

# Moorebank Precinct West – Early Works

## 6-Monthly Compliance Report (SSD 5066)



**SIMTA**

SYDNEY INTERMODAL TERMINAL ALLIANCE

# CONTACT



# TACTICAL GROUP MOOREBANK PRECINCT WEST

## 6-Monthly Compliance Report

February to August 2017

**Author**

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**Checker**

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**Approver**

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This report has been prepared for Tactical Group in accordance with the terms and conditions of appointment for Moorebank Precinct West Early Works dated 7 October 2016. Arcadis Australia Pacific Pty Limited (ABN 76 104 485 289) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

## REVISIONS

Revision	Date	Description	Prepared by	Approved by
001	26/09/17	First Draft internal reviewed		
002	05/10/17	Response to client comments		

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# APPENDICES

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**APPENDIX B COMPLIANCE TABLE - REVISED ENVIRONMENTAL MITIGATION MEASURES**

## ACRONYMS

Acronym	Meaning
ACM	Asbestos Containing Materials
AFFF	Aqueous Film Forming Foam
BOP	Biodiversity Offset Package
CAQMP	Construction Air Quality Management Plan
CATA	Contamination Assessment Treatment Areas
CBD	Central Business District
CCS	Community Consultation Strategy
CEMP	Construction Environmental Management Plan
CES	Community Engagement Strategy
CFFMP	Construction Flora and Fauna Management Plan
CHMP	Construction Heritage Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CoA	Conditions of Approval
CSWMP	Construction Soil and Water Management Plan
CTAMP	Construction Traffic and Access Management Plan
CTP	Compliance Tracking Programme
CUST Hut	Cullen Universal Steel Truss Hut
DP	Deposited Plan
DP&E	Department of Planning and Environment
EEC	Ecologically Endangered Community
EIS	Environmental Impact Statement
EOW	Explosive Ordnance Waste
EPBC	Environmental Protection and Biodiversity Act 1999
ER	Environmental Representative
ERSED	Erosion and Sediment Controls
ESCP	Erosion and Sediment Control Plan
EWMS	Environmental Work Method Statement

Acronym	Meaning
HBI	Health Buildings International
HHRA	Human Health Risk Analysis
HIS	Heritage Interpretation Strategy
IMP	Incident Management Plan
$L_{Aeq(15 \text{ min})}$	The A-weighted equivalent continuous (energy average) sound pressure level over a 15-minute period.
LGA	Local Government Area
LLEP	Liverpool Local Environmental Plan
LPWDR	Land Preparation Works – Demolition and Remediation
MH	Moorebank Heritage
MIC	Moorebank Intermodal Company
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
NOHSC	National Occupational Health and Safety Commission
OEH	Office of Environment and Heritage
OfMR	Options for Mitigation Report
OOH	Out of Hours
PCCR	Pre-Construction Compliance Report
PFAS	Polyfluoroalkyl Substances
RAPs	Registered Aboriginal Parties
RAP	Remedial Action Plan
RBL	The Rating Background Level for each period is the median value of the assessment background level values for the period over all of the days measured. There is therefore an RBL value for each period (day, evening and night).
REMM	Revised Environmental Mitigation Measures
RtS	Response to Submissions
SIMTA	Sydney Intermodal Terminal Alliance
SRtS	Supplementary Response to Submissions
SSD	State Significant Development
UST	Underground Storage Tank

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Acronym	Meaning
UXO	Unexploded Ordnance
UXOMP	Unexploded Ordnance Management Plan
VMP	Vehicle Movement Plan



# 1 INTRODUCTION

## 1.1 Precinct Overview

The Sydney Intermodal Terminal Alliance (SIMTA) and Moorebank Intermodal Company have entered into an agreement to develop the Moorebank Precinct East (MPE) Project and Moorebank Precinct West (MPW) Project into the Moorebank Intermodal Precinct (the Moorebank Precinct).

When completed, the Moorebank Precinct will move 1.5 million shipping containers annually by rail instead of road. It will also feature Australia’s largest purpose-built warehouse and distribution precinct serviced by the latest automated technology which will see driverless shuttle carriers collect and transport containers around the precinct to be processed, unpacked and stored on site or distributed in smaller consignments.

Contractors have been appointed to undertake three packages of works under the current approvals across both the MPW and MPE Projects. Figure 1-1 describes the approvals and the relevant contractors appointed under each; Figure 1-2 shows the extent of the sites of each appointed contractor.

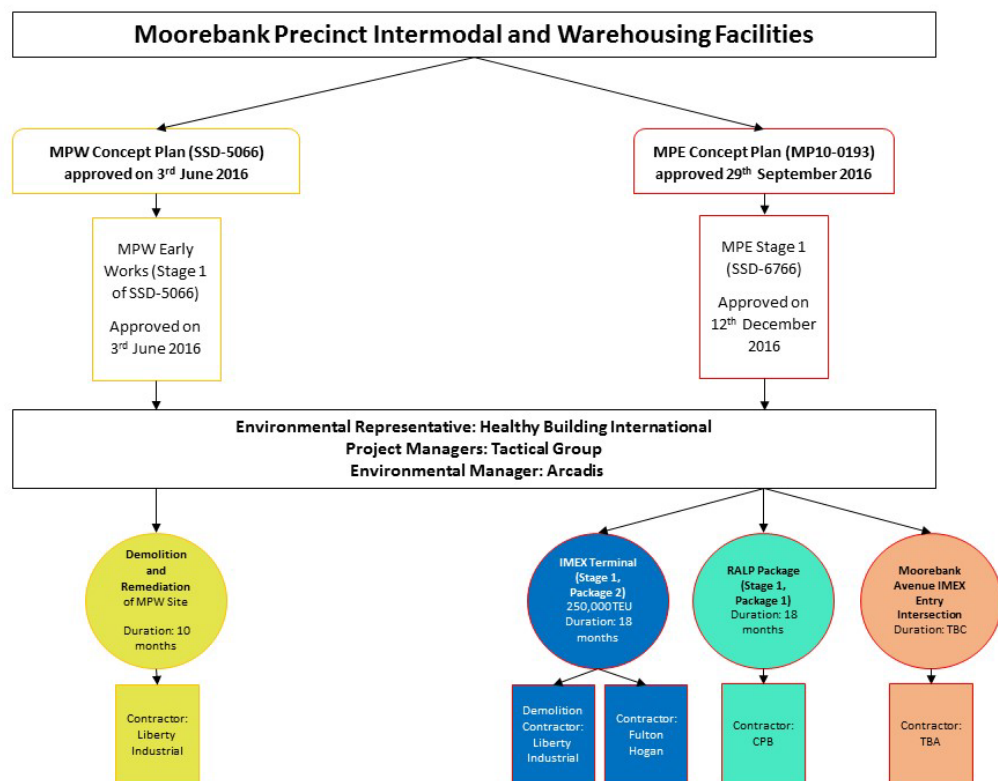


Figure 1-1 – Overview of Moorebank Precinct Contract Structure

Liberty Industrial will undertake all of the MPW Early Works, under the MPW Concept Approval, granted on 3 June 2016 (SSD 5066), i.e. the subject of this report.

The MPW Project will be delivered under the following existing concept plan and staged approvals:

- Concept Approval (SSD-5066) granted by the PAC on 3 June 2016 for the ‘Concept Plan Approval’ of the MPW Project and Stage 1 Early Works under Part 4, Division 4.1 of the EP&A Act

- EPBC Approval (No. 2014/7152) granted in May 2014 for the demobilisation of the Department of Defence from the Commonwealth land known formerly as Lot 3001
- EPBC Approval (No. 2011/6086) approved on 27 September 2016 for the impact of the MPW Project on listed threatened species and communities (sections 18 and 18A of the EPBC Act) and Commonwealth land (sections 26 and 27A of the EPBC Act)
- Planning Proposal for the rezoning of the MPW site which was gazetted on 24 June 2016 for an amendment to the Liverpool Local Environmental Plan 2008 (LLEP 2008).

The other approved works to be undertaken within the Moorebank Precinct, namely under the MPE Stage 1 Approval (SSD 14-6766), will be undertaken as part of a separate approvals and a separate construction program, i.e. not the subject of this report.

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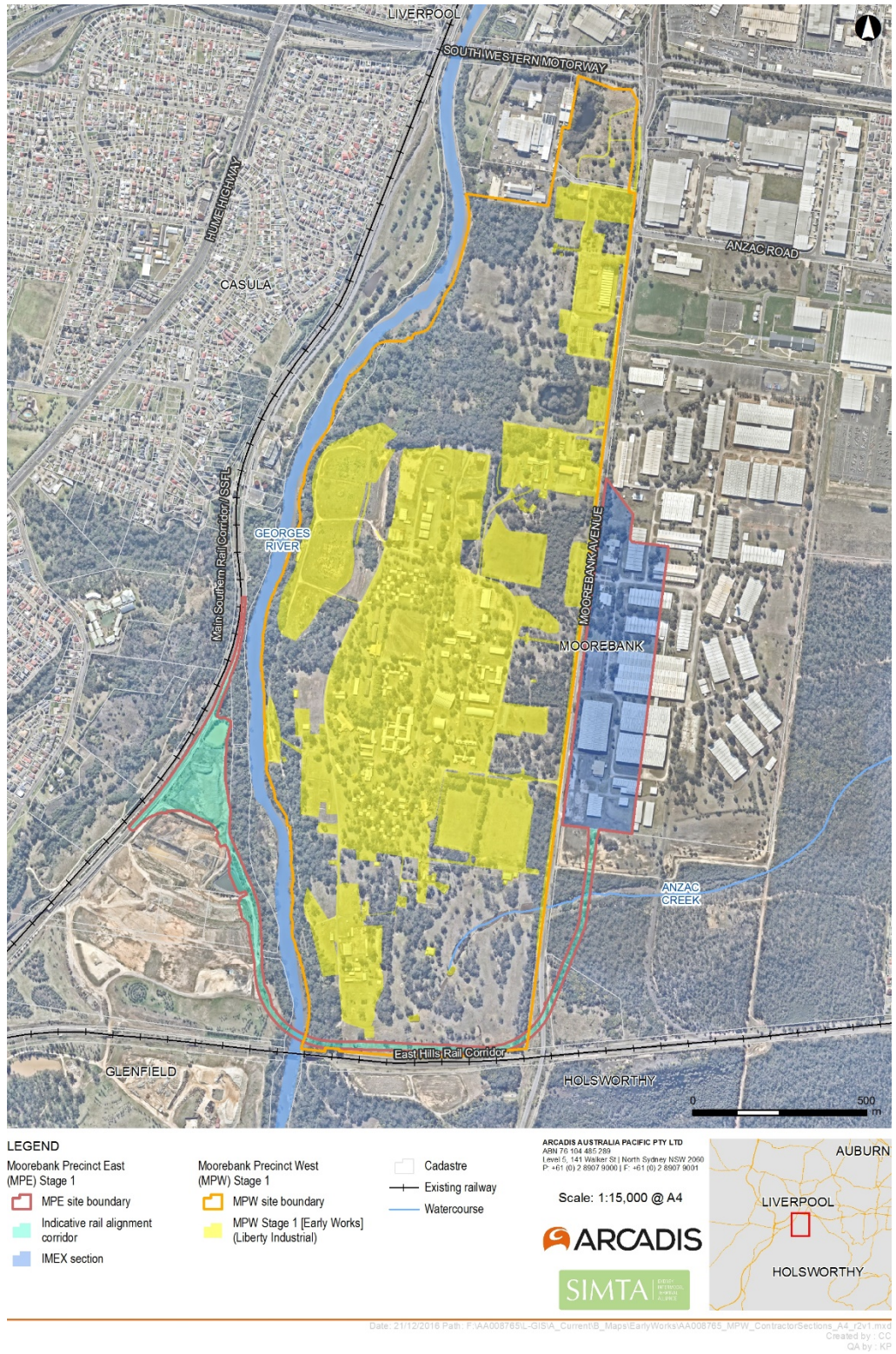


Figure 1-2 - The extent of the sites for each appointed contractor

## 1.2 Scope and Purpose

The purpose of this 6-Monthly Compliance Report is to satisfy CoA A2(c)(ii) (see Table 1-1) of the MPW Early Works (Stage 1 of the MPW Project (SSD 5066)) planning approval and to provide to the Department of Planning and Environment (DP&E) a report outlining the status of compliance with the Conditions of Approval and Revised Environmental Mitigation Measures (REMMs). This report covers the period between the commencement of construction (demolition) on 22 February 2017 to 22 August 2017.

Table 1-1 – Requirements for Compliance Reporting.

MPW Approval	Condition No.	Condition	Reference
Conditions of Approval SSD 5066)	A2	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 for approval prior to the commencement of construction and operate for the duration of construction. The Program shall include, but not be limited to:	CTP has been prepared to satisfy this condition. The CTP was approved by the Secretary on 21 February 2017 prior to the commencement of construction.
	(c)	provision for periodic reporting of compliance status to the Secretary, including but not limited to: <ul style="list-style-type: none"> <li>ii. Six-monthly, or other timing as agreed by the Secretary, Construction Compliance Reports, for the duration of construction</li> </ul>	This 6-monthly compliance report has been prepared to satisfy this condition and provides a description of the compliance status of the Project for the period from 22nd February 2017 to 22nd August 2017, and will be provided to the Secretary for information.

## 1.3 Periodic Review

This compliance report has been prepared in accordance with the Compliance Tracking programme requirements with inputs by Arcadis, Liberty Industrial and SIMTA. The CTP was approved by the Secretary on 21 February 2016.

Regular compliance activities, such as progress meetings, inspections, client surveillance and monitoring have been undertaken in accordance with the CEMP Section 9 and the aspect-specific sub-plans. Environmental controls are inspected regularly to ensure their ongoing suitability and effectiveness as detailed in Section 3 of this report.

## 2 PROJECT DESCRIPTION

### 2.1 Site Location and Environmental Constraints

The Moorebank Precinct West (MPW) site is located in the Liverpool Local Government Area (LGA) in Sydney's South West Sub-Region, approximately 4 km south of the Liverpool city centre. The MPW Site is approximately 30 km south-west of the Sydney Central Business District (CBD) and approximately 26 km west of Port Botany.

The MPW site is generally bounded by the Georges River to the west, Moorebank Avenue to the east, the East Hills Railway Line to the south and the M5 Motorway to the north. It is located on Moorebank Avenue, Moorebank and forms Lot 1 in Deposited Plan (DP) 1197707<sup>1</sup>, which is wholly owned by the Commonwealth, and leased by SIMTA. The site also contains Lots 100 and 101 DP1049508, which are located north of Bapaume Road.

The MPW Early Works footprint (i.e. area of impact) is located within the MPW site as shown in Figure 1-1. The MPW Early Works footprint is predominately located in the central part of the MPW site, however also includes areas of the northern and southern parts of the MPW site.

The MPW Early Works footprint and surrounds include a number of existing environmental constraints, which have been considered as part of the mitigation measures provided within the environmental approvals documentation for the MPW Project. Figure 2-1 shows the extent of the MPW Early Works footprint and key environmental constraints within and outside of the area.

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<sup>1</sup> Previously legally described as "Lot 3001, DP 1125930" in the Concept Plan Approval (MP 10\_0193), however has since been subdivided.

MPW Early Works



LEGEND

- MPW Site Boundary
- Site entry and exit
- Hollow bearing tree
- Watercourse
- Existing railway
- Known PFAS Contamination: Exclusion Zone
- Vegetation exclusion area
- Approximate Early Works footprint boundary
- Approximate Early Works (only to occur if no impact to EEC)

ARCADIS AUSTRALIA PACIFIC PTY LTD  
 ABRN 76 104 485 289  
 Level 5, 141 Walker St North Sydney NSW 2060  
 P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Scale: 1:20,000 @ A4



Environmental Constraints Maps - LPWDR

Date: 14/12/2016 Path: F:\AA008785L-GISA\_CurrentB\_Maps\EarlyWorks\AA008785\_MPW\_EnviroControlMaps\_A4\_5v1\_OverviewPage.mxd  
 Created by: CC  
 QA by: KP

Figure 2-1 – MPW Early Works Environmental Constraints Map

## 2.2 Scope of Works

Liberty Industrial have been appointed to undertake the MPW “Early Works” Project which is also referred to as Land Preparation Works – Demolition and Remediation (LPWDR) in construction documentation. Early Works is defined in the Conditions of Approval (Development) as:

*“the 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.”*

Based on this approval and the associated approvals documentation, the complete scope of works included within the MPW Early Works Project is as follows:

- The demolition of existing buildings and structures
- Service utility terminations and diversion/relocation
- Removal of existing hardstand/roads/pavements and infrastructure associated with existing buildings
- Rehabilitation of the excavation/earthmoving training area (i.e. ‘dust bowl’)
- Remediation of contaminated land and hotspots, including areas known to contain asbestos, and the removal of:
  - Underground storage tanks (USTs)
  - Unexploded ordnance (UXO) and explosive ordnance waste (EOW) if found
  - Asbestos contaminated buildings
- Archaeological salvage of Indigenous and European sites
- Establishment of a conservation area along the Georges River
- Establishment of construction facilities (which may include a construction laydown area, site offices, hygiene units, kitchen facilities, wheel wash and staff parking) and access, including site security
- Vegetation removal, including the relocation of hollow-bearing trees, as required for remediation/demolition purposes.

The MPW Concept Approval (Definitions), provides the following definition for construction:

*“Construction includes all work in respect of the SSD other than:*

- *Survey; acquisitions; or building/ road dilapidation surveys; fencing; investigative drilling, excavation or salvage; and work undertaken in accordance with a strategy or salvage operation required by the conditions of this approval; or minor clearing or translocation of native vegetation that does not comprise any EECs.*
- *Establishment of site compounds and construction facilities*
- *Installation of environmental mitigation measures*
- *Utilities adjustment and relocation that do not present a significant risk to the environment, as determined by the Environmental Representative*
- *Other activities determined by the Environmental Representative to have minimal environmental impact.”*

Based on the above definition of construction, ‘pre-construction works’ have been defined as follows:

- Repair of perimeter fencing

- Bushfire protection works (including any necessary minor vegetation clearing outside EEC areas, no clearing permitted in EEC areas)
- EEC and heritage protection fencing/bunting and signage
- Establishment of site compounds. Mobilisation to site to the extent required to undertake pre-construction works
- Soft strip of building interiors and waste management including removal of furniture, cabling, fluorescent light tubes, PCB capacitors, and asbestos and degassing of air conditioning units. Heritage buildings only to be soft stripped once archival recording has been completed.
- Servicing potholing/locating, disconnection, capping and relocation of all services
- Establishment of environmental controls
- Building hazardous material assessments and asbestos removal
- Management of unexpected heritage and contamination finds

The risks and mitigation measures associated with the construction activities are managed in accordance with the DP&E approved Construction Environment Management Plan (CEMP).

### **2.3 Works Undertaken – February to August 2017**

The physical works that have been undertaken during this reporting period are outlined below:

- Installation of environmental controls including erosion and sediment controls and heritage protection fencing
- Salvage and reinternment of the remains in the Dog Cemetery
- Selective salvage of the CUST Hut and STRARCH Hanger
- Non-Indigenous Heritage Salvage works which included the salvage of archaeological deposits at Moorebank Heritage (MH) Pad Sites/Locations MHPAD1 and MHPAD2
- Hazardous material removal including asbestos
- Soft strip of remaining buildings
- Demolition of buildings and roads in all areas where they could safely be done without impacting on EECs
- Stockpiling of concrete and road pavements for future recycling
- Remediation of contaminated fill areas, generally comprising of asbestos impacted soils
- Offsite disposal of soils that could not be remediated
- Aboriginal Heritage Salvage of items MA1, MA2, MA3, MA4, M5 and MA9

In addition to physical works, the preparation of the CEMP and associated sub-plans has been undertaken to facilitate for construction to commence.



The key steps undertaken for the CEMP within this period include:

- February 2017 – provisional approval of the CEMP except for the Construction Heritage Management Plan (CHMP)
- August 2017 – approval of the CHMP and Aboriginal Salvage Strategy

## 2.4 Works Forecast – September to February 2018

Works to be undertaken over the next 6-month period include, but are not limited to the works listed below. The completion of these works is subject to weather and other extenuating circumstances and may be subject to change:

- Completion of construction (demolition and remediation) activities:
  - Demolition of remaining infrastructure and remnant defence items
  - Completion of remediation of contamination hotspots
  - Remediation of underground storage tanks and dustbowl area
  - Ongoing management of environmental controls including erosion and sediment controls and heritage protection fencing including stabilisation of the site for handover to MPW Stage 2 contractor.

Table 2-1 is an indicative 6-monthly look-ahead for works to be undertaken.

Table 2-1 – Indicative 6-monthly forecast

Month	September 2017	October 2017	November 2017	December 2017	January 2018	February 2018
Demolition of existing infrastructure and remnant defence items	x					
Remediation of UST and Dustbowl Area	x	x	x			
Remediation of identified contaminated areas	x	x	x			
Ongoing Environmental Mitigation and Control Works	x	x	x	x		

## 3 PROJECT COMPLIANCE

### 3.1 Inspections

#### 3.1.1 Internal Inspections

Internal inspections are undertaken by Liberty Industrial's Environmental Advisor on a regular basis and are interspersed by inspections undertaken by the Environmental Representative (ER) as detailed in Section 3.1.2. The results from the internal inspections are summarised below (Table 3-1).

Table 3-1 Summary of Liberty internal inspections

Inspection Date	Key Findings	Action Taken	Close Out
17/03/2017	Geofabric in Contamination Assessment Treatment Areas (CATA) B sediment basin needs to be fixed	Replace geofabric on walls of basin and pin down securely	20/03/2017
19/04/2017	EEC flagging pulled down	Flagging re-installed	20/04/2017
04/05/2017	CATA A sediment basin is full of water and needs to be pumped out.	Water tested by JBS&G and pumped out.	10/05/2017
18/05/2017	Sediment fencing damaged	Sediment fencing re-installed.	19/05/2017
07/06/17	EEC flagging maintenance in various areas	Flagging checked and maintained	08/06/17
15/06/17	EEC flagging maintenance in various areas	Flagging checked and maintained	16/06/17
26/07/17	Additional sediment controls required around service removal works	Sediment fence installation	28/07/17
20/08/17	Additional polymer required for completed areas	Apply more polymer	21/08/17

#### 3.1.2 Environmental Representative Inspections

The ER undertook 32 inspections (in total) on weekly or fortnightly basis. A summary of the key findings from these inspections is provided in Table 3-2.

Table 3-2 Summary of ER Inspections

Inspection Date	Key Findings	Action Taken	Close Out
13/2/17	Sediment controls to be improved adjacent to EEC	Detention basin isolated and additional bunding placed	22/02/17

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Inspection Date	Key Findings	Action Taken	Close Out
13/2/17	EEC area not marked with flagging	Area demarked with flagging	22/02/17
13/2/17	Liberty plant maintenance area – full and empty drums stored outside bunded storage	All drums placed in bunds	28/02/17
21/3/17	Clean and repair damaged sediment fencing	Sediment control repairs completed	24/03/17
21/3/17	Double skinned above ground diesel fuel tank refuelling point bund is approaching capacity	Bund emptied by licensed contractor	24/03/17
4/4/17	Liberty maintenance compound – degreasing operations observed over bare ground, without bunding	Toolbox talk conducted and records provided	20/04/17
2/5/17	Existing bitumen concrete haul roads – significant build-up of dirt accumulation and deterioration of sediment control measures were noted at various locations, which require cleaning and repair	Sediment controls repaired	09/05/17
2/5/17	Removal of greater number of trees for safe removal of services required. Liberty to submit documents to ER for approval	Documents provided to ER prior to removal works	09/05/17
2/5/17	Viet Cong Remediation Area - Due to removal of fence, EEC Areas adjacent to the works are no longer adequately segregated. Segregation flagging to be placed around EEC areas no longer segregated by fencing.	Areas have been segregated by flagging	30/05/17
16/5/17	Chemicals and oil and grease stored unbunded. Place containers in bunded area	Containers moved to bunded locations	30/05/17
30/5/17	Soil Stockpile of unknown origin and un-bunded and uncontrolled stockpiling – remove to a dedicated soil stockpiling location	Material moved to designated stockpile area	08/06/17
30/5/17	Various areas highly disturbed due to demolition and services removal and soil stockpiles did not appear to be managed in accordance with the CSWMP	Sediment controls installed	16/06/17
17/5/17	Bunded plant washdown area required	CSWMP revised and approved by ER as minor amendment	27/06/17

Inspection Date	Key Findings	Action Taken	Close Out
7/7/17	EEC area west of Afghan training area - EEC area requires surveying and accurate demarcation flagging	Area Surveyed and flagged	17/07/17
7/7/17	Liberty maintenance compound - Various fluids stored unbundled inside cut-down container.	Rectified	25/07/17
1/8/17	Central and western riparian EEC area near playing field requires sediment control along stockpiled material. Stockpile also to be removed from under dripline of trees	Completed	08/08/17
27/6/17	Various locations throughout the site - Sediment controls require maintenance and sedimentation basins require pumping out (i.e. more than 5 days since last significant rain event)	All issues rectified	08/08/17
1/8/17	Old transport compound north of stormwater channel - Sediment controls required around stormwater pits, including diversion and grading of surrounding areas away from the stormwater pits	Areas surrounding pits have been excavated to prevent flow into pits	16/08/17
7/7/17	EEC areas west and north of Afghan training area - encroachment of services removal operations into EEC. See Table 3-3.	SeeTable 3-3	

Quarterly reports have been submitted to DP&E by the ER, as per Condition of Approval D2.

### 3.2 Other Regulator Inspections

No inspections have been undertaken by regulators during this reporting period.

### 3.3 Audits Undertaken

#### 3.3.1 Internal Audits

An Internal Audit of Liberty Industrial was completed on 3 August 2017. The Audit was completed by WSP and focused on compliance with the CEMP. During the audit, one non-conformance, six observations, and two opportunities for improvement were identified.

The non-conformance related to a lack of communication or induction records for the CEMP and sub-plans. Therefore, Liberty Industrial have ensured workers and contractors are inducted into the requirements of the CEMP and sub-plans and that the induction records are kept up to date.

### 3.3.2 External Audits

No external environmental audits have been undertaken during this reporting period.

## 3.4 Monitoring

### 3.4.1 Asbestos Air Monitoring

Asbestos air monitoring has been undertaken daily during asbestos remediation works throughout this reporting period. Monitoring is undertaken and reported by JBS&G in accordance with the *National Occupational Health and Safety Commission Guidance Note on the Membrane Filter Method for the Estimating Airborne Asbestos Fibre, 2nd Edition (NOHSC 2005b)*.

This monitoring commenced 16 March 2017. All results have been below detectable limit of 0.01 fibres/ml of air at boundaries of asbestos removal work areas.

### 3.4.2 Noise Monitoring

#### 3.4.2.1 High Energy Impact Compaction

High Energy Impact Compaction (HEIC) rolling trials were undertaken in three locations within the MPW Early Works site which involved the operation of a Caterpillar 'Challenger' 85E tractor with a HEIC attachment. The operation of the attachment, and the nature of the trials, was not addressed in the Construction Noise and Vibration Management Plan (CNVMP), therefore an additional assessment was undertaken and endorsed by the Environmental Representative, followed by in-situ noise and vibration monitoring in each catchment area.

The operation of the HEIC roller involved making several passes over a 12 metre strip of soil, compacting fill at speeds between 10 - 14 km. The noise levels from the operation of the tractor and HEIC attachment were calculated at the four nearest residential locations to investigate compliance with the noise management levels (NML's) established in the CNVMP. Modelling identified that the noise levels would be within the Noise Management Levels. The PPV criteria was considered to be met at distances of over 30 metres from the impact roller.

Attended noise and vibration monitoring (LAeq,15 minute) conducted during the trial indicated that no noise or vibration limits were exceeded.

#### 3.4.2.2 Use of Plant and Equipment

The use of a 70t excavator was not included within the plant and equipment list to be utilised on MPW Early Works. An assessment of noise impacts on nearby sensitive receivers at Casula, Wattle Grove and Glenfield as part of Early Works was undertaken. The results of the assessment were included with the Construction and Noise Vibration Management plan approved by the Environmental Representative. The assessment determined that the calculated sound pressure levels at receiver locations are compliant with the nominated noise criteria.

## 3.5 Environmental Incidents

Two minor non-reportable environmental incidents occurred during the reporting period as outlined below (Table 3-3).

Table 3-3 Summary of Environmental Incidents

Date	Incident Description	Immediate Action	Cause	Corrective Actions
06/07/17	Plant and equipment encroachment into EEC.	Works were ceased within the area and an immediate review was conducted for working in these areas close to the EEC zone	It was identified that the EEC zone flagging originally installed was inaccurate	<ul style="list-style-type: none"> <li>Establish temporary buffer zone between current flagging and current work zone</li> <li>Toolbox talk regarding EEC zones</li> <li>Employ survey to set out EEC zones accurately</li> </ul>
18/08/17	Dust observed leaving site boundary	Works were ceased, water carts to remain on site, continue air monitoring, further attempts to acquire additional water carts	Excessive windy conditions gusting to 80km/h (as per nearest weather station of Horsley Park)	<ul style="list-style-type: none"> <li>Further implementation of polymer on exposed areas</li> <li>Stop dust generating activities in strong wind conditions.</li> </ul>

Both incidents were rated Level 1 (low-minor severity) as defined in the MPW Early Works CEMP Section 10.

### 3.6 Conditions of Approval

Compliance against the Conditions of Approval and the Revised Environmental Mitigation Measures (REMMs) are outlined in Appendix A and Appendix B respectively. It is noted that only the REMMs applicable to Early Works have been included within Appendix B. These appendices show that the works undertaken during this period have been in compliance with the MPW Concept Approval.

#### 3.6.1 Additional Approvals

##### 3.6.1.1 Environmental Work Method Statements

Works method statements have been produced where it has been identified that works will encroach near to EEC areas to ensure that works do not impact on these areas. To date, four works method statements have been produced outlining exclusion zones and locations of nearby EEC areas. Instances of EEC encroachment or flagging issues have been identified in Sections 3.1 and 3.5.

##### 3.6.1.2 Out of Hours

Two out of hours' (OOH) requests were submitted and endorsed by the ER as outlined in Table 3-4 during this reporting period. OOH1 and OOH2 were approved prior to February 2017 and are outlined within the pre-construction compliance report.

Table 3-4 Summary of Out of Hours Request

OOH Number	Works to be Undertaken	Date Endorsed
OOH3	Plant maintenance, working on machinery between 6-7pm weekdays and 1pm-5pm Saturdays, within the site workshop compound for the duration of Early Works	24/02/17
OOH4	To allow pick up of oversized plant on Sunday 12/03/17	09/03/17

### 3.6.2 Non-Compliance

No non-compliances against the project approvals have been recorded during this reporting period.

## 3.7 Newly Identified Environmental Risks

### 3.7.1 Unexpected Contamination Finds

Unexpected asbestos finds have been identified across the site, as well as in anthropogenic fill, and buried services constructed out of asbestos containing material (ACM). The unexpected contamination finds were managed in accordance with Remediation Action Plan i.e. works stopped immediately and area delineated and signposted, an asbestos hygienist was notified to inspect the find and remove the asbestos removed under restricted access and conditions with correct asbestos removal protective equipment, finally including classification and licensed transport and disposal of asbestos materials. The hygienist provided clearance and validation of contaminated areas and will include the unexpected finds th in the final validation reports.

The risk of asbestos find and appropriate management of asbestos is outlined within the induction and site staff were reminded of the requirements during pre-starts when necessary as general awareness and prior to ground breaking activities.

## 3.8 Complaints Management

Three complaints were recorded during this reporting period. All complaints and enquiries were managed in accordance with the Community Communication Strategy Section 7.6 Complaints and Enquiry Handling Flowchart. Table 3-5 summarises the nature of the complaints.

Table 3-5 - Complaints Summary

Date	Reporting mechanism	Description	Comments/Action	Close Out Date
11/06/17	Community Hotline	Wattle Grove resident claimed workers may have dumped water through storm water drain and is requesting Liberty	No works were undertaken on this date; site was closed.	11/07/17

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Date	Reporting mechanism	Description	Comments/Action	Close Out Date
		Industrial to clean it up		
28/07/17	Local MP and DP&E	Wattle Grove resident complained of dust and excessive noise after hours on 28 <sup>th</sup> July 2017. The complaint was received by Local MP and DP&E.	Works concluded at 6pm on this date as per the approved working hours. However, dust controls were increased with three watercarts operating as of 26/07/17 and continued application of polymer (dust suppressant) to denuded areas	04/08/17



## **4 CONCLUSION**

At the completion of this compliance period, it has been deemed that there are no outstanding non-compliance issues identified and works were undertaken in accordance with the approved Construction Environmental Management Plan. Periodic review of compliance against the Conditions of Approval and the REMMs will continue to be undertaken.

## **APPENDIX A COMPLIANCE TABLE - MINISTERS CONDITIONS OF APPROVAL**

MPW Early Works: 6-Mpnthly Compliance Tracking - Conditions of Approval (CoA)

Responsibility for Compliance:  
Qube (Principal)  
Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility		Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments
				Principal	Liberty Industrial					
<b>Schedule 2 - Terms of Approval</b>										
1	Development Description	Except as amended by the conditions of this consent, development consent is granted only to the Concept Proposal and Early Works as described in Schedule 1 and the Environmental Impact Statement dated October 2014, as amended by the Response to Submissions, dated May 2015 (as further amended by the Supplementary Response to Submissions dated August 2015), and the conditions contained in this development consent.	Early Works	✓		No	Compliant	Provisional Approval 3/02/2017	Construction Environmental Management Plan (CEMP)	Provisional approval of CEMP was issued by DP&E on 3/02/2017 excluding the CHMP. The CHMP was subsequently approved in August 2017. Minor amendments to the CEMP have been approved by the ER throughout this reporting period. Early Works have been undertaken in accordance with the plan.
2	Determination of Future Applications	In accordance with section 83B(3)(a) of the EP&A Act, all future development under the Concept Proposal (for the avoidance of doubt, excluding the Early Works) shall be the subject of future development application(s).		✓		No	Not applicable to this reporting period		Not Applicable	This compliance report relates only to Early Works.
3		The determination of the future development application(s) are to be generally consistent with the terms of this development consent as described in Schedule 1, and subject to the conditions in Schedule 4		✓		No	Not applicable to this reporting period		Not Applicable	This compliance report relates only to Early Works.
4	Development in Accordance with Plans and Documents	The applicant shall carry out the development generally in accordance with the: a) Environmental Impact Statement titled Moorebank Intermodal Terminal Project Environmental Impact Statement, prepared by Parsons Brinckerhoff Australia Pty Limited, dated October 2014; b) Response to Submissions report titled, Moorebank Intermodal Terminal Response to Submissions Report, prepared by Parsons Brinckerhoff Australia Pty Limited, dated May 2015; c) Supplementary Submissions report titled, Moorebank Intermodal Terminal Supplementary Response to Submissions Report, prepared by Parsons Brinckerhoff Australia Pty Limited, dated August 2015; and d) the conditions of this consent	All Stages	✓	✓	No	Compliant		CEMP and sub plans	All MPW Early Works plans and documents have been prepared in accordance with condition 4(a) to 4(d). All conditions and relevant Revised Environmental Mitigation Measures have been included and addressed within these documents. Ongoing compliance with these conditions are outlined within the Compliance Tracking Program and associated compliance reports.
5		In the event of an inconsistency between: (a) the conditions of this approval and any document listed from condition 4(a) to 4(c) inclusive, the conditions of this approval shall prevail to the extent of the inconsistency; and (b) any document listed from condition 4(a) to 4(c) inclusive, and any other document listed from condition 4(a) to 4(c) inclusive, the most recent document shall prevail to the extent of the inconsistency.		✓	✓	No	Compliant		Compliance Reports	No inconsistencies were identified during this reporting period. Where inconsistencies are identified, they will be reported in the final compliance report.
6		Projects carried out under this staged development consent are to be assessed with the objective of not exceeding the capacity of the transport network, including the local, regional and State road network	All Stages	✓	✓	No	Compliant		Construction Traffic and Access Management Plan and Environmental Impact Statement	Works have been undertaken in line with the EIS traffic assessment ensuring the capacity of the road network is not exceeded.
7		Concept approval is granted for interstate terminal container freight with a throughput of up to 500,000 TEU p.a. if the combined movement of container freight on the Subject Site does not exceed 1.05 million TEU p.a. The consent authority must also be satisfied that the Traffic Impact Assessment demonstrates that the interstate terminal would not exceed the capacity of the transport network with or without mitigation measures/upgrades.	Construction	✓			NA		Not Applicable	This compliance report relates only to Early Works.
8		For the IMEX terminal, concept approval is granted for the movement of container freight by up to: a) initially, 250,000 TEU p.a. if the consent authority is satisfied that the Traffic Impact Assessment demonstrates the proposal would not exceed the capacity of the transport network with or without mitigation measures/upgrades; a) initially, 250,000 TEU p.a. if the consent authority is satisfied that the Traffic Impact Assessment demonstrates the proposal would not exceed the capacity of the transport network with or without mitigation measures/upgrades; b) after the facility has been in operation, an increase of up to an additional 300,000 TEU p.a. if the consent authority is satisfied that monitoring and modelling of the operation of the IMEX terminal demonstrates that traffic movements resulting from the proposed increase in TEU will achieve the objective of not exceeding the capacity of the transport network. The combined movement of container freight on the Subject Site must not exceed 1.05 million TEU p.a.	Construction	✓			NA		Not Applicable	This compliance report relates only to Early Works.
9		Concept approval is granted for the rail terminals (IMEX and interstate) incorporating either: a) the rail link; or b) if a rail link is under construction or has been constructed associated with the SIMTA development as identified in development application MP10_0193, then only a short connection from the IMEX/interstate terminals to the SIMTA rail connection on the eastern side of the Georges River		✓			NA		Not Applicable	This compliance report relates only to Early Works.
10		Port shuttle operations must use: a) Locomotives that incorporate available best practice noise and emission technologies. Prior to construction of the rail link connecting to the site, the Applicant is to submit a report to the Secretary for consideration and approval that has been prepared in consultation with TfNSW and the EPA that justifies the technology proposed and how it meets the objective of best practice noise and emission technologies; and b) Wagons that incorporate available best practice noise technologies including as a minimum, permanently coupled 'multi-pack' steering wagons using Electronically Controlled Pneumatic (ECP) braking with a wire based distributed power system (or better practice technology). Prior to the commencement of operation, the Applicant is to submit a report to the Secretary for consideration and approval that has been prepared in consultation with TfNSW and EPA that justifies the technology proposed and how it meets the objective of best practice noise technologies.		✓			NA		Not Applicable	This compliance report relates only to Early Works.
11	Limits of Approval	The Applicant shall install and maintain a rail noise monitoring system on the rail link at the commencement of operation to continuously monitor the noise from rail operations. The system shall capture the noise from each individual train passby noise generation event, and include information to identify: a) Time and date of freight train passbys; b) Imagery or video to enable identification of the rolling stock during day and night; c) LAeq(15hour) and LAeq(9hour) from rail operations; and d) LAF(max) and SEL of individual train passbys, measured in accordance with ISO3095; or e) Other alternative information as agreed with, or required by, the Secretary.  The results from the noise monitoring system shall be publicly accessible from a website maintained by the Applicant. The noise results from each train shall be available on the website within 24 hours of it passing the monitor, unless unforeseen circumstances (i.e. a system malfunction) have occurred. The LAeq(15hour) and LAeq(9hr) results from each day shall be available on the website within 24 hours of the period ending. Prior to the commencement of operation, the Applicant shall submit for the approval of the Secretary, justification supporting the appropriateness of the location for rail noise monitoring, including details of any alternative options considered and reasons for these being dismissed. The rail noise monitoring system shall not operate until the Secretary has approved the proposed monitoring location.  The Applicant shall provide an annual report to the Secretary with the results of monitoring for a period of 5 years, or as otherwise agreed with the Secretary, from the commencement of operation of either the IMEX or interstate terminal (whichever operates first). The Secretary shall consider the need for further reporting following a review of the results for year 5.		✓			NA		Not Applicable	This compliance report relates only to Early Works.
12		Prior to submitting any Development Application for either the IMEX or interstate terminal, the Applicant shall convene a meeting with regard to proposed traffic assumptions and mitigation measures. The Applicant must: a) Invite SIMTA, TfNSW, RMS, Liverpool City Council and Campbelltown City Council. Each Council may also invite a maximum of two community representatives to attend. b) At the meeting, present the scope and assumptions of the mesoscopic/microsimulation traffic modelling, the draft Traffic Impact Assessment and any proposed mitigation measures including timing of the delivery of any proposed measures; c) Publish the meeting minutes and a schedule of action items arising from the meeting, including responsibilities and timeframes on its website; d) Prepare a written report responding to the action items and consult with RMS on the action items and final mitigation measures; and e) Provide details of the undertaking and outcomes of this condition in the EIS.		✓			NA		Not Applicable	This compliance report relates only to Early Works.

**MPW Early Works: 6-Mpnthly Compliance Tracking - Conditions of Approval (CoA)**

Responsibility for Compliance:  
 Qube (Principal)  
 Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility	Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments
13		Containers must be transferred from Port Botany to the site and from the site to Port Botany by rail, unless there is planned track maintenance or where unforeseen circumstances have occurred (e.g. an incident, breakdown, derailment or emergency maintenance on the rail line). The Secretary may at any time request the Applicant to demonstrate that the transport of containers between the site and Port Botany container terminals is by rail. This is to be demonstrated upon request by the Secretary for the prior 12 month period.	Construction/ Design	✓		NA		Not Applicable	This compliance report relates only to Early Works.
14	Operations on the Subject Site cannot commence until a rail connection to the SSFL is operational.	✓			NA		Not Applicable	This compliance report relates only to Early Works.	
15	The warehousing must only be used for activities associated with freight using the IMEX and interstate terminals unless otherwise approved in a subsequent Development Application.	✓			NA		Not Applicable	This compliance report relates only to Early Works.	
16	Building heights are to be a maximum of 21 metres and other structures are to be generally consistent with Appendix D Landscape and Visual Impact of the Response to Submissions dated May 2015.	✓			NA		Not Applicable	This compliance report relates only to Early Works.	
17	Building setbacks are to be generally consistent with Appendix D Landscape and Visual Impact of the Response to Submissions dated May 2015.	✓			NA		Not Applicable	This compliance report relates only to Early Works.	
18	The layout of the site shall not prevent a possible future pedestrian connection to Casula Railway Station	✓			NA		Not Applicable	This compliance report relates only to Early Works.	
19	The layout of the site shall be designed to ensure heavy vehicles associated with the operation of the terminals can be accommodated on site in the event of an incident blocking access to the M5 Motorway/ Moorebank Avenue to avoid queuing on public roads.	✓			NA		Not Applicable	This compliance report relates only to Early Works.	
20	This approval will lapse ten years from the date of this approval unless works the subject of Early Works (Stage 1) or any related application are physically commenced, on or before that lapse date.	✓			No	Compliant		Environmental Work Method Statement and Environmental Constraints Maps	Pre-construction works (as defined under the definition of construction) commenced on 26 August 2016 under an ER approved Environmental Works Method Statement. Construction works commenced 4th February 2017 following approval of the CEMP and sub-plans by DP&E.
21	<b>Secretary as Moderator</b> In the event of a dispute between the Applicant and a public authority, in relation to this approval, either party may refer the matter to the Secretary for resolution. The Secretary's resolution of the matter shall be binding on the parties.	✓			No	Compliant		Not Applicable	There have been no disputes during this reporting period.
22	<b>Legal Notices</b> Any advice or notice to the consent authority shall be served on the Secretary	✓			Yes	Compliant	NA	Not Applicable	There have been no advice or notices during this reporting period.

MPW Early Works: 6-Monthly Compliance Tracking - Conditions of Approval (CoA)

Responsibility for Compliance:  
Qube (Principal)  
Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility	Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments					
<b>Schedule 3 Conditions to be Met for Early Works (Stage 1)</b>														
<b>Part A - Administrative Conditions</b>														
A1	Subject Land	The land Subject to this part to the intermodal site (Lot 1 DP 1197707, Lot 100 DP 1049508, Lot 101 DP 1049508 and Lot 2 DP 1197707)	All Stages	✓	✓	No	Compliant	Environmental Work Method Statement and Environmental Constraints Maps	The construction works have been undertaken wholly within the project boundaries as shown in the Environmental Constraints Maps which relate to Lot 1 DP 1197707, Lot 100 DP 1049508, Lot 101 DP 1049508 and Lot 2 DP 1197707. It is noted that a Change Compliance Review was developed defining the area of Early Works more clearly. The CCR was approved by the ER in October 2016.					
A2	Compliance Tracking and Monitoring	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 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:	Early Works	✓	✓	Yes	Complete	21/02/2017	Compliance Tracking Programme (CTP)	CTP approved by DP&E on 21/02/2017.				
		(a) provision for the notification to the Secretary prior to the commencement of construction;								✓	Yes	Complete	21/02/2017	This is outlined in the CTP Section 2.1
		(b) provision for periodic review of the compliance status of the SSD against the requirements of this approval;								✓	Yes	Complete	21/02/2017	This is outlined in the CTP Section 2.2
		(c) provision for periodic reporting of compliance status to the Secretary, including but not limited to:								✓	Yes	Complete	21/02/2017	This is outlined in the CTP Section 2.2
		(i) a Pre-Construction Compliance Report prior to the commencement of early works,								✓	Yes	Compliant	21/02/2017	A pre-construction compliance report (PCCR) was submitted to DP&E on 22/2/17 relating to activities undertaken in relation to the conditions of approval for all pre-construction works.
		(ii) Six-monthly, or other timing as agreed by the Secretary, Early Works Compliance Reports, for the duration of early works, and								✓	Yes	Compliant	15/09/2017	6-monthly compliance report This report covers the construction works undertaken between 22 February to 22 August 2017.
		(iii) a Completion Compliance Report within one month of completion of the early works stage;								✓	Yes	Not applicable to this reporting period		Completion compliance report To be provided at the end of Early Works, estimated to be completed in November 2017.
		(d) a program for independent environmental auditing in accordance with AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems ;								✓	Yes	Complete	21/02/2017	CTP approved by DP&E on 21/02/2017 and auditing outlined in Section 2.4.
		(e) mechanisms for recording environmental incidents during construction and actions taken in response to those incidents;								✓	Yes	Complete	21/02/2017	This is outlined in the CTP Section 2.5
		(f) provision for reporting environmental incidents to the Secretary during construction, in accordance with conditions A3 and A4;								✓	Yes	Complete	21/02/2017	This is outlined in the CTP Section 2.5
(g) procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management; and	✓	Yes	Complete	21/02/2017	This is outlined in the CTP Section 2.6									
(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.	✓	Yes	Complete	21/02/2017	This is outlined in the CTP Section 2.7									
A3	Incident Reporting	The applicant shall notify the Secretary and Relevant public authorities of any incident with actual or potential significant on-site or offsite 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.	Early Works	✓	✓	Yes	Compliant	Incident Management Plan (IMP) Section 3	Two incidents have occurred during this reporting period including minor incursion of an EEC area and observation of dust leaving the site boundary. No reportable incidents were recorded. The notification of incidents occurred in accordance with the IMP Section 3 and CTP Section 2.5. See section 3.5 for further detail of the incidents.					
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.		✓	✓	Yes	Compliant	IMP Section 3	No reportable incidents have occurred during this reporting period.					
<b>Part B - Prior to Construction</b>														
B1	Demolition	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.	Early Works	✓	✓	No	Compliant	Construction (Demolition) Management Plan	Demolition work has been carried out in accordance with the Construction (Demolition) Management Plan and Australian Standard AS 2601:2001. To date, approximately 95% of the demolition works have been completed. Outstanding demolition required is within EEC zones which cannot be impacted upon under Early Works.					
B2	Contamination	The approved works (including any excavation required for remediation) must not occur below 5 metres AHD and lower the water table below 1m AHD on adjacent class 1, 2, 3, 4 land in accordance with the Liverpool Local Environmental Plan 2008	Early Works	✓	✓	No	Compliant	Site Remediation Plan	No excavations have been undertaken below 5 metres AHD.					
B3	Contamination	The subject site is to be remediated in accordance with: a) The approved Remedial Action Plan; b) State Environmental Planning Policy No. 55 – Remediation of Land ; and c) The guidelines in force under the Contaminated Land Management Act .	Early Works	✓	✓	No	Compliant	Site Remediation Plan	All remediation is being carried out in accordance with the approved Remedial Action Plan. Ongoing remediation works include treatment of asbestos contaminated soil (picking) and unexpected finds (asbestos services). Remediation of excavations has been delayed as additional clean imported backfill is required (subject to CCR).					
		No												
		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. 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 State Environmental Planning Policy No. 55 – Remediation of Land. 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.				No	Not applicable to this reporting period		No amendments to the Remedial Action Plan have been undertaken. Notice of completion not applicable at this stage. Remediation due to be completed in October 2017.					
B4	Soil and Water Quality	The Early Works shall be undertaken to comply with section 120 of the Protection of the Environment Operations Act 1997 , which prohibits the pollution of waters.	Early Works	✓	✓	No	Compliant	CSWMP Section 6.1.1	Two incidents have occurred during this reporting period including minor incursion of an EEC area and observation of dust leaving the site boundary on 18 August 2017. No reportable incidents were recorded. The notification of incidents occurred in accordance with the IMP Section 3 and CTP Section 2.5. See section 3.5 for further detail of the incidents. However, these did not involve the pollution of waters. All works are being undertaken in accordance with the Environmental Representative endorsed Erosion and Sediment Control Plan.					
B5		All activities taking place in, on or under waterfront land, as defined in the Water Management Act 2000 should be conducted generally in accordance with the NSW Office of Water's Guidelines for Controlled Activities	Early Works	✓	✓	No	Compliant	CSWMP Section 6.1.1	No works have occurred on or under waterfront land					
B6		The Applicant shall not harm, modify or otherwise impact any heritage items outside the subject site.	All Stages	✓	✓	No	Compliant	Salvage Strategy and Aboriginal Heritage Management Plan	No works have occurred outside the project boundary. All works are located within the MPW site boundary.					

MPW Early Works: 6-Mpnthly Compliance Tracking - Conditions of Approval (CoA)

Responsibility for Compliance:  
Qube (Principal)  
Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility	Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments
B7	Heritage	Prior to the commencement of Early Works affecting Aboriginal sites MA1, MA2, MA3, MA4, MA5 and MA9, the Applicant shall: (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	Pre-construction	✓	Yes	Compliant	Aug-17	Salvage Strategy and Construction Heritage Management Plan	A detailed salvage strategy has been prepared in consultation with OEH and the Registered Aboriginal Parties (RAPs). Consultation commenced on 19/09/2016 and resulted in OEH stating that they do not intend to review. A response was received from the RAPs agreeing with the strategy. The Strategy was submitted to the Secretary on 29/11/2016 for approval. Unexpected aboriginal heritage finds were uncovered during the salvage of non-Indigenous Heritage sites MHPAD1 and MHPAD2 during pre-construction and detailed within the PCCR section 3.7.1. The CHMP was approved in August 2017 and Aboriginal Salvage Strategy approved in August 2017 by DP&E. Salvage of MA1-MA5 and MA9 commenced on 17/07/2017 and was completed on 25/8/17.
		(b) undertake any further archaeological excavation works recommended by the results of the Aboriginal archaeological investigation program.	Pre-construction		Yes				No further archaeological excavation works were recommended as a result of the Aboriginal archaeological investigation and salvage.
		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.	Pre-construction	✓	Yes	In-progress	Not applicable to this reporting period	Salvage Strategy and Aboriginal Heritage Management Plan	The salvage report has been scheduled to be completed by December 2017 due to the high number of items and time taken for a geomorphologist to undertake an assessment of the stratigraphic units in each of the salvage areas and report on findings.
B8	Heritage	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.	Pre-construction	✓	No	Compliant	Not applicable to this reporting period	Salvage Strategy and Aboriginal Heritage Management Plan	Archaeologists undertook salvage of MHPAD1 and MHPAD2 during October to December 2016 in pre-construction. Further archaeological investigations were undertaken during November and December as aboriginal artefacts were uncovered during this salvage. The unexpected finds procedure as outlined in the EWMS was enacted.
		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.	Within 12 months of salvage	✓	Yes	In-progress	Not applicable to this reporting period	Non-Aboriginal Salvage Report	The report is due to be completed and submitted to the Secretary by December 2017.
B9	Heritage	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.	Pre-construction	✓	No	Complete	8/12/2016	Options for Mitigation Report	Options for Mitigation Reports were developed for each of the heritage values identified in condition B9. The Options for Mitigation Reports were submitted to DP&E on 8 December 2016 for information and outline the measures taken to ensure mitigation of these heritage items is fully investigated. Consultation has been undertaken with all relevant stakeholders.  A copy of the reports has also been issued to Liverpool City Council, Office of Environment and Heritage, and the local Historical Society (Moorebank Heritage Group) as required by Condition B9.  The salvage of the CUST Hut, the Dog Cemetery and Commemorative Gardens has been completed. Specific items of heritage have been retained for onsite interpretative reuse.
B10	Dangerous Goods	Dangerous goods, as defined by the Australian Dangerous Goods Code, shall 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 <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (Environment Protection Authority, 1997).	All Stages	✓	No	Compliant		Hazardous Materials Management Plan Section 7.1	All dangerous goods on site are stored in accordance with relevant standards. Requirements for storage are outlined in Section 7.1 of the Hazardous Materials Management Plan
		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.							
B11	Dust Management	The Applicant shall carry out all feasible and reasonable measures to minimise dust generated by the Development	All Stages	✓	No	Compliant			
B12	Dust Management	During Early Works, the Applicant shall 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.	All Stages	✓	No	Compliant		CAQMP Section 5 CTAMP Section 6	Dust mitigation measures such as use of a water cart, stabilised access points, use of existing hard stand, and a rumble grid at the site exit are implemented on site. Dust management measures are reiterated in the induction, tool box talks and prestart meetings.
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 offsite.		✓	No	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).		✓	No	Compliant			

**MPW Early Works: 6-Mpnthly Compliance Tracking - Conditions of Approval (CoA)**

Responsibility for Compliance:  
Qube (Principal)  
Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility	Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments	
B15	Waste Management	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.	All Stages	✓	No	Compliant		Hazardous and Contaminated Materials Management Strategy and Waste Management Strategy (CEMP Appendix A4)	As far as practicable material is being reused onsite or recycled offsite and tracked using a waste tracking register.	
B16	Utilities and Services	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.	All Stages	✓	No	Compliant		Consultation Register	Dial before you dig information, and sucker trucks have been used to identify utilities within works areas. These have been supplemented by use of Ground Penetrating Radar. Despite these precautions, unknown services have been identified and managed.	
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.		✓	No	Compliant		Dilapidation Report	Dilapidation Report produced by Craigmar Consulting 26/07/2016.	
B18	Utilities and Services	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.	All Stages	✓	No	Compliant		CTAMP Section 3, 6, appendix A and B	<p>No works have been undertaken on Moorebank Avenue to date. There are no planned works on Moorebank Avenue. Access to the site is via the existing Chatham Avenue entrance, a signalised access point with a dedicated right turn lane into site. Resident access will not be affected during works. Construction heavy vehicle access to and from the site via Moorebank Avenue (south) / Cambridge Avenue during Early Works is not permitted</p> <p>Site traffic has been managed in accordance with the Construction Traffic and Access Management Plan. In particular, security is responsible for full time observation of the Moorebank Avenue gate and allows queuing on site only. Information is also included in the truck driver induction and signage is located at specific locations on site.</p> <p>Early Works are wholly contained within the project boundary and no works have occurred along Moorebank Avenue. However, should the need arise for works to be undertaken which may involve traffic changes, affected stakeholders would be provided with 48 hours notice in line with the Community Communication Strategy. Further measures are included within the CTAMP section 6 and appendices A and B.</p>	
<b>Part C - Community Information and Reporting</b>										
C1	Community Communications Strategy	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a Community Communication Strategy 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> <p>(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;</p> <p>(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</p> <p>(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;</p> <p>(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</p> <p>(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.</p>	Pre-construction	✓	✓	Yes	Complete	21/02/2017	CCS Section 4	Elton Consulting has been appointed as the Community Consultant and manages all complaints and enquiries. Elton have prepared a Precinct wide Community Engagement Strategy (CES). Liberty Industrial have developed a Community Communication Strategy (CCS) in line with the CES. Both strategies have been developed in line with the requirements of these conditions as outlined below. Stakeholders have been identified and listed in section 4 of the CCS. The CCS was approved by the Secretary on 21/02/2017.
				✓	✓	Yes	Complete	21/02/2017	CCS Section 6	A Precinct wide Community Communication Strategy has been produced by Elton. Liberty Industrial also produced a strategy which feeds into this. See CCS section 6. Procedures and mechanisms used for distribution of project information include: SIMTA website, letterbox drops, newsletters, and media advertising.
				✓	✓	Yes	Complete	21/02/2017	CCS Section 6	See CCS section 6. Procedures and mechanisms used for stakeholder discussions and feedback include: SIMTA website, 1800 information line, postal address, and project email have been established.
				✓	✓	Yes	Complete	21/02/2017	CCS Section 7	Enquiries and complaints management outlined in CCS section 7.
				✓	✓	Yes	Complete	21/02/2017	CCS Section 7, CEMP Section 6 and Section 8	Enquiries and complaints management outlined in CCS section 7 and CEMP Section 6 and Section 8. No third party disputes have occurred during this reporting period.

MPW Early Works: 6-Monthly Compliance Tracking - Conditions of Approval (CoA)

Responsibility for Compliance:  
Qube (Principal)  
Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility	Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments
C2		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: (a) a 24 hour telephone number(s) on which complaints and enquiries about the SSD may be registered; (b) a postal address to which written complaints and enquires may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved. 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.	Pre-construction	✓	No	Complete	21/02/2017	<a href="http://simta.com.au/newsletter/">http://simta.com.au/newsletter/</a>	Elton Consulting has been appointed as the Community Consultant and handles all complaints and enquiries.  24hr info line 1800 986 465 www.simta.com.au simta@elton.com.au PO Box 1488 Bondi Junction NSW 2022  A SIMTA community update newsletter was distributed to 10000 residents in July, September and November 2016 outlining the current status of the Moorebank Precinct. The newsletters include project contact details.  The SIMTA Communications and Engagement Strategy and Consultation Manager Section 8.16, Liberty Industrial CCS Section 7 detail management procedures for enquiries and complaints.
C3		Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a Construction Complaints Management System consistent with AS ISO 10002-2006 Customer satisfaction – Guidelines for complaints handling in organisations (ISO 10002:2004, MOD) and maintain the System for the duration of Early Works and up to 12 months following completion of this stage. 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.	Pre-construction	✓	No	Complete	21/02/2017	SIMTA Communications and Engagement Strategy Section 8.16, Liberty Industrial CCS Section 7	All complaints and enquiries are managed by Elton Consulting in line with Section 8.16 of the Communications and Engagement Strategy and Section 7 of the CCS. Two complaints were received during this reporting period and are further discussed in Section 3.8.
C4	Provision of Electronic Information	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:  (a) information on the current implementation status of the SSD;	Pre-construction	✓	No	Complete		<a href="http://simta.com.au/">http://simta.com.au/</a>	SIMTA have a dedicated webpage, documents related to this condition of approval have been uploaded to the website.
		(b) a copy of the documents listed in condition 4, and any documentation supporting modification to this approval and any future modifications of this approval		✓	No	In-progress	Ongoing	<a href="http://simta.com.au/current-works/">http://simta.com.au/current-works/</a>	Works currently being undertaken are included on the website.
		(c) a copy of this approval and any future modification to this approval		✓	No	Complete		<a href="http://simta.com.au/mpw/">http://simta.com.au/mpw/</a>	Relevant documentation as required by condition 4 of this approval have been uploaded onto the website.
		(d) a copy of each relevant environment approval, licence or permit required and obtained in relation to the SSD;		✓	No	Complete		<a href="http://simta.com.au/word-press/wp-content/uploads/2016/06/MIT_-_Development-Consent_030616.pdf">http://simta.com.au/word-press/wp-content/uploads/2016/06/MIT_-_Development-Consent_030616.pdf</a>	The SSD5066 Development Consent has been uploaded to the website.
		(e) a copy of each current report, plan, or other document required under this approval		✓	No	Compliant	Ongoing	<a href="http://simta.com.au/">http://simta.com.au/</a>	Permits are uploaded progressively as they have been obtained.
		(f) the outcomes of compliance tracking in accordance with condition A2 of this approval; and		✓	No	In-progress		<a href="http://simta.com.au/">http://simta.com.au/</a>	A copy of the following approved documents have been uploaded to the website: 1. Pre-construction Compliance Report 2. Non-Aboriginal Salvage Strategy 3. Options for Mitigation Report 4. Road Dilapidation Survey 5. Compliance Tracking Program 6. Community Communications Strategy 7. Dragonfly Survey Report 8. Construction Environmental Management Plan 9. Construction Air Quality Management Plan 10. Construction Soil and Water Management Plan 11. Construction Noise and Vibration Management Plan 12. Construction Traffic and Access Management Plan 13. Heritage Interpretation Strategy 14. Aboriginal Salvage Strategy 15. Construction Heritage Management Plan
		(g) details of contact point(s) to which community complaints and enquires may be directed, including a telephone number, a postal address and email address		✓	No	Complete		<a href="http://simta.com.au/contact-us/">http://simta.com.au/contact-us/</a>	This 6-monthly compliance report will be uploaded to the website once submitted to the Secretary.  Contact details for enquiries and complaints are available on the project website.
<b>Part D - Construction Environmental Management, Reporting and Auditing</b>									
D1	Environmental Representative	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, (a) be the principal point of advice in relation to the environmental performance of the Early Works; (b) monitor the implementation of environmental management plans and monitoring programs required under this approval and advise the Applicant upon the programs required under this approval and advise the Applicant upon the achievement of these plans/programs; (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; (d) ensure that environmental auditing is undertaken in accordance with the Applicant's Environmental Management System(s); (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; (f) be given the authority and independence to require reasonable steps to be taken to avoid or minimise unintended or adverse environmental impacts; and (g) 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.	Pre-construction	✓		Complete	19/07/2016	Rui Henriques of Healthy Buildings International appointed as ER, approved by the Secretary.	The nominated ER was approved by DP&E on 19/07/2016.
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	All Stages	✓		Compliant		DP&E Quarterly Reports	HBI has submitted quarterly reports to the Secretary as per condition requirements.



MPW Early Works: 6-Mpnthly Compliance Tracking - Conditions of Approval (CoA)

Responsibility for Compliance:  
 Qube (Principal)  
 Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility	Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments
D3	Construction Soil and Water Management	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.	All Stages	✓	No	Compliant		CSWMP Section 6	The Soil and Water Management Plan (SWMP) was approved by DP&E on the 3rd February 2017. The SWMP outlines the management measures for erosion and sediment control in line with <i>Managing Urban Stormwater - Soils and Construction Vols 1 and 2, 4th Edition</i> (Landcom, 2004).  The ESCP has been updated as works have progressed. The ESCP measures implemented include, but are not limited to: Installation of sediment basins Installation of sediment fencing Protection of drains Application of polymer on stockpiles and completed surfaces Rumble grids Use of street sweepers and water carts
D4	Bunding	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 <i>Storing and Handling Liquids: Environmental Protection – Participants Handbook</i> .	All Stages	✓	No	Compliant		CSWMP Section 6, CEMP Appendix A4	All hazardous materials are appropriately stored within chemical containers and sheds, or on bunding with 110% of the capacity of the largest container.
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.	All Stages	✓	No	Compliant		CEMP Section 3, CNVMP section 3	Standard construction hours adhered to except in accordance with Out of Hours requests. Two out of hours works requested were submitted to and approved by the ER. These are further detailed in Section 3.6.1.2.
D6	Construction Hours	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. Notwithstanding conditions D5 and D6, works may be undertaken outside the hours specified under those conditions in the following circumstances: (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).	All Stages	✓	No	NA	NA	CEMP Section 3, CNVMP section 3	During demolition works any impulsive or tonal noise has occurred during the approved hours of 8:00 am to 5:00 pm Monday to Friday, and 8:00 am to 1:00 pm Saturday. This work has never been carried out in continuous blocks not exceeding three hours.
D7		Notwithstanding conditions D5 and D6, works may be undertaken outside the hours specified under those conditions in the following circumstances: (a) construction works that cause LAeq (15 minute) noise levels that are: (i) No more than 5 dB above rating background level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009); and (ii) No more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses; or (b) for the delivery of materials required by the police or other authorities for safety reasons; or (c) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; or (d) construction works approved through an Out-Of-Hours Work Protocol prepared as part of the Construction Noise and Vibration Management Plan required by condition D21(b), provided the relevant Council, local residents and 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 (e) identified works approved by the Secretary	All Stages	✓	No	Compliant		CEMP Section 3 CNVMP Section 7.1.11 and Appendix B	Standard construction hours adhered to except in accordance with Out of Hours requests as described in Section 3.1.6.2.
D8	Construction Noise and Vibration	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: (a) construction noise management levels established using the Interim Construction Noise Guideline (DECC 2009); (b) vibration criteria established using the Assessing Vibration: a Technical Guide (DECC 2006) (for human exposure); and (c) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage). 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).	All Stages	✓	No	Compliant		CNVMP Section 4	All feasible and reasonable noise mitigation measures are implemented on site as detailed in Section 4 of the CNVMP. A noise assessment was undertaken by 'Day Design Group' to ensure noise limits during works do not exceed the approved levels associated with High Energy Impact Compaction, This is further detailed in Section 3.4.2.
D9	Construction Traffic Noise	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.	All Stages	✓	No	Compliant		CEMP / CNVMP	All contractors have been advised of noise requirements during pre-start meetings and induction
D10		No use of compression brakes shall be permitted for construction vehicles associated with the Early Works in the vicinity of the subject site.	All Stages	✓	No	Compliant		CEMP / CNVMP	All contractors have been advised of noise requirements during pre-start meetings and induction.
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.	All Stages	✓	No	Compliant		CTAMP Section 5.3	The Vehicle Movement Plan (VMP) and CTAMP restricts movements of heavy vehicles to and from Cambridge Avenue. This has been reiterated in pre-start meetings, induction and signage has been installed restricting right turns out of site.
D12		The Early Works shall be carried out, 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.	All Stages	✓	No	Compliant		CTAMP Section 5	Ongoing implementation. No complaints have been received to date with regards to the use of local roads. This requirement is reiterated in pre-starts meetings.
D13		Construction vehicles (including staff vehicles) associated with the Early Works shall be managed to: (a) minimise parking or queuing on public roads; (b) minimise idling and queuing in local residential streets where practicable; (c) adhere to the nominated haulage routes identified in the Construction Traffic and Access Management Plan required under condition D22(a); and (d) ensure access and egress from construction compounds is undertaken in a safe and lawful manner.	All Stages	✓	No	Compliant		CTAMP Section 4	Ongoing implementation. No complaints have been received to date with regards to the use of local roads. This requirement is reiterated in pre-starts meetings.
D14	Transport and Access	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.	All Stages	✓	No	NA		CTAMP Section 4.4	No works have been undertaken which would impact on pedestrians or cyclists
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.	All Stages	✓	No	NA		CTAMP Section 3.6	No property access has been affected during the Early Works, all works have been undertaken within the project boundaries.
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 shall prepare a Road Dilapidation Report. 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.	All Stages	✓	No	Compliant		Dilapidation Report	Dilapidation Report produced by Craigmar Consulting 26/07/2016
		Following completion of Early Works, a subsequent Report shall be prepared to assess any damage to the road that may have resulted. 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.		✓	No	NA		Dilapidation Report	Post-construction dilapidation survey not yet undertaken.

MPW Early Works: 6-Mpnthly Compliance Tracking - Conditions of Approval (CoA)

Responsibility for Compliance:  
Qube (Principal)  
Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility	Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments	
D17	Biodiversity	<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 NSW Biodiversity Offsets Policy for Major Projects (OEH 2014), unless otherwise agreed by the Secretary.</p> <p>The Package shall include, but not necessarily be limited to:</p> <p>(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;</p> <p>(b) the objectives and biodiversity outcomes to be achieved;</p> <p>(c) the final suite of the biodiversity offset measures selected and secured in consultation with OEH;</p> <p>(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:</p> <p>(e) the monitoring of the condition of species and ecological communities at offset (including translocation) locations;</p> <p>(f) the methodology for the monitoring program(s), including the number and location of offset monitoring sites, and the sampling frequency at these sites;</p> <p>(g) provisions for the annual reporting of the monitoring results for a set period of time as determined in consultation with the OEH; and</p> <p>(h) timing and responsibilities for the implementation of the provisions of the Package. 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>	All Stages	✓		Yes	In-progress	On-going	A Biodiversity Offset Package (BOP) is currently in development. The BOP is expected to be finalised in the fourth quarter of 2017.	
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.	All Stages	✓	✓	No	Compliant		Construction Flora and Fauna Management Plan (CFFMP) and Environmental Works Method Statement (EWMS)	The Environmental Constraints Maps identifies EEC areas which are not to be impacted upon during Early Works. Management of hollow bearing trees is detailed in Section 6 of the CFFMP. To date 51 hollows have been removed, 38 nest boxes have been installed with an additional 17 scheduled for September 2017. These have been located in the riparian area of Georges River.
D19		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 Fisheries Management Act 1994 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. 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 NSW DPI Policy and Guidelines for Fish Habitat Conservation and Management (2013).	All Stages	✓		No	Complete	10/10/2016	Threatened Dragonfly Species Survey Plan.	A Threatened Dragonfly Species Survey Plan and Report were completed in September and October 2016 respectively. The Plan and Report were accepted by DPI Fisheries as satisfying and closing this Condition on 10 October 2016. In summary, the survey found a lack of preferred habitat of the threatened dragonfly species under the FM Act along the MPW site, and therefore the likely lack of occurrence of these species, no specific construction mitigation measures were required to avoid potential impacts on these species.
D20	Construction Environmental Management Plan	Prior to the commencement of Early Works, or as otherwise agreed by the Secretary the applicant shall prepare and implement a <b>Construction Environmental Management Plan (CEMP)</b> . The CEMP is to be prepared in consultation with the EPA, OEH, DPI Water DPI Fisheries, and the relevant Council, for 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:	Pre-construction	✓	Yes	Complete	3/02/2017	CEMP and sub plans	Provisional approval of CEMP was issued by DP&E on 3/02/2017 excluding the CHMP. Early Works are being undertaken in accordance with this plan. The CHMP was approved in August 2017 and minor updates of the CEMP and sub-plans have been approved by the ER progressively.	
(a)		a description of activities to be undertaken during the Early Works		✓				CEMP Section 3 and Section 1		
(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		✓				CEMP Section 4		
(c)		A description of the roles and responsibilities for relevant employees, including contractors and sub-contractors, are aware of their environmental and compliance obligations under these conditions of approval.		✓				CEMP Section 4 and Section 5		
(d)		An environmental risk analysis to identify the key environmental performance issues associated with the early works; and		✓				CEMP Appendix A4		
(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.		✓				CEMP Section 9		
(i)		Measures to monitor and manage dust emissions including dust from stockpiles, traffic on unsealed roads and materials tracking from construction sites onto public roads		✓				CEMP Appendix B5		
(ii)		Measures for the handling, treatment and management of hazardous and contaminated materials (including asbestos)		✓				CEMP Appendix A3		
(iii)		Measure and monitor and manage waste generated during construction but not necessarily limited to: general procedures for waste classification, handling reuse, disposal; use of secondary waste material in construction wherever feasible and reasonable; procedures or dealings 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)		✓				CEMP Appendix A3		
(iv)		Measure and monitor and manage hazards and risks		✓				CEMP Appendix A4		
(v)		Measure and monitor and rectify any impacts to third party property and infrastructure, including details of the process of rectification or compensation of affected landowners, and timeframes for rectification works or compensation processes and		✓				CEMP Section 6		
(vi)		The issues identified in condition D21		✓				CEMP Appendix B1-B6		
D21	Construction Traffic and Access Management Plan	As part of the CEMP for the SSD, the Applicant shall prepare and implement a Construction Traffic and Access Management Plan 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:	Pre-construction	✓	Yes	Complete	3/02/2017	CTAMP	Provisional approval of CEMP and Sub-plans was issued by DP&E on 3/02/17 excluding the CHMP. The CHMP was approved in August 2017 and minor updates of the CEMP and sub-plans have been approved by the ER progressively.	
(a)		(i) identification of construction traffic routes and construction traffic volumes (including heavy vehicle/spoil haulage) on these routes;		✓				CTAMP Appendix		
		(ii) details of vehicle movements for construction sites and ancillary facilities including parking, dedicated vehicle turning areas, and ingress and egress points;		✓				CTAMP Section 4		
		(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;		✓				CTAMP Section 4		
		(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;		✓				CTAMP Section 4		
		(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;		✓				CTAMP Section 5.3		
		(vi) details of measures to maintain or provide alternative safe and accessible routes for pedestrians throughout the duration of construction;		✓				CTAMP Section 4		
		(vii) details of measures to maintain connectivity for cyclists, with particular emphasis on providing adequate access between key existing cycle routes for commuter cyclists;		✓				CTAMP Section 4		
		(ix) details of measures to manage traffic movements, parking, loading and unloading at ancillary facilities during out-of-hours work;		✓				CTAMP Section 4.3		
		(x) an adaptive response plan which sets out a process for response to any traffic, construction or other incident; and		✓				CTAMP Section 8		

MPW Early Works: 6-Mpnthly Compliance Tracking - Conditions of Approval (CoA)

Responsibility for Compliance:  
Qube (Principal)  
Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility	Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments	
		(xi) mechanisms for the monitoring, review and amendment of this plan.		✓				CTAMP Section 6.3		
(b)	Construction Noise and Vibration Plan	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 Interim Construction Noise Guidelines (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:	Pre-construction	✓	Yes	Complete	3/02/2017	CNVMP	Provisional approval of CEMP and Sub-plans was issued by DP&E on 3/02/17 excluding the CHMP. The CHMP was approved in August 2017 and minor updates of the CEMP and sub-plans have been approved by the ER progressively.	
		(i) identification of the work areas, site compounds and access points;		✓				CNVMP Appendix A		
		(ii) identification of sensitive receivers and relevant construction noise and vibration goals applicable to the SSD and stipulated in the conditions above;		✓				CNVMP Section 2 + Appendix C&D		
		(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;		✓				CNVMP Section 5		
		(iv) an Out-of-Hours Work Protocol 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: a) assessment of out-of-hours works against the relevant noise and vibration criteria; b) detailed mitigation measures for any residual impacts (that is, additional to general mitigation measures), including extent of at receiver treatments; and c) proposed notification arrangements.		✓				CNVMP Section 6, Section 7, and Appendix B		
		(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;		✓				CNVMP Section 6		
		(vi) identification of feasible and reasonable procedures and mitigation measures to ensure relevant vibration criteria are achieved, including 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);		✓				CNVMP Section 6.15		
		(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		✓				CNVMP Section 6.5 & 6.11		
		(viii) mechanisms for the monitoring, review and amendment of this plan.		✓				CNVMP Section 6.13		
(c)	Construction Heritage Management Plan	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:	Pre-construction	✓	Yes	Compliant	Subject to approval	CHMP	The CHMP was submitted to DP&E for approval on 28 September 2016. Comments have been received and addressed. The CHMP was approved in August 2017.	
		(i) in relation to Aboriginal Heritage: 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; 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 re-commence, 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 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; 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 e) procedures for ongoing Aboriginal consultation and involvement for the duration of the Early Works; and (ii) in relation to non-Aboriginal Heritage: a) identification of heritage items directly and indirectly affected by the Early Works;		✓				CHMP Section 6 Strategy 2		
		b) consideration of methods to prevent damage to any retained heritage items, including: I. procedures for identifying minimum working distances to retained heritage items (including, at minimum, vibration testing and monitoring), II. detailed options for alteration of construction methodology should preferred values for vibration be exceeded, and III. commitment to implementing those options if preferred values for vibration are likely to be exceeded;		✓				CHMP Strategy 4		
		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);		✓				CHMP Strategy 1		
		d) details of monitoring and reporting requirements for impacts on heritage items;		✓				CHMP Section 3.3		
		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 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 Heritage Act 1977; and 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 (iii) mechanisms for the monitoring, review and amendment of this plan.		✓				CHMP Section 5.2		
		(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;		✓				CHMP Table 1		No non-Indigenous heritage items are to remain on site; these have been salvaged from site prior to works being undertaken which may have affected these heritage structures. Refer to Options for Mitigation reports which detail how the heritage structures have been managed.  Indigenous heritage items which are located within EEC zones are to remain on site until salvage can be undertaken in stage 2. As these items are located within the EEC zones, they are protected with exclusion flagging.
		(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: a) clearing minimisation procedures (including fencing), b) clearing procedures (including nest box plan), c) removal and relocation of fauna during clearing, d) habitat tree management, and e) construction worker education;		✓				CHMP Table 1		
				✓				CHMP Section 7		The CHMP was submitted to DP&E for approval on 28 September 2016. Comments have been received and addressed. The CHMP was approved in August 2017.
				✓				CHMP Strategy 3		
				✓				CHMP Strategy 1		
								CHMP		
		a <b>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:		✓		Complete		CFFMP	The CFFMP was approved on 3 February 2017.	
		(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;		✓		Complete		CFFMP Figure 2; Section 6 and Appendix 1		
		(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: a) clearing minimisation procedures (including fencing), b) clearing procedures (including nest box plan), c) removal and relocation of fauna during clearing, d) habitat tree management, and e) construction worker education;		✓		Complete		CFFMP Figure 2; Section 6 and Appendix 1		

MPW Early Works: 6-Mpnthly Compliance Tracking - Conditions of Approval (CoA)

Responsibility for Compliance:  
 Qube (Principal)  
 Liberty Industrial (Contractor)

No.	Type	Condition	Timing	Overall Responsibility	Secretary Approval Required?	Compliance Status	Date Completed / Approval Received	Reference Document	Evidence / Comments	
(d)	Construction Flora and Fauna Management Plan	(iii) rehabilitation details, including identification of flora species and sources, and measures for the management and maintenance of rehabilitated areas;	Pre-construction	✓	Yes	Compliant	3/02/2017	CSWMP Section 6.1.3	Rehabilitation works will not be undertaken during Early Works as revegetation may impact on sub-grade for future works. Polymer has been, and will continue to be, sprayed on areas prior to handover to the Principal for MPW Stage 2 in order to stabilise the ground and minimise the potential of erosion. Small areas of hydro seeding have been undertaken adjacent to Moorebank Avenue.	
		(iv) a Weed Management Strategy, incorporating weed management measures focusing on early identification of invasive weeds and effective management controls (including for those related to aquatic and riparian zones);		✓		Complete		CFFMP Appendix 2		
		(v) a description of how the effectiveness of these management measures would be monitored;		✓		Complete		CFFMP Section 7		
		(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		✓		Complete		CFFMP Appendix 3		
		(vii) mechanisms for the monitoring, review and amendment of this plan.		✓		Complete		CFFMP Sections 6 and 8		
(e)	Construction Air Quality Management Plan	a Construction Air Quality Management Plan 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:	Pre-construction	✓	Yes	Complete	3/02/2017	CAQMP	The CAQMP was approved on 3 February 2017.	
		(i) identification of sources (including stockpiles and open work areas) and quantification of airborne pollutants;		✓		Complete		CAQMP Section 4		
		(ii) key performance indicators for local air quality during construction;		✓		Complete		CAQMP Section 7		
		(iii) details of monitoring methods, including location, frequency and duration of monitoring;		✓		Complete		CAQMP Section 7		
		(iv) mitigation measures to minimise impacts on local air quality;		✓		Complete		CAQMP Section 5		
		(v) procedures for record keeping and reporting against key performance indicators;		✓		Complete		CAQMP Section 7		
		(vi) provisions for implementation of additional mitigation measures in response to issues identified during monitoring and reporting; and		✓		Complete		CAQMP Section 5		
		(vii) mechanisms for the monitoring, review and amendment of this plan.		✓		Complete		CAQMP Section 1.2		
(f)	A Construction Soil and Water Management Plan	a Construction Soil and Water Management Plan 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:	Pre-construction	✓	Yes	Complete	3/02/2017	CSWMP	The CSWMP was approved on 3 February 2017.	
		(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;		✓		Complete		CSWMP Section 4 and Appendix B		
		(ii) potential impacts on watercourse bank stability and the development of appropriate mitigation measures as required;		✓		NA		NA		No works are to be undertaken in the vicinity of any water course. Georges River and Anzac Creek are not impacted on during these works.
		(iii) an Acid Sulphate Soils Management Plan, if required, including measures for the management, handling, treatment and disposal of acid sulphate soils, including monitoring of water quality at acid sulphate soils treatment areas, should the project impact on acid sulphate soils;		✓		Complete		CSWMP Section 4.5 (Plan not Required)		
		(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		✓		Complete		CSWMP Section 7		The CSWMP was approved on 3 February 2017.
(v) mechanisms for the monitoring, review and amendment of this plan.	✓	Complete	CSWMP Section 8							

SCHEDULE 4 CONDITIONS TO BE MET IN FUTURE DEVELOPMENT APPLICATIONS - NOT ADDRESSED IN THIS DEVELOPMENT APPLICATION

## **APPENDIX B COMPLIANCE TABLE - REVISED ENVIRONMENTAL MITIGATION MEASURES**

MPW Early Works: 6-Monthly Compliance Tracking - Revised Environmental Mitigation Measures

Responsibility for Compliance:  
Qube (Principal)  
Liberty Industrial (Contractor)

No.	Part	Type	Condition	Secretary Approval Required?	Date Completed / Approval Received	Compliance Status	Reference document	Evidence
1	A	General Environmental Management Proposed Environmental Framework	An EMS that complies with AS/NZS ISO 14001:2004 would be developed and implemented on the Project site.	No		Compliant	CEMP	CEMP and sub plans approved by DP&E 3/02/2017. The CEMP has been developed in line with the requirements of ISO14001 and the Guideline for the preparation of Environmental Management Plans (DIPNR, 2004). Minor updates to the CEMP and sub-plans have been approved by the ER.
	B		EMPs including CEMPs and OEMPs (or equivalent) would be prepared for the Project. At this point, Provisional EMPs (included in Volume 2, Appendix H of the EIS) have been prepared and would be updated as more is known about the Project phasing including detailed design, construction and operation	Yes	21/02/2017	Compliant	CEMP	CEMP and sub plans approved by DP&E 3/02/2017. The CEMP has been developed in line with the requirements of ISO14001 and the Guideline for the preparation of Environmental Management Plans (DIPNR, 2004).  OEMP will be submitted prior to commencement of operations.
2	A	Consultation	A Community Engagement Plan (CEP) (or equivalent) would be prepared to outline community involvement and consultation activities during early works, construction and operation phases. As a minimum, the CEP would include appropriate measures for community involvement, including: • a direct telephone number (24 hour); • an email address; • a postal address; • regular project updates; • a community liaison representative; and scheduled meetings with a local representative body such as a community consultative (or liaison) committee. The CEP would also set out a guide on expectations for responding to relevant information received from community members.	Yes	21/02/2017	Complete	CEP	Elton Consulting has been appointed as the Community Consultant and handles all complaints and enquiries. Elton have prepared a Precinct wide Community Engagement Strategy (CES), whilst Liberty Industrial have developed a Community Consultation Strategy (CCS) in line with the CEP. Both strategies have been developed in line with the requirements of these conditions as outlined below. Stakeholders have been identified and listed in section 4 of the CCS.  The CCS was approved by the Secretary on 21/2/17.
	B		The CEP would be prepared to ensure: • the community and stakeholders have a high level of awareness of all processes and activities associated with the Project; • accurate and accessible information is made available; and • a timely response is given to issues and concerns raised by stakeholders and the community.	Yes	21/02/2017	Complete	CEP	Elton Consulting has been appointed as the Community Consultant and handles all complaints and enquiries. Elton have prepared a Precinct wide Community Engagement Strategy (CES), whilst Liberty Industrial have developed a Community Consultation Strategy (CCS) in line with the CEP. Both strategies have been developed in line with the requirements of these conditions as outlined below. Stakeholders have been identified and listed in section 4 of the CCS.  The CCS was approved by the Secretary on 21/2/17.
3	B	Sustainability	Implementation of sustainability initiatives would be monitored in accordance with the monitoring framework developed as part of the EMS for the next stage of approvals. This framework would identify sustainability indicators for monitoring.	No		Compliant	CEMP Section 4	Sustainability indicators are outlined as 'Objectives and Targets' within the CEMP section 4.5.
4	I	Traffic And Access	Reducing the volumes of construction vehicles travelling during peak periods, especially if the increase in traffic generated by construction activities impedes on the operation of Moorebank Avenue.	No		Compliant	CTAMP Section 5	Daily inspections on all traffic management have been carried out by the site supervisor in line with CTAMP. The site Supervisor schedules vehicle movement to stagger movements through a "call up" system to prevent heavy vehicle queuing on Moorebank Avenue and local residential streets outside the Project boundaries. Trucks and queuing facilities are available on site. No queuing has been undertaken on Moorebank Avenue and or the neighbouring streets.
	J		Maintain access to neighbouring properties. It is particularly important that the ABB site has access throughout the construction stages.	No		Compliant	CTAMP Section 7	Access to all neighbouring properties has been maintained. Under the current scope of early works, neighbouring properties will not be affected by planned works. All accesses have been maintained during pre-construction works. ABB were consulted with to inform them on the commencement of works in the vicinity of their site access.
	K		In addition to the Community Engagement Plan (or equivalent) (Refer to 2A), a communication plan will be developed to provide information to the relevant authorities and bus operators in addition to the local community. The communication plan will need to incorporate a contact list with the chain of command.	No		Compliant	CCS Section 6. CTAMP Appendix E – Consultation register.	A Community and Engagement Strategy (CES) has been developed for the project by Elton Consulting. This strategy outlines how project information is provided. The Community Consultation Strategy outlines relevant project contacts in Section 6.
	L		Implement relevant traffic control measures to inform drivers of the construction activities and locations of heavy vehicle access locations.	No		Compliant	CTAMP Section 5	Signage has been provided to inform drivers of the access restrictions and location in line with this CTAMP. In addition, all heavy vehicle transport companies have received a copy of the site specific traffic requirements, including access points along Moorebank Avenue, site specific PPE requirements and a copy of Moorebank Avenue Vehicle Management Plan (VMP).

MPW Early Works: 6-Monthly Compliance Tracking - Revised Environmental Mitigation Measures

Responsibility for Compliance:  
 Qube (Principal)  
 Liberty Industrial (Contractor)

No.	Part	Type	Condition	Secretary Approval Required?	Date Completed / Approval Received	Compliance Status	Reference document	Evidence
	O		Traffic on Moorebank Avenue would be monitored during peak periods to ensure that queuing at intersections does not impact on other road users.	No		Compliant	CTAMP Section 5	Daily inspections on all traffic management have been carried out by the site supervisor. During Early Works, the site supervisor scheduled vehicle movement to stagger movements through a "call up" system to prevent heavy vehicle queuing on Moorebank Avenue and local residential streets outside the Project boundaries. Trucks and queuing facilities are available on site. No queuing has been undertaken on Moorebank Avenue and or the neighbouring streets.
6	A	Biodiversity	Following detailed design and before construction, detailed flora and fauna mitigation measures would be developed and presented as part of the CEMP. These detailed measures would incorporate the measures listed in 6B to 6W. The CEMP would address: • general impact mitigation; • staff/contractor inductions; • vegetation clearing protocols; • pre-clearing surveys and fauna salvage/translocation; • rehabilitation and restitution of adjoining habitat; • weed control; • pest management; and • monitoring. The plans would include clear objectives and actions for the Project including how to: • minimise human interferences to flora and fauna; • minimise vegetation clearing/disturbance; • minimise impact to threatened species and communities; • minimise impacts to aquatic habitats and species; and • undertake flora and fauna monitoring at regular intervals.	Yes	3/02/2017	Compliant	EWMS and CFFMP Sections 6 and 7	CFMP approved DP&E 3/02/2017.
	B		Vegetation clearing would be restricted to the construction footprint and sensitive areas would be clearly identified as exclusion zones.	No		Compliant	EWMS and CFFMP Section 6 Environmental Constraints Maps	Vegetation clearing within construction footprint only. Exclusion zones are demarcated physically on site and in Environmental Constraints Mapping.
	C		The exclusion zones would be marked on maps, which would be provided to contractors, and would also be marked on the ground using high visibility fencing (such as barrier mesh).	No		Compliant	EWMS and CFFMP Section 6	Vegetation clearing within construction footprint only. Exclusion zones are demarcated physically on site and in Environmental Constraints Mapping.
	D		A trained ecologist would accompany clearing crews to ensure disturbance is minimised and to assist in relocating any native fauna to adjacent habitat.	No		Compliant	EWMS and CFFMP Section 6	Ecologists from Biosis have undertaken pre-clearance surveys. No fauna was disturbed.
	E		A staged habitat removal process would be developed and would include the identification and marking of all habitat trees in the area. Where reasonable and feasible, clearing of hollow-bearing trees would be undertaken in March and April when most microbars are likely to be active (not in torpor) but are unlikely to be breeding or caring for young, and when threatened hollow-dependent birds in the locality are also unlikely to be breeding. Pre-clearing surveys would be conducted 12 to 48 hours before vegetation clearing to search for 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. Vegetation would be cleared from a 10 m radius around habitat trees to encourage animals roosting in hollows to leave the tree. A minimum 48 hour waiting period would allow animals to leave. After the waiting period, standing habitat trees would be shaken (where safe and practicable) under the supervision of an ecologist to encourage animals roosting in hollows to leave the trees, which may then be felled, commencing with the most distant trees from secure habitat. Felled habitat trees would either 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. All contractors would have the contact numbers of wildlife rescue groups and would be instructed to coordinate with these groups in relation to any animal injured or orphaned during clearing. Within areas of high quality intact native vegetation proposed to be removed: • topsoil (and seedbank) is to be collected from native vegetation that are to be permanently cleared and used in the vegetation of riparian areas; and • Native plants in areas that are to be permanently cleared are to be relocated and transplanted in riparian areas identified for rehabilitation.	No		Compliant	EWMS and CFFMP Section 6	Ecologist and Zoologist from Biosis assisted with assessing and clearing of trees for remediation work areas following the process outlined in the CFFMP.
	F		Relocation of fauna to adjacent retained habitat would be undertaken by an ecologist during the supervision of vegetation removal	No		Compliant	EWMS and CFFMP Section 6	Ecologists from Biosis have undertaken pre-clearance surveys. No fauna was disturbed.
	G		An ecologist would supervise the drainage of any waterbodies on the Project site and would relocate native fish (e.g. eels), tortoises and frogs to the edge of the Georges River and/or the existing pond at the northern end of the IMT site.	No		Compliant	EWMS and CFFMP Section 6	This has not been required during this reporting period. No waterbodies have been drained to date.
	H		The design of site fencing and any overhead powerlines would consider the potential for collision by birds and bats and minimise this risk where practicable.	No		Compliant	EWMS and CFFMP Section 6	Site boundary fencing has been installed in specific areas of site. This consists of chain wire mesh and is restricted to 1.8 high (standard ATF) thereby reducing the potential for bird collision.

MPW Early Works: 6-Monthly Compliance Tracking - Revised Environmental Mitigation Measures

Responsibility for Compliance:  
Qube (Principal)  
Liberty Industrial (Contractor)

No.	Part	Type	Condition	Secretary Approval Required?	Date Completed / Approval Received	Compliance Status	Reference document	Evidence
	I		The potential for translocation of threatened plant species as individuals or as part of a soil translocation process would be considered during the detailed development of the CEMP.	No		Compliant	NA	Threatened species are not to be removed during the Early Works stage. EEC area have been protected with signage and exclusion fencing to prevent access.
	O		Erosion and sediment control measures such as silt fencing and hay bales would be used to minimise sedimentation of streams and resultant impacts on aquatic habitats and water quality	No		Compliant	EWMS, CFFMP, CSWMP	Soil erosion and discharge of sediments and pollutants from the site are minimised by implementing all reasonable prevention measures. An erosion and sediment control plan has been developed and endorsed within the EWMS by the ER. Minor issues have been raised during ER inspections but have been closed out in a timely manner.
8	B	Contamination	Before construction, a remediation program would be implemented in accordance with the Moorebank Intermodal Terminal Preliminary Remediation Action Plan (RAP) (or equivalent). The program will have been formally reviewed and approved by the Site Auditor under Part 4 of the NSW Contaminated Land Management Act 1997 (CLM Act).	No		Compliant	CEMP / RAP	RAP Rev0 dated 9th August 2016 has been reviewed and approved by the Site Auditor - Enviroview.
	C		A CEMP would be prepared by the contractor for all excavation and remediation works and would include requirements for decontamination facilities at the Project site.	Yes		Compliant	CEMP Appendix A4	Decontamination facilities are provided at the work areas for personnel and equipment. The CEMP references the RAP and AMP and JHA's which detail the specifics of these facilities.
	D		An unexploded ordnance (UXO) management plan (or equivalent) would be developed for the Project site. This plan would detail a framework for addressing the discovery of UXO or explosive ordnance waste (EOW) to ensure a safe environment for all Project staff, visitors and contractors.	No		Compliant	UXO MP	UXOMP details a framework for addressing the discovery of UXO or explosive ordnance waste (EOW).
	I		Contaminated soil/fill material present will be 'chased out' during the excavation works based on visual, olfactory and preliminary field test results.	No		Compliant	CEMP Appendix A4	Compliant.
	J		Excavated soil would be temporarily stockpiled, sampled and analysed for waste classification processes. Subject to receipt of waste classification results, the material would be transported to a licensed offsite waste disposal facility as soon as practicable to minimise dust and odour issue through storage of materials on site.	No		Compliant	CEMP Appendix A4	A waste register has been maintained throughout Early Works and details quantities of waste recycled/disposed of.
	K		Stockpiled soils would be stored on a sealed surface and the stockpiled areas would be securely bunded using silt fencing to prevent silt laden surface water from entering or leaving the stockpiles or the Project site.	No		Compliant	CEMP Appendix A4	Leachable contaminated stockpiles are stored on an asphalt surface and the area is bunded. These are segregated from uncontaminated stockpiles, however, erosion and sediment controls are in place.
	L		All excavation works associated with potential contaminated lands would be undertaken by licensed contractors, experienced in remediation projects and the handling of contaminated soils.	No		Compliant	CEMP Appendix A4	Trained and ticketed Liberty employees only are undertaking remediation excavation of contaminated soils. All relevant qualifications are recorded during induction. Only qualified asbestos removalists work on asbestos removal.
	M		All asbestos removal, transport and disposal would be performed in accordance with the <i>Work Health and Safety Regulation 2012</i> (WHS Regulation).	No		Compliant		Liberty Industrial has a Class A Asbestos removal license (Lic no. AD211444, expiring 23/05/2018), and works in accordance with relevant regulations and codes of practise. Works have been undertaken in accordance with the Asbestos Removal Management Plan reviewed and approved by Niall Byrne of CARAS Pty Ltd on 24/11/2016.
	N		The removal works would be conducted in accordance with the National Occupational Health and Safety Commission Code of Practice for the Safe Removal of Asbestos, 2nd Edition [NOHSC 2002 (2005)] (NOHSC 2005a).	No		Compliant	CEMP / RAP	
	RO		An appropriate asbestos removal licence issued by WorkCover NSW would be required for the removal of asbestos contaminated soil	No		Compliant		
	P		Environmental management and WHS procedures would be put in place for the asbestos removal during excavation to protect workers, surrounding residents and the environment	No		Compliant	CEMP / AMP Section 8	Procedures outlined in the Asbestos Removal Management Plan approved by Niall Byrne of CARAS Pty Ltd on 24/11/2016.
	Q		Temporary stockpiles of asbestos containing material (ACM) soils would be covered to minimise dust and potential asbestos release.	No		Compliant	CEMP Appendix A4	Stockpiles containing asbestos fragments have been covered or sprayed with polymer to ensure that dust is minimised. Air Quality monitored has resulted in no detection of asbestos.
	R		An asbestos removal clearance certification would be prepared by an occupational hygienist at the completion of the removal work. This would follow the systematic removal of asbestos containing materials and any affected soils from the Project site, and validation of these areas (through visual inspection and laboratory analysis of selected soil samples).	No		Compliant	CEMP / RAP	The building asbestos removal works have been completed in all buildings identified to contain asbestos and 27 clearance certificates issued by WSP and JBS&G. Subsequent unexpected asbestos finds in the remediation and service removal works are cleared and certified by JBS&G and will be included in the final validation report.
	S		Asbestos fibre air monitoring would be undertaken during the removal of ACMs and in conjunction with the visual clearance inspection. The monitoring would be conducted in accordance with the National Occupational Health and Safety Commission Guidance Note on the Membrane Filter Method For the Estimating Airborne Asbestos Fibre, 2nd Edition [NOHSC 3003 (2005)] (NOHSC 2005b).	No		Compliant	CEMP / RAP	Asbestos air monitoring has occurred during both removal works within buildings and as part of remediation works; over 250 reports have been generated and all results have been below indicate levels are below the accepted concentration of <0.01 fibres/ml.
T	All stockpiles would be maintained in an orderly and safe condition. Batters would be formed with sloped angles that are appropriate to prevent collapse or sliding of the stockpiled materials	No		Compliant	CEMP Appendix A4	All stockpiles have been constructed and maintained in accordance with processes identified in the CEMP Appendix A4, Soil and Water Management Plan, EWMS and erosion and sediment control plan.		
U	Stockpiles would be placed at approved locations and would be strategically located to mitigate environmental impacts while facilitating material handling requirements. Contaminated or potentially contaminated materials would only be stockpiled in unremediated areas of the Project site or at locations that did not pose any risk of environmental impairment of the stockpile area or surrounding areas (e.g. hardstand areas).	No		Compliant	CEMP Appendix A4			
V	Stockpiles would only be constructed in areas of the Project site that had been prepared in accordance with the requirements of the Project Preliminary RAP in Appendix F of Technical Paper 5 – Environmental Site Assessment (Phase 2), Volume 5A and 5B. All such preparatory works would be undertaken before material is placed in the stockpile. Stockpiles must be located on sealed surfaces such as sealed concrete, asphalt, high density polyethylene or a mixture of these, to appropriately mitigate potential cross contamination of underlying soil.	No		Compliant	CEMP Appendix A4	All leachable contaminated materials are placed on asphalt surface which is bunded. At the completion of remediation works, all stockpile areas will be validated by JBS&G, in accordance with the RAP. Polymer is also applied in order to seal stockpiles to minimise dust generation.		
W	Any stockpiles of contaminated material would be covered with a waterproof membrane (such as polyethylene sheeting) to prevent increased moisture from rainwater infiltration and to reduce windblown dust or odour emission.	No		Compliant	CEMP Appendix A4	There has been stockpiling of contaminated soils on site. They are covered and labelled and contained within Contamination Assessment Treatment Areas (CATA) areas.		



MPW Early Works: 6-Monthly Compliance Tracking - Revised Environmental Mitigation Measures

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No.	Part	Type	Condition	Secretary Approval Required?	Date Completed / Approval Received	Compliance Status	Reference document	Evidence
	X		Before the reuse of any material on site, it would be validated so that the lateral and vertical extent of the contamination is defined.	No		Compliant	CEMP Appendix A4	Every stockpile assessed by the Environmental consultant (JBSG) in accordance with the RAP which has allowed some beneficial reuse of material onsite.
	Y		Where required, contaminated materials and wastes generated from the Project remediation and construction works would be taken to suitable licensed offsite disposal facilities.	No		Compliant	CEMP Appendix A4	Approximately 18,000 tonnes of contaminated soil has been transported to licenced waste facilities to the following locations: Breen - Kurnell SUEZ - Kemps Creek Blacktown Waste Services - Riverstone Veolia - Eastern Creek
	Z		Where necessary, consider undertaking further investigations to determine whether other buildings have organochlorine pesticides (OCP) impacts subgrade materials, and to quantify the volume of OCP impacted materials across the site.	No		Compliant	CEMP / RAP	Testing has been conducted by the environmental consultant JBS&G. All building subbases identified in the RAP have been assessed and it was determined that no further works were required JBS&G will include the results in their validation report.
	AA		Additional Aqueous Film Forming Foam Assessment (AFFF) be undertaken to determine if any direct remedial and/or management actions are required. A stage approach is considered appropriate and is detailed in the Preliminary AFFF Assessment (Golder Associates 2015b).			In-progress	PFAS Management Plan	SIMTA have engaged EP Risk (a contamination consultant) to conduct a literature review, analysis of site test data and preparation of a human health risk analysis (HHRA). Discussions with the Accredited Site Auditor are ongoing and it is anticipated that this work will result in the development of a PFAS management plan (including AFFF) by late 2017. Areas identified to contain PFAS have been isolated as an exclusion zone until such time that the PFAS management plan is developed and accepted by the Accredited Site Auditor.
9	A	Hydrology	A soil and water management plan (or equivalent) would be developed before work begins in the conservation area. This plan would include erosion and sediment control plans (ESCPs) and procedures to manage and minimise potential environmental impacts associated with developing this area.			Not applicable to this reporting period	CSWMP and ESCP	The soil and water management plan (CSWMP) has been approved. The CSWMP is a sub-plan to the CEMP.
	B		Site compounds, stockpiling areas and storage areas for sensitive plant, equipment and hazardous materials would be located above an appropriate design flood level, which would be determined based on the duration of the construction works.	No		Compliant	CSWMP Section 4 & CEMP Section 3.2	All stockpile locations are positioned on the upper level of the site which is 15-16m AHD. All locations approved by the ER in the reviews of the CSWMP.
	A		A Dust Management Plan (DMP) (or equivalent) would be prepared as part of the CEMP.	Yes	3/02/2017	Compliant	CAQMP	Dust management is included throughout the CAQMP. Provisional approval of CEMP was issued by DP&E on 3/2/17 excluding the CHMP.
	B		Dust minimisation measures would be developed and implemented before commencement of construction. The NSW Coal Mining Benchmarking Study: Measures to Prevent and/or Minimise Emissions of Particulate Matter from Coal Mining (DEH 2011) would be considered.	No		Compliant	CAQMP Section 5	Dust management is included in the CAQMP. Management includes the frequent wetting of exposed areas and not disturbing areas until work is required to commence.
	C		Methods for management of emissions would be incorporated into Project inductions, training and pre-start talks.	No		Compliant	CAQMP Section 6.2	Emission management is covered in the project induction and has been discussed in pre-start talks.
	D		Activities with the potential to cause significant emissions, such as material delivery and load out and bulk earthworks, would be identified in the CEMP. Work practices that minimise emissions during these activities would be investigated and applied where reasonable and feasible.	No		Compliant	CAQMP Section 5	Emission management has been discussed in pre-start talks.
	E		A mechanism for raising and responding to complaints would be put in place for the duration of the construction phase.	No		Compliant	CEMP Section 8 & CCS Section 6.	Enquiries and complaints processes are outlined in the CEMP and further detailed within section 6 of the CCS.
	F		Vehicle movements would be limited to designated entries and exits, haulage routes and parking areas. Project site exits would be fitted with hardstand material, rumble grids or other appropriate measures to limit the amount of material transported offsite (where required).	No		Compliant	CAQMP Section 5 Site photos	Mitigation measures are outlined in section 5 of the CAQMP. The existing road network within the site is being used and only waste loaded on hardstand has been transported offsite. To date the risk of transporting material offsite has been minimal. A rumble grid has been installed at the site exit.
	G		Work site compounds and exposed areas would be screened to assist in capturing airborne particles and reduce potential entrainment of particles from areas susceptible to wind erosion	No		Not applicable to this reporting period	CAQMP Section 5	Screening has been deemed unnecessary as the compound is located on hardstand within an area that is not to be disturbed by earthworks or demolition. Any exposed areas currently on site are wet down to control dust or sprayed with polymer. Completed areas have also been sprayed with polymer.
	H		Dust would be visually monitored during construction and the following measures would be implemented where necessary: Apply water (or alternative measures) to exposed surfaces that are causing dust generation. Surfaces may include any stockpiles, hardstand areas and other exposed surfaces (for example recently graded areas). Regular watering would ensure that the soil is moist to achieve 50% control of dust emissions from scrapers, graders and dozers. Appropriately cover loads on trucks transporting material to and from the construction site. Securely fix tailgates of road transport trucks before loading and immediately after unloading. Prevent, where possible, or remove, mud and dirt being tracked onto sealed road. Apply water at a rate of >2 litres (L) per square metre per hour (L/m <sup>2</sup> /hr) to internal unsealed access roadways and work areas. Application rates would be related to atmospheric conditions (e.g. prolonged dry periods) and the intensity of construction operations. Paved roads should be regularly swept and watered when necessary.	No		Compliant	CAQMP Section 5	Mitigation measures are outlined in Section 5 of the CAQMP and to date have included the below: 1. Water has been frequently applied to exposed areas. 2. Use of existing road network on site to not track material offsite. 3. Rumble grid has been installed at the site exit and every vehicle has to use the grid when exiting. 4. Polymer spray on completed areas and haulage roads and covering of stockpiles when necessary. 5. All loads of waste transported offsite are covered with an envirotarp.
	I		Where reasonable and feasible, dust generating activities (particularly clearing and excavating) would be avoided or minimised during dry and windy conditions. (particularly clearing and excavating) would be avoided or minimised during dry and windy conditions.	No		Compliant	CAQMP Section 5	The weather forecast is checked daily and work activities are planned accordingly. Machines have been stood down due to high winds, in particular, the site shut down on the 18/07/17 due to high winds.
	J		Project site speed limits of 20 km/h would be imposed on all construction vehicles travelling within the Project site	No		Compliant	CAQMP Section 5	20 km/h speed limit is imposed on site; this is reiterated during the site induction.
	K		Graders would be limited to a speed of 8 km/h to reduce potential dust emissions	No		Compliant	CAQMP Section 5	Graders have been limited to 8km/h
	L		Material stockpiles would not exceed an area of 1 ha and would be regularly watered to achieve 50% control of potential dust emissions	No		Compliant	CAQMP Section 5	Stockpiles do not exceed 1ha and are frequently watered to minimise dust.

MPW Early Works: 6-Monthly Compliance Tracking - Revised Environmental Mitigation Measures

Responsibility for Compliance:  
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Liberty Industrial (Contractor)

No.	Part	Type	Condition	Secretary Approval Required?	Date Completed / Approval Received	Compliance Status	Reference document	Evidence
10	M	Air Quality	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	No		Compliant	CAQMP Section 5	Excavation work is being staged and no unnecessary excavation or stripping of topsoil is occurring. Exposed areas are stabilised with polymer and access restricted.
	N		Revegetation or rehabilitation activities would proceed once construction activities were completed within a disturbed area.	No		Compliant	CAQMP Section 5	Rehabilitation works will not be undertaken during Early Works as revegetation may impact on sub-grade for future works. Polymer has been, and will continue to be, sprayed on areas prior to handover to the Principal for MPW Stage 2 in order to stabilise the ground and minimise the potential of erosion. Small areas of hydro-seeding have been undertaken adjacent to Moorebank Avenue.
	O		Construction plant and equipment would be well maintained and regularly serviced so that vehicular emissions remain within relevant air quality guidelines and standards	No		Compliant	CAQMP Section 6	Plant and equipment is regularly serviced by Liberty mechanics and service records kept.
	P		Excavation works in potentially contaminated soils should be managed to ensure that they are completed during optimal dispersive conditions to minimise odorous emissions.	No		Compliant	CAQMP Section 5	Excavation work in contaminated soils have been managed accordingly.
	Q		Emissions from trucks would be regulated in accordance with the requirements prescribed in the National Environmental Protection Measure (NEPM) (Diesel Vehicle Emissions) (NEPC 2001) or suitably relevant standards	No		Compliant	CAQMP Section 5	Plant and equipment is regularly serviced by Liberty Industrial mechanics and service records are kept on file.
	R		All construction vehicles would be tuned to avoid releasing excessive smoke from the exhaust and would be compliant with DEH Smokey Vehicles Program under the NSW Protection of the Environment and Operations Act 1997 (POEO Act) and POEO Regulations (NSW) (2010).	No		Compliant	CAQMP Section 5	Plant and equipment is regularly serviced by Liberty Industrial mechanics and service records are kept on file.
	S		All on-road trucks are to comply with the Euro V emission standards or suitably relevant standards	No		NA	CAQMP Section 5	Plant and equipment is regularly serviced by Liberty Industrial mechanics and service records are kept on file.  While the majority the on-road trucks on the project are compliant with this standard, it has not been feasible nor reasonable to convert existing and often specialist trucks, or purchase new on-road trucks for the limited duration of the Early Works. And while Euro V trucks have been requested when sourcing trucks from subcontractors, there did not exist the capacity to meet the project demands with only Euro V compliant trucks often working on urgent environmental mitigation measures such as dust suppression and disposal of contaminated waste.
	T		All new off-road construction equipment would be required to meet, at minimum, the US Environmental Protection Agency (EPA) Tier 3 emission standards (or suitably relevant standards) for non-road diesel engines.	No		Compliant	CAQMP Section 5	Liberty Industrial uses new off road equipment made by Volvo. Volvo equipment meets Tier 3 emission standards.
U	Establishment of Action Response Levels (ARLs) for use with real-time dust management. These aid in the assessment of impact potential, and establish an early warning system during adverse trends, reducing complaint potential and non-compliance issues. An ARL trigger would be a defined measurement of elevated dust levels for a prolonged period	No		Compliant	CAQMP Section 7	The performance indicator for dust is "no visible dust leaving the site boundaries and/or no visible dust being generated that has the potential to affect the workers onsite." One exceedance of this trigger resulted in a response as outlined in Section 5 of the CAQMP. Incident details provided in Section 3.5 of this compliance report.		
11	A	Greenhouse gases	Where possible, establish and maintain areas of native flora and vegetation within the Project site to generate significant carbon sequestration benefits.	No		In-progress	BOP	A Biodiversity Offset Package (BOP) is currently in development by Parsons Brinkerhoff within inputs by Arcadis ecologists. The BOP is expected to be finalised in the final quarter of 2017.
	B		Where possible, implement the use of biofuels (e.g. biodiesel, ethanol, or blends such as E10 and B880) to reduce GHG emissions from plant and equipment.	No		NA	Not yet possible	Liberty have not undertaken an assessment to determine whether alternative fuels are compatible with all machinery on site. However, given the limited nature of the works being undertaken and in accordance with the EIS, the GHG associated with Early Works are considered negligible.
	C		Consider the use of vehicles with minimum GHG emissions ratings of 7.5 for passenger vehicles and 6 for light commercial vehicles, as described in the Green Vehicle Guide	No		NA		Under Review. Two Hilux vehicles were purchased, however, the Green Vehicle Guide does not provide the required information. It is noted that the new vehicles are Euro V compliant.
	A		Where reasonable and feasible, options would be explored to conserve moderate to high significance sites in situ.	No		Compliant	CHMP and Salvage Strategies	Seven RAPs were contacted to review and provide feedback. Two parties responded, both advising that in relation to the long-term storage of recovered artefacts that these artefacts should be reburied on Country.
	B		An Aboriginal heritage interpretation strategy for the Project would be developed in close consultation with the registered Aboriginal parties	No		Compliant	Heritage Interpretation Strategy	A HIS for MPW Precinct has been developed. The HIS has been developed in consultation with the RAPs and presents three major themes for interpretation and suggestions for the best methods of interpretation.

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12	C	Aboriginal Heritage	Options for managing impacts at sites MA6 and MA7 would be explored during the detailed design phase in consultation with registered Aboriginal parties (RAP). If the scars are considered to be of Aboriginal origin, possible management options include: • Conservation of the tree(s) in situ. This would involve designing the project to ensure that the tree(s) would not be impacted. • Salvage and conservation of the tree(s), or the scarred portion of the tree's trunk, at a location outside the project area. In the event there is not a consensus of views among all of the RAPs, it is recommended that a precautionary approach be taken. This would involve acting upon statements of the tree(s) holding cultural value, even if only a minority of RAPs view either or both trees as holding cultural value.	No		NA	Heritage Interpretation Strategy	Management of the scar trees have been discussed with the RAPs and included within the HIS. The preferred mitigation for MA6 and MA7 is to relocate the trees to Thirimere. The relocation of the trees will not occur until MPW Stage 2.
	D		An archaeological salvage excavation program would be implemented to preserve archaeological deposits of moderate to high archaeological/scientific significance located within the construction footprint (items recorded at MA5 and MA9). Consideration would be given to conserving both sites in situ, within open space reserves, or as an extension of the proposed conservation zone	Yes	Aug-17	In-progress	CHMP - Aboriginal Salvage strategy	Salvage of MA1-MA5 and MA9 have been undertaken and preservation <i>in-situ</i> has not been possible. Preservation of the artefacts in currently being considered.
	E		A surface salvage program would be carried out to conserve surface artefacts located within the construction footprint (items recorded at MA1, MA2, MA3 and MA4). Salvage of surface artefacts would be undertaken before any impacts in these areas	Yes	Aug-17	Compliant	CHMP - Aboriginal Salvage strategy	An Aboriginal salvage strategy was approved by DP&E in August 2017 and MA1-MA5 and MA9 were salvaged in accordance with this strategy.
13	D	European heritage	Where avoidance of impacts on a heritage item is not reasonable or feasible, mitigation works inclusive of archival recordings, salvage of archaeological deposits, relocation of significant elements of the built environment and/or adaptive reuse would be undertaken.	No		Compliant	OfMR	An Options for Mitigation Report (OfMR) has been prepared for each of the non-Indigenous heritage items remaining on site, namely the CUST Hut, STRARCH Hangar, Memorial Gardens and Dog Cemetery. A detailed account of consultation and assessment of all heritage items of significance is included in the OfMR. Works were completed during this reporting period and items have been set aside where appropriate for heritage interpretation.
	E		A European heritage interpretation strategy would be developed in close consultation with local historical societies, former and current staff and military personnel	No		Compliant	OfMR Section 3. MPW Heritage Interpretation Strategy (HIS)	Options for Mitigation Report section 3 has a detailed account of consultation in preparation of this plan. Furthermore, the Heritage Interpretation is currently being prepared and included consultation with relevant stakeholders.
	F		No impacts would occur within the potential archaeological deposits (PAD) boundaries of Moorebank Historical Potential Archaeological Deposit (MHPAD) 1 and MHPAD2 without prior archaeological salvage, as these sites contain archaeological deposits, inclusive of in-situ building remains, that are assessed to be of local significance in the context of the history of military housing and training at Moorebank	No		Compliant	CHMP	Archaeological excavation, salvage and mapping was completed in MHPAD1 and MHPAD2 in December 2016. An archaeological investigation report will be submitted to DP&E by December 2017.
	G		In addition to archival recording of the Transport Compound Workshop (B99), consideration would be given during the detailed design stage to the in-situ conservation or adaptive reuse of this structure within the Project site. This would assist with mitigation of heritage impacts on the structure itself and the Moorebank Cultural Landscape as a whole.	No		Compliant	OfMR	The OfMR has a detailed account of consultation and assessment. The B99 Transport Compound Workshop has been archivally recorded, however, there are no options for on site adaptive reuse.
	H		In addition to archival recording, the Dog Cemetery (MH1) would be repositioned and the individual graves reinterred. This would be carried out in accordance with the wishes of the SME's Explosive Detection Dogs unit and respecting the social value of the site.	No		Compliant	OfMR	Options for Mitigation Report has a detailed account of consultation and assessment. The salvage of the canine remains within the MH1 Dog Cemetery was undertaken according to the salvage strategy contained within Appendix C and completed on 3/2/17. The remains were transferred to the Department of Defence for repatriation.
	I		In addition to archival recording, consideration would be given during detailed design to the in-situ conservation of the Commemorative Garden (MH6). If in situ conservation is not possible, the plaques and planting should be relocated to an alternative location on public display within the Project	No		Compliant	OfMR	Options for Mitigation Report has a detailed account of consultation and assessment. The retained items in the garden have been offered to Holsworthy Museum for display.
	K		The Unanticipated Discoveries Protocol (detailed in Appendix 7 of Technical Paper 11 – European Heritage Impact Assessment in Volume 8) would be followed in the event that historical items or relics or suspected burials are encountered during excavation works	No		Compliant	CHMP	Archaeological excavation, salvage and mapping was completed in MHPAD1 and MHPAD2 in December 2016. An archaeological investigation report will be submitted to DP&E by December 2017. No unexpected non-Aboriginal finds have been identified during excavation works.
L	The Unanticipated Discoveries Protocol (detailed in Appendix 7 of Technical Paper 11 – European Heritage Impact Assessment in Volume 8) would be followed in the event that historical maritime items or relics are encountered during bridge works within the Georges River.	No		NA	NA	No works have been undertaken within the Georges river.		
M	Further consideration would be given to options for the retention and/or relocation and adaptive reuse of the CUST Hut and the RAAF STRARCH Hangar to mitigate impacts on heritage values associated with these structures and to broaden their cultural landscape.	No		Compliant	OfMR	Options for Mitigation Report has a detailed account of consultation and assessment. Part of the CUST Hut and the RAAF STRARCH Hangar will be retained for reuse in an interpretive display. This is further detailed in the MPW HIS.		
15	B	Property and Infrastructure	Implement 'dial before you dig' protocols for all potential utilities affected by the Project	No		Compliant	CEMP	Utilities near site are identified by dial a dig enquiry. Utility providers provide information regarding location of services near site. Liberty has worked with all utility providers to ensure utilities are disconnected, cut or capped before works commence. Onsite services are being demolished and removed.

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16	A	Social and Economic Impacts	A Project contact phone number and website would be maintained during construction and operation to enable the community, including local business owners and/or operators, to access information on the Project and receive responses to any concerns	No		Compliant	CCS	Elton Consulting has been appointed as the Community Consultant and handles all complaints and enquiries.  24hr info line 1800 986 465 www.simta.com.au simta@elton.com.au PO Box 1488 Bondi Junction NSW 2022  SIMTA newsletter distributed monthly (approx.) which includes contact details.  http://simta.com.au/newsletter/  Distribution footprint on final page of Elton Community Communication Strategy.
	B		A complaints line and resolution process would be set up and maintained.	No		Compliant	CCS and CEP	All complaints and enquiries are managed by Elton Consulting in line with the Communications and Engagement Strategy. See section 8.16 for flow charts relating to enquiry and complaints handling.
18	A	Waste Management - Construction	A construction waste management plan (or equivalent) would be prepared as part of the overall CEMP. This would implement key principles of relevant waste guidelines, and the waste management hierarchy of reduction, reuse, recycling and recovery.	No		Compliant	CEMP	Included in Appendix A4 "Waste Management Strategy".
	B		The waste hierarchy would be investigated and implemented where possible with avoidance of waste, re-use and recycling incorporated into construction methodologies	No		Compliant	CEMP Appendix A4	Waste management is outlined in Appendix A4 of the CEMP. To date liquid waste, mixed waste from soft strip activities, contaminated spoil have been removed from site and sent to a licenced material recycling facility. Concrete (50000m3) and bitumen (30000m3) have been reused on site.
	C		Consideration would be given to the selection of materials for use in construction to minimise waste generated throughout their lifecycle.	No		NA	Not Applicable	There has been no construction during demolition and remediation activities.
	D		Where practicable, construction materials that contain minimal embodied energy would be preferred.	No		NA	Not Applicable	There has been no construction during demolition and remediation activities.
	E		Opportunities would be explored where practicable to recycle or re-use materials arising from demolition works, with a preference for onsite re-use where possible (or recycling through an appropriate recycling contractor).	No		Compliant	Waste Management register	Where possible materials have been re-used and recycled. However no demolition has been undertaken to date. Soft strip materials have been sent offsite for recycling.
	F		Where possible, site disturbance and unnecessary excavation would be minimised.	No		Compliant	SWMP	Excavation during demolition and remediation work has been limited to remediation of contaminated soils and removal of underground storage tanks. No other excavation work will occur during the early works.
	G		Formwork would be re-used where possible.	No		NA	Not Applicable	No formwork has been used during demolition and remediation work.
	H		Sewage waste would be disposed of by a licensed waste contractor in accordance with Sydney Water and OEH requirements.	No		Compliant	CEMP Appendix A4	Sewage waste is disposed of by a licensed waste contractor, Brandster Services as per the Waste management strategy.
Y	Measures to minimise the use of energy and fuel would be investigated and implemented where appropriate. These may include using non-renewable sources such as petroleum, diesel, natural gas and liquefied natural gas.	No		Compliant	CEMP	The smallest size generators and plant are utilised to undertake tasks to minimise fuel usage. Reduced run times for the site compound generator was trialled, however it is required to charge radios overnight.		
Z	Where practicable, water would be re-used onsite, including water stored in sediment basins.	No		Compliant	CSWMP Section 7	Sediment Basins have been constructed in CATA A and CATA B. Runoff from contaminated areas is re-used on contaminated stockpile areas only.		

