

# Annual Compliance Report

**Moorebank Avenue Realignment Works**

**EPBC Approval No. 2020/8839**

**23 October 2024 – 22 October 2025**

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Annual Compliance Report

EPBC Approval 2020-8839

23 October 2024 – 22 October 2025

22/12/24



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## Version Control

Revision No.	Date Issued	Description	Author	Approver
A	19/10/25	Draft for review	J. Crawford	W. Owers
B	22/12/25	Final	J. Crawford	W. Owers

## Declaration of Accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.



Signed:

Full name (please print): Westley Owers

Position (please print): National Intermodal: Senior Manager – Planning & Environment

Organisation (please print including ABN/ACN if applicable): NATIONAL INTERMODAL (ABN 64 161 635 105)

Date: 22/12/25

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## Acronyms and Definitions

Acronym	Definition
CoA	Condition of Approval
CEMP	Construction Environmental Management Plan
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DJLU	Defence Joint Logistics Unit
EPA	Environment Protection Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act
IMEX	Import Export Terminal
MARW	Moorebank Avenue Realignment Works
MLP	Moorebank Logistics Park
MPW	Moorebank Precinct West
MPE	Moorebank Precinct East
OCPs	Organochlorine pesticides
PFAS	Per- and polyfluoroalkyl substances
RAP	Remediation Action Plan
SAQP	Sampling Analysis Quality Plan

# 1 INTRODUCTION

## 1.1 Description of activities

EPBC number	2020/8839
Project name	Moorebank Avenue Realignment Works
Approval holder	National Intermodal (ABN 64 161 635 105)
Approved action	To realign a section of Moorebank Avenue, from south of Anzac Road to the East Hills Railway, in Moorebank, NSW. [See EPBC Act referral 2020/8839].
Location of the Project	Sydney, NSW
Person accepting responsibility for the report	National Intermodal (ABN 64 161 635 105)
Reporting period	23 October 2024 to 22 October 2025
Report date	22 December 2025

Refer to Section 3 for details of activities undertaken during the reporting period.

## 1.2 Purpose of this report

The Moorebank Avenue Realignment Works (MARW) was approved on 7 December 2021 under Sections 18, 18A, 26 and 27A of the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Annual compliance reporting requirements are specified in Condition of Approval (CoA) Condition 16. The Condition states:

*The approval holder must prepare a **compliance report** for each 12 month period for the life of the approval, following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the **Minister**. The approval holder must:*

- a. publish each **compliance report** on the **website** within 60 **business days** following the relevant 12-month period*
- b. notify the **department** by email that a **compliance report** has been published on the **website** and provide the weblink for the **compliance report** within 5 **business days** of the date of publication*
- c. keep all **compliance reports** publicly available on the **website** until this approval expires*
- d. exclude or redact **sensitive ecological data** from **compliance reports** published on the **website***
- e. where any **sensitive ecological data** has been excluded from the version published, submit the full **compliance report** to the **department** within 5 **business days** of publication.*

Construction of the MARW commenced on 23 October 2023 and this report summarises construction progress and compliance against the relevant CoA for the reporting period 23 October 2024 to 22 October 2025.

Refer to [Appendix A](#) for a copy of the EPBC 2020/8839 Approval.

Refer to [Appendix B](#) for a Compliance Table outlining the compliance status of the action against each CoA.

This report has been prepared by National Intermodal with input from BMD.

## 2 ACTION DESCRIPTION

### 2.1 Overview

Moorebank Avenue currently connects to Newbridge Road and M5 Motorway to the north, Anzac Road to the south and terminates at Cambridge Avenue, near the Holsworthy Military Reserve. Moorebank Avenue is currently a four-lane undivided road between Newbridge Road and the M5 Motorway, while between the M5 Motorway and Cambridge Avenue it is a two-lane undivided road. A section of Moorebank Avenue currently divides the Moorebank Logistic Park (MLP) into Moorebank Precinct East (MPE site) and Moorebank Precinct West (MPW site).

North of the M5 Motorway, Moorebank Avenue is a State road. Between the M5 Motorway and Anzac Road it is owned and maintained by Liverpool City Council, Between Anzac Road and Cambridge Avenue it is a private road on Commonwealth land. Figure 2-1 provides an overview of the Project.

The Moorebank Avenue Realignment Works (the Project) involves the realignment of an existing two-kilometre section of Moorebank Avenue, from a point approximately 130 meters south of the Anzac Road/Moorebank Avenue intersection to a point immediately north of the East Hills Railway

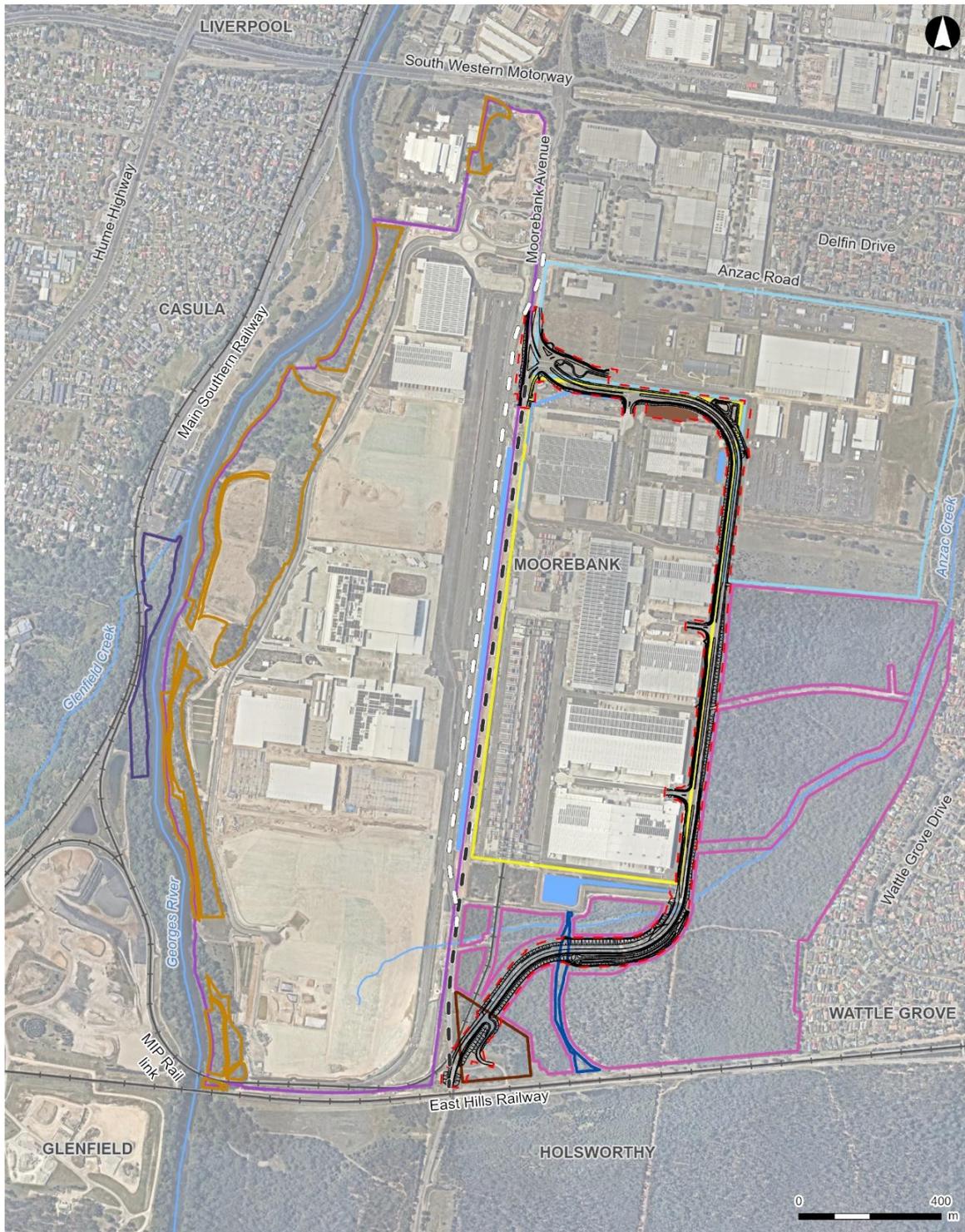
The Project is a controlled action under Section 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and was approved by the Minister for the Environment on 7 December 2021 (EPBC 2020-8839) (the MAR EPBC Approval). DCCEEW granted a variation to the MAR EPBC Approval to accommodate boundary changes on the 14 January 2025.

### 2.2 Site location

The Project is located approximately 27 kilometres south-west of the Sydney Central Business District (CBD) and approximately 26 kilometres west of Port Botany within the Liverpool Local Government Area in Sydney's South West Sub-Region, approximately 2.5 kilometres from the Liverpool City Centre.

Refer to Figure 2-1 for a summary of surrounding land uses, which comprise:

- The MPW site on the western side of Moorebank Avenue
- The MPE site on the eastern side of Moorebank Avenue
- The Defence Joint Logistics Unit (DJLU) site on the eastern side of Moorebank Avenue, north of MPE
- The Holsworthy Military Reserve, to the south of the MPE site on the southern side of the East Hills Rail Corridor
- Residual Commonwealth land (known as the Boot Land) comprising heavily vegetated remnant bushland between Moorebank Avenue, the MPE site and the Wattle Grove residential suburb
- Rail infrastructure including the East Hills Rail Corridor, the Import Export Terminal (IMEX) rail link and a disused rail spur corridor
- Residential suburbs including Wattle Grove (320 metres north and 350 metres east), Moorebank (1,200 metres north), Casula (770 metres west), and Glenfield (1,250 metres south-west)
- The industrial areas of Moorebank and Warwick Farm to the north, Chipping Norton to the north-east, Prestons to the west and Glenfield and Ingleburn to the south-west.



Legend

- |                                    |                              |                                       |
|------------------------------------|------------------------------|---------------------------------------|
| Moorebank Avenue Realignment Works | Railway                      | On-site detention                     |
| Moorebank Avenue diversion road    | Moorebank Precinct East      | Biobanking boundaries                 |
| Previous Moorebank Avenue          | Moorebank Precinct West      | Casula offset site (Hourglass)        |
| Construction footprint             | Defence Joint Logistics Unit | Moorebank offset site (Georges River) |
| Watercourse                        | Disused rail spur            | Wattle Grove Offset Area (BA341)      |
|                                    | Sydney Trains land           |                                       |
|                                    | Construction compound        |                                       |



1:16,000 at A4  
 Coordinate System: GDA2020 MGA Zone 56  
 Date issued: December 6, 2024  
 Imagery: Nearmap

Figure 2-1: Project overview

## 2.3 Construction activities

The key features of the Action include:

- Construction of approximately three kilometres of realigned road to bypass the MLP to the east, comprising: -
  - A four-lane road (two lanes in each direction) near MPE, commencing from a point approximately 130 metres south of the Anzac Road / Moorebank Avenue intersection to the south-eastern corner of the MPE site
  - A two-lane road (one lane in each direction) from the south-eastern corner of the MPE site to a point immediately north of the bridge over the East Hills railway
- Northern tie-in to the existing Moorebank Avenue, 130 meters south of the Anzac Road / Moorebank Avenue for a distance of 250 metres to the northwest corner of the MPE site
- Construction of four accesses with signalised intersections between the realigned road and the MLP
- Construction of a central median, typically six metres wide, tapering to zero width where the realigned road becomes two lanes
- Southern tie-in to the existing Moorebank Avenue, 17 metres before the East Hills railway over bridge. No work will be undertaken or impact the East Hills over bridge
- Construction of retaining walls
- Noise mitigation in the vicinity of the DJLU site as identified in the Detailed Design noise assessment
- Construction of operational drainage infrastructure, onsite stormwater detention basins, and operational water quality controls (including vegetated swales, bioretention systems, and spill containment)
- Installation of a culvert within Anzac Creek and extending existing culverts within existing watercourses/drainage lines
- Installation of road furniture including security fencing, guideposts, traffic signs, and street lighting
- Adjusting public utilities, including defence communications and high voltage electricity alignments
- Construction of temporary ancillary facilities, including a work site compound, lay-down areas, and construction water detention basins.

### 3 SCOPE OF REPORTING

This section summarises the key construction activities that have been undertaken during the 23 October 2024 to 22 October 2025 reporting period, as follows:

- Construction compound establishment
- Project boundary survey and clearing limit delineation
- Existing fence removal
- Temporary fence installation
- Ecological survey work
- Road and building dilapidation surveys
- Services investigation, removal, relocation and installation
- Vegetation clearing and grubbing
- Installation of erosion and sediment controls
- Bulk earthworks
- Construction and operation of onsite construction sediment basins
- Construction of minor ancillary facilities
- Contaminated soils identification and management (on-site containment and off-site disposal)
- Topsoil and mulch salvage and stockpiling (for revegetation)
- Importation of engineered fill materials
- Construction of retaining walls
- Construction of operational drainage infrastructure
- Temporary pedestrian access path construction
- Installation and operation of water treatment facilities.

## 4 NEW ENVIRONMENTAL RISKS

This section presents an overview of new environmental risks identified during the reporting period.

### 4.1 Levels of site contamination

The MARW Remedial Action Plan (RAP) was prepared in accordance with NSW Infrastructure Approval (SSI-10053) Conditions E35 to E37. The RAP was prepared based on soil, sediment, surface water and groundwater investigations completed within the project boundary as documented in the *'Targeted Site Contamination Investigation Report, Moorebank Avenue Realignment Project'* (the TSCI) prepared by WSP dated 30 April 2024.

The RAP identified the presence of limited areas of asbestos within surface and near surface soils along the project alignment requiring remediation as part of the project works. The RAP contemplated that these asbestos containing soils were of limited lateral and vertical extent, with an estimated volume of approximately 350 m<sup>3</sup> to 400 m<sup>3</sup>. Given the relatively small volume of asbestos containing soils anticipated, the RAP contemplated that these materials could be remediated via excavation and disposal off-site.

During land preparation works for the project commencing in May 2025, including clearing and grubbing works and excavation to strip geotechnically unsuitable topsoils and other near surface soils, unanticipated volumes of asbestos and fragments of asbestos containing materials (ACM), have been identified. This ACM has been detected in surface topsoils and near surface soils and in pre-existing stockpiles in several areas within the project boundary. To date, over 8,000 m<sup>3</sup> of asbestos containing materials have been identified for management. Such volumes represent a significant increase to the volumes contemplated by the RAP and in accordance with the requirements of the RAP, the contingency option in the event of such increases was to identify locations where these soil materials that contained asbestos could be placed for containment and long-term management.

The initial finds of unanticipated asbestos were disposed of off-site at a licensed disposal facility. A suitable location for the long-term containment of the asbestos containing soils and the beneficial re-use of geotechnically unsuitable soils within the works was also identified and, in accordance with the Environmental Representative and Site Auditor appointed in accordance with the NSW Infrastructure Approval, as well as the NSW Environmental Protection Authority (EPA), the remaining asbestos finds to date have been transferred to the appropriate location within the project for containment.

## 5 COMPLIANCE SUMMARY

### 5.1 Overview

This section provides a summary of the compliance status of the action.

Refer to [Appendix B](#) for a Compliance Table outlining the compliance status of the action against each CoA.

### 5.2 Independent audit, potential breach and warning letters

No independent audits against EPBC 2020/8839 were undertaken during the reporting period.

No breach notices or warning letters were issued by DCCEEW during the reporting period.

### 5.3 Non-compliances identified in the Reporting Period

One non-compliance was identified during the reporting period. Refer the following table.

CoA	Requirement	Detail	Corrective Action	Status
2	The approval holder must not clear outside of the project area.	<p>An area of 76m<sup>2</sup> of vegetation was cleared outside of the MARW boundary. This was reported to DCCEEW in accordance with the MAR EPBC Approval in correspondence dated 5 June 2025 and 17 June 2025.</p> <p>The vegetation cleared during the clearing event was classified as PCT 883 – Hard-leaved Scribbly Gum – Parramatta Red Gum heathy woodland of the Cumberland Plain, Sydney Basin Bioregion, also known as Castlereagh Scribbly Gum Woodland.</p> <p>The Project (including the clearing event) has not exceeded the EPBC clearing thresholds identified within the EPBC Approval.</p>	<p>In discussion with DPPI, BMD promptly stabilised the area of vegetation cleared outside of the MARW boundary.</p> <p>The area is proposed to be rehabilitated and remediated and brought into the biodiversity area, under the Biodiversity Agreement BA 341.</p> <p>Further, the project has undertaken measures to mitigate this event and reduce the overall impact of the Project on EPBC listed communities and species.</p> <p>Overall, the Project has avoided clearing over 2,000 m<sup>2</sup> of vegetation that was approved for removal via the Project approvals.</p>	Closed

## 5.4 Management Plans

During the reporting period, the following management plans were implemented in accordance with CoA 9 and NSW Approval (SSI 10053) Conditions C1 to C11:

- Construction Environmental Management Plan (CEMP)
- Construction Contamination Management Plan (CCMP)
- Construction Biodiversity Management Plan (CBMP)
- Construction Noise and Vibration Management Plan (CNVMP).

In accordance with CoA 15, the above stated plans remain published on the website.

These plans have been updated (CCMP, CBMP – updated 22/01/25 / CNVMP and CEMP - updated 31/07/25) during the reporting period to reflect the EPBC Variation and RAP (WSP, 2024). The updated versions of these plans were provided to provided to DCCEEW for information (on 15/09/25) and are available on the project website [Moorebank Avenue Realignment \(MAR\) Archives | Moorebank Intermodal Precinct](#).

During the reporting period, compliance with the requirements of the NSW Infrastructure Approval, including the above stated plans, was audited via independent audits conducted in March and September 2025. The findings of the audits are accessible via the project website [Moorebank Avenue Realignment \(MAR\) Archives | Moorebank Intermodal Precinct](#).

## 6 CONCLUSION

At the completion of this compliance reporting period, one non-compliance with the Commonwealth Conditions of Approval EPBC 2020/8839 had been identified and notified to DCCEE.

Works were otherwise undertaken in accordance with EPBC 2011/6086 and the approved management plans, as demonstrated in the compliance table located in [Appendix B](#).

# **Appendix A: EPBC 2020/8839 Approval**



## Variation of conditions attached to approval

### Moorebank Avenue Realignment, Moorebank, NSW (EPBC 2020/8839)

This decision to vary conditions of approval is made under section 143 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

#### Approved action

<b>approval holder</b>	National Intermodal Corporation  ABN: 64 161 635 105
<b>approved action</b>	To realign a section of Moorebank Avenue, from south of Anzac Road to the East Hills Railway, in Moorebank, NSW. [See EPBC Act referral 2020/8839.
<b>period for which the approval has effect</b>	This approval has effect until 03 December 2051.

#### Variation

<b>variation of conditions attached to approval</b>	The variation is: Delete Appendix A attached to the approval dated 7 December 2021 and substitute with the Appendix A specified in the table below.
<b>date of effect</b>	This variation has effect on the date this instrument is signed.

#### Person authorised to make decision

<b>name and position</b>	Brendan Linton-Smith Acting Branch Head Environment Assessments (Vic and Tas) and Post Approvals
<b>signature</b>	
<b>date of decision</b>	14 January 2025

<b>date of decision</b>	<b>Conditions attached to approval</b>
	This approval is subject to the conditions under the EPBC Act as set out in Annexure A.
	<b>Annexure A – conditions of approval</b>
	<b>Part A – Conditions specific to the action</b>
<i>Original dated 7/12/2021</i>	1) The approval holder must undertake the action as described in and in accordance with the <b>NSW Approval</b> .
<i>Original dated 7/12/2021</i>	2) The approval holder must not <b>clear</b> outside of the <b>project area</b> .
	<b>Listed threatened species and ecological communities and biodiversity on Commonwealth Land</b>
<i>Original dated 7/12/2021</i>	3) The approval holder must comply with conditions E2 – E3 of the <b>NSW Approval</b> as they relate to minimising the impact on <b>protected matters</b> .
<i>Original dated 7/12/2021</i>	4) Within the <b>project area</b> , the approval holder must not <b>clear</b> more than: <ul style="list-style-type: none"> <li>a. 0.91 hectares of <b>Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest</b>.</li> <li>b. 5.41 hectares of <b>Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion</b>.</li> <li>c. 6.84 hectares of <b>Koala habitat</b>.</li> </ul>
<i>Original dated 7/12/2021</i>	5) The approval holder must comply with conditions E4 – E6 and E8 of the <b>NSW Approval</b> as they relate to offsetting the impact to <b>protected matters</b> .
<i>Original dated 7/12/2021</i>	6) In retiring the number and class of <b>credits</b> in accordance with condition E5 of the <b>NSW Approval</b> , the following number and class of <b>credits</b> are specified for listed threatened species and communities: <ul style="list-style-type: none"> <li>a. 27 ecosystem <b>credits</b> for <b>Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest</b>, and</li> <li>b. 128 ecosystem <b>credits</b> for <b>Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion</b>, and</li> <li>c. 168 species <b>credits</b> for <b>Koala habitat</b>.</li> </ul>
	<b>Commonwealth land</b>
<i>Original dated 7/12/2021</i>	7) The approval holder must comply with conditions E32 – E43 of the <b>NSW Approval</b> as they relate to minimising contamination impacts on the environment, including in the <b>Commonwealth lands</b> surrounding the <b>study area</b> .

<i>Original dated 7/12/2021</i>	8) The approval holder must comply with conditions E47 – E48 of the <b>NSW Approval</b> as they relate to minimising impacts to property access to the <b>Commonwealth lands</b> .
<b>Construction Environmental Management Plans</b>	
<i>Original dated 7/12/2021</i>	9) The approval holder must comply with conditions C1 – C11 of the <b>NSW Approval</b> as they relate to the preparation and implementation of a Construction Environmental Management Plan, to avoid, mitigate, and manage impacts on <b>protected matters</b> during <b>construction</b> .
<i>Original dated 7/12/2021</i>	10) The Construction Environmental Management Plan must include measures in accordance with Table A.1 of the <b>Response to Submissions</b> to manage environmental impacts during construction, including to <b>protected matters</b> .
<b>Part B – Standard administrative conditions</b>	
<b>Notification of date of commencement of the action</b>	
<i>Original dated 7/12/2021</i>	11) The approval holder must notify the <b>department</b> in writing of the date of <b>commencement of the action</b> within 30 <b>business days</b> after the date of <b>commencement of the action</b> .
<b>Compliance records</b>	
<i>Original dated 7/12/2021</i>	12) The approval holder must maintain accurate and complete <b>compliance records</b> .
<i>Original dated 7/12/2021</i>	13) If the <b>department</b> makes a request in writing, the approval holder must provide electronic copies of <b>compliance records</b> to the <b>department</b> within the timeframe specified in the request.  <b>Note: Compliance records</b> may be subject to audit by the <b>department</b> or an independent auditor in accordance with section 458 of the <b>EPBC Act</b> , and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the <b>department's</b> website or through the general media.
<b>Submission and publication of plans</b>	
<i>Original dated 7/12/2021</i>	14) <b>Plans</b> required under <b>NSW Approval</b> in accordance with this approval must be submitted electronically for the information of and/or consultation with the <b>department</b> .
<i>Original dated 7/12/2021</i>	15) Each <b>plan</b> must be published on the <b>website</b> within 20 <b>business days</b> of the date the <b>plan</b> is approved by the NSW Planning Secretary, and until the end date of this approval.
<b>Annual compliance reporting</b>	
<i>Original dated 7/12/2021</i>	16) The approval holder must prepare a <b>compliance report</b> for each 12 month period for the life of the approval, following the date of <b>commencement of the action</b> , or otherwise in accordance with an annual date that has been agreed to in writing by the <b>Minister</b> . The approval holder must:

- 
- a. publish each **compliance report** on the **website** within 60 **business days** following the relevant 12 month period
  - b. notify the **department** by email that a **compliance report** has been published on the **website** and provide the weblink for the **compliance report** within 5 **business days** of the date of publication
  - c. keep all **compliance reports** publicly available on the **website** until this approval expires
  - d. exclude or redact **sensitive ecological data** from **compliance reports** published on the **website**
  - e. where any **sensitive ecological data** has been excluded from the version published, submit the full **compliance report** to the **department** within 5 **business days** of publication.

**Note:** **Compliance reports** may be published on the **department's** website.

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### Reporting non-compliance

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*Original dated  
7/12/2021*

- 17) The approval holder must notify the **department** in writing of any: **incident**; non-compliance with the conditions; or non-compliance with the commitments made in **plans**. The notification must be given as soon as practicable, and no later than 2 **business days** after becoming aware of the **incident** or non-compliance. The notification must specify:
  - a. any condition which is or may be in breach
  - b. a short description of the **incident** and/or non-compliance
  - c. the location (including co-ordinates), date, and time of the **incident** and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.

*Original dated  
7/12/2021*

- 18) The approval holder must provide to the **department** the details of any **incident** or non-compliance with the conditions or commitments made in **plans** as soon as practicable and no later than 10 **business days** after becoming aware of the **incident** or non-compliance, specifying:
  - a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future
  - b. the potential impacts of the **incident** or non-compliance
  - c. the method and timing of any remedial action that will be undertaken by the approval holder.

### Independent audit

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*Original dated  
7/12/2021*

- 19) The approval holder must ensure that **independent audits** of compliance with the conditions are conducted as requested in writing by the **Minister**.
-

<i>Original dated 7/12/2021</i>	20) For each <b>independent audit</b> , the approval holder must: <ol style="list-style-type: none"> <li>a. provide the name and qualifications of the independent auditor and the draft audit criteria to the <b>department</b></li> <li>b. only commence the <b>independent audit</b> once the audit criteria have been approved in writing by the <b>department</b></li> <li>c. submit an audit report to the <b>department</b> within the timeframe specified in the approved audit criteria.</li> </ol>
<i>Original dated 7/12/2021</i>	21) The approval holder must publish the audit report on the <b>website</b> within 10 <b>business days</b> of receiving the <b>department's</b> approval of the audit report and keep the audit report published on the <b>website</b> until the end date of this approval.
<b>Completion of the action</b>	
<i>Original dated 7/12/2021</i>	22) Within 30 days after the <b>completion of the action</b> , the approval holder must notify the <b>department</b> in writing and provide <b>completion data</b> .
<b>date of decision</b>	<b>definitions attached to approval</b>
<b>Part C Definitions</b>	
In these conditions, except where contrary intention is expressed, the following definitions are used:	
<i>Original dated 7/12/2021</i>	<b>Business day</b> means a day that is not a Saturday, a Sunday, or a public holiday in the state of NSW.
<i>Original dated 7/12/2021</i>	<b>Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion</b> means the threatened ecological community, listed under the <b>EPBC Act</b> on 15 March 2017 as endangered, as specified in the <i>Approved Conservation Advice (including listing advice) for Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion</i> (Department of the Environment, 2015). The location of <b>Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion</b> in the <b>study area</b> is shown in Map 1 at <a href="#">Appendix A</a> by the areas shaded in dark and fluoro green, which are designated '883 - Hard-leaved Scribbly Gum - Parramatta Red Gum heathy woodland of the Cumberland Plain, Sydney Basin Bioregion (High and Medium)'.  <b>Clear, clearance, or clearing</b> means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning of vegetation (but not including weeds – see the <i>Australian weeds strategy 2017 to 2027</i> for further guidance).
<i>Original dated 7/12/2021</i>	<b>Clear, clearance, or clearing</b> means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning of vegetation (but not including weeds – see the <i>Australian weeds strategy 2017 to 2027</i> for further guidance).
<i>Original dated 7/12/2021</i>	<b>Commencement of the action</b> means the first instance of any specified activity associated with the action including <b>clearing</b> and <b>construction</b> .

	<b>Commencement of the action</b> does not include minor physical disturbance necessary to carry out <b>low impact work</b> .
<i>Original dated 7/12/2021</i>	<b>Commonwealth land</b> means land owned or leased by the Commonwealth or a Commonwealth agency. <b>Commonwealth lands</b> are shown in Map 2 at <u>Appendix A</u> , shaded in blue and green, and respectively designated 'Defence Joint Logistics Unit' (Lot 3 DP 1197707 and Lot 3002 DP 1125930) and 'Boot Land' (Lot 41 DP 1197707 and Lot 42 DP 1197707).
<i>Original dated 7/12/2021</i>	<b>Completion data</b> means an environmental report and spatial data clearly detailing how the conditions of this approval have been met. The <b>department's</b> preferred spatial data format is <b>shapefile</b> .
<i>Original dated 7/12/2021</i>	<b>Completion of the action</b> means the date on which all specified activities associated with the action have permanently ceased.
<i>Original dated 7/12/2021</i>	<b>Compliance records</b> means all documentation or other material in whatever form required to demonstrate compliance with the conditions of approval in the approval holder's possession or that are within the approval holder's power to obtain lawfully.
<i>Original dated 7/12/2021</i>	<b>Compliance reports</b> means written reports: <ul style="list-style-type: none"> <li>i. providing accurate and complete details of compliance, <b>incidents</b>, and non-compliance with the conditions and the <b>plans</b></li> <li>ii. consistent with the <b>department's Annual Compliance Report Guidelines</b> (2014)</li> <li>iii. include a <b>shapefile</b> of any <b>clearance</b> of any <b>protected matters</b>, or their habitat, undertaken within the relevant 12 month period</li> <li>iv. annexing a schedule of all <b>plans</b> prepared and in existence in relation to the conditions during the relevant 12 month period.</li> </ul>
<i>Original dated 7/12/2021</i>	<b>Construction</b> means all work required to <b>construct</b> the action including commissioning trials of equipment and temporary use of any part of the action, but excluding <b>low impact work</b> which is carried out or completed before approval of the Construction Environmental Management Plan.
<i>Original dated 7/12/2021</i>	<b>Credit(s)</b> means biodiversity credits under the <i>Biodiversity Conservation Act 2016</i> (NSW).
<i>Original dated 7/12/2021</i>	<b>Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest</b> means the threatened ecological community, listed under the <b>EPBC Act</b> on 9 December 2009 as critically endangered, as specified in the <i>Approved Conservation Advice for Cumberland Plain Shale Woodlands and Shale Gravel Transition Forest</i> (Department of the Environment, Water, Heritage and the Arts, 2009). The location of <b>Cumberland Plain Shale Woodlands and Shale-</b>

	<b>Gravel Transition Forest</b> in the <b>study area</b> is shown in Map 1 at <a href="#">Appendix A</a> by the areas shaded in dark and medium brown, which are designated '724 - Broad-leaved Ironbark - Grey Box - <i>Melaleuca decora</i> grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion (High and Medium)'
<i>Original dated 7/12/2021</i>	<b>Department</b> means the Australian Government agency responsible for administering the <b>EPBC Act</b> .
<i>Original dated 7/12/2021</i>	<b>EPBC Act</b> means the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth).
<i>Original dated 7/12/2021</i>	<b>Incident</b> means any event which has the potential to, or does, impact on one or more <b>protected matter(s)</b> other than as authorised by this approval.
<i>Original dated 7/12/2021</i>	<b>Independent audit</b> means an audit conducted by an independent and <b>suitably qualified person</b> as detailed in the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> (2019).
<i>Original dated 7/12/2021</i>	<b>Koala</b> means the threatened species <i>Phascolarctos cinereus</i> ( <b>combined populations of Queensland, New South Wales and the Australian Capital Territory</b> ), listed under the <b>EPBC Act</b> on 2 May 2012 as vulnerable, as specified in the <i>Approved Conservation Advice for Phascolarctos cinereus (combined populations in Queensland, New South Wales and the Australian Capital Territory</i> (Department of Sustainability, Environment, Water, Population and Communities, 2012); <b>habitat</b> means the location of <b>Koala habitat</b> in the <b>study area</b> , shown in Map 1 at <a href="#">Appendix A</a> by the areas shaded in all shades of brown, pink, green, and purple (excluding areas marked "DNG"), which are designated '724 - Broad-leaved Ironbark - Grey Box - <i>Melaleuca decora</i> grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion', '725 - Broad-leaved Ironbark - <i>Melaleuca decora</i> shrubby open forest on clay soils of the Cumberland Plain, Sydney Basin Bioregion', '883 - Hard-leaved Scribbly Gum - Parramatta Red Gum heathy woodland of the Cumberland Plain, Sydney Basin Bioregion' and '1067 - Parramatta Red Gum woodland on moist alluvium of the Cumberland Plain, Sydney Basin Bioregion'.
<i>Original dated 7/12/2021</i>	<b>Low impact work</b> means: <ul style="list-style-type: none"> <li>i. survey work including carrying out general alignment survey, installing survey controls (including installation of global positioning systems), installing repeater stations, carrying out surveys of existing and future utilities and building and road dilapidation surveys</li> <li>ii. investigations including investigative drilling, contamination investigations and excavation</li> </ul>

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- iii. use of ancillary facilities if the **NSW Environmental Representative** has determined the operational activities will have minimal impact on the environment and community
  - iv. minor clearing and relocation of native vegetation, as identified in the documents listed in Condition A1 of the **NSW Approval**
  - v. installation of mitigation measures including erosion and sediment controls, temporary exclusion fencing for sensitive areas and at-property treatments
  - vi. property acquisition adjustment work including installation of property fencing
  - vii. relocation and connection of utilities where the relocation or connection has been determined by the **NSW Environmental Representative** to have a minor impact to the environment
  - viii. archaeological testing under the *Code of practice for archaeological investigation of Aboriginal objects in NSW* (DECCW, 2010) or archaeological monitoring undertaken in association with i – vii above to ensure that there is no impact on heritage items
  - ix. maintenance of existing buildings and structures required to facilitate the carrying out of the action
  - x. other activities determined by the **NSW Environmental Representative** to have minimal environmental impact which may include but not be limited to construction of minor access roads, temporary relocation of pedestrian and cycle paths, and the provision of property access.
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*Original dated 7/12/2021*      **Minister** means the Australian Government Minister administering the **EPBC Act** including any delegate thereof.

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*Original dated 7/12/2021*      **NSW Approval** means the NSW Government Infrastructure Approval under section 5.19 of the *Environmental Planning & Assessment Act 1979*, for the Moorebank Avenue Realignment project, application number SSI-10053, dated 14 October 2021.

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*Original dated 7/12/2021*      **NSW Environmental Representative** means the person approved by the NSW Planning Secretary for the State Significant Infrastructure.

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*Original dated 7/12/2021*      **Plan(s)** means any of the documents required to be prepared, approved by the **Minister**, implemented by the approval holder and published on the **website** in accordance with these conditions (includes action management plans and/or strategies).

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*Original dated 7/12/2021*      **Project area** means the area to be directly impacted by the action, shown in Map 1 at [Appendix A](#) by the area enclosed in the solid maroon line, and designated ‘Construction footprint’.

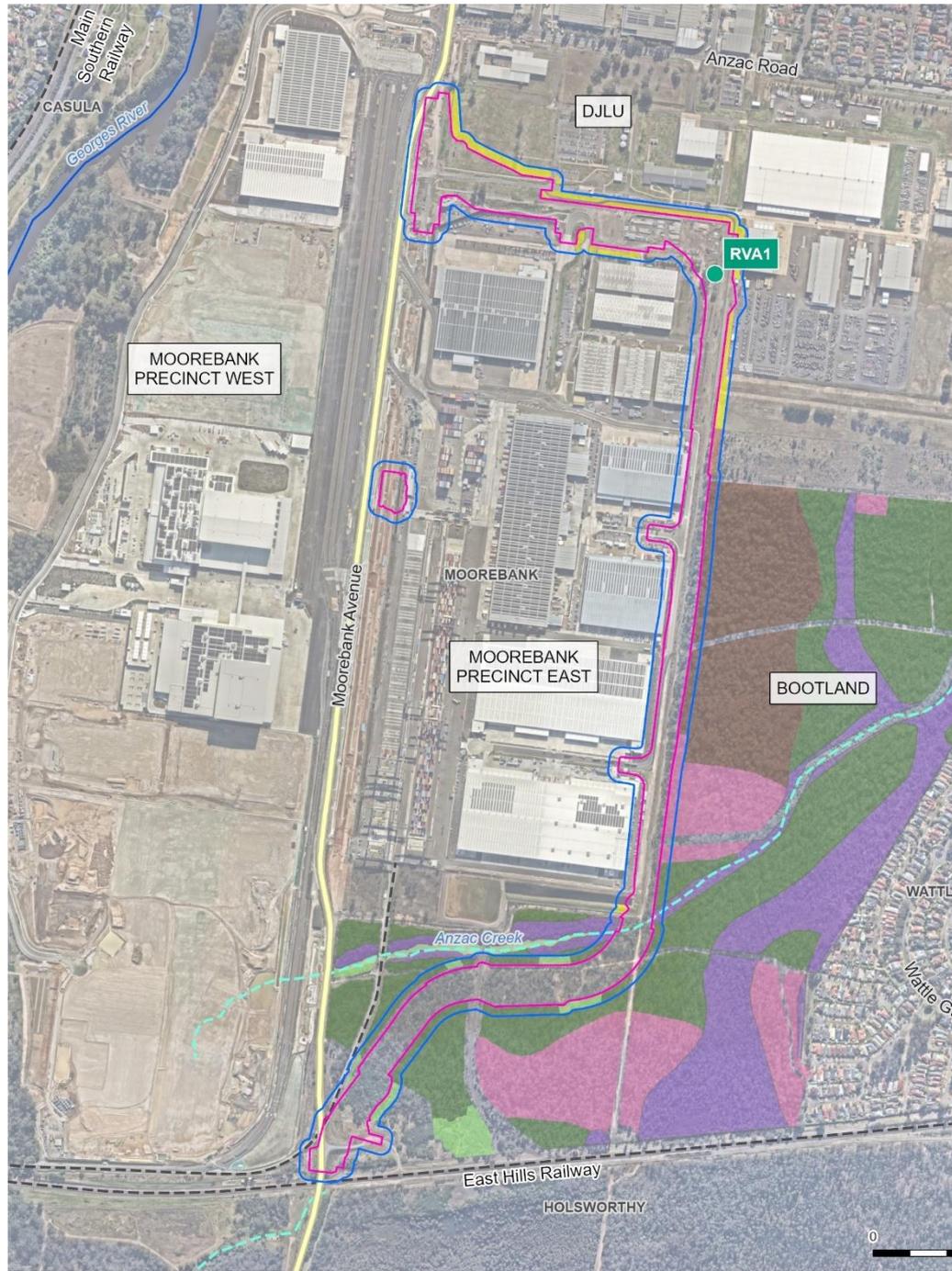
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<i>Original dated 7/12/2021</i>	<b>Protected matter</b> means a matter protected under a controlling provision in Part 3 of the <b>EPBC Act</b> for which this approval has effect.
<i>Original dated 7/12/2021</i>	<b>Response to Submissions</b> means the Moorebank Avenue Realignment – Response to Submissions document, prepared by Sydney Intermodal Terminal Alliance, dated May 2021.
<i>Original dated 7/12/2021</i>	<b>Sensitive ecological data</b> means data as defined in the Australian Government department of the Environment (2016) <i>Sensitive Ecological Data – Access and Management Policy V1.0</i> .
<i>Original dated 7/12/2021</i>	<b>Shapefile</b> means location and attribute information of the action provided in an Esri shapefile format. Shapefiles must contain '.shp', '.shx', '.dbf' files and a '.prj' file that specifies the projection/geographic coordinate system used. Shapefiles must also include an '.xml' metadata file that describes the shapefile for discovery and identification purposes.
<i>Original dated 7/12/2021</i>	<b>Study area</b> means the area comprising the <b>project area</b> and a 20 metre buffer around the <b>project area</b> , shown in Map 1 at <a href="#">Appendix A</a> by the entire area enclosed in the blue solid line, and designated 'Indirect impact area'.
<i>Original dated 7/12/2021</i>	<b>Suitably qualified person</b> means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.
<i>Original dated 7/12/2021</i>	<b>Website</b> means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

date of decision	Attachments	
<i>As varied on the date this instrument was signed.</i>	Appendix A Map 1	Project area, Study area and plant community type to be impacted.
<i>As varied on the date this instrument was signed.</i>	Map 2	Commonwealth lands to be impacted.

As varied on the date this instrument was signed.

Map 1 – Project area, Study area and plant community type to be impacted.



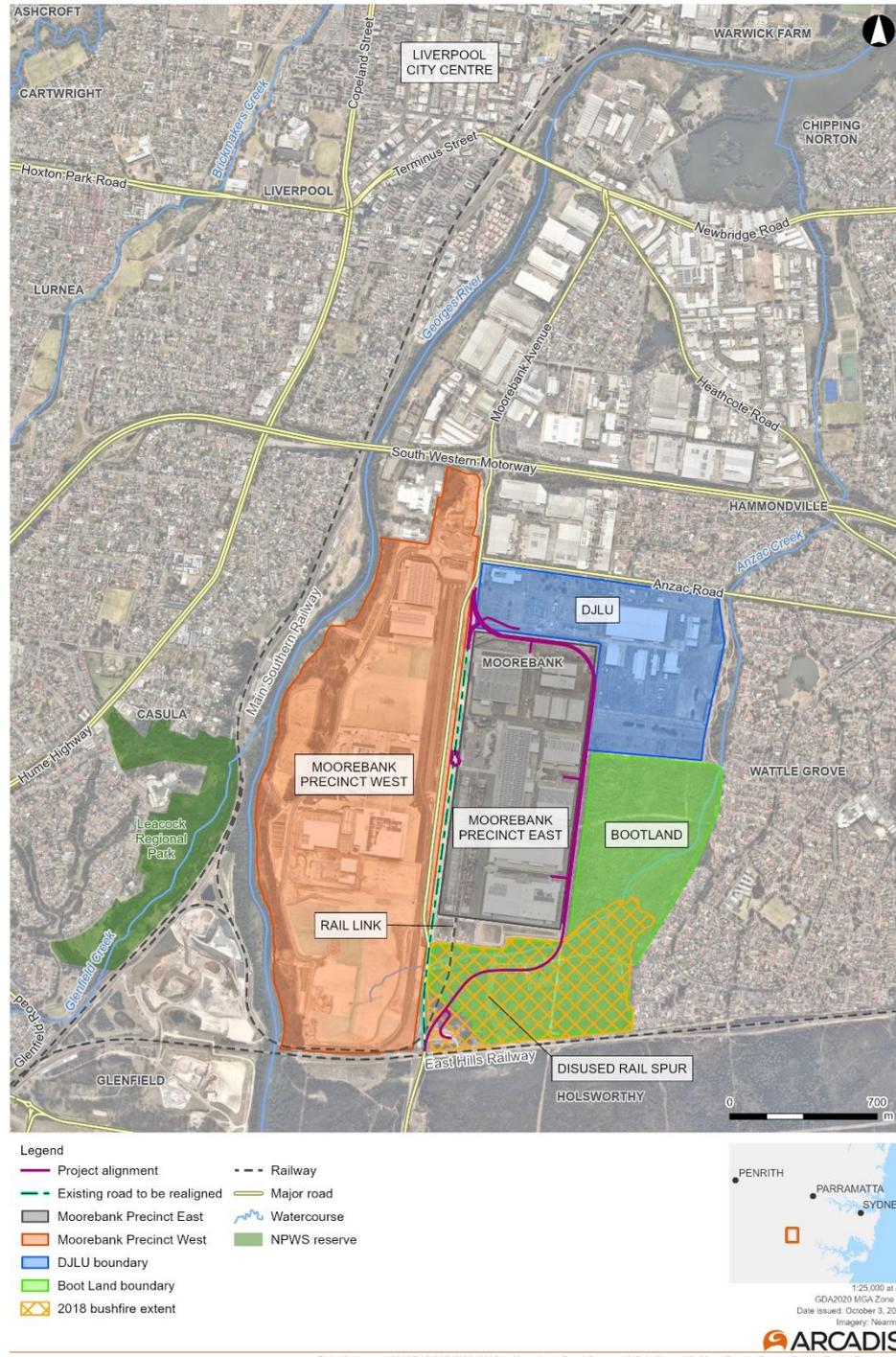
<p><b>Legend</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px solid magenta; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Construction footprint</li> <li><span style="border: 1px solid blue; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Indirect impact area</li> <li><span style="border-bottom: 1px solid yellow; display: inline-block; width: 15px; margin-right: 5px;"></span> Major road</li> <li><span style="border-bottom: 1px dashed black; display: inline-block; width: 15px; margin-right: 5px;"></span> Railway</li> <li><span style="color: green; font-weight: bold; font-size: 1em; margin-right: 5px;">●</span> Rapid vegetation assessment</li> <li>Strahler stream order             <ul style="list-style-type: none"> <li><span style="border-bottom: 1px dashed cyan; display: inline-block; width: 15px; margin-right: 5px;"></span> 1st order</li> <li><span style="border-bottom: 1px solid blue; display: inline-block; width: 15px; margin-right: 5px;"></span> 7th order</li> </ul> </li> <li>Plant community type             <ul style="list-style-type: none"> <li><span style="background-color: yellow; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Exotic grassland</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>724 - Broad-leaved Ironbark - Grey Box - Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion             <ul style="list-style-type: none"> <li><span style="background-color: brown; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> High</li> <li><span style="background-color: tan; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Medium</li> <li><span style="background-color: orange; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Poor</li> </ul> </li> <li>725 - Broad-leaved Ironbark - Melaleuca decora shrubby open forest on clay soils of the Cumberland Plain, Sydney Basin Bioregion             <ul style="list-style-type: none"> <li><span style="background-color: pink; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> High</li> </ul> </li> <li>883 - Hard-leaved Scribbly Gum - Parramatta Red Gum heathy woodland of the Cumberland Plain, Sydney Basin Bioregion             <ul style="list-style-type: none"> <li><span style="background-color: green; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> High</li> <li><span style="background-color: lightgreen; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Medium</li> <li><span style="background-color: yellowgreen; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> DNG</li> </ul> </li> <li>1067 - Parramatta Red Gum woodland on moist alluvium of the Cumberland Plain, Sydney Basin Bioregion             <ul style="list-style-type: none"> <li><span style="background-color: purple; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> High</li> </ul> </li> </ul>
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Path: C:\Users\emaz466\ARCADIS\30100351 - Moorebank Detail Design - GIS\A\_Current\B\_Maps\DetailedDesign\Details



As varied  
on the date  
this  
instrument  
was signed.

Map 2 – Commonwealth lands to be impacted.



# Appendix B: Compliance Matrix

Conditions Number	Condition	Compliance Status	Comment
1	The approval holder must undertake the action as described in and in accordance with the NSW Approval.	Compliant	There are currently no non-compliances in relation to the NSW Approval for conditions that have been triggered.
2	The approval holder must not clear outside of the project area	Non-compliant	An area of 76m <sup>2</sup> of vegetation was inadvertently cleared outside of the MARW boundary. This was reported to DCCEE in accordance with the MAR EPBC Approval in correspondence dated 5 June 2025 and 17 June 2025.
3	The approval holder must comply with conditions E2 – E3 of the NSW Approval as they relate to minimising the impact on protected matters.	Compliant	No intrusion on the lands established as a Biobanking site under the BioBanking Agreement No. 341 have occurred during Project construction. The project area is delineated from the Biobank site, and signage is in place.  With the exception of the non-compliance reported above (refer Condition 2), native vegetation clearing has not exceeded the clearing footprint identified in the documents listed in SSI-10053 Condition A1 of the NSW Infrastructure Approval.
4	Within the project area, the approval holder must not clear more than: a) 0.91 hectares of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest	Compliant	The Project (including the clearing event) has not exceeded the EPBC clearing thresholds identified within the EPBC Approval (refer to <b>Table 1</b> ). 0.91 Ha of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest has been cleared, in accordance with the EPBC clearing threshold of 0.91 Ha.
	b) 5.41 hectares of Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion	Compliant	The Project (including the clearing event) has not exceeded the EPBC clearing thresholds identified within the EPBC Approval (refer to <b>Table 1</b> ). 5.19 Ha of Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion has been cleared, representing less than the EPBC clearing threshold of 5.41 Ha.
	c) 6.84 hectares of Koala habitat.	Compliant	The Project (including the clearing event) has not exceeded the EPBC clearing thresholds identified within the EPBC Approval (refer to <b>Table 1</b> ). 6.54 Ha of Koala habitat has been cleared, representing less than the EPBC clearing threshold of 6.84 Ha.

Conditions Number	Condition	Compliance Status	Comment
5	The approval holder must comply with conditions E4 – E6 and E8 of the NSW Approval as they relate to offsetting the impact to protected matters	Compliant	<p>A Biodiversity Offset Strategy has been prepared in consultation with DCCEEW.</p> <p>Before any impact on the species or community types to be offset, the number and classes of biodiversity credits (like-for-like) set out in Tables 7.8, 7.9, 7.10 and 7.11 of the revised Biodiversity Development Assessment Report (version 5), prepared by EMM and dated 24 May 2021, have been retired. A letter from the NSW Department of Planning and Environment (now Department of Planning, Housing and Infrastructure) to National Intermodal Corporation dated 15 September 2023 has been provided to DCCEEW as evidence. The letter acknowledged the following:</p> <ul style="list-style-type: none"> <li>• The retirement of biodiversity credits under NSW Approval conditions E5 and E7</li> <li>• Payment to the Biodiversity Conservation Fund as required under NSW Approval condition E6</li> <li>• The provision of offset evidence prior to any impact on the species or community to be offset</li> <li>• That the biodiversity credit evidence has been provided to the Department as per NSW Approval condition E8.</li> </ul>
6	In retiring the number and class of credits in accordance with condition E5 of the NSW Approval, the following number and class of credits are specified for listed threatened species and communities: a) 27 ecosystem credits for Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest, and	Compliant	As above for CoA 5.
	b) 128 ecosystem credits for Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion, and	Compliant	As above for CoA 5.
	c) 168 species credits for Koala habitat	Compliant	As above for CoA 5.
7	The approval holder must comply with conditions E32 – E43 of the NSW Approval as they relate to minimising contamination impacts on the environment, including in the Commonwealth lands surrounding the study area.	Compliant	<p>Requirements are discharged via the Construction Contamination Management Plan.</p> <p>A NSW EPA-accredited Site Auditor has been engaged for the duration of work.</p> <p>On 4 July 2023, an Interim Audit Advice, prepared by the NSW EPA-accredited Site Auditor, was submitted to the Planning Secretary confirming</p>

Conditions Number	Condition	Compliance Status	Comment
			<p>that the Sampling Analysis and Quality Plan, included in the documents listed in Condition A1, was appropriate for the scope of targeted investigations in areas before the implementation of the Sampling Analysis and Quality Plan.</p> <p>Targeted investigations have been undertaken between August and November 2023, before commencement of construction in accordance with the Sampling Analysis and Quality Plan.</p> <p>The MARW Targeted Site Contamination Investigation Report (WSP, 2023) indicated that remediation was required to make land suitable for the final intended land use, and so a Remediation Action Plan has been prepared by a suitably qualified and experienced person to document the proposed remediation of areas of identified contaminated soils and sediment located within the Project Site. The RAP has been prepared in accordance with NSW CoA E35, E36, E37 and E38.</p> <p>The Remedial Action Plan includes measures to remediate contamination at the site to make the site suitable for the proposed use and detail how the environmental and human health risks will be managed during the disturbance, remediation and/or removal of contaminated soil/sediment or groundwater.</p> <p>Before implementing the Remedial Action Plan, an Interim Audit Advice dated 14 February 2025 was prepared by the NSW EPA-Accredited Site Auditor and submitted to the Planning Secretary, for information, that certifies that implementation of the Remedial Action Plan would make the site suitable for the proposed use.</p> <p>Remediation activities on site commenced in May 2025 and are being undertaken in accordance with the requirements of the Remedial Action Plan. A Validation Report will document the remediation strategies adopted.</p>
8	The approval holder must comply with conditions E47 – E48 of the NSW Approval as they relate to minimising impacts to property access to the Commonwealth lands	Compliant	Access to utilities and properties has been maintained during the course of construction.
9	The approval holder must comply with conditions C1 – C11 of the NSW Approval as they relate to the preparation and implementation of a	Compliant	The Construction Environmental Management Plan (CEMP) and associated Sub-plans have been prepared and implemented in accordance with CoA 9 and NSW Approval (SSI 10053) Conditions C1 to C11. The CEMP was

Conditions Number	Condition	Compliance Status	Comment
	Construction Environmental Management Plan, to avoid, mitigate, and manage impacts on protected matters during construction.		approved by DPPI on 6/4/23 noting that the CEMP had been endorsed by the Environmental Representative and submitted at least one month prior to the commencement of construction.
10	The Construction Environmental Management Plan must include measures in accordance with Table A.1 of the Response to Submissions to manage environmental impacts during construction, including to protected matters	Compliant	The Construction Environmental Management Plan (CEMP) and associated Sub-plans have been prepared and implemented in accordance with CoA 9 and NSW Approval (SSI 10053) Conditions C1 to C11. The CEMP was approved by DPPI on 6 April 2023 noting that the CEMP had been endorsed by the Environmental Representative and submitted at least one month prior to the commencement of construction.
11	The approval holder must notify the department in writing of the date of commencement of the action within 30 business days after the date of commencement of the action.	Non-compliant (as reflected in the previous report for the reporting period 23 October 2023 to 22 October 2024)	DCCEEW were notified via email on 25 June 2024 of the commencement of the action, noting that the action commenced on 23 October 2023. The notification confirmed that works to date had been relatively minor and limited to geotechnical/contamination investigations and ancillary works (utilities connection), with primary road works not scheduled to commence until a later date.
12	The approval holder must maintain accurate and complete compliance records	Compliant	This compliance tracker and internal document control measures.
13	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.  <i>Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department's website or through the general media</i>	Compliant	Not requested.
14	Plans required under NSW Approval in accordance with this approval must be submitted electronically for the information of and/or consultation with the department.	Compliant	The CEMP and associated Sub-plans were placed on the Moorebank Precinct Website ( <a href="#">Moorebank Avenue Realignment (MAR) Archives</a>   <a href="#">Moorebank Intermodal Precinct</a> ) and notified as available for the information of DCCEEW.

Conditions Number	Condition	Compliance Status	Comment
15	Each plan must be published on the website within 20 business days of the date the plan is approved by the NSW Planning Secretary, and until the end date of this approval	Compliant	The CEMP and associated Sub-plans were placed on the Moorebank Precinct Website ( <a href="#">Moorebank Avenue Realignment (MAR) Archives   Moorebank Intermodal Precinct</a> ) and notified as available for the information of DCCEE..
16	<p>The approval holder must prepare a compliance report for each 12 month period for the life of the approval, following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p> <ul style="list-style-type: none"> <li>a) publish each compliance report on the website within 60 business days following the relevant 12 month period</li> <li>b) notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication</li> <li>c) keep all compliance reports publicly available on the website until this approval expires</li> <li>d) exclude or redact sensitive ecological data from compliance reports published on the website</li> <li>e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication.</li> </ul> <p><i>Note: Compliance reports may be published on the department's website.</i></p>	Compliant	The date of commencement of the action is 23 October 2023. This report represents the second compliance report required under CoA 16.
17	The approval holder must notify the department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify: a) any condition which is or may be in breach b) a short description of the incident and/or non-compliance c) the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.	Compliant	The department was notified in writing on 5 June 2025 of a non-compliance with Condition 2 within two business days of becoming aware of the non-compliance. The notification included the required information.

Conditions Number	Condition	Compliance Status	Comment
18	The approval holder must provide to the department the details of any incident or noncompliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: <ul style="list-style-type: none"> <li>a) any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future</li> <li>b) the potential impacts of the incident or non-compliance</li> <li>c) the method and timing of any remedial action that will be undertaken by the approval holder.</li> </ul>	Compliant	The department was provided with further details of the non-compliance noted above (refer Condition 2 and Condition 17) in writing on 17 June 2025. The notification included the required information.
19	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister	Not triggered	No requests received in writing by the Minister.
20	For each independent audit, the approval holder must: <ul style="list-style-type: none"> <li>a) provide the name and qualifications of the independent auditor and the draft audit criteria to the department</li> <li>b) only commence the independent audit once the audit criteria have been approved in writing by the department</li> <li>c) submit an audit report to the department within the timeframe specified in the approved audit criteria.</li> </ul>	Not triggered	No requests received in writing by the Minister.
21	The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval	Not triggered	No requests received in writing by the Minister.
22	Within 30 days after the completion of the action, the approval holder must notify the department in writing and provide completion data.	Not triggered	Not yet required.