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NATIONAL INTERMODAL

The Planning Secretary
The Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARAMATTA, NSW, 2140

14 May 2025

Dear Planning Secretary,

Moorebank Avenue Realignment Works - SSI 10053

Response to Independent Environmental Audit #2

The purpose of this correspondence is to provide response to the Independent Environmental Audit Report #2 (Audit Report) (prepared by Trigalana – dated 10 May 2025), as required by condition of approval (CoA) A37(b) of the Moorebank Avenue Realignment Works (MARW) Instrument of Approval (approval) (SSI -10053).

This response has been prepared in conjunction with the BMD Constructions Pty Limited, the construction contractor appointed by National Intermodal for the construction of the MARW.

Further, the Audit Report (enclosed) and this response addresses the following CoA of SSI-10053:

- CoA A34 - the independent environmental auditor, [redacted] (Trigalana), has been approved by the Secretary (correspondence dated 7 December 2024)
- CoA A35 - the Audit Report, has been prepared in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020), in particular:
  - audit report submitted to DPHI within 2 months from the site audit inspection (18 March 2025 inspection / deadline for submission 18 May 2025).

The Audit Report concludes that the works undertaken to date for the project are compliant with the approval. National Intermodal supports the findings of the Audit Report. For completeness a response to the findings of the Audit Report is provided within Table 1.

Table 1 National Intermodal response to Audit Report findings

Audit Report	National Intermodal Response	Action Required
Finding		
The Project is in the early stages with site activities limited to the establishment of site compounds and some electrical works being undertaken during the Audit period. Geotechnical and contamination investigations as noted in the previous audit are now complete.	Agree.	N/A

Audit Report	National Intermodal Response	Action Required
No incidents have occurred during the Audit period.	Agree.	N/A
No construction related complaints have been received. Two complaints have been received regarding potential operational noise impacts	Agree.	N/A
No non compliances have been identified by this Audit.	Agree.	N/A
The recommendation from the previous Audit has been implemented.	Agree.	N/A
Environmental issues managed effectively		
The construction contractor for the main works (BMD) has mobilised with key environmental management roles appointed	Agree.	N/A
BMD EMP and systems have been prepared that are aligned with the National Intermodal approved environmental management plans.	Agree.	N/A
The Environmental Representative (OptiumE) has undertaken site inspections and is performing their role in accordance with the CoA.	Agree.	N/A
Strengths		
The project team was well organised and had a good understanding of the conditions of approval and their compliance obligations.	Agree.	N/A
The project team was well organised and had a good understanding of the conditions of approval and their compliance obligations.	Agree.	N/A
Recommendation for improvement		
Update the complaints handling procedure to include the requirement to notify complainants that the register may be forwarded to government agencies in accordance with this condition.	Agree. TSA have been instructed to implement this action.	The email response template has been updated to include this commentary.
Update the complaints register to include an additional column that documents which precinct of the intermodal terminal the complaint relates to so that it is clear which complaints relate to the MARW project.	Agree. A project specific complaints register is held by National Intermodal / BMD / TSA and provided to DPHI in the monthly ER Report. The joint Moorebank Intermodal Precinct register generally identifies the relevant project however this will be made clearer within the register.	For future complaints, a distinct column will be included within the online complaints register to delineate the relevant Moorebank Intermodal Terminal project.

Audit Report	National Intermodal Response	Action Required
	TSA have been instructed to implement this action.	
Update the drivers code of conduct to include a map showing the approved vehicle routes to and from the as well as the approved routes to the Glenfield Waste Depot as applicable.	Agree. BMD have been instructed to implement this action.	BMD Code of Conduct to be updated accordingly.

A copy of the Audit Report and this letter of response will be uploaded to the project website within 60 days (of the date of this letter, i.e. submission to DPHI) in accordance with CoA B13 (SSI-10053).

Please do not hesitate to contact the undersigned with any further questions.

Yours sincerely,

[redacted]

[redacted]