INDEPENDENT AUDIT NO. 6 – AUDIT REPORT

MOOREBANK PRECINCT WEST STAGE 1 (SSD 5066)

AUGUST 2024

Authorisation

Author name	[redacted]	**Reviewer / approver name**	[redacted]
Author position	Lead Auditor	**Review position**	Peer Reviewer
Author signature	[redacted]	**Reviewer / approver signature**	[redacted]
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Prepared for:

LOGOS Property Group Consortium (LOGOS)
c/o Aspect Environmental Pty Ltd

Prepared by:

WolfPeak Group Pty Ltd

T: 1800 979 716

W: www.wolfpeak.com.au

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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 A2(d), and to verify compliance with the relevant Conditions and assess the effectiveness of environmental management on the Project.

This Audit Report presents the findings from the sixth Independent Audit covering the period from December 2022 to June 2024. An Independent Audit was not conducted in November 2023, as the activities undertaken during 2023 were limited to management of environmental controls of covered stockpiles. The Department was informed of the situation and approved postponing the Independent Audit on the 14 November 2023, until the commencement of construction activities which started in June 2024. Works conducted under SSD 5066 during the audit period were minimal, comprising:

- Storage and maintenance of ACM in Lot 100 ceased, with material removed under MPW Stage 2 (SSD 7709).
- Management plans updated for the rehabilitation of Dustbowl area outside of Biobanking Agreement No. 341.
- Rehabilitation of Dustbowl area has commenced.

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 29 July 2024.

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:

- There were 72 Conditions assessed.
- 47 Conditions were considered by the auditor to be not triggered.
- 24 Conditions were considered by the auditor to be compliant.
- One (1) non-compliance was identified against Condition C4, this pertains to:
    - The Construction Compliance Reports for September 2022 to February 2023 (No. 11) and March to August 2023 (No.12) were not posted on the project website as required by condition C4.

There were no audit findings from the previous Independent Audit (IA4) to follow-up.

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 1,600,000m^3 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.

An Independent Audit was not conducted in November 2023, as the activities undertaken during 2023 were limited to management of environmental controls of covered stockpiles. The Department was informed of the situation and approved postponing the Independent Audit on the 14 November 2023, until the commencement of construction activities which started in June 2024. Works conducted under SSD 5066 during the audit period were minimal, comprising:

- Storage and maintenance of ACM in Lot 100 ceased, with material removed under MPW Stage 2 (SSD 7709).
- Management plans updated for the rehabilitation of Dustbowl area outside of Biobanking Agreement No. 341.
- Rehabilitation of Dustbowl area.

Figure 1: The MPWS1 Site Plan (Source: Moorebank Precinct West Stage 1 Construction Environmental Management Plan, SIMTA 31 May 2024).

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 was ceased and following the completion of those works, WolfPeak was engaged to prepare a further Independent Audit Program, in compliance with Condition A2(d), and to carry out the independent audits specified in that program. The Independent Audit Program was updated and finalised on 3 July 2019. This Audit Report presents the findings from the sixth Audit.

1.3 The audit team

The Independent Auditor who performed the auditing works is shown on the table below.

Table 1: Audit Team

Name	Company	Participation	Certification
[redacted]	WolfPeak	Lead Auditor	Bachelor of Industrial Engineering Master of Engineering Management Exemplar Global Certified Lead Environmental Auditor (Certificate No. 115421)

Declaration of independence is 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 Conditions and assess the effectiveness of environmental management on the Project.

1.5 Audit scope

This Audit covers the period from December 2022 to June 2024. 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
  - 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.

2.2.3 Meetings

The opening and closing meetings were held on 29 July 2024 at the construction site on Moorebank Road with the project personnel, Aspect and WolfPeak. During the opening meeting, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed. 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 on the 29 of July 2024 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 a detailed Request for Information (RFI) and auditee responses to the request interviews.

The names of personnel interviewed during the audit are provided in Table 2 below.

Table 2: Audit meeting attendance and personnel interviewed

Personnel	Position	Company
[redacted]	Environmental Site Representative	Aspect Environmental (representing LOGOS)
[redacted]	Environmental Representative	Aspect Environmental

Personnel	Position	Company
[redacted]	Environmental Manager	Georgiou
[redacted]	Project Manager	JWP

2.2.5 Site inspection

The on-site audit activities took place on 29 July 2024 and included an inspection of the site and work activities. The Dustbowl, placement site 5 (Lot 11) were sighted during the site inspection. Photos are presented in Appendix C.

2.2.6 Document review

The 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 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.
Compliant	WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.
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.

Status	Description
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 Conditions and their content is adequate
- have been implemented in accordance with the Conditions.

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 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. The primary documents reviewed during the Audit are as follows:

- *Moorebank Intermodal Terminal Project Environmental Impact Statement, Parsons Brinckerhoff, October 2014* (the EIS)
- *Development Consent SSD 5066, 24 December 2020* (the Consent), including MOD 1 and MOD 2
- *Moorebank Precinct West Stage 1, Construction Environmental Management Plan, MIC1-QPMS-EN-PLN-00005, 31/5/2024 Rev.5* (the CEMP)
- *Moorebank Precinct West Stage 1, Construction Air Quality Management Plan, MIC1-QPMS-EN-PLN-00002, 1/12/2020 Rev.4* (the CAQMP)
- *Moorebank Precinct West Stage 1, Construction Noise and Vibration Management Plan, MIC1-QPMS-EN-PLN-00008, 31/5/2024 Rev.6* (the CNVMP)
- *Moorebank Precinct West Stage 1, Construction Traffic and Access Management Plan, MIC1-QPMS-EN-PLN-00005, 01/12/2020* Rev. 5 (the CTAMP)
- *Moorebank Precinct West Stage 1, Construction Soil and Water Management Plan, MIC1-QPMS-EN-PLN-00004, 20/6/2024 Rev.6* (the CSWMP).
- *Moorebank Precinct West Stage 1, Construction Flora Fauna Management Plan, MIC1-QPMS-EN-PLN-00005, 20/6/2024 Rev.6* (the CFFMP)
- *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 (MPW) Stage 1 SSD 5066 ER Quarterly Reports from February 2023 to May 2024.*
- *Moorebank Precinct West SSD 5066 Construction Compliance Reports from September 2022 to February 2023 (No.11), March to August 2023 (No.12) and September 2023 to February 2024 (No.13) from Logos*
- *Moorebank Intermodal Precinct Complaints Register up to 31 May 2024.*

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

3.2 Previous Audit Findings

There was no audit findings raised in the previous audit (IA4).

3.3 Summary of Compliance

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

- There were 72 Conditions assessed.
- 47 Conditions were considered by the auditor to be not triggered.
- 24 Conditions were considered by the auditor to be compliant.
- One (1) non-compliance was identified against Condition C4, this pertains to:
    - The Construction Compliance Reports for September 2022 to February 2023 (No. 11) and March to August 2023 (No.12) were not posted on the project website as required by condition C4.

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
-	-	-	*None Audit findings were raised in IA5.*			

Table 4: Findings, recommendation and applicant response from this Independent Audit (IA6)

Item	Reference	Type	Details of item	Audit Finding	Proposed or completed action by the auditee	Status
IA6_01	C4	Non-Compliance	*Provision of Electronic Information* *Prior to commencement of the Early Works, or as otherwise agreed by the Secretary, the Applicant shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the SSD, for the duration of Early Works.* ***The Applicant shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including****, but not necessarily limited to:* *(a) information on the current implementation status of the SSD;* *(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, license 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.*	The Construction Compliance Reports for September 2022 to February 2023 (No. 11) and March to August 2023 (No.12) have not been posted on the project website as required by this condition. The auditor is of the view that while both reports were prepared and issued in 2023, they were not posted on the project website to maintain the compliance tracking information current as mandated by condition C4. Consequently, this condition is rated as non-compliant.	Construction Compliance Reports No.11 and No.12 to be uploaded to the project website as soon as possible.	OPEN

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 CEMP and associated sub-plans listed in Section 3.1 were generally compliant with the requirements of the SSD Conditions and were implemented for the works being undertaken. This was verified during the site inspection and records review as detailed in Appendix A.

3.5 Summary of notices from agencies

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

3.6 Other matters considered relevant by the Auditor or the Department

It was noted that an Independent Audit was not conducted in November 2023, as the activities undertaken during 2023 were limited to management of environmental controls of covered stockpiles. The Department was informed of the situation and approved postponing the Independent Audit on the 14 November 2023, until the commencement of construction activities, which started in June 2024.

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

3.7 Actual versus predicted impacts

Predicted impacts are presented in Sections 11 – 27 of the EIS[1] and Sections 5 and 6 of the Submissions Report[2]. 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.

[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.

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 Conditions
- the degree of implementation of the management plans
- 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.

The Auditor is of the view that fill importation activities impacts were generally consistent with the predicted impacts. PFAS separation layer and installation of the layer were conducted in accordance with the PFAS Management Plan, prepared in accordance with the Commonwealth Approval EPBC 2011/6086, Condition 8.

The Dustbowl (Placement site 5 name derived from SSD 7709 Condition B172) has been managed under Lot 11 in accordance with Long Term Environmental Management Plan (LTEMP). The area outside of the Biobanking Agreement BA No. 341 sits under MPW1 rehabilitation of the Dustbowl requirement.

The MPWS2 (SSD 7709) Condition B169 specified that all future works on MPW need to be carried out in accordance with Condition B172 LTEMP. The LTEMP specified for Placement site 5 a 500mm cover layer that includes and organic component. The cover layer being placed includes 300mm of sandstone and 200mm of topsoil. It was indicated that the area will be then hydromulched with a seed mix identified in the Biodiversity Implementation Management Plan (excluding deep rooted trees). Therefore, the auditor is of the view that the works are adhering to the EIS and the SSD 7706 Conditions.

3.8 Complaints

A complaints register is being maintained for the entire Moorebank Logistics Park development (MLP). Complaints in the register presented are not specific to the MPW Stage 1 Project. (i.e.: a complaint would be raised about the broader development, rather than any activity associated with the Project and LOGOS would investigate accordingly).

The complaints register sighted was current to 30 June 2024. The publicly available complaints register is available on the Project website: https://moorebankintermodalprecinct.com.au/community/.

No complaints were 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. The Dustbowl (Placement site 5 name derived from SSD 7709 Condition B172) has been managed in accordance with Long Term Environmental Management Plan (LTEMP). Erosion and sediment controls observed during the site audit were in place.

4. CONCLUSIONS

This Audit Report outlines the findings from the sixth Independent Audit, covering the period from December 2022 to June 2024. An Independent Audit was not conducted in November 2023, as the activities undertaken during 2023 were limited to management of environmental controls of covered stockpiles. The Department was informed of the situation and approved postponing the Independent Audit on the 14 November 2023, until the commencement of construction activities which started in June 2024.

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 29 July 2024.

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:

- There were 72 Conditions assessed.
- 47 Conditions were considered by the auditor to be not triggered.
- 24 Conditions were considered by the auditor to be compliant.
- One (1) non-compliance was identified against Condition C4, this pertains to:
    - The Construction Compliance Reports from September 2022 to February 2023 (No. 11) and from March to August 2023 (No.12) were not posted on the project website as required by condition C4.

There was no audit findings raised in the previous audit (IA4).

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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With respect to conditions relating to compliance with the design, Building Codes of Australia (BCA) or satisfaction of the Independent Verifier / Certifier / Certifying Authority, the Independent Audits relied on confirmation from the Independent Verifier / Certifier / Certifying Authority that this is the case. The Independent Audits do not extend to an assessment of the works against the design or BCA requirements themselves, nor did they examine the steps the Independent Verifier / Certifier / Certifying Authority has taken to verify that the design is compliant.

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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To the best of WolfPeak's knowledge, the facts and matters described in this Document reasonably represent the Client's intentions at the time of which WolfPeak issued the Document to the Client. However, the passage of time, the manifestation of latent conditions or the impact of future events (including a change in applicable law) may have resulted in a variation of the Document and its possible impact. WolfPeak will not be liable to update or revise the Document to take into account any events or emergent circumstances or facts occurring or becoming apparent after the date of issue of the Document.

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 and site inspection 29/07/2024 CEMP MPWS1, REV.005, 31/05/2024, SIMTA DP1299137 Subdivision of Lots 5 to 13 DP1276464, executed Moorebank Precinct Nominees Proprietary Limited Lans registry Services NSW, 16/5/24 Notice.	The land remains unchanged, but the Lots has changed due to MPW3 subdivision. Works conducted under this audit period are under Lot 11. Lot 100 is under Part Lot 5. Placement site 5 (dustbowl) continues to be managed under Lot 11, as per the SD conditions and the LTMP.	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 *AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems*; (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.	MPWS1 Construction Compliance Report No.11 (Sep 2022-Feb 2023) Logos, 28/04/2023, Rev.1 MPWS1 Construction Compliance Report No.12 (Mar 2023- Aug 2023) Logos, 16/11/2023, Rev.2 MPWS1 Construction Compliance Report No.13 (Sep 2023- Feb 2024) Logos, 31/07/2024, Rev.2 CEMP MPWS1, REV.005, 31/05/2024, SIMTA WolfPeak, MPW Independent Audit Program, 03/07/19, Rev V1 SIMTA Compliance Tracking Program, 24/09/2020, Rev 1	CTP was prepared and approved by the Department on 3 February 2017. Construction compliance reports continue to be prepared (every six months) for each cycle. No non-compliances were identified by the proponent for the December 2022 to June 2024 reporting period. Section 2.4 of 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 CTP and Section 10.3 of the CEMP. Reports for September 2022 to February 2024 are available on the Project website.	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. *Note: Where an incident also requires reporting to the EPA and/or OEH, the incident report prepared for the purposes of notifying the EPA and/or OEH would meet this requirement.*	Interview with Auditees 29/07/2024 Georgiou Incident Register within the Beakon system	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. The only incident (class 1) happened on the 23/7/24, fuel tank leak during the delivery – spill contained immediately, cleaned up adequately.	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 *Australian Standard AS 2601:2001:* The Demolition of Structures, or its latest version.	Site Inspection 29/07/2024 Interview with Auditees 29/07/2024	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 29/07/2024	Removal of the ACM stockpiles held at Lot 100 for placement on MPW2. This is being conducted under MPW2 consent. Imported sandstone to dustbowl, no excavations, all ACM material was imported there as part of the landfill strategy.	Not Triggered
B3	The subject site is to be remediated in accordance with: (a) The approved Remedial Action Plan; (b) *State Environmental Planning Policy No. 55 - Remediation of Land;* and (c) The guidelines in force under the *Contaminated Land Management Act.* Amendments to the approved Remedial Action Plan required as a result of further site investigations must be approved by the site auditor, in consultation with the EPA. Within 3 months after the completion of the remediation works, a notice of completion, including a validation and/or monitoring report is to be provided to the Secretary. This notice must be consistent with *State Environmental Planning Policy No. 55 - Remediation of Land.* The validation and/or monitoring report is to be independently audited and a Site Audit Statement Issued. The audit is to be carried out by an independent auditor accredited by the Environment Protection Authority. Any conditions recorded on the Site Audit Statement are to be complied with.	Site Audit Statement, 0301-1613-7 Letter DPHI to Qube, 15/11/20 Site Audit Report, MPW S1, 600099_0301-1613-7, James Davis, Sep 2020.	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. Not Triggered during this audit period – no remediation works.	Not Triggered
Soil, Water Quality and Hydrology				
B4	The Early Works shall be undertaken to comply with section 120 of the *Protection of the Environment Operations Act 1997,* which prohibits the pollution of waters.	ER Quarterly Report – December 2022 to February 2023 ER Quarterly Report – March to May 2023 ER Quarterly Report – June to August 2023 ER Quarterly Report – September to November 2023 ER Quarterly Report – December to February 2024 ER Quarterly Report – March to May 2024 Site Inspection 29/07/2024 Interview with Auditees 29/07/2024 CSWMP, 20/6/2024, Rev.6 including Dust Bowl (Placement site) Appendix A, SIMTA CPESP endorsement, 10/5/24 Erosion and Sediment Control Plan – Dustbowl Rehabilitation Works, 24/6/2024, Georgiou	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. Sighted CSWMP including in Appendix A the ESCP for Dust Bowl (Placement site) CPESC endorsement, 10/5/2024. ER Approval of Minor Amendment to Moorebank Precinct West (MPW) Early Works (Stage 1) Construction Environmental Management Plan and Subplans – Dust Bowl Rehabilitation Activities, 3/6/24. The erosion and sediment control plan – preventing the migration of water on the field is in place.	Compliant
B5	All activities taking place in, on or under waterfront land, as defined in the *Water Management Act 2000* should be conducted generally in accordance with the NSW Office of Water's Guidelines for Controlled Activities.	Site Inspection 29/07/2024 CEMP MPWS1, REV.005, 31/05/2024, SIMTA	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 29/07/2024 ER Quarterly Report – December 2022 to February 2023	Heritage works were completed before the audit period and no heritage items remained.	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
		ER Quarterly Report – March to May 2023 ER Quarterly Report – June to August 2023 ER Quarterly Report – September to November 2023 ER Quarterly Report – December to February 2024 ER Quarterly Report – March to May 2024	To the Auditor's knowledge, there were no events that impacted heritage items. No heritage finds occurred during the audit period. All works contained within site.	
B7	Prior to the commencement of Early Works affecting Aboriginal sites MA1, MA2, MA3, MA4, MA5 and MA9, the Applicant shall: (a) develop a detailed salvage strategy, prepared in consultation with the OEH (Aboriginal heritage) and the Aboriginal stakeholders. The investigation program shall be prepared to the satisfaction of the Secretary; and (b) undertake any further archaeological excavation works recommended by the results of the Aboriginal archaeological investigation program. 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. *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).*	Interview with Auditees 29/07/2024	This condition falls outside this Independent Audit period.	Not Triggered
B8	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. 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. *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.*	Interview with Auditees 29/07/2024	This condition falls outside this Independent Audit period.	Not Triggered
B9	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.	Interview with Auditees 29/07/2024	This condition falls outside this Independent Audit period.	Not Triggered
Dangerous Goods				
B10	Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with: (a) all relevant Australian Standards; (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (c) the *Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin* (Environment Protection Authority, 1997). 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.	Site Inspection 29/07/2024	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.	CAQMP MPWS1, Rev.004, 1/12/2020 Site Inspection 29/07/2024 Environmental Monitor Register, Georgiou Dust monthly reports (Certificate of Analysis) from ALS for: - 10 Feb 2024, 3/1/24 – 1/2/24 - 12 March 2024, 1/2/24 – 1/3/24 - 5 April 2024, 1/3/24 – 28/3/2024 - 12 June 2024, 28/4/24 to 5/6/24 - 23 July 2024, 05/6/24 to 4/7/24 - 7 Aug 2024, 1/7/24 – 1/8/24 Certificate of Analysis from ALS (Dust monthly reports) for Jan, Feb, Mar, Jun, Jul, Aug, Nov and Dec 2023 MPW Dust Gauge Locations 2024 map from Integral Survey, 17/05/2023 Biobanking Agreement No. 341, NSW OEH, 26/11/19	The Asbestos contaminated stockpiles in Lot 100 were removed and placed on MPW1 under the Biobanking agreement ID number: 341. The handling of the material for placement is occurring under MPW2. Dust mitigation measures are implemented on site in accordance with the CAQMP. The environmental monitoring register was presented, showing DDG003 monitor for dust (limits 4g/m^2 per month). No exceedances were recorded in the reports sighted from Jan to Jul 2024 and for Feb, Mar, Jun, Jul, Nov and Dec 2023. DGG reports for Jan, Aug and Sep 2023 recorded three (3) exceedances as follows: - Jan 2023 (3/1/23 – 31/1/23) 4.6g/m^2.month - Aug 2023 (1/8/23 – 1/9/23) 29.4g/m^2.month - Sep 2023 (1/9/23 – 3/10/23) 8.8g/m^2.month Exceedances were analysed and 'voided' with an explanation e.g. Aug 2023 result was due to movement of Dust gauge equipment. Other dust measures implemented on site were the use of water carts, stabilised access points, slowing down works (active works) during high wind and dry conditions, street sweepers, speed limit and applying a polymer spray, when required.	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 29/07/2024 Georgiou Site Induction, (40Km), Road sealed – therefore 30km speed limit increase to 40km/hr. – MPW2 MPW Dust Gauge Locations 2024 map from Integral Survey, 17/05/2023 Biobanking Agreement No. 341, NSW OEH, 26/11/19	Stabilized access and site speed limits were observed during the site inspection. Lot 10 is the only remaining part of the MPW1 site. No material export is occurring on MPW1. Asbestos contaminated stockpiles and other material loads were taken from Lot 100 and moved onto MPW2. Trucks are not taking material out of the site.	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 29/07/2024 Interview with Auditees 29/07/2024 Environmental Monitoring Register, - Recycling & general Waste, current to June 2024. Biobanking Agreement No. 341, NSW OEH, 26/11/19	No waste has been generated or disposed under MPW1. Compact waste is managed under MPW2. The hollow bearing trees from previous vegetation clearing activities have been reused (stockpile in MPW1) under the Biobanking agreement 341.	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 29/07/2024 Interview with Auditees 29/07/2024 Environmental Monitoring Register, - Recycling & general Waste, current to June 2024.	One spill incident happened on MPW1 during the audit period. Georgiou cleaned the spill, and the hazardous waste (post cleaning of the spill) has been kept on site. Spill material was pre-classified under GSW, and has been contained on site, waiting for disposal.	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 29/07/2024 Interview with Auditees 29/07/2024 Environmental Monitoring Register, - Recycling & general Waste, current to June 2024.	No removal of waste material yet. The Asbestos contaminated stockpiles in Lot 100 were removed and placed on MPW1 under the Biobanking agreement 341. The handling of the material for placement is occurring under MPW2.	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
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 29/07/2024 Interview with Auditees 29/07/2024	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 29/07/2024 Interview with Auditees 29/07/2024	This condition falls outside this Independent Audit period. No new infrastructure has been affected by MPW1. No new dilation 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. *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.*	Site Inspection 29/07/2024	Moorebank Avenue is owned by the Department of Defence and provided to LOGOS as the operator. For this condition public road is not applicable. Moorebank Ave and Anzac Rd upgrade have been managed under MPW2. The Moorebank temporary diversion road is managed under MPE2. Moorebank Avenue upgrade works were completed and consistent with pre-existing use.	Not Triggered
PART C COMMUNITY INFORMATION AND REPORTING				
Community Communication Strategy				
C1	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: (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.	Community Communication Strategy, prepared by KJA (v4, dated 1/02/17), approved by DPHI on 21/02/17, version 4.	The CCS was approved by the Secretary on 21 February 2017 and remains unchanged. The Project website includes project updates, complaints register, contact details to raise complaints. The system remains unchanged since the previous audit and is mature. Note that the development of the CCS falls outside of the Audit period.	Compliant
Complaints and Enquiries Procedure				
C2	Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall ensure that the following are available for community enquiries and complaints for the duration of Early Works: (a) a 24 hour telephone number(s) on which complaints and enquiries about the SSD may be registered; (b) a postal address to which written complaints and enquires may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved. The telephone number, the postal address and the email address shall be published in newspaper(s) circulating in the local area prior to the commencement of construction and prior to the commencement of operation. This information shall also be provided on the website (or dedicated pages) required by	Community Communication Strategy, prepared by KJA (v4, dated 1/02/17), approved by DPHI on 21/02/17.	The Complaints Management System and protocols have been updated since the approval of the CCS on 21 February 2017. The new community complaints detail available in the Community Communication Strategy – Addendum and the Project Website are: Email: moorebank@tsamgt.com 24-hour project information hotline: 1800 986 465 Postal: c/- TSA Management Level 15, 207 Kent Street, Sydney NSW 2000	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	this approval.		Community Communication Strategy - Addendum, 28/02/2024, LOGOS is applicable to MPW2 only.	
C3	Prior to the commencement of Early Works, or as otherwise agreed by the Secretary, the Applicant shall prepare and implement a **Construction Complaints Management System** consistent with *AS ISO 10002-2006 Customer satisfaction - Guidelines for complaints handling in organisations (ISO 10002:2004, MOD)* and maintain the System for the duration of Early Works and up to 12 months following completion of this stage. Information on all complaints received, including the means by which they were addressed and whether resolution was reached, with or without mediation, shall be maintained in a complaints register and included in the construction compliance reports required by this approval. The information contained within the System shall be made available to the Secretary on request.	Community Communication Strategy, prepared by KJA (v4, dated 1/02/17), approved by DPHI on 21/02/17. MIP Complaints Register current to 30/06/24	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. The Complaints Management System and protocols have been updated since the approval of the CCS on 21 February 2017. 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.	Compliant
Provision of Electronic Information				
C4	Prior to commencement of the Early Works, or as otherwise agreed by the Secretary, the Applicant shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the SSD, for the duration of Early Works. The Applicant shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including, but not necessarily limited to: (a) information on the current implementation status of the SSD; (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 Moorebank Precinct West SSD 5066, Stage 1 Construction Compliance Reports from Logos for: - September 2022 to February 2023 (No.11), 28/4/2023, Rev.1 - March to August 2023 (No.12), 16/11/2023, Rev.2 - September 2023 to February 2024 (No.13), 31/7/2024, Rev.2	The website contains the information required by parts a) – g) of this condition. However, it was noted that the construction compliance reports for 2023 and 2024 have not been posted. **Non-Compliance: Construction Compliance Reports No.11 (September 2022 to February 2023) and No.12 (March to August 2023) were sighted during the Audit but have not been posted on the project website.** It was indicated that Construction Compliance Report No.13 (September 2023 to February 2024) is still waiting for endorsement from the stakeholders. **Note: prior to finalisation of this audit report, the Construction Compliance Report No.13 was finalised and was published on the project website.**	Non-Compliant
PART D - CONSTRUCTION ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
Environmental Representative				
D1	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: (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 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.	ER Quarterly Reports for: - December 2022 to February 2023 - March to May 2023 - June to August 2023 - September to November 2023 - December to February 2024 - March to May 2024 DPHI post approval portal lodgments for: - 08/03/2023 (2:08am) - 07/06/2023 - 07/09/2023 - 14/12/2023 - 7/03/2024 - 7/06/2024 Biobanking Agreement No. 341, NSW OEH, 26/11/19 Letter Healthy Buildings International to Aspect Environmental (ER) dated 03/06/24, ER Approval of Minor Amendment to Moorebank Precinct West (MPW) Early Works (Stage 1) Construction Environmental Plan and	Appointment of the ER occurred outside of the audit period. The nominated ER was approved by DPHI on 19 July 2016. Inspection and Quarterly Reports indicate ongoing engagement with the ER for the audit period.	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
		Sub-plans – Dust Bowl Rehabilitation Activities		
D2	The Environmental Representative shall prepare and submit to the Secretary a three monthly report on the Environmental Representative's actions and decision on matters specified in condition D1 for the preceding month. The reports shall be submitted within seven (7) days for the end of each month for the duration of Early Works, or as otherwise agreed by the Secretary. Notwithstanding, the Environmental Representative shall be given the independence to report to the Secretary at any time and/or at the request of the Secretary.	ER Quarterly Reports for: - #26 December 2022 to February 2023 - #27 March to May 2023 - #28 June to August 2023 - #29 September to November 2023 - #30 December to February 2024 - #31 March to May 2024 DPHI post approval portal lodgments for: - 08/03/2023 (2:08am) - 07/06/2023 - 07/09/2023 - 14/12/2023 (Late) - 7/03/2024 - 7/06/2024 Letter Healthy Buildings International to Aspect Environmental (ER) dated 03/06/24, ER Approval of Minor Amendment to Moorebank Precinct West (MPW) Early Works (Stage 1) Construction Environmental Plan and Sub-plans – Dust Bowl Rehabilitation Activities	All ER Quarterly Reports during the audit period were submitted to the Department in accordance with the requirement. The ER Quarterly Report for the period of September to November 2023 was not submitted to DPHI within the required 7-day period following the end of the reporting month. However, it was indicated by the Applicant that the ER requested an extension to submit the Quarterly Report until 14/12/2023, which was approved by the Department on the 4/12/2023. The ER notes that there were no ER nor construction activities related to SSD 5066 in the subject period, and DPHI Compliance did not issue a Request for Information, nor did they indicate the late submission to be an issue.	Compliant
Construction Soil and Water Management				
D3	Soil and water management measures consistent with *Managing Urban Stormwater - Soils and Construction Vols 1 and 2, 4th Edition* (Landcom, 2004) shall be employed during Early Works to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters.	Site Inspection 29/07/2024 CSWMP, 20/6/2024, Rev.6 including Dust Bowl (Placement site) Appendix A, SIMTA CPESP endorsement, 10/5/24 Erosion and Sediment Control Plan – Dustbowl Rehabilitation Works, 24/6/2024, Georgiou	CSWMP and ESCP prepared by a competent person and appear to be consistent with the Blue Book. Site controls in the field were generally consistent with the ERSED plan, no issues observed. Sediment fences installed.	Compliant
Bunding				
D4	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded 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 29/07/2024	Chemical storage was stored in the area at the time of the site inspection.	Not Trigged
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 MPWS1, REV.005, 31/05/2024, SIMTA Interview with Auditees 29/07/2024 MIP Complaints Register current to 30/06/24 Site induction, Georgiou	Work hours are included in the latest version of the CEMP which is provided to contractors to implement. No Out of Hours Works have been required during the audit period other than that approved under CoC D7(a).	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
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 29/07/2024 Site Inspection 29/07/2024	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. No continues blocks of noise emission on the site.	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 *Interim Construction Noise Guideline (DECC, 2009); and* ii. No more than the noise management levels specified in Table 3 of the *Interim Construction Noise Guideline* (DECC, 2009) at other sensitive 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.	MIP Complaints Register current to 30/06/24 Project Website ER Quarterly Reports for: - December 2022 to February 2023 - March to May 2023 - June to August 2023 - September to November 2023 - December to February 2024 - March to May 2024	No OOHW identified by the auditee or the ER. No complaints received for MPW1 during the audit period.	Not Triggered
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 *Interim Construction Noise Guideline* (DECC 2009); (b) vibration criteria established using the *Assessing Vibration: a Technical Guide* (DECC 2006) (for human exposure); and (c) the vibration limits set out in the *German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures* (for structural damage). Any construction activities identified as exceeding the construction noise management levels and/or vibration criteria shall be managed in accordance with the Construction Noise and Vibration Management Plan required by condition D22(b). *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.*	Site Inspection 29/07/2024 MIP Complaints Register current to 30/06/24 CNVMP, 20/06/2024, SIMTA Rev.007	No premises are located within safe work distance for vibration. No significant noise or vibration sources on site associated with SSD 5066 activities at the time of the audit. Measures implemented included: Only two plant operated at any one time are kept on site. Trucks coming and going from the site generate noise below the daytime NMLs 50dBA as per the noise monitoring reports from Jan to Jul 2024. The CNVMP Section 5.14 describes the noise monitoring requirements; No complaints were received to MPW1 works during the audit period. Whenever a complaint is received, noise monitoring is conducted to determine exceedances of Noise Monitor Limits. In the case of an exceedance, monitoring will continue to measure the effectiveness of mitigation measures	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
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.	Beakon system captures Delivery Driver Inductions, 24/4/24 Delivery Driver Induction, 30/4/204 Georgiou Site Induction (7am – 6pm construction hours and they were inducted 7am-5pm), Feb 2024 Toolbox talk, 26/7/24, sign-off sheet (RFI) re. construction hours and noise Pre-start MPW1, 27/7/24 (sign-on sheet - complete) Glasgow Grader (PLR_8997) last checked 13/3/24	The Delivery Driver Instruction includes details relating to hours, material tracking, parking, idling and so forth. The Project induction includes controls to limit speeds (40km/h) and reversing. Stabilised access and site speed limits were observed, the site appeared to be set up so that vehicle reversing is negligible. The plant prestart checks indicate that non-tonal alarms are to be fitted to the plant. Sighted Glasgow Grader (PLR_8997) last checked 13/3/24 and Excavator.	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 29/07/2024 MIP Complaints Register current to 30/06/24 Site Induction, Georgioui CTAMP	The site is effectively level and does not require compression braking. The Code of Conduct includes details relating to hours, material tracking, parking, queueing 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 29/07/2024 Interview with Auditees 29/07/2024	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. Georgiou - If there are any deliveries a traffic controller will be at the gate. Import is coming from the Tunnels – M5.	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 29/07/2024 Interview with Auditees 29/07/2024	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. Trucks are following the Haulage route in CTAMP.	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 29/07/2024 Interview with Auditees 29/07/2024	There is no need to use off-site locations, and no issues were observed during the site inspection. There is no offsite parking available. Sufficient parking is available on site. No queuing on Moorebank, about 5 trucks come on a day, and they come and go. Very little import, max 5 trucks at any one time.	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 29/07/2024	There are no cycle ways on Moorebank Avenue. Arrangements for Bapaume Road are included. No public access for MPW1. The footpath is not affected by the current work on MPW1. Signalised pedestrian crossing at the main intersection.	Not Triggered
D15	Access to all properties affected by the carrying out of Early Works shall be maintained, where feasible and reasonable, unless otherwise agreed by the relevant property owner or occupier. Any access physically affected by the carrying out of Early Works shall be reinstated to at least an equivalent standard, unless agreed with by the property owner.	CTAMP SIMTA.005, 01/12/20, Appendix C (VMP) and D (TMP for Bapaume Rd) Site Inspection 29/07/2024	The only interface is with the ABB access road. Formalised access has been maintained at all times (under MPW2) other than crossing of the road under traffic control.	Compliant

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
		MIP Complaints Register current to 30/06/24		
D16	Upon determining the haulage route(s) for construction vehicles associated with subject site, and prior to Early Works, a suitably qualified and experienced independent expert shall prepare a **Road Dilapidation Report.** The Report shall assess the current condition of roads and describe mechanisms to restore any damage that may result due to its use by traffic and transport related to the Early Works. The Report shall be submitted to the Secretary for information and the relevant Council for review prior to the commencement of haulage. Following completion of Early Works, a subsequent Report shall be prepared to assess any damage to the road that may have resulted. Measures undertaken to restore or reinstate roads affected by the Early Works shall be undertaken in a timely manner, in accordance with the reasonable requirements of the relevant Council, and at the full expense of the Applicant.	Dilapidation Report, 26/07/2016, Craigmar Consulting	The road dilapidation report was prepared prior to the audit period and is available on the Project website. The requirement for a subsequent report to be prepared following completion is negated due to the approval of MPWS2 and the works that relate to these two projects. New intersection at Moorebank Ave.	Compliant
Biodiversity				
D17	Within 12 months of the commencement of Early Works, the Applicant shall develop and implement a Biodiversity Offset Package for the approval of the Secretary. The Package shall detail how the ecological values lost as a result of the SSD will be offset. The Package shall be consistent with the *NSW Biodiversity Offsets Policy for Major Projects* (OEH 2014), unless otherwise agreed by the Secretary. The Package shall include, but not necessarily be limited to: (a) the identification of the extent and types of habitat that would be lost or degraded as a result of the final design of the SSD; (b) the objectives and biodiversity outcomes to be achieved; (c) the final suite of the biodiversity offset measures selected and secured in consultation with OEH; (d) the management and monitoring requirements for compensatory habitat works and other biodiversity offset measures proposed to ensure the outcomes of the package are achieved, including: (e) the monitoring of the condition of species and ecological communities at offset (including translocation) locations; (f) the methodology for the monitoring program(s), including the number and location of offset monitoring sites, and the sampling frequency at these sites; (g) provisions for the annual reporting of the monitoring results for a set period of time as determined in consultation with the OEH; and (h) timing and responsibilities for the implementation of the provisions of the Package. Where land offsets cannot solely achieve compensation for the loss of habitat, additional measures shall be provided to collectively deliver an improved or maintained biodiversity outcome for the region. 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.	Biodiversity Offset Package, Rev C 08/02/2018 Letter DPHI to SDIMTA, 23/03/20, Moorebank Precinct West – Stage 2 (SSD 7709) Approval of Construction Flora and Fauna Management Plan (CFFMP) – Condition B154 Biobanking Agreement No. 341, NSW OEH, 26/11/19 DPHI letter- BOP not required, D17 complied with 23/03/2018 Arcadis EPBC Biodiversity Offset Strategy and Management Plan 18/11/2019 DoEE approval of EPBC BOSMP 11/12/2019 Arcadis MPW concept and Stage 1 Early Works BOP 08/02/2018 Arcadis memo to DPHI 11/12/2019 re MPW stage 2 Letter DPHI to SIMTA, 04/05/20, Moorebank Intermodal Precinct West –Stage 2 (SSD 7709) Approval of Koala Management Plan (KMP) - Condition B152 Letter DPHI to SIMTA, 23/10/20, Moorebank Precinct West Stage 2 (SSD 7709) Contamination Management Plan – Condition B165	The MPW S1 Biodiversity Offset Package (BOP) was approved on 23 March 2018. The BOP states that no native vegetation is affected by early works. No clearing of endangered vegetation associated with this audit period. Credits were retired in November to December 2019 and addressed under B157 of the MPW S2 approval (SSD7709). Biobanking retirement memorandum, prepared by Arcadis describes how the project has retired the biobanking offset requirements for SSD 7709 and other projects). It includes consultation with the Department on inclusion from the other projects. The OEH biobanking agreement from 26/11/2019 confirms the retirement. 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.	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
D18	Subject to future Development Applications, no threatened species or communities can be cleared other than that required for Early Works. Any hollow bearing trees shall be relocated to areas to be determined by a suitably qualified ecologist in areas identified for conservation.	Biodiversity Offset Package, Rev C 08/02/2018 Letter DPHI to SDIMTA, 23/03/20, Moorebank Precinct West – Stage 2 (SSD 7709) Approval of Construction Flora and Fauna Management Plan (CFFMP) – Condition B154 Biobanking Agreement No. 341, NSW OEH, 26/11/19 DPHI letter- BOP not required, D17 complied with 23/03/2018 Arcadis EPBC Biodiversity Offset Strategy and Management Plan 18/11/2019 DoEE approval of EPBC BOSMP 11/12/2019 Arcadis MPW concept and Stage 1 Early Works BOP 08/02/2018 Arcadis memo to DPHI 11/12/2019 re MPW stage 2 Letter DPHI to SIMTA, 04/05/20, Moorebank Intermodal Precinct West –Stage 2 (SSD 7709) Approval of Koala Management Plan (KMP) - Condition B152 Letter DPHI to SIMTA, 23/10/20, Moorebank Precinct West Stage 2 (SSD 7709) Contamination Management Plan – Condition B165	The MPW S1 Biodiversity Offset Package (BOP) was approved on 23 March 2018. The BOP states that no native vegetation is affected by early works. Hollow bearing trees previously located in MPW1 were transferred and placed-in-situ for that Dust bowl area. Credits were retired in November to December 2019 and addressed under B157 of the MPW S2 approval (SSD7709). Biobanking retirement memorandum, prepared by Arcadis describes how the project has retired the biobanking offset requirements for SSD 7709 and other projects). It includes consultation with the Department on inclusion from the other projects. The OEH biobanking agreement from 26/11/2019 confirms the retirement. 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.	Not Triggered
D19	The Applicant shall prepare and implement a 'Threatened Dragonfly Species Survey Plan' to determine the presence or absence of threatened dragonfly species listed under the *Fisheries Management Act 1994* on the Georges River, adjacent to the development site. The plan, including survey methodology, shall be prepared in consultation with DPI Fisheries prior to the commencement of Early Works. On implementing the plan, the survey results are to be forwarded onto DPI Fisheries. Should threatened dragonfly species be found at this site, DPI Fisheries should be contacted to agree on possible mitigation measures to avoid impacts in accordance with *NSW DPI Policy and Guidelines for Fish Habitat Conservation and Management* (2013).	Threatened Dragonfly Species Survey Plan Dragonfly monitoring reports June-Aug 19 and Sep-Nov 19 29/01/2020 ER approval of CFFMP and CEMP revs 003d	The Threatened Dragonfly Species Survey Plan was prepared in consultation with the Department in 2016. Survey and reporting are outside the audit period. No change from previous IA.	Compliant
Construction Environmental Management Plan				
D20	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 *Guideline for the Preparation of Environmental Management Plans* (Department of Infrastructure, Planning and Natural Resources, 2004). The CEMP shall include, but not necessarily be limited to: (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	CEMP MPWS1, REV.005, 31/05/2024, SIMTA Sub-plans available on the website Letter Healthy Buildings International to Aspect Environmental (ER) dated 03/06/24, ER Approval of Minor Amendment to Moorebank Precinct West (MPW) Early Works (Stage 1) Construction Environmental Plan and Sub-plans – Dust Bowl Rehabilitation Activities CEMP 31/05/2024, updated to include rehabilitation of excavation/earthmoving training area (outside of Biobanking Agreement (BA) 341 perimeter) and reflect RfMA 024.	The CEMP and subplans were originally approved on 3 February 2017 (the CHMP was approved 29 May 2017). The CEMP and AQMP were updated during the audit period. The updated CEMP and sub-plans were approved on 3 June 2024 by the ER. Evidence of communication of project requirements to the workforce was available and included relevant information. Inspection and monitoring records (referred to elsewhere in this audit table) were available during the audit. The evidence provided by the auditee indicates that the CEMP was implemented during the audit period. Rehabilitation of PS 5 has commenced. ER Approval of Minor Amendment to Moorebank Precinct West (MPW) Early Works (Stage 1) Construction Environmental Management Plan and Subplans – Dust Bowl Rehabilitation Activities, 3/6/2024.	Compliant

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	(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: (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. 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). 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. 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 Flora and Fauna Management Plan MPWS1, MIC1-QPMS-EN-PLN-00005, 20/6/2024, Rev.6 Beakon system Inspections carried out 26/7/24, 3/7/24, Daily inspections from BMD, 18/4/2023, 14/4/23 including Lot 100 stockpile mgt and ACM removal, stockpile assessment	Project requirements are communicated to the workforce through the site inductions and CEMP. Inspection and monitoring records were sighted as follows: Sighted weekly inspections: 26/7/24. Flagging in place. Post rain inspection (10mm triggered): 3/7/24, that was 25mm over the last 5 days. The evidence provided by the auditee indicates that the CEMP was implemented during the audit period. Sighted daily inspections from BMD for 18/4/23 including Lot 100 stockpile mgt, ACM removal and stockpile assessment and 14/4/23 including stockpile mgt.	
Construction Environmental Management Plan — Sub Plans				
D21	As part of the CEMP for the SSD, the Applicant shall prepare and implement: (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: (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;	CEMP MPWS1, REV.005, 31/05/2024, SIMTA Sub-plans available on the website Construction Flora and Fauna Management Plan MPWS1, MIC1-QPMS-EN-PLN-00005, 20/6/2024, Rev.6 CAQMP MPWS1, Rev.004, 1/12/2020 Construction Heritage Management Plan, MPWS1, 01/12/20, SIMTA.005 CNVMP MPWS1, Rev.006, 31/05/2024 Construction Soil & Water Management Plan, MPWS1, 20/6/2024 SIMTA.006 CTAMP MPWS1, Rev.005, 1/12/2020 Letter Healthy Buildings International to Aspect Environmental (ER) dated 03/06/24, ER Approval of Minor Amendment to Moorebank Precinct West (MPW) Early Works (Stage 1) Construction Environmental Plan and	The evidence provided by the auditee indicates that the CEMP was implemented during the audit period. The CEMP and AQMP were updated during the audit period. The updated CEMP and AQMP were approved on 3 June 2024 by the ER. Inspections are occurring in accordance with the CEMP. Any actions are identified, recorded and tracked through to completion. BMD - A stockpile register is being implemented for all stockpiles, including location and material Compliance tracking and reporting is occurring, with reports for 2021-2022 and 2022-2023 being published online. Inspections are occurring in accordance with the CEMP. Any actions are identified, recorded and tracked through to completion. Compliance tracking and reporting is occurring. Two of the compliance reports have not been published online. No imports from Dec 2022 to June 2024. No complaints during the audit period for MPW1. Rehabilitation of PS 5 has commenced.	Compliant

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	(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. (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 *Interim Construction Noise Guidelines* (Department of Environment and Climate Change 2009). The plan shall be developed in consultation with the EPA and shall include, but not be limited to: (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: a) assessment of out-of-hours works against the relevant noise and vibration criteria; b) detailed mitigation measures for any residual impacts (that is, additional to general mitigation measures), including extent of at receiver treatments; and c) proposed notification arrangements. (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; (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); (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 (viii) mechanisms for the monitoring, review and amendment of this plan. (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 OEH, the relevant Council, the NSW Heritage Council (for non-Aboriginal State heritage items) and the relevant Local Aboriginal Land Councils (for Aboriginal heritage), and include, but not necessarily be limited to: (i) in relation to Aboriginal Heritage: a) details of management measures to be carried out in relation to Aboriginal heritage, including a detailed methodology and strategies for protection, monitoring, and conservation of sites and items;	Sub-plans – Dust Bowl Rehabilitation Activities ER Quarterly Reports for: - December 2022 to February 2023 - March to May 2023 - June to August 2023 - September to November 2023 - December to February 2024 - March to May 2024 BMD daily inspections: 18/4/23, 14/4/23 Stockpile Register 17/03/2023, BMD MPWS1 Six-Monthly Compliance Report No.11, Sep 2022-Feb 2023, SIMTA MPWS1 Six-Monthly Compliance Report No.12, Mar 2023- Aug 2023, SIMTA MPWS1 Six-Monthly Compliance Report No.13, Sep 2023- Feb 2024, SIMTA Resource recovery Exemption, Rozelle Interchange, 17/12/19 Waste Classification Report, Rozelle Interchange Tunnel Spoil, ADE, 28/01/20 (x2), 10/03/20, Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the Protection of the Environment Operations (Waste) Regulation 2014. CARAS Register Monthly Report covering active works from Georgiou, June 2024		

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	b) procedures for dealing with previously unidentified Aboriginal objects (excluding human remains), including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures, including when works can re-commence, by a suitably qualified and experienced archaeologist in consultation with the Secretary and Aboriginal stakeholders, assessment of the consistency of any Aboriginal heritage impacts against the approved impacts of the SSD, and, where relevant, registration in the OEH's Aboriginal Heritage Information Management System (AHIMS) register; c) procedures for dealing with human remains, including cessation of works in the vicinity, notification of Secretary, NSW Police Force, OEH and Aboriginal stakeholders, and commitment to cease recommencing any works in the area unless authorised by the OEH and/or the NSW Police Force; d) heritage training and induction processes for construction personnel (including procedures for keeping records of inductions) and obligations under the conditions of this approval including site identification, protection and conservation of Aboriginal cultural heritage; and e) procedures for ongoing Aboriginal consultation and involvement for the duration of the Early Works; and (ii) in relation to non-Aboriginal Heritage: a) identification of heritage Items directly and indirectly affected by the Early Works; b) consideration of methods to prevent damage to any retained heritage items, including: I. procedures for identifying minimum working distances to retained heritage items (including, at minimum, vibration testing and monitoring), II. detailed options for alteration of construction methodology should preferred values for vibration be exceeded, and III. commitment to implementing those options if preferred values for vibration are likely to be exceeded; 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); d) details of monitoring and reporting requirements for impacts on heritage items; e) procedures for dealing with previously unidentified heritage objects, (including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures including when works can re-commence by a suitably qualified and experienced archaeologist in consultation with the OEH, NSW Heritage Council and the Secretary, assessment of the consistency of any heritage impacts against the approved impacts of the SSD, and, where relevant, notification of the Heritage Council of NSW in accordance with section 146 of the *Heritage Act 1977*; and f) heritage training and induction processes for construction personnel (including procedures for keeping records of inductions and obligations under this approval including site identification, protection and conservation of non-Aboriginal cultural heritage; and (iii) mechanisms for the monitoring, review and amendment of this plan. (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: (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;			

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	(ii) the identification of areas to be cleared and details of management measures to avoid residual habitat damage or loss and to minimise or eliminate time lags between the removal and subsequent replacement of habitat such as: a) clearing minimisation procedures (including fencing), b) clearing procedures (including nest box plan), c) removal and relocation of fauna during clearing, d) habitat tree management, and e) construction worker education; (iii) rehabilitation details, including identification of flora species and sources, and measures for the management and maintenance of rehabilitated areas; (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); (v) a description of how the effectiveness of these management measures would be monitored; (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 (vii) mechanisms for the monitoring, review and amendment of this plan. (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: (i) identification of sources (including stockpiles and open work areas) and quantification of airborne pollutants; (ii) key performance indicators for local air quality during construction; (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. (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: (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 mechanisms for the monitoring, review and amendment of this plan.			

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
SCHEDULE 4 CONDITIONS TO BE MET IN FUTURE DEVELOPMENT APPLICATIONS				
Operational Noise and Vibration				
E1	To ensure the operational noise impacts are appropriately managed, the following measures must be considered in future Development Applications: (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 the occur; and whether there are any times of day when there is a clear change in the noise environment; and 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.	-	This requirement does not relate to the current audit period	Not Triggered
E2	Development Applications for both the IMEX and interstate terminal shall include a report to identify: (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 Any monitoring system proposed to capture brake squeal.	-	This requirement does not relate to the current audit period	Not Triggered
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: (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;	-	This requirement does not relate to the current audit period	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	(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 *Environmental Guidelines: Solid Waste Landfills*, 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.			
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
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

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
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
Soil and Water				
E21	All future Development Application shall include an assessment of soil and water impacts. The assessment shall (where relevant): (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: (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; include a contamination assessment in accordance with the guidelines made under the *Contaminated Land Management Act 1997* and in consultation with the EPA for the subject site including the Glenfield Waste Facility.	-	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	All future Development Application shall be accompanied by a preliminary risk screening completed in accordance with *State Environmental Planning Policy No. 33- Hazardous and Offensive Development*	-	This requirement does not relate to the current audit period	Not Triggered

Unique ID	Compliance Requirement	Evidence	Findings and Recommendations	Compliance Status
	and *Applying SEPP 33* (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 *Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis* (DoP 2011) and *Multi-Level Risk Assessment* (DoP 2011). The PHA should: (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 Demonstrate that the proposal complies with the criteria set out in the *Hazardous Industry Planning Advisory Paper No. 4 - Risk Criteria for Land Use Safety Planning.*			
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:	• 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:	Sydney International Terminal Alliance (SIMTA) as LOGOS
Title of audit	Independent Audit No.6
Date:	16 August 2024

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:	[redacted]
Signature:	[redacted]
Qualification:	Bachelor of Industrial Engineering Master of Engineering Management Exemplar Global Lead Environmental Auditor Number 115421
Company:	WolfPeak Pty Ltd

APPENDIX C – SITE INSPECTION PHOTOGRAPHS

No.	Comment	Photograph
1	Silt fence at the back and suitable delineation demarcation at the dustbowl area	
2	Dustbowl works in progress	

No.	Comment	Photograph
3	Placement of Lot 10	
4	Silt fence along the site boundary and signage in place	

No.	Comment	Photograph
5	Riparian demarcation in place and dust gauge equipment	
6	Silt fence maintained in proximity to the George's River	