaken on a regular basis and will include, where required information on environmental impacts of the demolition and remediation works. Where required, specific training will be provided to the relevant personnel on hazards associated within specific activities and the controls to be implemented to minimise environmental harm.</p> <p>This will include measures identified in the CEMP.</p> <p>Toolbox talks will be tailored to specific environmental issues including:</p> <ul style="list-style-type: none"> <li>• Erosion and sedimentation control;</li> <li>• Hours of work;</li> <li>• Emergency and spill response;</li> <li>• Aboriginal and non-Aboriginal heritage;</li> <li>• Threatened species, endangered ecological communities, clearing controls and vegetation protection</li> <li>• Weed management</li> <li>• Noise</li> <li>• Housekeeping and waste</li> <li>• Project and clearing limits</li> <li>• Dust control</li> <li>• Approved Water Discharge</li> </ul> <p>Toolbox attendance is mandatory and attendees of Toolbox talks are required to sign an attendance form. Records of Toolbox attendance will be maintained</p>	<p>TBT spill kit usage, koala sighting and signage, PFAS, environmental protection procedure</p> <p>Discharge water forms covering each month.</p>	<p>The TBT talks cover environmental risks and aspects as needed for the stage of works.</p> <p>Evidence show they are being carried out regularly.</p> <p>Discharge forms cover parameters, and authorisation. No issues.</p> <p>25 x JBS&amp;G PFAS water test reports completed.</p>	Compliant
7.3 – Pre starts	<p>The pre-start meeting is a tool for informing the workforce of the day's/ shift's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, hazards and other information that may be relevant to the day's work.</p>	<p>Sighted pre-start meeting file register.</p>	<p>Pre-starts are being undertaken daily. The pre-</p>	Compliant

	<p>The site supervisor, or other appropriate site staff member, will conduct a daily pre-start meeting for the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Pre-start meetings may be project-wide and/or held for specific work areas.</p> <p>The environmental component of pre-starts will include any environmental issues that could potentially be impacted by, or impact on, the day's activities. All attendees will be required to sign on to the pre-start and acknowledge their understanding of the issues explained. Pre-start topics, dates delivered and a register of attendees will be recorded and the records maintained.</p>		<p>starts cover environmental risks as relevant to the works.</p> <p>All staff sign on.</p>	
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<p>9.2 – Inspections and monitoring</p>	<p><i>Table 10 - Environmental Monitoring and Inspection Table</i></p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Frequency</th> <th>Location</th> <th>Responsibility</th> <th>KPI</th> <th>Record</th> </tr> </thead> <tbody> <tr> <td>Dust</td> <td>Daily, During Works and Weekly</td> <td>All</td> <td>Project Environment Advisor (Weekly) Site Supervisor (During Works)</td> <td>No visible dust leaving the boundaries</td> <td>Weekly Environmental Audit Work Permit</td> </tr> <tr> <td>Odour</td> <td>Daily, During Works and Weekly</td> <td>Remediation Work Areas</td> <td>Project Environment Advisor (Weekly) Site Supervisor (During Works)</td> <td>All non-detectable odour at boundary</td> <td>Weekly Environmental Audit Work Permit</td> </tr> <tr> <td rowspan="4">Discharge Water Quality</td> <td rowspan="4">Prior to Discharge</td> <td rowspan="4">Sediment Basins</td> <td rowspan="4">Project Environment Advisor Environmental Consultant</td> <td>No visible oil and grease</td> <td rowspan="4">Water Discharge and Reuse Permit Laboratory Reports</td> </tr> <tr> <td>pH between 6.5-8.5</td> </tr> <tr> <td>Specific contaminants below ANSECC Guidelines</td> </tr> <tr> <td>TSS Below 50mg/L</td> </tr> <tr> <td>Weather</td> <td>Daily</td> <td>Using Bureau of Meteorology</td> <td>Project Environment Advisor</td> <td>Review of work activities when adverse weather is described</td> <td>Daily Prestart Meeting</td> </tr> <tr> <td>Chemical Spillage</td> <td>Daily</td> <td>Chemical Storage Area</td> <td>Project Environment Advisor</td> <td>No spills to ground All chemicals correctly stored and banded</td> <td>Weekly Environmental Audit Work Permit</td> </tr> <tr> <td>Plant</td> <td>Daily</td> <td>On all plant and equipment</td> <td>Site Supervisor Plant Operators</td> <td>No Excessive Smoke No leaks on Plant</td> <td>Plant Pre-Start Checks</td> </tr> <tr> <td>Sediment Control Devices</td> <td>Weekly and Prior to and following rainfall</td> <td>All current work areas</td> <td>Project Environment Advisor Site Supervisor</td> <td>All sediment control devices in good condition allowing adequate operation</td> <td>Weekly Inspection Report Work Permit</td> </tr> <tr> <td>Asbestos</td> <td>Daily</td> <td>Asbestos Removal Areas</td> <td>Asbestos Supervisor Project Environment Advisor</td> <td>All monitoring results for the project below a fibre count of 0.01 f/ml</td> <td>Asbestos Air Monitoring Register</td> </tr> </tbody> </table>	Activity	Frequency	Location	Responsibility	KPI	Record	Dust	Daily, During Works and Weekly	All	Project Environment Advisor (Weekly) Site Supervisor (During Works)	No visible dust leaving the boundaries	Weekly Environmental Audit Work Permit	Odour	Daily, During Works and Weekly	Remediation Work Areas	Project Environment Advisor (Weekly) Site Supervisor (During Works)	All non-detectable odour at boundary	Weekly Environmental Audit Work Permit	Discharge Water Quality	Prior to Discharge	Sediment Basins	Project Environment Advisor Environmental Consultant	No visible oil and grease	Water Discharge and Reuse Permit Laboratory Reports	pH between 6.5-8.5	Specific contaminants below ANSECC Guidelines	TSS Below 50mg/L	Weather	Daily	Using Bureau of Meteorology	Project Environment Advisor	Review of work activities when adverse weather is described	Daily Prestart Meeting	Chemical Spillage	Daily	Chemical Storage Area	Project Environment Advisor	No spills to ground All chemicals correctly stored and banded	Weekly Environmental Audit Work Permit	Plant	Daily	On all plant and equipment	Site Supervisor Plant Operators	No Excessive Smoke No leaks on Plant	Plant Pre-Start Checks	Sediment Control Devices	Weekly and Prior to and following rainfall	All current work areas	Project Environment Advisor Site Supervisor	All sediment control devices in good condition allowing adequate operation	Weekly Inspection Report Work Permit	Asbestos	Daily	Asbestos Removal Areas	Asbestos Supervisor Project Environment Advisor	All monitoring results for the project below a fibre count of 0.01 f/ml	Asbestos Air Monitoring Register	<p>Weekly environmental checklists</p> <p>Workpack PIWW planting and bush regen</p> <p>Continuous noise and PM10, PM2.5, NOx logger data.</p> <p>Dust deposition results for May 19.</p> <p>Asbestos monitoring results January 19</p>	<p>The checklists cover all environmental aspects.</p> <p>Workpacks include JHA , SDS, work permits,. These are the method by which the project checks off all daily inspections and controls. These are signed off by supervisors daily.</p> <p>Continuous noise and dust results occurring</p> <p>Asbestos monitoring occurring during ACM works. No hits above 0.01.</p>	<p>Compliant</p>
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<p>3.6 – worksite access</p>	<p>Access including entry and exit to the work site will be at the intersection of Moorebank Avenue and Chatham Avenue. All trucks will enter and exit the site in a forward motion only, no reversing will be permitted onto the site. Resident access will not be affected during works.</p>	<p>CTAMP</p> <p>PIWW VMP</p> <p>Site inspection 17/07/19</p>	<p>Vehicle movements are as described in the CTAMP. All movements are</p>	<p>Compliant</p>																																																									



			forward in and forward out.  No access is restricted as a result of the works	
4.1 – public car parking	<p>Control measures will be put in place to prevent impacts on public parking during the early works phase and thereafter. To ensure minimal impact on local parking the following shall apply:</p> <ul style="list-style-type: none"> <li>• Parking will be made available within the site for all early works personnel and vehicles;</li> <li>• Trucks and delivery vehicles will load/unload on site;</li> <li>• Certified traffic controllers will be made available for all major truck movements and deliveries, closing off the footpath and opening when deemed safe to do so; and</li> <li>• Labourers where possible will car pool to and from the site each day.</li> </ul>	<p>CTAMP</p> <p>PIWW VMP</p> <p>Site inspection 17/07/19</p>	<p>Sufficient parking is available on site so as not to require any off site impacts.</p> <p>The VMP has been prepared by authorised traffic controllers. There were no traffic controllers required on the day of the inspection</p>	Compliant
5.2 – truck movements	<p>Construction work including major deliveries and concrete pumping will be undertaken outside of peak traffic times wherever possible to minimise the impact and disruption of traffic flow on surrounding roads.</p>	<p>Site inspection 17/07/19</p> <p>Interviews with auditees 17/07/19</p>	<p>Disruption to traffic is negligible as works use Moorebank Avenue and M5 motorways. Traffic movements occur throughout the construction hours.</p>	Compliant
5.3 – heavy vehicle management measure	<p>Construction heavy vehicle access to and from the site via Moorebank Avenue (south) / Cambridge Avenue during Early Works is not permitted.</p> <p>All truck drivers will be directed (by Security Guard) to turn left at the intersection of Chatham and Moorebank Ave. This information is included in the project induction and will be reiterated in pre-start meetings and tool box talks. Additional signage will be placed at Security Hut to ensure compliance.</p> <p>Liberty Industrial will take reasonable measures to ensure that heavy vehicles accessing the site shall not queue within the adjacent local road network.</p>	<p>CTAMP figure 2 and appendix C</p> <p>Interview with auditees 17/07/19</p> <p>Site inspection 17/07/19</p>	<p>Traffic routes to M5 are documented and communicated to haulage contractors. There is no need to head south of the site.</p>	Compliant

	Liberty Industrial will take reasonable measures to ensure that vehicles used for the construction and/or operation of the project shall not park on local roads in the vicinity of the project at any time. Due to the size and scope all heavy vehicles will be parked in designated areas prior to loading and or unloading.		There is no need for off-site parking to occur.	
6.1 – monitoring	Noise controls such as silencers and low-noise mufflers will be installed and maintained. Where reasonably practicable trucks with broadband alarms as opposed to beepers will be used as they provide an effective warning while being more directional as well as less bothersome to the surrounding community.	Interview with auditees 17/07/19  Site inspection 17/07/19	No tonal alarms observed on site.  Project advises that non-tonal alarms are selected where possible.	Compliant
<b>Construction Air Quality Management Plan (Rev E, approved 03/02/17)</b>				
AQ12	Exposed areas and stockpiles would be limited in area and duration. For example, vegetation stripping or grading would be staged where possible, unconsolidated stockpiles would be covered, or hydro mulch or other revegetation applicant applied to stockpiles or surfaces left standing for extended periods	Site inspection 17/07/19	Stockpiles are revegetated or stabilised with polymer.	Compliant
AQ15	Material stockpiles would not exceed an area of 1 ha and would be regularly watered to achieve 50% control of potential dust emissions	Site inspection 17/07/19  Stockpile register	Stockpiles are revegetated or stabilised with polymer.  Stockpile register tracks total area. Current area is <1ha.	Compliant

7 –  
monitoring

Table 7- Air Monitoring Details Summary

Monitoring Details	Area	Responsibility	Frequency
<b>Weather –</b> Meteorological Data Including daily rainfall, temperature, relative humidity, wind (direction and speed)	All	Environment Advisor	Daily
<b>Dust –</b> Visual observation during daily site inspections, and by supervisors as works progress	All	Environment Advisor (Daily) Site Supervisors (During Works)	Daily and during works
<b>Volatiles and Odour -</b> Odour observations during daily site inspections, and by supervisors as works progress	Remediation Work Areas	Environment Advisor (Daily and as requested) Site Supervisors (During Works) Environmental Consultant (As requested)	Daily and during works
<b>Asbestos -</b> Asbestos Air Monitoring	Asbestos Removal Areas	Asbestos Supervisors Environment Advisor	Daily as Results are published
<b>Plant</b> Daily Plant Inspection	NA	Plant Operators	Daily

Table 8 - Air Quality KPI

Air Quality Indicator	KPI	Recording
<b>Dust</b>	No Visible dust leaving the boundaries	Work Permit Weekly Environmental Audit
	No Complaints received over the duration of the project	Complaints Database
<b>Odour/Volatiles</b>	All non-detectable odour at boundary	Work Permit Weekly Environmental Audit
	No Complaints received over the duration of the project	Complaints Database
<b>Asbestos</b>	All monitoring results for the project below a fibre count of 0.01 f/ml	Asbestos Air Monitoring Register
<b>Plant</b>	No Excessive Smoke	Daily Plant Inspections
	All Plant Maintained as Per Manufactures Specification	Plant Maintenance Records

Weekly  
environmental  
checklists

Workpack  
PIWW planting  
and bush  
regen

Continuous  
PM10, PM2.5,  
NOx logger  
data.

Dust  
deposition  
results for May  
19.

Asbestos  
monitoring  
results January  
19

The checklists  
cover all  
environmental  
aspects.

Workpacks include  
JHA , SDS, work  
permits,. These are  
the method by  
which the project  
checks off all daily  
inspections and  
controls. These are  
signed off by  
supervisors daily.

Continuous results  
occurring

Asbestos  
monitoring  
occurring during  
ACM works. No  
hits above 0.01.

Compliant

**Construction Flora and Fauna Management Plan (Rev 8, approved 30/02/17)**

6.1 – environmental mitigation measures	Task	Potential Hazard	Action	Responsibility	Site inspection 17/07/19	No works within EECs during audit period. Previous works are managed under WMS, which provides details on protections and controls for EECs and soil and water etc.	Compliant
	Pre-clearance surveys of Priority 1 areas	Clearing / damage to threatened flora or fauna Spread of noxious weeds	<p>Site Establishment and protection of native vegetation and habitats (Priority Area 1)</p> <p><b>No clearing of EEC vegetation is to occur.</b></p> <ul style="list-style-type: none"> <li>Project Ecologist to undertake a pre-clearing survey of the vegetation within 12-48 hours of clearing works to identify any potential threatened species, endangered vegetation, weed infestation, habitat trees. The ecologist will identify at a minimum:               <ul style="list-style-type: none"> <li>The correct placement and installation of exclusion fencing;</li> <li>The species and location of any weeds;</li> <li>Locations of threatened flora species and habitat or hollow bearing trees;</li> <li>Trees which require limbs to be removed;</li> <li>Native wildlife (e.g. reptiles, frogs, Cumberland Land Snail) that can be captured and relocated to the retained riparian vegetation of the Georges River corridor.</li> </ul> </li> <li>Identification of pest fauna species.</li> <li>If hollow-bearing or habitat trees are identified as requiring removal the two-staged clearing process is to be implemented and the clearing supervised by an ecologist.</li> <li>Trees in clearing zones to be marked as follows:               <ul style="list-style-type: none"> <li>Red flagging tape to indicate the tree is a habitat tree and an ecologist is to be required to supervise its removal.</li> <li>Orange flagging tape to indicate the tree supports no fauna habitat and an ecologist is not required to be present during removal.</li> </ul> </li> </ul>	Liberty Industrial Supervisor	<p>Site inspection 17/07/19</p> <p>Interview with auditees.</p> <p>Biosis pre-clearance report</p> <p>WMS 026</p>	<p>Biosis pre-clearance reports cover clearing non EECs. These reports verify that veg is not EEC and deals with HBTs.</p> <p>All EECs on site are demarcated on site. No issues observed.</p>	Compliant
	Fencing off of ecological values	Clearing / damage to threatened flora or fauna	<p>As a minimum the following will be implemented to protect retained trees and threatened vegetation:</p> <ul style="list-style-type: none"> <li>Fencing such as para-webbing or bunting is to be placed along the edge of the EEC clear of tree drip line. Signage to be placed to inform all personnel of the exclusion zone.</li> <li>Retained trees will be fenced off and marked as exclusion zones within Environmental Control Plans. Fencing will be placed at the drip line of the tree at a minimum.</li> <li>Where roots or branches are identified as being within the pre-construction zone, an arborist will be contacted to assess the likely impact on the tree prior to works commencing.</li> <li>All exclusions zones will be included in sensitive areas maps.</li> </ul>	Liberty Industrial Supervisor	Site inspection 17/07/19	EECs are all demarcated and controlled. No issues.	Compliant
	Two-Stage clearing process of Priority 1 areas	Injury to fauna	<p>Vegetation Clearing (Priority Area 1)</p> <ul style="list-style-type: none"> <li>Environment Advisor to issue 'Permit to Clear' once pre-clearing survey is complete and signed off. No clearing shall be undertaken without Permit to Clear. Clearing of vegetation outside of the defined clearing permit boundary is not permitted.</li> <li>If feasible clearing of any hollow-bearing vegetation (if required) is to be undertaken between March and April to minimise impacts to microbats and threatened bird species. If clearing of hollow-bearing vegetation is required outside this timeframe, this two-staged clearing process, under the supervision of an Ecologist is considered sufficient to minimise impacts to threatened species.</li> <li>Local wildlife and vets to be contacted to assist in treating injured animals if necessary.</li> <li>Ecologist to be present on site during the clearing process and relocate fauna for release at designated area where required.</li> <li>Non-habitat vegetation removal first to a radius of 10m around habitat trees. Habitat trees are to remain standing overnight before further clearing to allow fauna to vacate the habitat.</li> </ul>	Liberty Industrial Environmental Advisor, Supervisor and Contractor	WMS 026	<p>None during audit period.</p> <p>No works within EECs during audit period. Previous works are managed under WMS, which provides details on</p>	Not triggered

				protections and controls for EECs and soil and water etc.	
	<p><b>Two-Stage clearing process of Priority 1 areas</b></p> <ul style="list-style-type: none"> <li>After retaining standing overnight habitat trees are to be shaken (where safe and practicable) under the supervision of an ecologist to encourage roosting fauna to leave the trees, which may then be felled, commencing with the most distant trees from secure habitat.</li> <li>Felled habitat trees are to be immediately moved to the edge of retained vegetation, or left on the ground for a further 24 hours before being removed from the construction area, at the discretion of the supervising ecologist.</li> <li>Important habitat elements (e.g. large woody debris) are to be moved to locations within the conservation area (under supervision of the ecologist), which will not be cleared during the Project, or to stockpiles for later use in vegetation/habitat restoration.</li> <li>Select appropriate size/type of machines and equipment for clearing. Remove trees so as not to cause damage to surrounding vegetation or to areas outside the project boundary (ensuring groundcover disturbance is kept to a minimum).</li> <li>Only the ecologist or fauna handler to touch or move fauna. If fauna is present, allow to move through worksite or contact the ecologist, fauna handler or WRES to assist in relocation to adjacent retained habitat.</li> <li>All personnel to stay out of the exclusion zone.</li> <li>Ensure no materials are stockpiled and no vehicles are parked within the tree drip line.</li> <li>No excavation or placing of fill near any tree without advice from an ecologist.</li> <li>Route haul roads and access tracks clear of the tree drip line.</li> </ul> <p>Damage to retained trees and EEC habitat</p> <p>Liberty Industrial Environmental Advisor, Supervisor and Contractor</p>		WMS 026	<p>None during audit period.</p> <p>No works within EECs during audit period. Previous works are managed under WMS, which provides details on protections and controls for EECs and soil and water etc.</p>	Not triggered
	<p><b>Disturbance to vegetation</b></p> <p>Spread of noxious weeds</p> <p>Ongoing monthly weed inspections are to be undertaken by a person experienced in the identification of noxious weed species. If weeds are identified within clearing area then:</p> <ul style="list-style-type: none"> <li>Weeds to be treated in accordance with Table 8 below and disposed of off-site at a licenced waste facility. Weedy material must not be mulched or retained on site.</li> <li>Weed contaminated topsoil is to be segregated from non-weed contaminated topsoil or removed from site to a designated licenced landfill. Stockpile to be banded and covered to minimise potential of seed washing away.</li> <li>Plant/equipment used in areas where noxious weeds are present to be washed down and declared weed free before moving to a non-weed area.</li> </ul> <p>Liberty Industrial Environmental Advisor, Supervisor and Contractor</p>		<p>Biosis weed assessment reports</p> <p>Dragonfly weed treatment reports.</p>	<p>Biosis conduct monthly surveys monitoring and mapping weeds on site.</p> <p>Dragonfly conduct weed treatment in response to Biosis reports. the dragonfly reports include maps and photos showing treatment areas.</p> <p>The two feed information back and forth as needed.</p>	Compliant
<p><b>Construction Heritage Management Plan (Rev 9, 04/07/17)</b></p>					

<p>6 – environmental mitigation measures</p>	<p>Strategy 2: Procedure to follow in the event of unexpected Aboriginal finds</p> <p>The following process should be followed with respect to unexpected finds:</p> <ul style="list-style-type: none"> <li>• Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.</li> <li>• The archaeologist will investigate and assess the Aboriginal object to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager within 24 hours stating: <ul style="list-style-type: none"> <li>– Determination of whether the find is an Aboriginal object.</li> <li>– Advice on whether how the project is to proceed and whether the establishment of any no-go areas is necessary.</li> <li>– Recommendation on further works that may be required and timeframe for completion of these works.</li> <li>– Any Aboriginal objects will be registered on the Aboriginal Heritage Information Management System (AHIMS). Where sites are impacted, a site impact form will be completed and lodged with AHIMS prior to impact.</li> </ul> </li> <li>• Create a no-go area around the find based upon the advice of the archaeologist.</li> <li>• The archaeologist's written advice will be supplied to OEH, the secretary and Aboriginal stakeholders for their review. This will include a statement concerning the find, management measures implemented and notification of any further works arising. Aboriginal stakeholders are to be involved in any further assessments or works as required. Any comments made by OEH, the secretary and Aboriginal stakeholders will be incorporated into the written advice prior to finalisation and works proceeding.</li> <li>• Details of the newly identified site will be recorded on the Aboriginal Heritage Information Management System (AHIMS) within five working days of the inspection. Any relevant reporting forwarded to OEH for their records.</li> <li>• Should any Aboriginal objects be identified this will trigger a review of this CHMP in accordance with Section 8.</li> <li>• Work will be able to recommence once further investigations have been completed.</li> </ul>	<p>Interview with auditees 17/07/19</p>	<p>No unexpected finds during the audit period.</p>	<p>Not triggered</p>
	<p>Strategy 3: Procedure of follow in the event of unexpected non-Aboriginal finds</p> <p>The following process should be followed with respect to unexpected items:</p> <ul style="list-style-type: none"> <li>• Should any suspected non-Aboriginal items be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.</li> <li>• The archaeologist will investigate and assess the non- Aboriginal item to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager within 24 hours stating <ul style="list-style-type: none"> <li>– Determination of whether the find is a non-Aboriginal item.</li> </ul> </li> </ul>	<p>Interview with auditees 17/07/19</p>	<p>No unexpected finds during the audit period.</p>	<p>Not triggered</p>

	<ul style="list-style-type: none"> <li>- Advice on whether how the project is to proceed and whether the establishment of any no-go areas is necessary.</li> <li>- Recommendation on further works that may be required and timeframe for completion of these works.</li> <li>• Create a no-go area around the find based upon the advice of the archaeologist.</li> <li>• Heritage Council of NSW and DPE will need to be notified. This will include a statement concerning the find, management measures implemented and notification of any further works arising.</li> <li>• Should any non-Aboriginal item be identified this will trigger a review of this CHMP in accordance with Section 8.</li> <li>• Work will be able to recommence once further investigations have been completed.</li> <li>• Where impacts to the site are able to be avoided or mitigated, monitoring of the condition of the site may need to take place.</li> </ul>			
	<p>Strategy 6: Demarcation of heritage sites</p> <p>Figures 3 and 4 identified Aboriginal sites that have been identified as being outside of the early works footprint or that are to be conserved. To ensure that these sites are not impacted the following management measures should be implemented:</p> <ul style="list-style-type: none"> <li>• The location of these sites should be identified on all construction drawings, heritage inductions and in prestart meetings.</li> <li>• Where works are taking place within 100 metres of a site, the boundaries of the site should be fenced, or where the site is an individual artefact or tree a minimum distance of 50 metres should be observed. Fencing should be erected and maintained for the duration of the activity and may only be removed once the activity has concluded.</li> <li>• Fencing should consist of non-invasive fencing or marking tape dependent on the activity and should be marked as an "environmentally sensitive area".</li> <li>• In the event that the boundary of a site cannot be adequately located or identified, the assistance of an archaeologist may be required.</li> <li>• Heritage sites and fencing should be subject to weekly monitoring inspections by the site environmental officer. The location and condition of heritage sites and fencing should be compared to the locations identified within the CEMP to ensure that adequate management measures are being maintained.</li> </ul>	<p>Interview with auditees 17/07/19</p> <p>Site inspection 17/07/19</p>	<p>There are two scar trees remaining on site, these are protected by EECs demarcation.</p>	<p>Compliant</p>
<p><b>Noise &amp; Vibration Management Plan (Rev F, approved 03/02/17)</b></p>				



6.4 – attended noise monitoring schedule	<p><b>Table 12 Noise Monitoring Schedule</b></p> <table border="1"> <thead> <tr> <th data-bbox="353 236 645 272">Monitoring Schedule</th> <th data-bbox="645 236 1122 272">Measurement Procedure</th> <th data-bbox="1122 236 1245 272">Reporting</th> </tr> </thead> <tbody> <tr> <td data-bbox="353 272 645 400">During the first week of each stage during Early Works</td> <td data-bbox="645 272 1122 400">Complete one round of operator-attended 15 minute noise monitoring on separate days at site boundaries and closest residences</td> <td data-bbox="1122 272 1245 400"></td> </tr> <tr> <td data-bbox="353 400 645 520"></td> <td data-bbox="645 400 1122 520">Carry out equipment noise level checks on all critical items of plant and issue Equipment Noise Certificates.</td> <td data-bbox="1122 400 1245 520">Reporting procedure as</td> </tr> <tr> <td data-bbox="353 520 645 639"></td> <td data-bbox="645 520 1122 639">Carry out equipment noise level checks on any new (untested) critical items of plant and issue Equipment Noise Certificates.</td> <td data-bbox="1122 520 1245 639">outlined in Section 6.5</td> </tr> <tr> <td data-bbox="353 639 645 823">During subsequent months</td> <td data-bbox="645 639 1122 823">Carry out attended noise monitoring in the event of complaints and/or recorded exceedances. Continue noise monitoring after noise mitigation measures have been employed to confirm compliance.</td> <td data-bbox="1122 639 1245 823"></td> </tr> </tbody> </table>	Monitoring Schedule	Measurement Procedure	Reporting	During the first week of each stage during Early Works	Complete one round of operator-attended 15 minute noise monitoring on separate days at site boundaries and closest residences			Carry out equipment noise level checks on all critical items of plant and issue Equipment Noise Certificates.	Reporting procedure as		Carry out equipment noise level checks on any new (untested) critical items of plant and issue Equipment Noise Certificates.	outlined in Section 6.5	During subsequent months	Carry out attended noise monitoring in the event of complaints and/or recorded exceedances. Continue noise monitoring after noise mitigation measures have been employed to confirm compliance.		Interview with auditees 17/07/19  Noise compliance report for High energy compaction works  Realtime noise monitoring	Complaints are not specific to MPW S1. Given the limited nature of works being undertaken it is unlikely that complaints relate to MPW S1.  The project has been in caretaker mode only during the audit period. There have been non critical plant items brought onto site during that period.  Previous noise monitoring for high energy works was conducted outside audit period (during 2017). Results are included in the CNVMP.  SIMTA are conducting ongoing realtime noise logging for the MPE and MPW project works.	Compliant
Monitoring Schedule	Measurement Procedure	Reporting																	
During the first week of each stage during Early Works	Complete one round of operator-attended 15 minute noise monitoring on separate days at site boundaries and closest residences																		
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	Carry out equipment noise level checks on any new (untested) critical items of plant and issue Equipment Noise Certificates.	outlined in Section 6.5																	
During subsequent months	Carry out attended noise monitoring in the event of complaints and/or recorded exceedances. Continue noise monitoring after noise mitigation measures have been employed to confirm compliance.																		
6.5 – reporting on attended	The following information must be included in the weekly reports when applicable: <ul style="list-style-type: none"> <li>Field calibration results (before and after measurements);</li> <li>Measurement times and dates;</li> <li>Qualitative description of the noise environment during measurement;</li> </ul>	Interview with auditees 17/07/19	Complaints are not specific to MPW S1. Given the limited nature of	Not triggered															



noise monitoring	<ul style="list-style-type: none"> <li>• LA1, LAeq and LA90 levels;</li> <li>• Meteorological conditions during the measurements;</li> <li>• Estimation of recorded noise contribution from other major noise sources.</li> </ul> <p>The Construction Contractor Project Manager shall establish and maintain a system of records which provides full documentation of all noise monitoring results, complaint handling and responses to non-compliances. The Construction Contractor Project Manager shall establish and maintain procedures for the collection, indexing, filing, storage and maintenance of the records.</p>	Noise compliance report for High energy compaction works	<p>works being undertaken it is unlikely that complaints relate to MPW S1.</p> <p>The project has been in caretaker mode only during the audit period. There have been non critical plant items brought onto site during that period.</p> <p>Previous noise monitoring for high energy works was conducted outside audit period (during 2017). Results are included in the CNVMP.</p>	
6.12 – out of hours works protocol	Any work proposed to be conducted out of standard construction hours shall be subject to approval by the Environmental Representative. Details of proposed work shall be submitted for evaluation which will include; location of work to be conducted, types of plant and equipment proposed, character and likelihood of noise being generated, anticipated effect on traffic flow to and from the site. An example of an Out-of-Hours request form is included in Appendix B	Interview with auditees 17/07/19	There have been no out of hours works required during the audit period	Not triggered
6.14 – noise monitoring	<p>Noise monitoring shall be conducted at the most affected residence at each receptor location, as listed in Table 1, within the first four weeks from the commencement of works at each Stage. If compliance with the NMLs is demonstrated and no complaints are received, noise logging will be discontinued.</p> <p>If exceedances are measured during the initial logging periods for each stage, it shall be determined from the time code of the recorded data as to which specific activities are causing the exceedance. Noise mitigation strategies and methods shall be implemented to reduce noise to within acceptable levels at the nearest sensitive receptors.</p> <p>In the event of a noise complaint following the initial noise monitoring periods for each stage, monitoring shall be resumed at the complainant’s residence to determine which activities are generating excessive noise. If practicable,</p>	<p>Interview with auditees 17/07/19</p> <p>Noise compliance report for High energy compaction works</p>	Complaints are not specific to MPW S1. Given the limited nature of works being undertaken it is unlikely that complaints relate to MPW S1.	Compliant

	<p>noise mitigation measures, such as those outlined above, shall be implemented and further monitoring shall then be employed to determine the efficacy of noise mitigation.</p>	<p>Realtime noise monitoring</p>	<p>The project has been in caretaker mode only during the audit period. There have been non critical plant items brought onto site during that period.</p> <p>Previous noise monitoring for high energy works was conducted outside audit period (during 2017). Results are included in the CNVMP.</p> <p>SIMTA are conducting ongoing realtime noise logging for the MPE and MPW project works. These are placed at the nearest accessible receivers.</p>	
<p><b>Construction Soil and Water Management Plan (Rev H, approved 03/02/2017)</b></p>				
<p>SW2</p>	<p>In order to control the potential impacts arising from site disturbance, topsoil in areas that will be disturbed shall be stripped and stockpiled for reuse in rehabilitation activities. Suitable soils shall be stripped in accordance with the following provisions:</p> <ul style="list-style-type: none"> <li>• Materials shall be stripped in a slightly moist condition where possible, however stripping shall not occur during significant rainfall events.</li> <li>• Preference shall be given to stripping with as few passes as possible.</li> <li>• For areas of cleared native vegetation (no weeds), the topsoil will be stockpiled separately to a maximum height of 1.5m to help preserve the seed bank for use during rehabilitation of the site.</li> </ul>	<p>Site inspection 17/07/19</p>	<p>Topsoil stockpiles are held across the site and appear to be well maintained (stable, correct size, demarcated).</p>	<p>Compliant</p>

	<ul style="list-style-type: none"> <li>A maximum stockpile height of 2m shall be maintained for all other topsoil material with a maximum 1:1 batter.</li> <li>Weed contaminated topsoil will be separately stockpiled and managed by stabilisation techniques to ensure no weeds and seeds leave the stockpile</li> </ul>			
SW3	<p>The following requirements apply to all stockpiles (topsoil and subgrade) on the site:</p> <ul style="list-style-type: none"> <li>The surface of stockpiles shall be shaped in order to minimise infiltration and minimise erosion</li> <li>For stockpiles that are in place longer than 28 days, they are to be covered either by vegetation or other means (e.g. emulsion spray, geofabric etc)</li> <li>Stockpiles shall be located in areas where there is minimal risk of sedimentation of land or surface water, where the movement of fauna is not impeded, and where they do not impede surface drainage channels</li> <li>Stockpiles shall not be located against fence lines, within or on vegetation to be retained, or beneath the drip line of trees</li> <li>All stockpiles shall be regularly monitored for erosion and weeds, with appropriate controls implemented when required</li> <li>Stockpiles are to be located in approved works zone site.</li> <li>The location of all stockpiles shall be clearly identified in the Site Layout Plan</li> </ul>	Site inspection 17/07/19	All remaining stockpiles appear to suitably shaped, stabilised, located and demarcated.	Compliant
SW4	A stockpile register shall be developed for all stockpiles, including location, and material type. The register shall be made available to the Client Representative upon request	Site inspection 17/07/19  Stockpile register	Stockpile register tracks total area. Current area is <1ha.	Compliant
SW12	<p>Erosion and sediment controls will be visually inspected on a regular basis as described in Section 8.3.</p> <p>Inspections will be undertaken prior to a predicted rainfall event, during rainfall as well as post rainfall.</p> <p>Inspections will also be undertaken within 24 hours of a high rainfall event. Inspections will also take place prior to site shutdowns greater than 3 days.</p>	Weekly environmental checklists	The checklists cover all environmental aspects including erosion and sediment controls. These capture wet weather	Compliant
SW16	Works are not to occur within the riparian zone of Georges River. Should works be required in these areas, a specific control plan will be developed for approval prior to commencement. The riparian zone will be marked and delineated from the worksite with flagging or similar	Site inspection 17/07/19  Interview with auditees	The Georges River riparian zone is delineated. No works appear to have occurred during the audit period.	Compliant
<b>Per &amp; Poly-Fluoroalkyl Substances (PFAS) Management Plan (Rev G, 27/02/18)</b>				
8 – control and	Risk: Worker exposed to PFAS during excavation works	Interview with auditees 17/07/19	No PFAS work has occurred during the audit period	Not triggered

mitigation measures	<p>Controls:</p> <ul style="list-style-type: none"> <li>• Project inductions to identify areas with high risk of PFAS contamination.</li> <li>• JHA to identify risk of PFAS and appropriate control measures</li> <li>• Excavation Permit to control the excavations in high risk remediation of identified contamination areas.</li> <li>• PPE used in high risk areas including:</li> <li>• Disposable overall suits including boots</li> <li>• Disposable waterproof nitrite gloves in addition to standard glove requirements</li> <li>• All other standard PPE required for works on Site</li> <li>• Signage placed in ablution blocks to ensure all workers wash hands and face prior to eating, regardless if gloves are worn</li> <li>• If worker's skin comes into contact with PFAS impacted water, ensure skin is immediately washed with clean water and wet clothing is removed immediately after work is complete</li> <li>• Dewatering of groundwater impacted with PFAS should be avoided</li> </ul> <p>Monitoring and reporting:</p> <ul style="list-style-type: none"> <li>• Site inspections</li> <li>• Construction Compliance Audits</li> <li>• Laboratory Testing</li> <li>• Validation Report</li> </ul>			
	<p>Risk: PFAS impacted waste not stored/stockpiled in an environmentally sound manner</p> <p>Control:</p> <ul style="list-style-type: none"> <li>• Where PFAS impacted soils need to be temporarily stored onsite the following has been included in the Stockpile Management Plan (Liberty 2017):</li> <li>• The stockpiles of PFAS impacted material should be kept separate from all other stockpiled material</li> <li>• The area will be located and constructed to adequately protect the contents from the ingress of stormwater, weather conditions and unlawful entry.</li> <li>• Have an impermeable floor or base with no drainage outlets.</li> <li>• Have appropriate environmental controls to prevent offsite contamination and where practicable be bunded in accordance with Australian Standard AS1940.</li> <li>• The storage area will be sign posted noting the PFAS impacted soils are stored here.</li> <li>• The storage area will be inspected weekly to ensure proper containment and management has been maintained. Where improvements are required these will be reported to the Principal Contractor and conducted within 24 hours.</li> <li>• Any leachate must be captured, analysed for PFASs, and if necessary treated, removed, and destroyed in accordance with HEPA 2018.</li> </ul> <p>Monitoring and reporting:</p>	Interview with auditees 17/07/19	All solid PFAS waste has been removed from the site prior to the current audit period.	Not triggered

	<ul style="list-style-type: none"> <li>• Site inspections</li> <li>• Construction Compliance Audits</li> <li>• Laboratory Testing</li> <li>• Validation Report</li> </ul>			
	<p>Risk: PFAS impacted waste not disposed off-site in an environmentally sound manner</p> <p>Control:</p> <ul style="list-style-type: none"> <li>• Any PFAS Impacted waste must be classified in accordance with this Plan.</li> <li>• Impacted waste must be transported to appropriately licensed waste facility.</li> <li>• Impacted waste is transported in trucks with appropriate environmental controls such as tarp covers.</li> <li>• Waste tracked as per the Liberty Industrial Waste Tracking Management Plan.</li> <li>• Environmental controls such as road sweeping should be implemented.</li> <li>• Any waste material with a concentration of PFOS or PFOA above 50 mg/kg must be treated in such a way that there is zero environmental release of PFOS and PFOA, such as through destruction. Assurance must be received from the treatment or waste facility that this outcome can be achieved</li> </ul> <p>Monitoring and reporting:</p> <ul style="list-style-type: none"> <li>• Waste classification testing</li> <li>• Waste classification letter</li> <li>• Waste disposal docket</li> </ul>	Interview with auditees 17/07/19	All solid PFAS waste has been removed from the site prior to the current audit period.	Not triggered
	<p>Risk: PFAS impacted material above acceptable site-specific criteria remains on site</p> <p>Control:</p> <ul style="list-style-type: none"> <li>• All soil excavated from previously identified remediation areas suspected of containing PFAS is to be removed to the Contamination Assessment Treatment Area (CATA) for testing.</li> <li>• Based on test results the soil will be stored and managed in accordance with the PFAS Materials Tracking Plan (Liberty 2017) and the Remedial Action Plan (RAP) (EP Risk 2017c)</li> </ul> <p>Monitoring and reporting</p> <ul style="list-style-type: none"> <li>• Site inspections</li> <li>• Construction Compliance Audits</li> <li>• Laboratory Testing</li> <li>• Validation Report</li> </ul>	Interview with auditees 17/07/19	All solid PFAS waste has been removed from the site prior to the current audit period.	Not triggered

**Appendix C. Independent Audit Declaration Form(s)**

# Independent Audit Declaration Form

## Independent Audit Declaration Form


Project name	Moorebank Intermodal Precinct West
Consent Number	5066
Description of Project	Construction and operation of an intermodal logistics facility
Project Address	Moorebank Avenue, Moorebank NSW 2170
Proponent	NSW Department of Education
Title of Audit	Independent Audit
Date	12/08/19

I declare that I:

- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit;
  - **I declare that I have been engaged to prepare the Audit Program for the project.**
- I am not the Environmental Representative for the project; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) 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) 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; and
- b) 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 auditor	Derek Low
Signature	
Qualification	Master of Environmental Engineering Management Exemplar Global Auditor Number 114283
Company	WolfPeak Pty Ltd
Company address	Suite 2, Level 10, 189 Kent Street Sydney NSW 2000

# Independent Audit Declaration Form

## Independent Audit Declaration Form

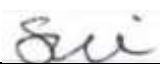
Project name	Moorebank Intermodal Precinct West
Consent Number	5066
Description of Project	Construction and operation of an intermodal logistics facility
Project Address	Moorebank Avenue, Moorebank NSW 2170
Proponent	NSW Department of Education
Title of Audit	Independent Audit
Date	12/08/2019

I declare that I:

- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit;
  - **I declare that I have been engaged to prepare the Audit Program for the project.**
- I am not the Environmental Representative for the project; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) 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) 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; and
- b) 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 auditor	Steve Fermio
Signature	
Qualification	Bachelor of Science (Honours) Exemplar Global Auditor Number 110498
Company	WolfPeak Pty Ltd
Company address	Suite 2, Level 10, 189 Kent Street Sydney NSW 2000



**Appendix D. Site inspection photographs.**



**Photo 1: ResourceCo compound parking**



Photo 2: 40L drums at ResourceCo outside of bund.



Photo 3: ResourceCo compound



**Photo 4: PFAS impacted water treatment plant**



**Photo 5: Boundary flagging around environmental no-go zones**





Photo 6: Turkeys Nest



Photo 7: Basin with impacted water



**Photo 8: Dust suppression on haul roads**



**Photo 9: Bunded fuel storage**





Photo 10: Spill response station



Photo 11: Maintenance and fuel storage area



**Photo 12: Heritage item storage**



**WolfPeak Pty Limited**

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