

INDEPENDENT AUDIT NO. 5 – AUDIT REPORT

MOOREBANK PRECINCT WEST STAGE 1 (SSD 5066)

DECEMBER 2022

Authorisation

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Date	24/01/23	Date	24/01/23

Revision History

Revision	Date	Description
1.0	19/12/22	For issue to client
2.0	21/12/22	Updated in response to client feedback
3.0	23/01/23	Updated in response to client feedback
4.0	24/01/23	Final

Report Name: Independent Audit No. 5 – Audit Report, Moorebank Precinct West Stage 1 – SSD 5066

Project No.: 691

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EXECUTIVE SUMMARY

The Moorebank Precinct West (Stage 1) project (MPW1, or the Project), is part of the Moorebank Precinct West (MPW) development which, in turn, is part of the broader Moorebank Logistics Park (MLP) development. The MLP development involves the construction and operation of intermodal freight terminal facilities at Moorebank in south-west Sydney, linked to Port Botany and the interstate rail network.

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

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

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

This Audit Report presents the findings from the fifth Independent Audit under the revised Independent Audit Program (WolfPeak, 2019) covering the period 25 November 2021 to 24 November 2022.

Works conducted under SSD 5066 during the audit period were minimal, comprising:

- Receipt and maintenance of ACM stockpiles in Lot 100. Approval was granted under MPW1 to receive ACM from Moorebank Precinct East Stage 2 – SSD 7628 (MPE2) and manage the ACM stockpiles under MPW1 approval.
- Relocation of some ACM from the Lot 100 stockpiles and placement on MPW2 land (completed as part of SSD 7709).
- Out of Hours Work (OOHW) involving delivery of imported fill to southern end of MPW. This haul road construction did not proceed, and the material was instead used for fill as part of MPW2.

The overall outcome of the Independent Audit was positive. The majority of compliance records were organised and available at the time of the site inspection and interview with Project personnel on 24 November 2022.

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

- With regards to the status of previously open findings from the fourth Independent Audit; the outstanding findings from the previous audit have now been closed.
- With regards to the fifth Independent Audit:
 - There were 72 CoCs assessed.

- No non-compliances or observations were identified against the CoCs.

The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the Independent Audit

1. INTRODUCTION

1.1 Project overview

The Moorebank Precinct West (Stage 1) project (MPW1, or the Project), is part of the Moorebank Precinct West (MPW) development which, in turn, is part of the broader Moorebank Logistics Park (MLP) development. The MLP development involves the construction and operation of intermodal freight terminal facilities at Moorebank in south-west Sydney, linked to Port Botany and the interstate rail network.

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

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

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

The approval for the MPW Early Works Stage 1 (herein referred to as SSD 5066 or MPW1) involved the following works to the west of Moorebank Avenue:

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

On 30 October 2019, approval was granted for a modification to the project (SSD 5066 MOD 1), which included, relevantly, amending the Applicant from “Moorebank Intermodal Company” to “SIMTA as Qube Holdings Limited”, adding “Part Lot 3 DP 1197707” and “Part Anzac Road and Moorebank Avenue public road reserves” to the land making up the MPW site, and:

- importation of approximately 1,600,000m³ of clean fill for bulk earthworks within the site
- expansion of construction footprint to allow for Moorebank Avenue/Anzac Road intersection works
- rearrangement of warehousing, freight village, internal roads and truck parking locations and layouts
- additional onsite detention (OSD) basin near the northern boundary of the site, relocation of the western boundary and enlargement of the southern OSD basin

- deletion of the port shuttle (IMEX) rail freight intermodal terminal and an increase in the warehousing area
- use of interstate terminal for interstate, intrastate and port shuttle rail freight including one additional rail track
- increase in building heights as a result of raising the site by up to 3.6 m
- reducing construction stages from four (excluding Stage 1 Early Works) with potentially only two future development applications
- transfer of containers by heavy vehicles between the MPW warehouses and MPE rail terminal and between the MPE rail terminal and MPW warehouses
- ability to subdivide the site as part of a future development application.

These changes relate to the Concept Proposal, rather than the Early Works scope. The Early Works scope remains unchanged as a result of the modification.

A second modification (SSD 5066 MOD 2) was approved on 24 December 2020. MOD 2 seeks to adjust the southern operational boundary of the MPW Stage 2 (MPW2) warehouse area and amend the maximum building height established across warehouse areas 5 and 6 from approximately 21 m up to and including 45 m. Again, the Early Works scope will remain unchanged as a result of the proposed modification.

Works conducted under SSD 5066 during the audit period were minimal, comprising:

- Receipt and maintenance of ACM stockpiles in Lot 100. Approval was granted under MPW1 to receive ACM from Moorebank Precinct East Stage 2 – SSD 7628 (MPE2) and manage the ACM stockpiles under MPW1 approval.
- Relocation of some ACM from the Lot 100 stockpiles and placement on MPW2 land (completed as part of SSD 7709).
- Out of Hours Work (OOHW) involving delivery of imported fill to southern end of MPW. This haul road construction did not proceed, and the material was instead used for fill as part of MPW2.



Figure 2: Early Works Site Plan

Figure 1 The MPW S1 Project (Source: Moorebank Precinct West Stage 1 Construction Environmental Management Plan, SIMTA 2020).

1.2 Approval requirements

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

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

The Program shall include, but not be limited to:

...

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

...

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

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

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

1.3 The audit team

The list of independent auditors who performed the auditing works are shown on the table below.

Table 1 Audit Team

Name	Company	Participation	Certification
██████████	WolfPeak	Lead Auditor	Master of Environmental Engineering Management, Exemplar Global Certified Lead Environmental Auditor (Certificate No 114283).

Declaration of independence are presented in Appendix B.

1.4 The audit objectives

The objectives of this Independent Audit are to comply with the Independent Audit Program prepared in accordance with SSD 5066 Schedule 3, Condition of Consent (CoC) A2(d), and to

verify compliance with the relevant CoCs and assess the effectiveness of environmental management on the Project.

1.5 Audit scope

This Independent Audit covers the period from the previous Independent Audit (25 November 2021) to 24 November 2022.

The Project, having been granted consent in 2016, is not required to comply with the requirements of the Department of Planning Industry and Environment document entitled *Independent Audit Post Approval Requirements* (IAPAR). However, for the sake of consistency and continuity with conditions within future consents (including SSD 7709), the Project has voluntarily elected to align the scope of the Independent Audits with the IAPAR where appropriate, in addition to complying with AS/NZS ISO 19011:2019 - Guidelines for Auditing Management Systems, as required by CoC A2(d).

The scope of the Independent Audit comprises:

- an assessment of compliance with:
 - all conditions of consent applicable to the phase of the development that is being audited.
 - all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and
 - all environmental licences and approvals applicable to the development excluding environment protection licences issued under the Protection of the Environment Operations Act 1997 or as otherwise agreed by the Secretary.
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and

- any other matters considered relevant by the Auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices

2. AUDIT METHODOLOGY

2.1 Audit process

The Audit was conducted in a manner consistent with AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems and the methodology set out in the Department’s IAPAR.

2.2 Audit process detail

2.2.1 Audit initiation and scope development

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

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

2.2.2 Preparing audit activities

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

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

- *Moorebank Intermodal Terminal Project Environmental Impact Statement, Parsons Brinckerhoff, October 2014 (the EIS)*
- *Development Consent SSD 5066, 30 October 2019 (the Consent), including MOD 1 and MOD 2*
- *Moorebank Precinct West Stage 1, Construction Environmental Management Plan, MIC1-QPMS-EN-PLN-00001, 23/01/2020 and 19/11/20 (the CEMP)*
- *Moorebank Precinct West Stage 1, Construction Air Quality Management Plan, MIC1-QPMS-EN-PLN-00002, 5/11/2019 and 01/12/2020 (the CAQMP)*
- *Moorebank Precinct West Stage 1, Construction Flora Fauna Management Plan, MIC1-QPMS-EN-PLN-00003, 23/01/2020 and 19/11/2020 (the CFFMP)*
- *Moorebank Precinct West Stage 1, Construction Noise and Vibration Management Plan, MIC1-QPMS-EN-PLN-00008, 5/11/2019 and 01/12/2020 (the CNVMP)*
- *Moorebank Precinct West Stage 1, Construction Soil and Water Management Plan, MIC1-QPMS-EN-PLN-00004, 5/11/2019 (the CSWMP).*
- *Moorebank Precinct West Stage 1, Construction Traffic and Access Management Plan, MIC1-QPMS-EN-PLN-00005, 5/11/2019 and 01/12/2020 (the CTAMP)*
- *Moorebank Precinct West Stage 1, Construction Heritage Management Plan, MIC1-QPMS-EN-PLN-00007, 5/11/2019 and 01/12/2020 (the CHMP)*

- *Moorebank Precinct West - Early Works Per & Poly-Fluoroalkyl Substances (PFAS) Management Plan, Rev G, 27/02/2018 (the PFASMP)*
- *Moorebank Precinct West, 6-Monthly Compliance Report, September 2021 – February 2022, J001836220502.1, 04 May 2022*
- *Moorebank Precinct West, 6-Monthly Compliance Report, March 2022 – August 2022, J001836221021.1, 21 October 2022.*

An audit checklist comprising CoCs from Schedule 3 of SSD 5066 was prepared and distributed.

2.2.3 Meetings

Opening and closing meetings were held on 24 November 2022 at the MPW construction site with project personnel and WolfPeak auditor. Key items discussed included:

- Confirmation of the purpose and scope of the audit
- Overview of the project and status of the works
- Update on the project documentation (CEMP and its sub-plans) and records to verify compliance with the SSD 5066 conditions
- Conduct of a site walk led by the project team to review implementation of mitigation measures and environmental controls
- Conduct of the audit based on the checklist with the Conditions of Approval, interviews with personnel and review of records provided as evidence of compliance, and
- Discussion of any identified findings and any actions noted during site inspection.

At the closing meeting, preliminary audit findings were presented, preliminary recommendations (as appropriate) were made, and any post-audit actions were confirmed.

2.2.4 Interviews

The Auditor conducted interviews during the site inspection with key personnel involved in Project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development. All other communication was conducted remotely, which included detailed request for information and auditee responses to the request.

The auditor conducted interviews on 24 November 2022 with key personnel during and following the site inspection. During the inspection key personnel involved in on-site Project delivery, including those with responsibilities for environmental management, who could assist on verifying the compliance status of the development were interviewed. All other communication was conducted remotely, which included detailed request for information and auditee responses to the request. The names of personnel interviewed during the audit are provided in the table below.

Table 2 Audit meeting attendance and personnel interviewed

Personnel	Position	Company
██████████	Environmental Site Representative	Aspect Environmental (representing LOGOS)

Personnel	Position	Company
██████████	Environmental Manager	BMD Constructions (construction contractor)

2.2.5 Site inspection

The on-site audit activities took place on 24 November 2022 and included an inspection of the site and work activities. The Dustbowl, stockpiles in Lot 100 and area that was subject to delivery of imported fill to southern end of MPW were sighted during the site inspection. Photos are presented in Appendix C.

2.2.6 Document review

The Independent Audit included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are referenced within Appendix A.

2.2.7 Generating audit findings

Independent Audit findings were based on verifiable evidence. The evidence included:

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

Section 3 and Appendix A present the general audit findings and Section 4 presents the summary of findings.

2.2.8 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR, as shown in Table 3 below.

Table 3: Compliance status descriptors

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

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

2.2.9 Evaluation of post approval documentation

The Auditor assessed whether post approval documents:

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

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

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

2.2.10 Completing the audit

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

3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

The documents audited comprised all the conditions from Schedule 3 of SSD 5066 applicable to the works being undertaken, and selected mitigation measures and commitments from the CEMP and associated sub-plans.

The evidence sighted against each requirement is detailed within Appendix A.

3.2 Previous Audit Findings

Table 4 presents the status of the previous audit findings. All previously open findings are considered by the Auditor to be closed.

3.3 Summary of Compliance

This Section presents a summary of the findings raised from the Independent Audit and the applicant response to each of the findings. Detailed findings against each requirement are presented in Appendix A.

- There were 72 CoCs assessed.
- No non-compliances or observations were identified against the CoCs.

Table 3: Status of previously open audit findings

Item	Reference	Type	Details of item	Proposed or completed action by the auditee	By whom and by when	Status
IA4_01	CAQMP-REMM-10U	Observation 01	<p>Requirement: <i>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, non-compliance and non-conformance issues. An ARL trigger would be a defined measurement of elevated dust levels for a prolonged period.</i></p> <p>Observation: Real-time monitoring is used on-site with a threshold of 100 µg/m³; however, the Construction Air Quality Management Plan (CAQMP) does not provide any reference to real-time monitoring, locations or Action Response Levels despite being a Review of Environmental Mitigating Measures (REMM) requirement as stated in Table 2, Item 10U of the CAQMP.</p>	Clarification should be provided in the CAQMP as to whether real-time dust monitoring forms part of the dust monitoring program for SSD 5066. If not, an explanation of as to why REMM 10U should not apply should be provided.	SIMTA – Next Independent Audit	<p>CLOSED</p> <p>MPW1 works (and their potential to generate fugitive dust) are now negligible. MPW1 construction is nearing completion.</p> <p>MPW2 is the primary construction activity across the site, and dust management is being managed under the SSD 7709 CEMP and sub-plans.</p>

Table 4: Findings, recommendation and applicant response from this fifth Independent Audit

Item	Reference	Type	Details of item	Proposed or completed action by the auditee	By whom and by when	Status
None						

3.4 Adequacy of Environmental Management Plans, sub-plans and post approval documents

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

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

The implementation of the CEMP and sub-plans were verified during the site inspection and records review as detailed in Appendix A:

Based on the evidence presented during the audit, the level of compliance achieved, and the condition of the site during the site it is the Auditors opinion that the management plans are adequate, implemented and maintained for the works being undertaken.

3.5 Actual versus predicted impacts

Predicted impacts are presented in Sections 11 – 27 of the EIS¹ and Sections 5 and 6 of the Submissions Report². The documents include a voluminous number of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the Project (including mitigation measures). Full assessment of the accuracy of these predictions would also require a significant number of studies involving measurement and modelling using actual data points as inputs. Other than the monitoring and inspection requirements specified in the CoC and identified mitigation measures, to the Auditor's knowledge there are no requirements to undertake such studies as part of the Early Works scope, and doing so does not form part of this Independent Audit.

Notwithstanding the above, the EIS did identify that there would be general nuisance impacts arising from Early Works in relation to traffic and access, noise and vibration and air quality; direct and indirect impacts on biodiversity (both flora and fauna) and heritage, and impacts on soils, contamination risk and water quality through ground disturbance and material handling.

In considering whether the actual impacts were consistent with those predicted in the EIS the Auditor considered:

- The scale and complexity of works conducted under the SSD 5066 consent during the audit period
- the degree compliance with the CoCs
- the degree of implementation of the management plans

¹ Moorebank Intermodal Terminal Project Environmental Impact Statement, Parsons Brinckerhoff, October 2014.

² Moorebank Intermodal Terminal Supplementary Response to Submissions Report, Parsons Brinckerhoff, August 2015.

- the condition of the site during the site inspection (including whether works had extended beyond the approved boundary)
- the degree of compliance and environmental performance as identified by the Environmental Representative through review of the Quarterly Reports
- the number and type of complaints received during the audit period (noting that these are recorded for the Moorebank Logistics Park as a whole), and
- the number and type of incidents recorded.

At the third and fourth Independent Audits it was observed that the PFAS separation layer (and, therefore, the associated works required to install the layer) appeared to be inconsistent with what was originally anticipated under the EIS for the Early Works package. It is understood that these works had been conducted in accordance with the PFAS Management Plan, prepared in accordance with the Commonwealth Approval EPBC 2011/6086, Condition 8.

The Department, by way of their letter to the auditee dated 3 December 2021, confirmed its position that these works were not consistent with the terms of the consent but elected to not take any further regulatory action on the basis that:

- there was no actual environmental harm as a result of the activity
- whilst the non-compliant activities were not authorised under the SSD 5066 consent, they are permissible under the subsequent planning approval SSD-7709, which authorises MPW2 (SSD 7709) works.

It is the Auditors opinion that, other than the fill importation activities identified above (which was completed prior to the current audit period), the actual impacts are generally consistent with that predicted. Previous observations about the significant complexity around works from SSD 7709 and SSD 7628 overlapping and occurring in tandem with those conducted under SSD 5066 have now subsided given that MPW1 works are essentially complete.

3.6 Summary of notices from agencies

The Auditor refers to the Department's warning letter of 3 December 2021 which alleged a breach of the terms of SSD 5066 for the following activities (of which took place prior to the current audit period):

- Clearing of Endangered Ecological Communities (EEC)
- Excavation and filling works using imported fill
- Remediation works occurring within the former sewerage treatment plant (STP) area; and
- Importation and stockpiling of fill.

The Department elected to not take any further regulatory action at that time.

To the Auditors knowledge no other formal notices were issued by the Department or the EPA during the audit period.

3.7 Other matters considered relevant by the Auditor or DPE

The Auditor has no other matters considered relevant beyond the findings presented elsewhere in Section 3 of this Report.

3.8 Complaints

A complaints register is being maintained for the entire MLP development. Complaints in the register presented are not specific to the Project. No complaints received for MPW1 during the audit period.

3.9 Incidents

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

3.10 Key strengths and environmental performance

The overall outcome of this audit indicated that compliance was proactively tracked by the key project personnel. The Auditor notes that there are negligible works being conducted under SSD 5066. Nevertheless, the controls were observed to be in place (stockpiles were covered and erosion and sediment controls were in place).

4. CONCLUSIONS

This Independent Audit was completed to satisfy the requirements of SSD 5066 Schedule 3, CoC A2(d). This Audit Report presents the findings from the fifth Independent Audit under the revised Independent Audit Program (WolfPeak, 2019) covering the period 25 November 2021 to 24 November 2022.

The overall outcome of the Independent Audit was positive. The majority of compliance records were organised and available at the time of the site inspection and interview with Project personnel on 24 November 2022.

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

- With regards to the status of previously open findings from the fourth Independent Audit; the outstanding findings from the previous audit have now been closed.
- With regards to the fifth Independent Audit:
 - There were 72 CoCs assessed.
 - No non-compliances or observations were identified against the CoCs.

The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the Independent Audit.

5. LIMITATIONS

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The assessment of actual impacts and those predicted in the Environmental Impact Assessment(s) was a high-level assessment qualitative assessment only. The Environmental Impact Assessment(s) include a voluminous number of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the Project (including mitigation measures). Full assessment of the accuracy of these predictions would also require a significant number of studies involving measurement and modelling using actual data points as inputs. Other than the requirements specified in the, to the Auditor's knowledge there are no requirements to undertake such studies and doing so does not form part of this Independent Audit.

Audits of all post approval documents prepared to satisfy the conditions, including an assessment of the implementation of Environmental Management Plans and Sub-plans, adopts a Judgement Based Sampling approach. Judgement Based Sampling is the process of selecting a sample of commitments and evidence from within the total available data set (population) to obtain and evaluate evidence about some characteristic of that population, in order to form a conclusion concerning the population.

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APPENDIX A – SSD 5066 CONDITIONS OF CONSENT

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
Schedule 3				
Part A Administrative conditions				
Subject Land				
A1	The land subject to this part relates to the intermodal site (Lot 1 DP 1197707, Lot 100 DP 1049508, Lot 101 DP 1049508 and Lot 2 DP 1197707).	Interview with Auditees 24/11/22 Construction Environmental Management Plan Moorebank Precinct West Stage 1, Rev 004, 19/11/20 Site inspection 24/11/22	The land remains unchanged to the extent that there has been no increase.	Compliant
Compliance Monitoring and Tracking				
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 the Early Works stage. The Program shall include, but not be limited to: (a) provision for the notification to the Secretary prior to the commencement of construction; (b) provision for periodic review of the compliance status of the SSD against the requirements of this approval; (c) provision for periodic reporting of compliance status to the Secretary, including but not limited to: (i) a Pre-Construction Compliance Report prior to the commencement of early works, (ii) Six-monthly, or other timing as agreed by the Secretary, Early Works Compliance Reports, for the duration of early works, and (iii) a Completion Compliance Report within one month of completion of the early works stage; (d) a program for independent environmental auditing in accordance with <i>AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems</i> ; (e) mechanisms for recording environmental incidents during construction and actions taken in response to those incidents; (f) provision for reporting environmental incidents to the Secretary during construction, in accordance with conditions A3 and A4; (g) procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management; and (h) provision for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.	Moorebank Precinct West (SSD 5066) Stage 1: Six-Monthly Compliance Report - #07 September 2020 – February 2021 25 MAY 2021 MOOREBANK PRECINCT WEST (SSD 5066) Stage 1: Six-Monthly Compliance Report - #08 March 2021 – August 2021 14 OCTOBER 2021 CEMP (SIMTA.004) 19/11/20 Liberty Industrial Pty Ltd., Compliance Tracking Program, 22/02/2017, Rev 0 WolfPeak Pty Ltd, MOOREBANK PARK WEST – SSD 5066 INDEPENDENT AUDIT PROGRAM, 03/07/19, Rev V1	A CTP was prepared and approved by the Department on 3 February 2017. Six monthly compliance reports continue to be prepared for each cycle. Reports for September 2020 to February 2021 and March 2021 to August 2021 were available on the Project website. The compliance report for the reporting period September 2020 to February 2021 acknowledged the non-compliances identified in the previous independent audit (IA3). No non-compliances were identified by the proponent for the March 2021 to August 2021 reporting period. The Completion Compliance Report will not be triggered for a number of years until early works scope of works are completed. Section 2.4 of the CTP has been superseded by a standalone Independent Audit Program dated 3 July 2019 that requires independent audits to be conducted at intervals not greater than 52 weeks. Incident management was addressed in Section 2.5 of the CTP and Section 10 of the CEMP. Procedures for rectifying non-compliances are identified in Section 2.6 of the CTP and Section 10.3 of the CEMP.	Compliant
Incident Reporting				
A3	The Applicant shall notify the Secretary and relevant public authorities of any incident with actual or potential significant on-site or off-site impacts on human health or the biophysical environment within 24 hours of becoming aware of the incident. The Applicant shall provide full written details of the incident to the Secretary within seven days of the date on which the incident occurred. <i>Note:</i> <i>Where an incident also requires reporting to the EPA and/or OEHL, the incident report prepared for the purposes of notifying the EPA and/or OEHL would meet this requirement.</i>	Interview with Auditees 24/11/22 BMD incident register, current to 23/11/22 BMD incident management portal (online)	No incidents with actual or potential significant on-site or off-site impacts on human health or the biophysical environment concerning SSD 5066 during the audit period.	Not Triggered
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.	As above	As above	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
PART B PRIOR TO CONSTRUCTION				
Demolition				
B1	The Applicant shall ensure that all demolition work is carried out in accordance with <i>Australian Standard AS 2601:2001: The Demolition of Structures</i> , or its latest version.	Site Inspection 24/11/22 Interview with Auditees 24/11/22	No demolition activities occurred during the audit period.	Not Triggered
Contamination				
B2	The approved works (including any excavation required for remediation) must not occur below 5 metres AHD and lower the watertable below 1m AHD on adjacent class 1, 2, 3, 4 land in accordance with the Liverpool Local Environmental Plan 2008.	Site Inspection 24/11/22	The only excavation during the audit period is the removal of the ACM stockpiles held at Lot 100 for placement on MPW2. This is being conducted under MPW2 consent. The excavation has not gone below 5 metres AHD.	Not Triggered
B3	The subject site is to be remediated in accordance with: (a) The approved Remedial Action Plan; (b) <i>State Environmental Planning Policy No. 55 - Remediation of Land</i> ; and (c) The guidelines in force under the <i>Contaminated Land Management Act</i> . 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 <i>State Environmental Planning Policy No. 55 - Remediation of Land</i> . 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.	Letter DPIE to Qube, 15/11/20 Site Audit Statement, 0301-1613-7 Site Audit Report, MPW S1, 600099 0301-1613-7, James Davis, Sep 2020.	It is understood that regulated remediation works are complete. The Site Audit Report was finalised by the accredited Contaminated Sites Auditor prior to the audit period. The Site Audit Statement confirms that the site is fit for purpose subject to implementation of three LTEMPs. The Department has provided written correspondence acknowledging receipt of the Validation Report and Site Audit Statement and Site Audit Report. No change for the current audit period.	Compliant
Soil, Water Quality and Hydrology				
B4	The Early Works shall be undertaken to comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> , which prohibits the pollution of waters.	ER Quarterly Report – December 2021 to February 2022 ER Quarterly Report – March to May 2022 ER Quarterly Report – June to August 2022 Site inspection 24/11/22 Interview with Auditees 24/11/22 BMD incident register, current to 23/11/22 BMD incident management portal (online) Moorebank ERSED Plan, 31/10/22	There were no known incidents with the potential to pollute waters concerning SSD 5066 that occurred during the audit period. The controls were installed as per the erosion and sediment control plan. The site was observed to be stable during the inspection.	Compliant
B5	All activities taking place in, on or under waterfront land, as defined in the <i>Water Management Act 2000</i> should be conducted generally in accordance with the NSW Office of Water's Guidelines for Controlled Activities.	Site Inspection 24/11/22	No works were occurring on waterfront land during the audit period.	Not Triggered
Heritage				
B6	The Applicant shall not harm, modify or otherwise impact any heritage items outside the subject site.	Site Inspection 24/11/22 ER Quarterly Report – December 2021 to February 2022 ER Quarterly Report – March to May 2022 ER Quarterly Report – June to August 2022	Heritage works were completed before the audit period and that no heritage items remained that were associated with SSD 5066 Early Works. To the Auditor's knowledge, there were no events that impacted heritage items. No heritage finds occurred during the audit period.	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
B7	<p>Prior to the commencement of Early Works affecting Aboriginal sites MA1, MA2, MA3, MA4, MA5 and MA9, the Applicant shall:</p> <ul style="list-style-type: none"> (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 (b) undertake any further archaeological excavation works recommended by the results of the Aboriginal archaeological investigation program. <p>Within twelve months of completing the above work, unless otherwise agreed by the Secretary, the Applicant shall submit a report containing the findings of the excavations, including artefact analysis and Aboriginal Site Impacts Recording Forms (ASIR), and the identification of final storage location for all Aboriginal objects recovered (testing and salvage), prepared in consultation with the Aboriginal stakeholders, the OEH (Aboriginal heritage) and to the satisfaction of the Secretary.</p> <p><i>Note: where archaeological testing has occurred as part of the Environmental Assessment and the results are included in the documents listed in condition 4 the sites tested must still form part of the final report prepared under B7(b).</i></p>	-	This condition falls outside this Independent Audit period.	Not Triggered
B8	<p>Prior to the commencement of Early Works affecting non-Aboriginal sites MHPAD1 and MHPAD2, the Applicant shall undertake any further archaeological excavation works recommended by the results of the non-Aboriginal archaeological investigation program.</p> <p>Within 12 months of completing the above work, unless otherwise agreed by the Secretary, the Applicant shall submit a report containing the findings of the excavations, including artefact analysis, and the identification of a final repository for finds, prepared in consultation with the OEH (Heritage branch) and to the satisfaction of the Secretary.</p> <p><i>Note: where archaeological testing has occurred as part of the environmental assessment and the results are included in the documents listed in condition 4, the sites tested must still form part of the methodology and final report prepared for the non-Aboriginal archaeological investigation program.</i></p>	-	This condition falls outside this Independent Audit period.	Not Triggered
B9	<p>Prior to the commencement of Early Works affecting the CUST Hut, RAAF STRARCH Hangar, the Dog Cemetery and Commemorative Gardens, the Applicant shall prepare a report in consultation with the Heritage Council of NSW, the local Council and the local Historical Society which considers the options for mitigation of these items. In relation to the Dog Cemetery, consultation should also occur with the School of Military Engineering's Explosive Detection Dog's Unit. The report shall include the archival recordings and the historical research, where required, to the Secretary, the Heritage Council of NSW, the local Council and the local Historical Society.</p>	-	This condition falls outside this Independent Audit period.	Not Triggered
Dangerous Goods				
B10	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with:</p> <ul style="list-style-type: none"> (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). <p>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>	Site Inspection 24/11/22	Dangerous Goods storage was not required in the three areas subject to the requirements of SSD 5066 at the time of the site inspection.	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
Dust Management				
B11	The Applicant shall carry out all feasible and reasonable measures to minimise dust generated by the Development.	Construction Air Quality Management Plan, Moorebank Precinct West Stage 1, 01/12/20, SIMTA.004 Site Inspection 24/11/22 Moorebank ERSED Plan, BMD, 31/10/22	No dust generating activities were observed relevant to early works activities at the time of the site inspection. Asbestos contaminated stockpiles in Lot 100 were observed to be covered at the time of the site inspection. The handling of the material for placement is occurring under MPW2.	Compliant
B12	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.	Site Inspection 24/11/22 Driver Code of Conduct (within CTAMP) BMD CCTV trimble status (aerial photos of trucks with covered loads)	The code of conduct includes details relating to hours, covering of loads, material tracking, parking, idling and so forth. Stabilized access and site speed limits were observed during the site inspection. Lot 10 is the only remaining part of the MPW1 site. There is no opportunity to exceed 30km/h. Photos show trucks being covered. No material import or export is occurring on MPW1. Material load out from Lot 100 onto MPW2.	Compliant
Waste Management				
B13	The reuse and/or recycling of waste materials generated on site shall be maximised as far as practicable, to minimise the need for treatment or disposal of those materials off site.	Site Inspection 24/11/22 Interview with auditees 24/11/22	Asbestos containing topsoil was being stored in Lot 100 from March 2021 and is being placed on MPW2 under that consent. Contaminated materials (PPE, liner etc.) is being disposed of.	Not Triggered
B14	All liquid and/or non-liquid waste generated on the site shall be assessed and classified in accordance with Waste Classification Guidelines (Department of Environment, Climate Change and Water 2009).	Site Inspection 24/11/22 Interview with auditees 24/11/22 Disposal docket, Cleanaway 05/09/22	The only waste disposed of from site is one skip of contaminated PPE and liners etc. This material is pre-classified as Special Waste under the Waste Classification Guidelines.	Compliant
B15	All waste materials removed from the subject site shall only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Site Inspection 24/11/22 Interview with auditees 24/11/22 Disposal docket, Cleanaway 05/09/22	The only waste disposed of from site is one skip of contaminated PPE and liners etc. This material is pre-classified as Special Waste under the Waste Classification Guidelines.	Compliant
Utilities and Services				
B16	Utilities, services and other infrastructure potentially affected by construction and operation shall be identified prior to construction to determine requirements for access to, diversion, protection, and/or support. Consultation with the relevant owner and/or provider of services that are likely to be affected by the Early Works shall be undertaken to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure as required. The cost of any such arrangements shall be borne by the Applicant, or as otherwise agreed between the parties.	Site Inspection 24/11/22 Interview with Auditees 24/11/22	This condition falls outside this Independent Audit period. No new infrastructure has been affected by MPW1. Utility works are occurring under MPW2.	Not Triggered
B17	The Applicant shall prepare dilapidation surveys and reports on the condition of local roads, footpaths, services and utilities affected by Early Works. The Applicant shall carry out rectification work at the Applicant's expense and to the reasonable requirements of the owners for damage resulting from the completion of Early Works.	Site Inspection 24/11/22 Interview with Auditees 24/11/22	This condition falls outside this Independent Audit period. No new infrastructure has been affected by MPW1. No new dilapidation reports have been required.	Not Triggered
B18	The Applicant shall ensure that the construction and operation of the proposed development will not prevent the existing use of Moorebank Avenue as a public road to a standard commensurate to its current use prior to the development. <i>Note: temporary closures or part closures and changes to operation of Moorebank Ave may occur for limited periods during construction as detailed in the Construction Traffic Management Plan.</i>	Site Inspection 24/11/22	Moorebank Avenue is not a public road, it is owned by the Department of Defence and provided to LOGOS as the operator. Moorebank Avenue upgrade works were satisfactory and consistent with pre-existing use.	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
PART C COMMUNITY INFORMATION AND REPORTING				
Community Communication Strategy				
C1	<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> <ul style="list-style-type: none"> (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; (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; (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; (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 (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>Community Communication Strategy, prepared by KJA (v4, dated 1/02/17), approved by DPIE on 21/02/17.</p>	<p>Note that the development of the CCS falls outside of the Audit period.</p> <p>The CCS was approved by the Secretary on 21 February 2017 and remains unchanged.</p> <p>The Project website includes project updates, complaints register, contact details to raise complaints. The system remains unchanged since the previous audit and is mature.</p>	Compliant
Complaints and Enquiries Procedure				
C2	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall ensure that the following are available for community enquiries and complaints for the duration of Early Works:</p> <ul style="list-style-type: none"> (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. <p>The telephone number, the postal address and the email address shall be published in newspaper(s) circulating in the local area prior to the commencement of construction and prior to the commencement of operation. This information shall also be provided on the website (or dedicated pages) required by this approval.</p>	<p>Community Communication Strategy, prepared by KJA (v4, dated 1/02/17), approved by DPIE on 21/02/17.</p>	<p>The Complaints Management System and protocols are included in the CCS. The CCS was approved by the Secretary on 21 February 2017 and remains unchanged.</p> <p>24hr info line 1800 986 465 www.simta.com.au simta@elton.com.au PO Box 1488 Bondi Junction NSW 2022.</p>	Compliant
C3	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a Construction Complaints Management System consistent with AS ISO 10002-2006 <i>Customer satisfaction - Guidelines for complaints handling in organisations (ISO 10002:2004, MOD)</i> and maintain the System for the duration of Early Works and up to 12 months following completion of this stage.</p> <p>Information on all complaints received, including the means by which they were addressed and whether resolution was reached, with or without mediation, shall be maintained in a complaints register and included in the construction compliance reports required by this approval. The information contained within the System shall be made available to the Secretary on request.</p>	<p>Community Communication Strategy, prepared by KJA (v4, dated 1/02/17), approved by DPIE on 21/02/17.</p> <p>Complaints Register – current to 31/10/22</p>	<p>Note that the preparation of the Complaints Management System is outside of the Audit period and therefore relies on information presented in the 6-monthly Compliance Report.</p> <p>The Complaints Management System and protocols are included in the CCS. The CCS was approved by the Secretary on 21/02/2017.</p> <p>The Complaints Register is precinct wide and appears to have been implemented during the audit period. No complaints received for MPW1 during the audit period.</p>	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
Provision of Electronic Information				
C4	<p>Prior to commencement of the Early Works, or as otherwise agreed by the Secretary, the Applicant shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the SSD, for the duration of Early Works. The Applicant shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including, but not necessarily limited to:</p> <ul style="list-style-type: none"> (a) information on the current implementation status of the SSD; (b) a copy of the documents listed in condition 4, and any documentation supporting modifications to this approval that may be granted from time to time; (c) a copy of this approval and any future modification to this approval; (d) a copy of each relevant environmental approval, licence or permit required and obtained in relation to the SSD; (e) a copy of each current report, plan, or other document required under this approval; (f) the outcomes of compliance tracking in accordance with condition A2 of this approval; and (g) details of contact point(s) to which community complaints and enquiries may be directed, including a telephone number, a postal address and an email address. 	Project Website: www.simta.com.au	The website contains the information required by parts a) – g) of this condition	Compliant
PART D CONSTRUCTION ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
Environmental Representative				
D1	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall appoint a suitably qualified and experienced Environmental Representative(s) that is independent of the design and construction personnel, and that has been approved by the Secretary. The Applicant shall employ the Environmental Representative(s) for the duration of construction of this stage, or as otherwise agreed by the Secretary. The Environment Representative(s) shall:</p> <ul style="list-style-type: none"> (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 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 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. 	<p>ER Quarterly Report – December 2021 to February 2022 DPE post approval portal lodgment, 07/03/22</p> <p>ER Quarterly Report – March to May 2022 DPE post approval portal lodgement, 08/06/22 (12:59am)</p> <p>ER Quarterly Report – June to August 2022 DPE post approval portal lodgement, 08/09/22 (01:11am)</p> <p>BioBanking agreement ID number: 341</p>	<p>Appointment of the ER occurred outside of the audit period. The nominated ER was approved by DPI&E on 19 July 2016.</p> <p>Inspection and Quarterly Reports indicate ongoing engagement with the ER for the audit period.</p> <p>The ER has identified concern over the proposal to place fill in the 'dustbowl' as part of the works under the biobanking agreement 341, on the basis that this activity would be inconsistent with the SSD 5066 and SSD 7709 consents. The auditees state that in November 2022 the ER was informed by DPE of EPA concurrence with these activities and closed the matter from a compliance perspective. The Auditor notes that the works under the biobanking agreement at this location had not commenced at the time of the audit and regardless, are separate to SSD 5066.</p>	Compliant
D2	<p>The Environmental Representative shall prepare and submit to the Secretary a three monthly report on the Environmental Representative's actions and decision on matters specified in condition D1 for the preceding month. The reports shall be submitted within seven (7) days for the end of each month for the duration of Early Works, or as otherwise agreed by the Secretary. Notwithstanding, the Environmental Representative shall be given the independence to report to the Secretary at any time and/or at the request of the Secretary.</p>	<p>ER Quarterly Report – December 2021 to February 2022 DPE post approval portal lodgment, 07/03/22</p> <p>ER Quarterly Report – March to May 2022 DPE post approval portal lodgement, 08/06/22 (12:59am)</p> <p>ER Quarterly Report – June to August 2022 DPE post approval portal lodgement, 08/09/22 (01:11am)</p>	<p>Quarterly Reports were submitted to the Department in accordance with the requirement.</p>	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
Construction Soil and Water Management				
D3	Soil and water management measures consistent with <i>Managing Urban Stormwater - Soils and Construction Vols 1 and 2, 4th Edition</i> (Landcom, 2004) shall be employed during Early Works to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters.	Moorebank ERSED Plan, BMD, 31/10/22	Plan prepared a competent person and appears to be consistent with the Blue Book. Controls in the field were generally consistent with the ERSED plan. Site controls in Lot 100 were observed to be of a high standard. No issues observed.	Compliant
Bunding				
D4	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participants Handbook.	Site Inspection 24/11/22	Chemical storage was not required in the three areas subject to the requirements of SSD 5066 at the time of the site inspection.	Not Triggered
Construction Hours				
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; at no time on Sundays or public holidays.	CEMP (SIMTA.004) 19/11/20 Interview with Auditees 24/11/22 Complaints Register current to 24/11/22	Work hours are included in the latest version of the CEMP which is provided to contractors to implement. No other Out of Hours Works have been required during the audit period other than that approved under CoC D7(a).	Compliant
D6	Activities resulting in impulsive or tonal noise emissions shall only be undertaken: (a) between the hours of 8:00 am to 5:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) in continuous blocks not exceeding three hours each with a minimum respite from those activities and works of not less than one hour between each block. For the purposes of this condition, 'continuous' includes any period during which there is less than a one hour respite between ceasing and recommencing any of the work the subject of this condition.	Interview with Auditees 24/11/22 Site Inspection 24/11/22	No impulsive or tonal noise source plant were observed on site at the time of the site inspection. Mobile plant used long term on site use non-tonal reverse sirens.	Compliant
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 L_{Aeq} (15 minute) noise levels that are: i. No more than 5 dB above rating background level at any residence in accordance with the <i>Interim Construction Noise Guideline (DECC, 2009)</i> ; and ii. No more than the noise management levels specified in Table 3 of the <i>Interim Construction Noise Guideline (DECC, 2009)</i> at other sensitive landuses; or (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.	Renzo Tonin, Moorebank Precinct West Stage 1, OOHW Fill Importation Monitoring, 15/10/21 Complaints Register current to 24/11/22 Project Website ER Quarterly Report – December 2021 to February 2022 ER Quarterly Report – March to May 2022 ER Quarterly Report – June to August 2022	OOHW were conducted for the import of fill to the southern extent of site under D7(a). An assessment was undertaken to support this position. No other OOHW identified by the auditee or the ER. No complaints received for MPW1 during the audit period.	Compliant
Construction Noise and Vibration				
D8	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 <i>Interim Construction Noise Guideline (DECC 2009)</i> ; (b) vibration criteria established using the <i>Assessing Vibration: a Technical Guide (DECC 2006)</i> (for human exposure); and (c) the vibration limits set out in the <i>German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures</i> (for structural damage). 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).	Site Inspection 24/11/22 Complaints Register current to 24/11/22	No premises are located within safe work distance for vibration. No significant noise or vibration sources on site associated with SSD 5066 remaining Early Works activities at the time of the audit. No premises are predicted to be affected above daytime NMLs based on existing plant and distance to receivers.	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	<i>Note: The Interim Construction Noise Guideline identifies 'particularly annoying' activities that require the addition of 5dB(A) to the predicted level before comparing to the construction Noise Management Level.</i>			
Construction Traffic and Noise				
D9	The Applicant is to ensure that construction vehicle contractors operate so as to minimise any construction noise impacts from the subject site. Measures that could be used include toolbox talks, contracts that include provisions to deal with unsatisfactory noise performance for the vehicle and/or the operator, and specifying non-tonal movement alarms in place of reversing beepers or alternatives such as reversing cameras and proximity alarms, or a combination of these, where tonal alarms are not mandated by legislation.	Delivery Driver Induction, 16/04/21 Delivery Driver Instruction-FRM-00421, Rev.10(8/07/2020) Site Rev 6.(08/07/2021).	The Delivery Driver Instruction includes details relating to hours, material tracking, parking, idling and so forth. A Code of Conduct is included in the Instruction. The Project induction includes controls to limit speeds and reversing. Stabilised access and site speed limits were observed, the site appeared to be set up so that vehicle reversing is negligible. No machinery associated SSD 5066 Early Works was being operated at the time of the site inspection. The plant prestart checks indicate that non-tonal alarms are to be fitted to plant.	Compliant
D10	No use of compression brakes shall be permitted for construction vehicles associated with the Early Works in the vicinity of the subject site.	Site Inspection 24/11/22 Driver Code of Conduct (within CTAMP) Complaints Register current to 24/11/22	Refer response to CoC D9. The site is effectively level and does not require compression braking. The Code of Conduct includes details relating to hours, material tracking, parking, idling and so forth	Not Triggered
Transport and Access				
D11	Construction heavy vehicle access to and from the site via Moorebank Avenue (south) / Cambridge Avenue during Early Works is not permitted, with the exception of heavy vehicles travelling to and from the Glenfield Waste Facility.	CTAMP SIMTA.005, 01/12/20, Appendix C (VMP) Site Inspection 24/11/22 Interview with Auditees 24/11/22 Driver Code of Conduct (within CTAMP)	The Driver Code of Conduct and CTAMP include the requirement to access to site is via the M5 and Moorebank Road only and that Anzac Road east of the industrial complex and Cambridge Avenue are not to be used by heavy vehicles. Site access is left in left out only. Articulated trucks are required to travel south to Chatham Ave and undertake a u-turn at the roundabout past the security hut.	Compliant
D12	The Early Works shall be carried out to, where feasible and reasonable, to avoid the use of local roads (through residential streets) by heavy vehicles to gain access to the site and/or ancillary facilities.	CTAMP SIMTA.005, 01/12/20, Appendix C (VMP) Site Inspection 24/11/22 Interview with Auditees 24/11/22 Driver Code of Conduct (within CTAMP)	The Driver Code of Conduct and CTAMP includes the requirement to access to site is via the M5 and Moorebank Road only and that Anzac Road east of the industrial complex and Cambridge Avenue are not to be used by heavy vehicles.	Compliant
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.	CTAMP SIMTA.005, 01/12/20, Appendix C (VMP) Site Inspection 24/11/22 Interview with Auditees 24/11/22 Driver Code of Conduct (within CTAMP)	Sufficient parking is available on site. There is no need to use off site locations and no issues were observed during the site inspection. There is no offsite parking available.	Compliant
D14	Safe pedestrian and cyclist access through or around worksites shall be maintained during early works. In circumstances where pedestrian and cyclist access is restricted due to construction activities, a satisfactory alternate route shall be provided and signposted, including provision of permanent footpaths where pedestrian access is reliant on grassed verges.	CTAMP SIMTA.005, 01/12/20, Appendix C (VMP) and D (TMP for Bapaume Rd) Site Inspection 24/11/22	There are no cycle ways or footpaths on Moorebank Avenue. Arrangements for Bapaume Road are included. No issues identified on site.	Compliant
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.	CTAMP SIMTA.005, 01/12/20, Appendix C (VMP) and D (TMP for Bapaume Rd) Site Inspection 24/11/22 Complaints Register current to 24/11/22	The only interface is with the ABB access road. This access is maintained at all times other than crossing of the road under traffic control.	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
D16	<p>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.</p> <p>Following completion of Early Works, a subsequent Report shall be prepared to assess any damage to the road that may have resulted.</p> <p>Measures undertaken to restore or reinstate roads affected by the Early Works shall be undertaken in a timely manner, in accordance with the reasonable requirements of the relevant Council, and at the full expense of the Applicant.</p>	Project Website: Dilapidation Report	<p>The road dilapidation report was prepared prior to the audit period and is available on the Project website HERE</p> <p>The requirement for a subsequent report to be prepared following completion is negated due to the approval of MPWS2 and the commencement of the realignment of Moorebank Avenue (under MPES2) and the works that relate to these two projects.</p>	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
Biodiversity				
D17	<p>Within 12 months of the commencement of Early Works, the Applicant shall develop and implement a Biodiversity Offset Package for the approval of the Secretary. The Package shall detail how the ecological values lost as a result of the SSD will be offset. The Package shall be consistent with the <i>NSW Biodiversity Offsets Policy for Major Projects</i> (OEH 2014), unless otherwise agreed by the Secretary.</p> <p>The Package shall include, but not necessarily be limited to:</p> <ol style="list-style-type: none"> 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; the objectives and biodiversity outcomes to be achieved; the final suite of the biodiversity offset measures selected and secured in consultation with OEH; 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: the monitoring of the condition of species and ecological communities at offset (including translocation) locations; the methodology for the monitoring program(s), including the number and location of offset monitoring sites, and the sampling frequency at these sites; provisions for the annual reporting of the monitoring results for a set period of time as determined in consultation with the OEH; and timing and responsibilities for the implementation of the provisions of the Package. <p>Where land offsets cannot solely achieve compensation for the loss of habitat, additional measures shall be provided to collectively deliver an improved or maintained biodiversity outcome for the region.</p> <p>Where monitoring referred to in (e) above indicates that biodiversity outcomes are not being achieved, remedial actions shall be undertaken to ensure that the objectives of the Biodiversity Offset Package are achieved to the satisfaction of the Secretary. Such remedial actions shall be documented under an addendum to the Biodiversity Offset Package and the addendum be submitted for the approval of the Secretary, prior to the implementation of that addendum.</p>	<p>Biodiversity Offset Package, Rev C 08/02/2018</p> <p>DPE letter- BOP not required, D17 complied with 23/03/2018</p> <p>Arcadis EPBC Biodiversity Offset Strategy and Management Plan 18/11/2019</p> <p>DoEE approval of EPBC BOSMP 11/12/2019</p> <p>Arcadis MPW concept and Stage 1 Early Works BOP 08/02/2018</p> <p>Arcadis memo to DPIE 11/12/2019 re MPW stage 2</p> <p>Letter DPIE to SIMTA, 04/05/20, Moorebank Intermodal Precinct West –Stage 2 (SSD 7709) Approval of Koala Management Plan (KMP) - Condition B152</p> <p>Letter DPIE to SIMTA, 23/10/20, Moorebank Precinct West Stage 2 (SSD 7709) Contamination Management Plan – Condition B165</p> <p>Letter DPIE to SDIMTA, 23/03/20, Moorebank Precinct West – Stage 2 (SSD 7709) Approval of Construction Flora and Fauna Management Plan (CFFMP) – Condition B154</p>	<p>The MPW S1 Biodiversity Offset Package (BOP) was approved on 23 March 2018.</p> <p>The BOP states that no native vegetation is affected by early works.</p> <p>Credits were retired in November to December 2019 and addressed under B157 of the MPW S2 approval (SSD7709). B158 of SSD7709 allows for credits to be retired for other Moorebank projects (in addition to that for SSD7709), prior to commencement of construction of SSD7709 provided they are consistent with B157.</p>	Compliant
D18	<p>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.</p>	<p>Biodiversity Offset Package, Rev C 08/02/2018</p> <p>DPE letter- BOP not required, D17 complied with 23/03/2018</p> <p>Arcadis EPBC Biodiversity Offset Strategy and Management Plan 18/11/2019</p> <p>DoEE approval of EPBC BOSMP 11/12/2019</p> <p>Arcadis MPW concept and Stage 1 Early Works BOP 08/02/2018</p> <p>Arcadis memo to DPIE 11/12/2019 re MPW stage 2</p> <p>Letter DPIE to SIMTA, 04/05/20, Moorebank Intermodal Precinct West –Stage 2 (SSD 7709) Approval of Koala Management Plan (KMP) - Condition B152</p> <p>Letter DPIE to SIMTA, 23/10/20, Moorebank Precinct West Stage 2 (SSD 7709) Contamination Management Plan – Condition B165</p> <p>Letter DPIE to SDIMTA, 23/03/20, Moorebank Precinct West – Stage 2 (SSD 7709) Approval of Construction Flora and Fauna Management Plan (CFFMP) – Condition B154</p>	<p>The MPW S1 Biodiversity Offset Package (BOP) was approved on 23 March 2018.</p> <p>The BOP states that no native vegetation is affected by early works.</p> <p>Credits were retired in November – December 2019 and addressed under B157 of the MPW S2 approval (SSD 7709). B158 of SSD 7709 allows for credits to be retired for other Moorebank projects (in addition to that for SSD 7709). It is the understanding of the Auditor that the project has cleared threatened species or communities for the purposes of Early Works, as well as under SSD 7709 and SSD 7628.</p>	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
D19	<p>The Applicant shall prepare and implement a 'Threatened Dragonfly Species Survey Plan' to determine the presence or absence of threatened dragonfly species listed under the <i>Fisheries Management Act 1994</i> on the Georges River, adjacent to the development site. The plan, including survey methodology, shall be prepared in consultation with DPI Fisheries prior to the commencement of Early Works.</p> <p>On implementing the plan, the survey results are to be forwarded onto DPI Fisheries. Should threatened dragonfly species be found at this site, DPI Fisheries should be contacted to agree on possible mitigation measures to avoid impacts in accordance with <i>NSW DPI Policy and Guidelines for Fish Habitat Conservation and Management (2013)</i>.</p>	<p>Threatened Dragonfly Species Survey Plan</p> <p>Dragonfly monitoring reports June-Aug 19 and Sep-Nov 19</p> <p>29/01/2020 ER approval of CFFMP and CEMP revs 003d</p>	<p>No change from previous IA.</p> <p>The Threatened Dragonfly Species Survey Plan was prepared in consultation with the Department in 2016. Survey and reporting is outside the audit period.</p>	Compliant
Construction Environmental Management Plan				
D20	<p>Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP). The CEMP is to be prepared in consultation with the EPA, OEH, DPI Water, DPI Fisheries, and the relevant Council, for the approval of the Secretary. The CEMP shall outline the environmental management practices and procedures that are to be followed during construction. The CEMP is to be prepared in accordance with the <i>Guideline for the Preparation of Environmental Management Plans</i> (Department of Infrastructure, Planning and Natural Resources, 2004). The CEMP shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> (a) a description of activities to be undertaken during Early Works; (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; (c) a description of the roles and responsibilities for relevant employees involved in the Early Works, including relevant training and induction provisions for ensuring that employees, including contractors and sub-contractors, are aware of their environmental and compliance obligations under these conditions of approval; (d) an environmental risk analysis to identify the key environmental performance issues associated with the Early Works; and (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: <ul style="list-style-type: none"> (i) measures to monitor and manage dust emissions including dust from stockpiles, traffic on unsealed internal roads and materials tracking from construction sites onto public roads; (ii) measures for the handling, treatment and management of hazardous and contaminated materials (including asbestos); (iii) measures to monitor and manage waste generated during construction including but not necessarily limited to: general procedures for waste classification, handling, reuse, and disposal; use of secondary waste material in construction wherever feasible and reasonable; procedures or dealing with green waste including timber and mulch from clearing activities; and measures for reducing demand on water resources (including potential for reuse of treated water from sediment control basins); (iv) measures to monitor and manage hazard and risks; (v) measures to monitor and rectify any impacts to third party property and infrastructure, including details of the process for rectification or compensation of affected landowners, and timeframes for rectification works or compensation processes; and (vi) the issues identified in condition D21. <p>The CEMP shall include procedures for its periodic review and update (including the sub-plans required under condition D21), as necessary (including where minor changes can be approved by the Environmental Representative).</p> <p>The CEMP shall be submitted for the approval of the Secretary no later than one month prior to the commencement of Early Works, or as otherwise agreed by the Secretary. The CEMP may be prepared in stages; however, Early Works shall not commence until written approval of the relevant stage has been received from the Secretary.</p>	<p>CEMP (SIMTA.004) 19/11/20 sub-plans available on the website</p> <p>Construction Environmental Management Plan Moorebank Precinct West Stage 1, 004, 19/11/20</p> <p>Construction Flora and Fauna Management Plan Moorebank Precinct West Stage 1, 004, 19/11/20</p> <p>Letter, DPIE to SIMTA, Moorebank Precinct West Stage 1 (SSD 5066)</p> <p>Updated Construction Environmental Management Plan (CEMP) and Construction Flora and Fauna Management Plan (CFFMP) - SSD 5066, 27/11/20</p>	<p>The CEMP and Sub-plans were not updated during the audit period.</p> <p>The preparation and approval of the CEMP and sub-plans occurred outside of the audit period. The CEMP and subplans were approved 3 February 20217 (the CHMP was approved 29 May 2017).</p> <p>The latest version of the CEMP and FFMP were approved by the Department on 27 November 2020.</p> <p>Evidence of communication of project requirements to workforce was available and included relevant information.</p> <p>Inspection and monitoring records (referred to elsewhere in this audit table) were available during the audit.</p> <p>The evidence provided by the auditee indicates that the CEMP has been implemented during the audit period.</p>	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	The approval of a CEMP does not relieve the Applicant of any requirement associated with this approval. If there is an inconsistency with an approved CEMP and the conditions of this approval, the requirements of this approval shall prevail.			
Construction Environmental Management Plan — Sub Plans				
D21	<p>As part of the CEMP for the SSD, the Applicant shall prepare and implement:</p> <p>(a) 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:</p> <ul style="list-style-type: none"> (i) identification of construction traffic routes and construction traffic volumes (including heavy vehicle/spoil haulage) on these routes; (ii) details of vehicle movements for construction sites and ancillary facilities including parking, dedicated vehicle turning areas, and ingress and egress points; (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; (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; (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; (vi) details of measures to maintain or provide alternative safe and accessible routes for pedestrians throughout the duration of construction; (vii) details of measures to maintain connectivity for cyclists, with particular emphasis on providing adequate access between key existing cycle routes for commuter cyclists; (viii) details of measures to manage traffic movements, parking, loading and unloading at ancillary facilities during out-of-hours work; (ix) details of methods to be used to communicate proposed future traffic changes to affected road users, pedestrians and cyclists, consistent with the Community Communication Strategy required under condition C1; (x) an adaptive response plan which sets out a process for response to any traffic, construction or other incident; and (xi) mechanisms for the monitoring, review and amendment of this plan. <p>(b) a Construction Noise and Vibration Management Plan to detail how construction noise and vibration impacts will be minimised and managed. The Plan shall be consistent with the guidelines contained in the <i>Interim Construction Noise Guidelines</i> (Department of Environment and Climate Change 2009). The plan shall be developed in consultation with the EPA and shall include, but not be limited to:</p> <ul style="list-style-type: none"> (i) identification of the work areas, site compounds and access points; (ii) identification of sensitive receivers and relevant construction noise and vibration goals applicable to the SSD and stipulated in the conditions above; (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; (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: <ul style="list-style-type: none"> a) assessment of out-of-hours works against the relevant noise and vibration criteria; 	<p>CEMP (SIMTA.004) 19/11/20 and sub-plans available on the website</p> <p>Construction Flora and Fauna Management Plan Moorebank Precinct West Stage 1, 004, 19/11/20, SIMTA.004</p> <p>Construction Air Quality Management Plan, Moorebank Precinct West Stage 1, 01/12/20, SIMTA.004</p> <p>Construction Heritage Management Plan, Moorebank Precinct West Stage 1, 01/12/20, SIMTA.005</p> <p>Construction Noise & Vibration Management Plan, Moorebank Precinct West Stage 1, 01/12/20, SIMTA.004</p> <p>Construction Soil & Water Management Plan, Moorebank Precinct West Stage 1, 05/11/19, SIMTA.004</p> <p>Construction Traffic & Access Management Plan, Moorebank Precinct West Stage 1, 01/12/20, SIMTA.005</p> <p>Letter, DPIE to SIMTA, Moorebank Precinct West Stage 1 (SSD 5066) Updated Construction Environmental Management Plan (CEMP) and Construction Flora and Fauna Management Plan (CFFMP) - SSD 5066, 27/11/20</p> <p>ER Quarterly Report – December 2021 to February 2022</p> <p>DPE post approval portal lodgment, 07/03/22</p> <p>ER Quarterly Report – March to May 2022</p> <p>DPE post approval portal lodgment, 08/06/22 (12:59am)</p> <p>ER Quarterly Report – June to August 2022</p> <p>DPE post approval portal lodgment, 08/09/22 (01:11am)</p> <p>Weed inspection report, BMD, May 2022</p> <p>Stockpile register, BMD trimble portal (online)</p> <p>Stockpile Register 121-2101, BMD</p> <p>BMD daily inspections (various, November 21 – November 22).</p>	<p>The preparation and approval of the CEMP and sub-plans occurred outside of the audit period.</p> <p>The CEMP and subplans were originally approved on 3 February 2017 (the CHMP was approved 29 May 2017).</p> <p>The latest version of the CEMP and FFMP were approved by the Department on 27 November 2020.</p> <p>The evidence provided by the auditee indicates that the CEMP was implemented during the audit period.</p> <p>Inspections are occurring in accordance with the CEMP. Any actions are identified, recorded and tracked through to completion.</p> <p>Waste is being tracked and disposed of at a licence facility.</p> <p>A stockpile register is being implemented for all stockpiles, including location, and material type.</p> <p>Compliance tracking and reporting is occurring, with reports being published online.</p> <p>Material import is being tracked and classified.</p> <p>No complaints for the audit period.</p>	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	<p>b) detailed mitigation measures for any residual impacts (that is, additional to general mitigation measures), including extent of at receiver treatments; and</p> <p>c) proposed notification arrangements.</p> <p>(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;</p> <p>(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);</p> <p>(vii) a description of how the effectiveness of mitigation and management measures would be monitored during the Early Works, clearly indicating how often this monitoring would be conducted, the locations where monitoring would take place, how the results of this monitoring would be recorded and reported, and, if any exceedance is detected, how any noncompliance would be rectified; and</p> <p>(viii) mechanisms for the monitoring, review and amendment of this plan.</p> <p>(c) a Construction Heritage Management Plan 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 OEHL, the relevant Council, the NSW Heritage Council (for non-Aboriginal State heritage items) and the relevant Local Aboriginal Land Councils (for Aboriginal heritage), and include, but not necessarily be limited to:</p> <p>(i) in relation to Aboriginal Heritage:</p> <p>a) details of management measures to be carried out in relation to Aboriginal heritage, including a detailed methodology and strategies for protection, monitoring, and conservation of sites and items;</p> <p>b) procedures for dealing with previously unidentified Aboriginal objects (excluding human remains), including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures, including when works can 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 OEHL's Aboriginal Heritage Information Management System (AHIMS) register;</p> <p>c) procedures for dealing with human remains, including cessation of works in the vicinity, notification of Secretary, NSW Police Force, OEHL and Aboriginal stakeholders, and commitment to cease recommencing any works in the area unless authorised by the OEHL and/or the NSW Police Force;</p> <p>d) heritage training and induction processes for construction personnel (including procedures for keeping records of inductions) and obligations under the conditions of this approval including site identification, protection and conservation of Aboriginal cultural heritage; and</p> <p>e) procedures for ongoing Aboriginal consultation and involvement for the duration of the Early Works; and</p> <p>(ii) in relation to non-Aboriginal Heritage:</p> <p>a) identification of heritage items directly and indirectly affected by the Early Works;</p> <p>b) consideration of methods to prevent damage to any retained heritage items, including:</p> <p>I. procedures for identifying minimum working distances to retained heritage items (including, at minimum, vibration testing and monitoring),</p> <p>II. detailed options for alteration of construction methodology should preferred values for vibration be exceeded, and</p>	<p>BMD weekly environmental inspection reports (various between November 21 and November 22).</p> <p>BMD corrective action register, current to 24/11/22 (MyJob and Beakon)</p> <p>6 Monthly Compliance Tracking Report, Sep 21 – Feb 22</p> <p>6 Monthly Compliance Tracking Report, Mar 22 – Aug 22</p> <p>Waste Register, BMD, current to 23/11/22</p> <p>MPW spoil tracking register, CARAS (no date)</p> <p>Resource recovery Exemption, Rozelle Interchange, 17/12/19</p> <p>Waste Classification Report, Rozelle Interchange Tunnel Spoil, ADE, 28/01/20 (x2), 10/03/20,</p>		

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	<p>III. commitment to implementing those options if preferred values for vibration are likely to be exceeded;</p> <p>c) details of management measures to be implemented to prevent and minimise impacts on heritage items (including further heritage investigations, archival recordings and/or measures to protect unaffected sites during construction works in the vicinity);</p> <p>d) details of monitoring and reporting requirements for impacts on heritage items;</p> <p>e) procedures for dealing with previously unidentified heritage objects, (including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures including when works can re-commence by a suitably qualified and experienced archaeologist in consultation with the OEH, NSW Heritage Council and the Secretary, assessment of the consistency of any heritage impacts against the approved impacts of the SSD, and, where relevant, notification of the Heritage Council of NSW in accordance with section 146 of the <i>Heritage Act 1977</i>; and</p> <p>f) heritage training and induction processes for construction personnel (including procedures for keeping records of inductions and obligations under this approval including site identification, protection and conservation of non-Aboriginal cultural heritage; and</p> <p>(iii) mechanisms for the monitoring, review and amendment of this plan.</p> <p>(d) a Construction Flora and Fauna Management Plan to detail how impacts on ecology will be minimised and managed. The Plan shall be developed by a suitably qualified and experienced ecologist and in consultation with the OEH, and shall include, but not necessarily be limited to:</p> <p>(i) plans for impacted and adjoining areas showing vegetation communities; important flora and fauna habitat areas; locations where threatened species, populations or ecological communities have been recorded; including preclearing surveys to confirm the location of threatened flora and fauna species and associated habitat features;</p> <p>(ii) the identification of areas to be cleared and details of management measures to avoid residual habitat damage or loss and to minimise or eliminate time lags between the removal and subsequent replacement of habitat such as:</p> <p>a) clearing minimisation procedures (including fencing),</p> <p>b) clearing procedures (including nest box plan),</p> <p>c) removal and relocation of fauna during clearing,</p> <p>d) habitat tree management, and</p> <p>e) construction worker education;</p> <p>(iii) rehabilitation details, including identification of flora species and sources, and measures for the management and maintenance of rehabilitated areas;</p> <p>(iv) 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);</p> <p>(v) a description of how the effectiveness of these management measures would be monitored;</p> <p>(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</p> <p>(vii) mechanisms for the monitoring, review and amendment of this plan.</p> <p>(e) 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:</p> <p>(i) identification of sources (including stockpiles and open work areas) and quantification of airborne pollutants;</p> <p>(ii) key performance indicators for local air quality during construction;</p>			

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> (iii) details of monitoring methods, including location, frequency and duration of monitoring; (iv) mitigation measures to minimise impacts on local air quality; (v) procedures for record keeping and reporting against key performance indicators; (vi) provisions for implementation of additional mitigation measures in response to issues identified during monitoring and reporting; and (vii) mechanisms for the monitoring, review and amendment of this plan. <p>(f) 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:</p> <ul style="list-style-type: none"> (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; (ii) potential impacts on watercourse bank stability and the development of appropriate mitigation measures as required; (iii) an Acid Sulfate Soils Management Plan, if required, including measures for the management, handling, treatment and disposal of acid sulfate soils, including monitoring of water quality at acid sulfate soils treatment areas, should the project impact on acid sulfate soils; (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 <p>mechanisms for the monitoring, review and amendment of this plan.</p>			
SCHEDULE 4 CONDITIONS TO BE MET IN FUTURE DEVELOPMENT APPLICATIONS				
Operational Noise and Vibration				
E1	<p>To ensure the operational noise impacts are appropriately managed, the following measures must be considered in future Development Applications:</p> <ul style="list-style-type: none"> (a) Best practice plant for both the IMEX and interstate terminal, including electronic automated container handling equipment or equipment with equivalent sound power levels; (b) The use of automatic rail lubrication equipment in accordance with ASA Standard T HR TR 00111 ST Rail Lubrication and top of rail friction modifiers; (c) Measures to ensure the rail cross sectional profile is maintained in accordance with ETN-01-02 Rail Grinding Manual for Plain Track to ensure the correct wheel / rail contact position and hence to encourage proper rolling stock steering; (d) A noise barrier on the western side of the haul road; (e) A detailed assessment of sleep disturbance impacts, including: how often noise events occur; the time of day when they occur; and whether there are any times of day when there is a clear change in the noise environment; and <p>A risk assessment to determine if non-tonal reversing alarms can be fitted as a condition of site entry. Alternatively, site design may include traffic flow that does not require or precludes reversing of vehicles.</p>	-	This requirement does not relate to the current audit period	Not Triggered
E2	<p>Development Applications for both the IMEX and interstate terminal shall include a report to identify:</p> <ul style="list-style-type: none"> (a) The extent of wheel squeal across the fleet of rail vehicles that will frequently use the terminals. This should identify the number of occurrences of brake squeal, the typical noise levels associated with brake squeal (including the frequency content), and the operational conditions under which brake squeal occurs (e.g. under light braking, hard braking, low / medium / high speed, effects of temperature and weather, etc.); (b) The root cause of brake squeal, including the influence of the design, set-up and maintenance of both brake shoes and brake rigging; (c) Possible solutions to mitigate or eliminate brake squeal, including modifications to brake rigging and alternative brake shoe designs and compounds; and 	-	This requirement does not relate to the current audit period	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	Any monitoring system proposed to capture brake squeal.			
Locomotives				
E3	Development Applications for the IMEX terminal shall detail how the expected port shuttle locomotives incorporate available best practice technologies.	-	This requirement does not relate to the current audit period	Not Triggered
E4	Development Applications for either the IMEX or interstate terminal shall consider the effect of headlight glare on surrounding sensitive receivers.	-	This requirement does not relate to the current audit period	Not Triggered
Rail Link				
E5	Any Development Application comprising the rail link must consider maximising curve radii of the rail connection, particularly the southern tie-in to the SSFL, to minimise the potential for wheel squeal.	-	This requirement does not relate to the current audit period	Not Triggered
E6	Any Development Application comprising the rail link shall ensure the width of the rail link corridor is no greater than 20 metres in the Riparian Corridor.	-	This requirement does not relate to the current audit period	Not Triggered
E7	Any Development Application comprising the rail link shall consider fauna movement in the bridge design.	-	This requirement does not relate to the current audit period	Not Triggered
E8	Any Development Application comprising the rail link shall consider minimising potential impacts to the aquatic environment, aquatic habitats and fish passage, both in the design and construction of the bridge.	-	This requirement does not relate to the current audit period	Not Triggered
E9	Any Development Application comprising the rail link shall include an assessment of the impacts of the rail link on the Glenfield Waste Facility, including: <ul style="list-style-type: none"> (a) Targeted intrusive investigations to determine contamination pathways and to develop mitigation, management and/or remediation options based on those investigations; (b) details of the quantity of landfilled waste to be removed, the location from where it will be removed, the methodology to be utilised and the estimated timeframe for the removal and reburial; (c) proposed measures to mitigate odour impacts on sensitive receivers, including an undertaking to apply daily cover to any exposed waste in accordance with benchmark technique 33 of the document <i>Environmental Guidelines: Solid Waste Landfills</i>, NSW EPA 1996; (d) details of impacts on pollution control and monitoring systems including existing groundwater and landfill gas bores and their subsequent repair/ replacement; (e) the methodology proposed to ensure that the landfill barrier system disturbed in the removal process is replaced/ repaired to ensure its ongoing performance. The Applicant shall detail matters such as sub grade preparation and specifications, liner installation/ reinstallation procedures and construction quality assurance (CQA) procedures; (f) a commitment to providing the EPA with a construction quality assurance report within 60 days of the completion of the works referred to in (d) above; and (g) an overview of any access and/or materials/ equipment storage arrangements with Glenfield Waste Facility in relation to the construction of the rail link, (h) details of any other expected or potential impacts to the licensed area and options for management and mitigation of those impacts (i.e. leachate management and surface water runoff, potential impacts on the Georges River during works, dust etc.); and (i) details of and proposed mitigation measures for the long term management of the rail link. 	-	This requirement does not relate to the current audit period	Not Triggered
Traffic				
E10	Development Applications for either the IMEX or interstate terminal shall include documentation demonstrating how Condition 14 of this approval has been satisfied.	-	This requirement does not relate to the current audit period	Not Triggered
E11	All future Development Applications shall include a Traffic Impact Assessment based on background growth models developed by RMS for the Liverpool/Moorebank area (if applicable).	-	This requirement does not relate to the current audit period	Not Triggered
E12	All future Development Applications shall demonstrate how the main access to the site has been designed to prevent heavy vehicles associated with the facility from using Moorebank Avenue south, and should be accompanied by a detailed engineering drawing(s).	-	This requirement does not relate to the current audit period	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
Section 94 Contributions				
E13	E13. All future Development Application shall include: a) an assessment of the impacts of the project on local infrastructure, having regard to any relevant Council's Developer Contributions Plan (or equivalent document requiring developer contributions); a commitment to pay developer contributions to the relevant consent authority or undertake works-in-kind towards the provision or improvement of public amenities b) and services. Note: This requirement may be satisfied subject to the terms of any applicable Voluntary Planning Agreement; and a commitment to undertake vehicle monitoring on Cambridge Avenue. Should any monitoring reveal the need for improvement works within the Campbelltown LGA as a result of the proposal, the Applicant may be required to contribute towards local road maintenance or upgrades.	-	This requirement does not relate to the current audit period	Not Triggered
Public Transport				
E14	All future Development Applications shall consider the need for a bus stop on Moorebank Avenue (including direct pedestrian access from the warehousing to the bus stop), and associated turnaround facility suitable for a 14.5 metre long non-rear steer bus.	-	This requirement does not relate to the current audit period	Not Triggered
Biodiversity				
E15	All future Development Applications shall consider measures to improve the condition of the riparian corridor along the western bank of the Georges River (known as the 'hourglass land').	-	This requirement does not relate to the current audit period	Not Triggered
E16	All future Development Applications shall include the following riparian corridor widths (measured from the top of bank): (a) a minimum of 50 metres wide associated with the rail corridor; and (b) a minimum of 40 metres wide along the terminal site.	-	This requirement does not relate to the current audit period	Not Triggered
Landscaping				
E17	All future Development Applications for new built form must include detailed landscape plans identifying the vegetation to be removed or relocated and the location of replacement and additional landscaping.	-	This requirement does not relate to the current audit period	Not Triggered
E18	All future Development Applications shall include detailed landscape plans including relevant details of the species to be used in the various landscaped areas (preferably species indigenous to the area), including details of the informal native and cultural avenue plantings, and other soft and hard landscape treatments, including any pavement areas and furniture.	-	This requirement does not relate to the current audit period	Not Triggered
Heritage				
E19	All future Development Applications relevant to MA6 and MA7 (Scarred Trees) shall include a consideration of the Aboriginal cultural value of the trees and options for avoiding impacts and ongoing conservation measures, including evidence of consultation with Aboriginal community representatives.	-	This requirement does not relate to the current audit period	Not Triggered
E20	All future Development Application shall assess heritage impacts of the proposal. The assessment shall: (a) consider impacts to Aboriginal heritage (including cultural and archaeological significance), in particular impacts to Aboriginal heritage sites identified within or near the project should be assessed. Where impacts are identified, the assessment shall demonstrate effective consultation with Aboriginal communities in determining and assessing impacts and developing and selecting options and mitigation measures (including the final proposed measures); (b) consider impacts to historic heritage. For any identified impacts, the assessment shall: (i) outline the proposed mitigation and management measures (including measures to avoid significant impacts and an evaluation of the effectiveness of the measures). Mitigation measures should include (but not be limited to) photographic archival recording and adaptive re-use of buildings or building elements on site); (ii) be undertaken by a suitably qualified heritage consultant(s); and (iii) include a statement of heritage impact.	-	This requirement does not relate to the current audit period	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
Soil and Water				
E21	<p>All future Development Application shall include an assessment of soil and water impacts. The assessment shall (where relevant):</p> <ul style="list-style-type: none"> (a) assess impacts on surface and groundwater flows, quality and quantity, with particular reference to any likely impacts on Georges River and Anzac Creek; (b) assess flooding impacts and characteristics, to and from the project (including rail link), with an assessment of the potential changes to flooding behaviour (levels, velocities and direction) and impacts on bed and bank stability, through flood modelling, including: <ul style="list-style-type: none"> (i) hydraulic modelling for a range of flood events; (ii) description, justification and assessment of design objectives (including bridge, culvert and embankment design); (iii) an assessment of afflux and flood duration (inundation period) on property; and (iv) consideration of the effects of climate change, including changes to rainfall frequency and/or intensity, including an assessment of the capacity of stormwater drainage structures. (c) identify and assess the soil characteristics and properties that may impact or be impacted by the project, including acid sulfate soils; <p>include a contamination assessment in accordance with the guidelines made under the <i>Contaminated Land Management Act 1997</i> and in consultation with the EPA for the subject site including the Glenfield Waste Facility.</p>	-	This requirement does not relate to the current audit period	Not Triggered
E22	All future Development Application which includes construction in the vicinity of Amiens Wetland shall include advice from an independent wetland expert to determine whether it is artificial or a natural lake basin, its significance, and any recommendations on mitigation measures (if appropriate).	-	This requirement does not relate to the current audit period	Not Triggered
Hazards and Risks				
E23	<p>All future Development Application shall be accompanied by a preliminary risk screening completed in accordance with <i>State Environmental Planning Policy No. 33- Hazardous and Offensive Development and Applying SEPP 33</i> (DoP 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the proposal. Should preliminary screening indicate that the proposal is 'potentially hazardous,' a Preliminary Hazard Analysis (PHA) must be prepared in accordance with <i>Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis</i> (DoP 2011) and <i>Multi-Level Risk Assessment</i> (DoP 2011). The PHA should:</p> <ul style="list-style-type: none"> (a) Estimate the risks from the facility; (b) Be set in the context of the existing risk profiles for the intermodal facility and demonstrate that the proposal does not increase the overall risk of the area to unacceptable levels; and <p>Demonstrate that the proposal complies with the criteria set out in the <i>Hazardous Industry Planning Advisory Paper No. 4 - Risk Criteria for Land Use Safety Planning</i>.</p>	-	This requirement does not relate to the current audit period	Not Triggered
Bushfire Management				
E24	All future Development Application shall be accompanied by an assessment against the Planning for Bushfire 2006 (NSW Rural Fire Service).	-	This requirement does not relate to the current audit period	Not Triggered
Building Code of Australia				
E25	All future Development Applications shall demonstrate compliance with the Building Code of Australia, as relevant.	-	This requirement does not relate to the current audit period	Not Triggered

APPENDIX B – DECLARATION FORM

Declaration of Independence - Auditor




Project Name:	Moorebank Precinct West Stage 1
Consent Number:	SSD 5066
Description of Project:	<ul style="list-style-type: none"> • 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.
Project Address:	Moorebank Avenue, Moorebank - Lot 1 DP 1197707, Lot 100 DP 1049508, Lot 101 DP 1049508 and Lot 2 DP 1197707.
Proponent:	SIMTA as Quba Holdings Limited
Title of audit	Independent Audit Moorebank Precinct West Stage 1 2022
Date:	19/12/22

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.


Notes:

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

Name of Auditor:	Derek Low
Signature:	
Qualification:	Master of Environmental Engineering Management Exemplar Global Auditor Number 114283
Company:	WolfPeak Pty Ltd

APPENDIX C – SITE INSPECTION PHOTOGRAPHS

No.	Comment	Photograph
1	Lot 100 stockpiles covered, and with erosion and sediment controls in place	
2	Lot 100 stockpiles covered, and with erosion and sediment controls in place	
3	Lot 100 stockpiles covered, and with erosion and sediment controls in place	
4	Stockpile and asbestos signage in place.	

No.	Comment	Photograph
5	Asbestos signage in place.	
6	Dustbowl free of works.	