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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

2 November 2026

Dear Planning Secretary,

**Moorebank Avenue Realignment Works - SSI 10053**

**Response to Independent Environmental Audit #5**

The purpose of this correspondence is to provide response to the Independent Environmental Audit Report #5 (Audit Report) (prepared by Trigalana – dated 8 September 2026), 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 address the following CoA of SSI-10053:

- CoA A34 - the independent environmental auditor, Richard Peterson (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 (10 March 2026 inspection / deadline for submission 10 May 2026).

The Audit Report concludes that the works undertaken to date for the MARW 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 /BMD Response | Action Required |
|---|---|---|
| **Findings** | | |
| Construction activities have progressed since the previous Audit, with paving, earthworks and permanent drainage structures advanced. | Agree. | N/A |
| Experienced environmental professionals and specialists have been appointed to oversee the implementation of the CEMP and subplans. | Agree. | N/A |
| Key environmental issues are being managed effectively on site as summarised:<br>• Erosion and sediment controls included stabilised embankments and batters, perimeter drains, bunding, stabilised access and egress points, rumble grids and other controls associated with active earthworks.<br>• A water treatment plant was established on site to treat PFAS-contaminated water.<br>• Regular inspections were undertaken by the independent Environmental Representative and, albeit not mandated by the SSI Approval, an experienced Certified Professional in Erosion and Sediment Control (CPESC). | Agree. | N/A |
| Three complaints have been received during the Audit period. The complaints management system appears to be effective with all complaints resolved. | Agree | N/A |
| No non compliances or reportable incidents have been recorded during the audit period. | Agree. | N/A |
| Two recommendations are made relating planning for project completion and pre-operational compliance obligations as well as the progressive removal /decommissioning of redundant environmental controls. | National Intermodal and BMD are currently preparing and progressing checklists for the close out of the project ensuring environmental standards are maintained in the interim and after completion. | Ongoing management / monitoring. |
| One key strength has been identified by the Audit relating to the systematic implementation of environmental management systems and processes resulting in compliant outcomes and continual improvement achieved throughout project delivery. | Agree, National Intermodal and BMD have worked collaboratively to ensure the works remain to a high environmental standard. | Ongoing management / monitoring. |

A copy of the Audit Report and this letter of response will be uploaded to the Moorebank Intermodal Precinct 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,

