

2025-2026 Annual Compliance Report

Time period: 18 February 2025 to 17 February 2026

EPBC 2020/8816

Upper South Creek Advanced Water Recycling Centre and
Pipelines Project

Kemps Creek, NSW

May 2026



Acknowledgement of Country

Sydney Water respectfully acknowledges the Traditional Custodians of the land and waters on which we work, live and learn. We pay respect to Elders past and present.



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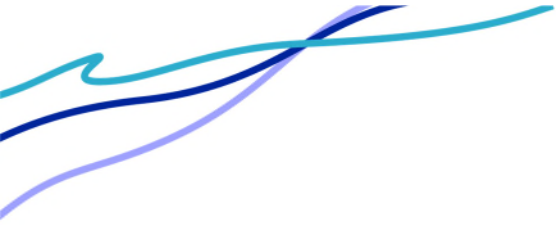
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Document Control

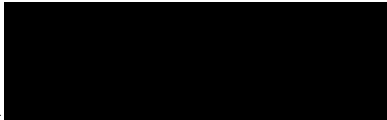
Revision Status	Date	Prepared by
Rev A	14/05/2026	Cheryl Cahill – for issue



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): Cheryl Cahill

Position (please print): Major Projects Environment Lead - USC

Organisation (please print including ABN/ACN if applicable): Sydney Water, ABN: 49 776 225 038

Date: 14/05/2026



Introduction

The Upper South Creek (USC) Advanced Water Recycling Centre and Pipelines project (the project) is being constructed to support the population growth and economic development of the Western Sydney Aerotropolis Growth Area (WSAGA or Aerotropolis), South West Growth Area (SWGA) and the new Western Sydney International Airport. The project will provide wastewater services to Western Sydney to produce high-quality treated water for non-drinking reuse and for release to local waterways.

The project comprises the following components:

- A new Advanced Water Recycling Centre (AWRC) to collect wastewater from businesses and homes and treat it, producing high-quality treated water, renewable energy and biosolids for beneficial reuse
- A new green space area around the AWRC, adjacent to South Creek and Kemps Creek, to support the ongoing development of a green spine through Western Sydney
- New infrastructure from the AWRC to South Creek, to release excess treated water during significant wet weather events, estimated to occur about 3 – 14 days each year
- A new treated water pipeline from the AWRC to Nepean River at Wallacia Weir, to release high-quality treated water to the river during normal weather conditions
- A new brine pipeline from the AWRC connecting into Sydney Water's existing wastewater system to transport brine to the Malabar Wastewater Treatment Plant
- A range of ancillary infrastructure.

This compliance report has been prepared to detail the Project's compliance and implementation status against the EPBC (2020/ 8816) conditions during the reporting period. In accordance with the Annual Compliance Report Guidelines (Commonwealth of Australia, 2023), the following information relates to the project for this compliance reporting period:

- EPBC number: 2020/ 8816
- Project name: Upper South Creek Advanced Water Recycling Centre, Kemps Creek, NSW
- Approval holder: Sydney Water Corporation - ABN: 49 776 225 038
- The approved action: To construct and operate a wastewater treatment plant located between South Creek and Kemps Creek, and associated infrastructure, including three new pipelines between Warragamba and Lansdowne, NSW
- Location of the project: Kemps Creek and pipelines NSW
- Person accepting responsibility for the report: Cheryl Cahill, Sydney Water Major Projects Environmental Lead (refer to signed declaration above)
- Dates for the reporting period of the report – 18 February 2025 to 17 February 2026
- Date of preparation of the report: 14 May 2026

Description of Activities

The project commenced construction on 28 August 2023. During the reporting period, the AWRC civil works were completed for all designed structures, tanks and buildings and the majority of the electrical, mechanical and fit out was also complete. Project moving into completing the remaining mechanical and electrical elements, defect rectification and pre-commissioning works. Project activities undertaken during the reporting period included:

- Inlet works – All Screens installed, all odour cover installations complete. Odour duct installation and piling complete. Completed cable pulls, terminations and containment to main switch room. Barometric loops and grit chamber covers installed. Overflow pipe connection and inlet epoxy completed. All Incoming rising mains connected and hydrotested.
- Workshop building – slab FRP, concreting for slab and driveway complete. Wall and roller door installation complete and internal fit out of workshop furniture.

- Membrane Bioreactor (MBR) – All anaerobic tanks and flow splitter hydrotest complete and passed. Membrane train epoxy complete. Pipe work installation complete at filtrate slab. Membrane train support steel complete. Anaerobic odour cover installation and pipework complete. MRAS platform installed complete. Cable hauling complete and all filtrate pumps terminated.
- Bioreactor – Mechanical installation complete. Cable containment installation complete. Train #1,2 and 3 cable hauling and electrical installation works complete. Field instrument and aeration pipework installation complete. Clean out complete. Progressive handover to Commissioning Team commenced.
- Brine tanks – completed concrete pours and post tensioning of tank walls. Cross connection minor pipework and external above ground pipework complete. Internal grating and electrical mechanical installation complete. North and South tank hydrostatic testing and floating disk installation complete. Apron FRP and concrete pours complete.
- Digesters – Mechanical installations complete, with internal pipework fitout and inground pipework. Completed hydrotesting of tanks. Ramp preparation and concrete pour complete. Cable hauling and terminations complete. Gas membrane holder mast's installed and gas membrane installed and inflated.
- Reverse Osmosis (RO) Building – Completed LV pit installation, LV cable hauling and terminations. RO electrical panels installed and terminations completed and testing complete. Stainless and MSCL above ground pipework at flowsplitters completed. Large bore pipe work install and hydrotesting complete.
- All switchrooms, including main switchroom, Blower switch room and AWTP switchroom - Completed under floor containment and computer floor installations. HV Terminations complete. LV cable hauling, terminations and LV switchboards completed and installed. Electrical panel installs complete. HVAC commenced and well advanced. Preparation for "Power on" and testing commenced.
- Treated Water Pump station and pump gallery - LV cable hauling and above ground pipework installations complete. Pump terminations and pump alignments complete. Hydrotesting complete. Progressive handover to Commissioning Team commenced.
- Odour control facility – Support frames and major pipework complete. Cable containment, hauling and terminations complete. Major ducting and media install complete. Bio trickling filter media install complete. Progressive handover to Commissioning Team commenced.
- Outloading building – Completed Silo and screw conveyors installation. Wall cladding complete. Complete LV pit installation. LV cable containment, cable hauling and electrical panel installs complete. Silo hydrotest complete. Electrical panel and field instrument terminations and testing complete.
- Blower Building – Mechanical install complete. External pipe supports complete. LV cable hauling and blower terminations complete.
- Sludge thickening – Cladding complete and front apron driveway poured. Electrical panels installed and terminations and testing complete.
- Administration Building – brickwork and roof sheeting complete. Services rough in's complete. Tiling, windows, painting and cabinetry complete. Flooring and HVAC installation complete. Footpaths complete and garden bed installation and landscaping commenced.
- Tasman Tanks – Treated Water tank hydrotest complete. BP tank to height. Mechanical and electrical fit out complete. All tanks and permeate aprons poured and all tanks hydrotested.
- Solar Farm – All solar panels installed. Installation of cable containment complete. Inverters installed. Mechanical and electrical testing works underway.
- Roads – Internal roads formed up and asphaltting complete
- Landscaping –South Creek riparian Vegetation Management Zone (VMP) works complete and internal landscaping works around structures, permanent stockpiles, administration building and perimeter continuing.

The pipelines were completed within the previous reporting period, with both the treated water and brine pipelines fully installed and hydrostatic tested. Restoration works were largely completed, with only maintenance activities undertaken. Planting continued along the RBM12 corridor, in associated with landowner agreements to meet the requirements of the RBM12 Rehabilitation Management Plan. During the reporting period there was only minor defect

works undertaken for the pipeline, plus the installation of minor ancillary components (eg cages to aboveground structures) and the assets were transferred to the Project commissioning team.

Figures 1 and 2 are aerial photos taken of the AWRC site near the start of the reporting period. Figures 3 and 4 are aerial photos taken of the AWRC just after the reporting period. Figure 5 provides a labelled overview of the AWRC structures. While all works were completed along the pipelines corridor within the previous reporting period, Figures 6 and 7 are aerial photos of the Nepean Discharge location and the Northern Georges Rivers Submain (NGRS), depicting completed works and restored sites within the reporting period.

Figure 1: Aerial photo of the AWRC site (start of reporting period)



(Aerial photo taken 27th February 2025)

Figure 2: Aerial photo of the AWRC construction works (start of reporting period)



(Aerial photo taken 27th February 2025)

Figure 3: Aerial photo of the AWRC site (end of reporting period)



(Aerial photo taken 24 February 2026)

Figure 4: Aerial photo of the AWRC construction works (end of reporting period)



(Aerial photo taken 24 February 2026)

Figure 5: Labelled overview of the ARWC structures

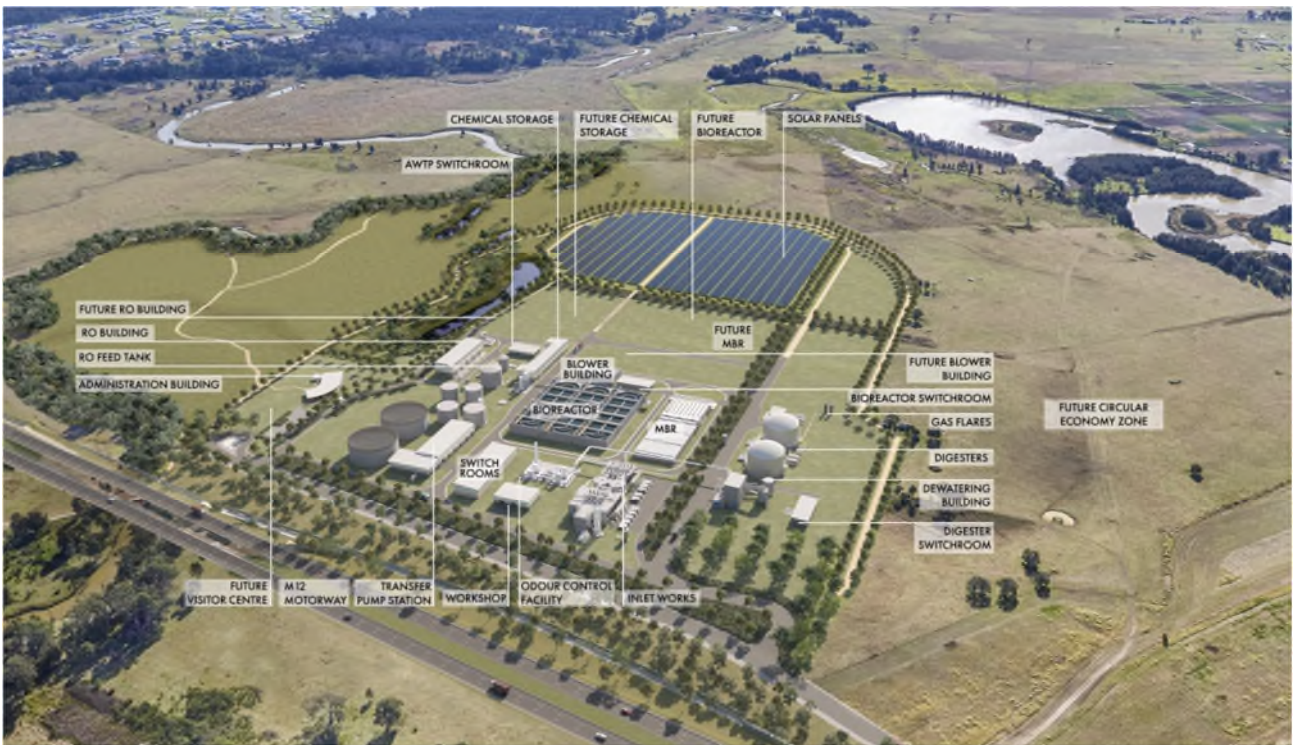


Figure 6: Aerial photo of the Nepean River Discharge location



(Aerial photo taken 14 December 2025)

Figure 7: Aerial photo of NGRS site



(Aerial photo taken 11 July 2025)



Compliance Status during reporting period

In accordance with the Annual Compliance Report Guidelines, this annual compliance report must:

- Demonstrate that all conditions of the EPBC approval have been considered and addressed.
- List the conditions of the EPBC approval, including any variations to those conditions, noting if compliance or non-compliance with each condition has been achieved.
- If a management plan is required under an approval condition:
 - the specifics in a management plan that support an approval condition must be detailed in the compliance report; and
 - material must be provided demonstrating that the requirements of that plan have been implemented.

Table 1 details the compliance status and supporting statements in relation to the EPBC 2020/ 8816 conditions associated with the Project Approval for this reporting period and has been prepared in accordance with the requirements included in the Annual Compliance Report Guidelines.

Table 1 - EPBC Approval Conditions Compliance Table

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
1	<p>To minimise impacts to protected matters, the approval holder must not clear more than:</p> <p>a) 1.44 ha of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest</p> <p>b) 1.64 ha of Spiked Rice-flower habitat.</p>	Compliant	<p>There has been no clearing of protected matters within the reporting period. Clearing of protected matters has not exceeded the conditional limits and the extent of clearing for the Project works is reported in Appendix A. No further vegetation clearing is proposed associated with the project works.</p> <p>The only clearing that occurred within the reporting period was associated with minor clearing of vegetation for the construction of the southern access road drainage channel on the south-western corner of the AWRC site, which is mapped as Swamp Oak Floodplain (EEC) under the NSW Biodiversity Conservation Act 2016 only.</p> <p>Mapping of protected matters cleared vegetation and the associated shapefiles were previously provided electronically to the Department, as part of the 2024-2025 EPBC 2020/8816 Annual Compliance Report. This information remains current, as no additional clearing of protected matters has been undertaken within the reporting period.</p>
2	<p>The approval holder must not clear outside the impact assessment area. The approval holder must not impact on protected matters by clearing outside the impact area.</p>	Compliant	<p>As noted in condition 1, no clearing of protected matters was undertaken within the reporting period and there has been no vegetation clearing undertaken outside the impact assessment area, as defined within the approval.</p>
3	<p>To mitigate impacts on protected matters the approval holder must implement conditions C4, C5, C9, C11, C12, E23, E119, E120, E132, E133, E134, C-B1 and C-B7 of the State Infrastructure Approval, in so far as they relate to monitoring, mitigating, and avoiding impacts to protected matters.</p>	Compliant	<p>There has been no exceedance to the clearing limits noted in condition 1, as detailed in Appendix A. Refer to Appendix C which includes the specifics of the referenced State Infrastructure Approval conditions (SSI 8609189).</p> <p>C4 - The CEMP and sub-plans (including those referenced under condition 6 to be approved by the Department) have been implemented since the commencement of construction on 28 August 2023. As noted in relevant conditions, the CEMP and listed subplans were approved by the Department on 23 August 2023. There were no changes to the CEMP or sub plans (including minor amendments) within this reporting period.</p>

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
			<p>C5 - The CEMP sub plans were developed to comply with all the listed requirements noted in the condition.</p> <p>C9 - The Biodiversity CEMP sub plan was prepared by an experienced ecologist and addressed the requirements listed in the condition. This was verified under the State Infrastructure Approval and by the Department when the sub plan was approved. The Biodiversity CEMP sub plan has been implemented on the project since construction commenced.</p> <p>C11 – Construction commenced 28 August 2023, after the CEMP and relevant subplans were approved by both the State Department of Planning, Housing and Infrastructure (DPHI) (formerly known as the Department of Planning and Environment (DPE)) on 8 August 2023 under the State Infrastructure Approval and by the Department on 23 August 2023.</p> <p>C12 - The CEMP and sub plans were approved prior to construction and have been implemented since construction commenced. Minor amendments to several CEMP sub plans have been endorsed by the Independent Environment Representative (ER) (required under the State Infrastructure Approval), however this has not included those action management plans noted within condition 6.</p> <p>E23 – During preclearing surveys, native vegetation or habitat features that were marked for clearing were identified and salvaged for future reuse both on the project (during restoration) or by other parties. During the reporting period, opportunities to use this felled vegetation for habitat were pursued within landscaping works at the AWRC.</p> <p>E119 – The operational WQMP was prepared and provided to the Department for approval within the reporting period in accordance with condition 8. Approval of the plan was received on 6th March 2026.</p> <p>E120 – the operational WQMP was submitted to the EPA for review and DPHI for information.</p> <p>E132 – The WHMP is currently being drafted and includes baseline monitoring data. It will be provided to the various agencies listed in the condition for</p>

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
			<p>consultation and information and will be provided to the Department for approval, in accordance with condition 8.</p> <p>E133 – not triggered within reporting period. Relates to the development and provision of post operation annual monitoring reports. Arrangements have been made by Sydney Water to gather data and develop these reports to meet the requirements of the SSI condition, which is also required under condition 10.</p> <p>E134 - No work or investigations have been undertaken within the Blue Mountains National Park.</p> <p>Conditions E133, C-B1, C-B7 were not triggered during the reporting period. These are expected to be triggered during operation.</p>
4	To offset the impacts of the Action on protected matters, the approval holder must implement conditions E12, E13, E14, E15 and E16 of the State Infrastructure Approval.	Compliant	<p>Offsets for biodiversity credits have been obtained and evidence of these were provided to the Department, in accordance with Condition 5. Refer to Appendix C which includes the specifics of the referenced State Infrastructure Approval conditions (SSI 8609189).</p> <p>E12 – Clearing impacts were assessed within the EIS, however, the project has sought opportunities to reduce clearing, wherever possible. All clearing has been completed on the project and the clearing volumes against the State Infrastructure Approval and EPBC 2020-8816 approval conditional clearing limits are included in Appendix A.</p> <p>E13 – Clearing of vegetation was managed to ensure no exceedance to conditional clearing limits for plant community types and species detailed in State Infrastructure Approval and condition 1. Pre-clearing inspections and reports assessed clearing extents to ensure only vegetation approved for removal was cleared and there was no exceedance to clearing limits. Project vegetation clearing volumes against the State Infrastructure Approval and EPBC 2020-8816 approval conditional clearing limits are included in Appendix A.</p> <p>E14 – Prior to impacts on biodiversity values, biodiversity credits were obtained. Evidence of the purchase and retirement of credits was provided to the</p>

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
			<p>Department, in accordance with Condition 5. The Biodiversity Credits for the project comprised:</p> <ul style="list-style-type: none"> • Payment and confirmation of purchase and retirement of credits to the Biodiversity Conservation Fund (BCF), as evidenced by the provided statement dated 2/06/23, with reference no. BCF557; and • Transfer and retirement of previously held biodiversity offsets, as evidenced by the provided correspondence from the DPE Biodiversity Offset Scheme Credits team issued 27/06/23, with retirement case ID: 00041471/CRE/RET. This was also evidenced on the provided extract of the transactions register sourced from the BOS Public Register. <p>E15 – not relevant, ancillary and variation rules not pursued for the project.</p> <p>E16 – evidence of the retirement of biodiversity credits was provided to both DPHI under the State Infrastructure Approval and the Department in accordance with condition 5 on 4 July 2023.</p>
5	The approval holder must notify the department in writing within 10 business days of the biodiversity credits being retired in accordance with conditions E14, E15 and E16 of the State Infrastructure Approval	Compliant	<p>Refer to Appendix C which includes the specifics of the referenced State Infrastructure Approval conditions (SSI 8609189).</p> <p>This information was supplied to the Department on the 4 July 2023 via email to the post approval email listed in the Approval. This included evidence of payment and confirmation of purchase and retirement of credits to the Biodiversity Conservation Fund (BCF), as evidenced by the statement attached to the email (dated 2/06/23, with reference no. BCF557); and transfer and retirement of previously held biodiversity offsets, as evidenced by the correspondence (attached to the email) from the DPE Biodiversity Offset Scheme Credits team issued 27/06/23, with retirement case ID: 00041471/ CRE/ RET. The notification included an extract of the transactions register sourced from the BOS Public Register and a link to the register. The email included a table documenting how the cumulative total of the 2 sources satisfied the biodiversity credit obligations listed under the State Infrastructure Approval.</p>

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
			<p>E14 - Prior to impacts on biodiversity values, biodiversity credits were obtained. Evidence of the purchase and retirement of credits was provided to the Department, as noted above.</p> <p>E15 – not relevant, ancillary and variation rules not pursued for the project.</p> <p>E16 – evidence of the retirement of biodiversity credits was also provided to DPHI under the State Infrastructure Approval on 4 July 2023.</p>
6	<p>The approval holder must ensure, prior to submitting them for approval by the Planning Secretary, that the Construction Environmental Management Plan (CEMP) and sub-plans required for Biodiversity (sub-plan C4 (d)) and Heritage (sub-plan C4 (g)) required under conditions C4, C5 and C9 of the State Infrastructure Approval:</p> <p>a) are consistent with statutory documents for protected matters, including for the listings and management of the Greater Blue Mountains Area World Heritage property and the National Heritage place,</p> <p>b) demonstrate how the approval holder will protect, minimise and mitigate impacts to protected matters, and</p> <p>c) state how the relevant terms of the State Infrastructure Approval for protected matters will be complied with.</p>	Compliant	<p>The CEMP, Biodiversity CEMP Sub Plan (BCSP) and the Heritage CEMP Sub Plan (HCSP) were prepared to address the requirements in the condition (and those in the referenced State Infrastructure Approval conditions) and were submitted to the Department on 10 May 2023 for review and comment. Additional documentation was supplied on request. Revised plans were submitted in July and August 2023 to address comments received from the Department.</p> <p>The CEMP and relevant sub plans were approved by the Department on 23 August 2023 and have been implemented during the construction works</p> <p>No changes to the CEMP and various sub plans have been made within the reporting period, however, minor amendments were made within the previous reporting period and were documented within the 2024-2025 EPBC 2020/8816 Annual Compliance Report.</p>
7	<p>The approval holder must not commence the Action unless the Minister has approved all of the CEMP, Biodiversity and Heritage sub-plans, required by condition C4 of the State Infrastructure Approval, in writing.</p>	Compliant	<p>Construction did not commence until after approval of the CEMP and relevant sub plans by the Department on 23 August 2023.</p> <p>Construction commenced on 28 August 2023, as notified to the Department in accordance with Condition 22.</p>

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
8	The approval holder must not commence the Operation unless the Minister has approved the World Heritage Monitoring Program (WHMP) and Water Quality Monitoring Program (WQMP), required by conditions E132 and E119 of the State Infrastructure Approval, in writing.	Not Applicable	<p>The Project is still in construction, undergoing commissioning and operation is currently forecast for Oct/ Nov 2026. Operation will not commence until all the required conditions have been met.</p> <p>E119 – The WQMP was developed to address the obligations under the State Infrastructure Approval conditions E119 and E120. It was provided to DPHI for information and to the NSW EPA for review. It was developed to support the operational Environmental Protection Licence (EPL #21800) required for the ultimate operation of the AWRC facility. The WQMP was submitted to the Department on 16/09/2025 and was approved on 6th March 2026.</p> <p>E132 - The WHMP is currently being drafted and includes baseline monitoring data. It will be provided to the various agencies listed in the condition for consultation and will then be provided to the Department for approval prior to operation.</p>
9	The approval holder must implement the CEMP, Biodiversity and Heritage sub-plans, WHMP and WQMP approved by the Minister until, at least, the end date of this approval, unless otherwise agreed to by the Minister in writing	Compliant	<p>The approved CEMP, Biodiversity CEMP Sub Plan and Heritage CEMP Sub Plan have been implemented during construction since the plans were approved by the Department on 23 August 2023. The WHMP and WQMP are yet to be implemented, as noted in condition 8, they relate to operational requirements.</p> <p>Appendix B provides further detail on the implementation of the plans required under this approval.</p>
10	Each World Heritage monitoring report required by Condition E133 of the State Infrastructure Approval must be provided to the department for information within one month of submission of each annual report required by the State Infrastructure Approval.	Not Applicable	Not triggered - This is a post-operation requirement
11	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of	Not Applicable	Not triggered during the reporting period.

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
	section 143A of the EPBC Act. If the Minister approves a Revised Action Management Plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.		
12	The approval holder may choose to revise an action management plan approved by the Minister under conditions 7-8, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the Action in accordance with the RAMP would not be likely to have a new or increased impact.	Not Applicable	During the current reporting period, no minor amendments to the CEMP, Biodiversity CEMP Sub Plan and Heritage CEMP Sub Plan were required.
13	<p>If the approval holder makes the choice under condition 12 to revise an action management plan without submitting it for approval, the approval holder must:</p> <p>a) Notify the department electronically that the approved action management plan has been revised and provide the department with:</p> <p>i) An electronic copy of the RAMP</p> <p>ii) An electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP.</p> <p>iii) An explanation of the differences between the approved action management plan and the RAMP.</p> <p>iv) The reasons the approval holder considers that taking the Action in accordance with the RAMP would not be likely to have a new or increased impact.</p>	Not Applicable	Not triggered within the current reporting period.

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
	<p>v) Written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the department.</p> <p>b) Subject to condition 15, implement the RAMP from the RAMP implementation date.</p> <p>c) Document changes to approved action management plans in the compliance report, as per condition 29.</p>		
14	The approval holder may revoke its choice to implement a RAMP under condition 12 at any time by giving written notice to the department. If the approval holder revokes the choice under condition 12, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 12	Not Applicable	Not Triggered – No plans have been revoked during the reporting period.
15	<p>If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the Action in accordance with the RAMP would be likely to have a new or increased impact, then:</p> <p>a) Condition 12 does not apply, or ceases to apply, in relation to the RAMP.</p> <p>b) The approval holder must implement the action management plan specified by the Minister in the notice.</p>	Not Applicable	Not Triggered during the reporting period.
16	At the time of giving the notice under condition 15, the Minister may also notify that for a specified period of	Not Applicable	Not Triggered during the reporting period.

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
	time, condition 12 does not apply for one or more specified action management plans.		
17	The approval holder must submit all plans required by these conditions electronically to the department.	Compliant	Plans and reports were submitted electronically, either direct to the email address provided or via the SigBox platform and link sent by Department representatives. This included the initial copies of the CEMP and relevant sub plans specified in condition 6 submitted for review and comments, annual compliance reports and the WQMP specified in condition 8.
18	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: <ul style="list-style-type: none"> a) of this approval, if the version of the plan to be implemented is specified in these conditions; or b) the plan is approved by the Minister in writing, if the plan requires the approval of the Minister; or c) the plan is submitted to the department in accordance with a requirement of these conditions, if the plan does not require the approval of the Minister; or d) the plan is approved by a state/territory government official/the NSW Planning Secretary as required under a state/territory government condition which must be complied with in accordance with these EPBC Act conditions. 	Compliant	All current versions of the plans required under the conditions (excluding those not yet triggered or if draft) are maintained on the Sydney Water Upper South Creek Advanced Water Recycling Centre Project website: https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppersouthcreek-advanced-water-recycling-centre.html
19	The approval holder must keep all published plans required by these conditions on the website until the expiry date of this approval, unless otherwise agreed by the Minister in writing.	Compliant	All current versions of the plans required under the conditions (excluding those not yet triggered) have been published on the Sydney Water Upper South Creek Advanced Water Recycling Centre Project website: https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppersouthcreek-advanced-water-recycling-centre.html

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
20	The approval holder is required to exclude or redact sensitive ecological data from plans published on the website or otherwise provided to a member of the public	Not Applicable	Not Triggered during the reporting period.
21	If sensitive ecological data is excluded or redacted from a plan in accordance with condition 20, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.	Not Applicable	Not Triggered during the reporting period
22	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days of commencement of the Action.	Compliant	The notification letter detailing the commencement of construction (28 August 2023) was sent via email on 28 August 2023 to the email address indicated in the approval and directly to the Department representative assigned to the project.
23	If the commencement of the Action does not occur within 5 years from the date of this approval, then the approval holder must not commence the Action without the prior written agreement of the Minister	Compliant	This condition was not triggered as the commencement date of the project, 28 August 2023, was within 5 years of the date of this approval (17 February 2023).
24	The approval holder must maintain accurate and complete compliance records	Compliant	A compliance tracking program is maintained for the project, which tracks compliance against the EPBC 2020/8816 conditions, the EIS mitigation measures and the State Infrastructure Approval conditions. Records of all correspondence with the Department and relevant agencies are also maintained. This annual compliance report provides a record of the compliance status over the reporting period for each triggered condition. The project is also subject to 6 monthly independent auditing under the State Infrastructure Approval, to assess compliance status. This includes numerous conditions which are also referenced in the EPBC 2020/8816 approval.
25	If the department makes a request in writing, the approval holder must provide electronic copies of	Compliant	No requests have been received from the Department during the reporting period.

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
	compliance records to the department within the timeframe specified in the request.		
26	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	Not Applicable	No clearing of protected matters has been undertaken within the reporting period. Monitoring data, shape files, maps, surveys and pre-clearing reports were provided in the 2024-2025 EPBC 2020/8816 Annual Compliance Report and there have been no updates or changes to this information in the reporting period. No further clearing is proposed associated with the Project. Refer to Appendix A, which details calculations of clearing volumes with reference to conditional clearing limits.
27	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Not Applicable	No clearing of protected matters has been undertaken within the reporting period. Monitoring data, shape files, maps, surveys and pre-clearing reports were provided in the 2024-2025 EPBC 2020/8816 Annual Compliance Report and there have been no updates or changes to this monitoring data in the reporting period.
28	The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 12 months of the date of this approval decision, or as otherwise agreed by the Minister in writing.	Not Applicable	No clearing of protected matters has been undertaken within the reporting period. Monitoring data, shape files, maps, surveys and pre-clearing reports were provided in the 2024-2025 EPBC 2020/8816 Annual Compliance Report and there have been no updates or changes to this monitoring data in the reporting period. No further clearing is proposed associated with the Project. Refer to Appendix A, which details calculations of clearing volumes with reference to conditional clearing limits.
29	The approval holder must prepare a compliance report for each 12-month period following the date of this	Compliant	This report is the 3rd compliance report prepared for the project and satisfies this condition for the reporting period 18 February 2025 to 17 February 2026. This

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
	approval, or as otherwise agreed to in writing by the Minister.		report is scheduled to be submitted by 15 May 2026 (60 NSW business days from the end of the 12 month reporting period).
30	Each compliance report must be consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2014	Compliant	This compliance report has been developed with reference to, and is considered consistent with, the Annual Compliance Report Guidelines.
31	Each compliance report must include: <ul style="list-style-type: none"> a) Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents. b) One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared. c) A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented. 	Compliant	<p>This compliance report has been prepared with reference to the Annual Compliance Report Guidelines for the reporting period 18 February 2025 to 17 February 2026.</p> <ul style="list-style-type: none"> a) This table (Table 1) provides details of the compliance status for each condition. There have been no incidents, as defined in Annexure A, Part C – Definitions that have resulted in any actual or potential impacts to protected matters during the reporting period. There have also been no non-compliances raised against any EPBC 2020/8816 conditions or any commitments included in the plans (required under Condition 6) during the reporting period. b) No clearing of protected matters has been undertaken within the reporting period. Shape files were provided electronically to the Department to accompany the 2024-2025 EPBC 2020/8816 Annual Compliance Report. c) A schedule has been included in Appendix B, which includes implementation details.
32	The approval holder must: <ul style="list-style-type: none"> a) Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required. b) Notify the department electronically, within 5 business days of the date of publication that a compliance report 	Compliant	<p>This report will be published on the Sydney Water Upper South Creek Advanced Water Recycling Centre Project website and the Department will be notified via email.</p> <ul style="list-style-type: none"> a) This 3rd annual compliance report is scheduled to be published on the Sydney Water Project website: https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppersouthcreek-advanced-water-recycling-centre.html by 15 May 2026 (60 NSW business days from the end of the 12 month period - 17 February 2026).

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
	<p>c) Provide the weblink for the compliance report in the notification to the department.</p> <p>d) Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.</p> <p>e) Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.</p> <p>f) If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.</p>		<p>b) Following the publication of the report, the Department will be notified via email to the email addresses listed in the approval decision letter and directly to the Department representative assigned to the project. This notification will include providing a copy of the compliance report prepared for the reporting period (unless restricted due to file sizes).</p> <p>c) The notification to the Department regarding the online availability of the annual compliance report will include a specific weblink to the report on the Sydney Water Project website (https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppertsouthcreek-advanced-water-recycling-centre.html).</p> <p>d) This report is the 3rd compliance report prepared by the Project and will be maintained on the project website, along with the previous compliance reports.</p> <p>e) Not Triggered - No sensitive ecological data has been excluded from compliance report in this reporting period.</p> <p>f) Not Triggered.</p>
33	<p>The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.</p>	Compliant	<p>Not Triggered - There have been no incidents that have resulted in any actual or potential impacts to protected matters during the reporting period. There have also been no non-compliances raised against any EPBC 2020/8816 conditions or any commitments included in the plans (required under Condition 6) during the reporting period.</p> <p>As part of the State Infrastructure Approval (SSI 8609189), two independent audits were undertaken within the reporting period, in April and October 2025, respectively. No non compliances were raised during these audits, however 4 minor recommendations were made. These were associated with the completion of the Detailed Site Investigation (DSI) report for the pipelines, due to the need to undertake additional insitu testing; ensure premise maps for the environmental protection licence are updated when pipeline areas are completed/ restored; removal of fallen tree guards along South Creek restoration area; and ensuring</p>

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
			inspections and reports are completed to satisfy conditions for the RBM12 corridor along the brine pipeline.
34	<p>The approval holder must specify in the notification:</p> <p>a) Any condition or commitment made in a plan which has been or may have been breached.</p> <p>b) A short description of the incident and/or potential non-compliance and/or actual non-compliance.</p> <p>c) The location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance</p>	Not Applicable	Not Triggered - There have been no incidents that have resulted in any (actual or potential) impacts to protected matters during the reporting period. There have also been no non-compliances raised or breaches identified against any EPBC 2020/8816 conditions or any commitments included in the plans (required under Condition 6) during the reporting period.
35	<p>The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify:</p> <p>a) Any corrective action or investigation which the approval holder has already taken</p> <p>b) The potential impacts of the incident and/or non-compliance</p> <p>c) The method and timing of any corrective action that will be undertaken by the approval holder</p>	Not Applicable	Not Triggered - There have been no incidents or non-compliances raised or identified in relation to any protected matters specified in the EPBC 2020/8816 conditions or commitments to plans (required under Condition 6) during the reporting period.
36	<p>The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every five-year period following the commencement of the Action until this approval expires, unless otherwise specified in writing by the Minister.</p>	Not Applicable	Not Triggered during the reporting period. Commencement of the action was Monday 28 August 2023. The first audit is to be undertaken prior to 28 August 2028.

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
37	<p>For each independent audit, the approval holder must:</p> <p>a) Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit.</p> <p>b) Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department.</p> <p>c) Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department.</p> <p>d) Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report.</p> <p>e) Keep every audit report published on the website until this approval expires.</p>	Not Applicable	Not Triggered during the reporting period.
38	Each audit report must report for the five-year period preceding that audit report	Not Applicable	Not Triggered during the reporting period.
39	Each audit report must be completed to the satisfaction of the Minister and be consistent with the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019.	Not Applicable	Not Triggered during the reporting period.
40	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.	Not Applicable	Not Triggered - The approval has effect until 31 December 2063

Condition No	Condition Requirements	Compliance Status	Evidence/Comments
41	Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data.	Not Applicable	Not Triggered, as the project is still in construction.



Appendix A – Clearing volumes noting conditional limits

Upper South Creek Vegetation Clearing Register

Period - Commencement of Project to 17/02/2026

Clearing calculations undertaken by AMBS Ecologists

State / Commonwealth	Vegetation Type	Condition	Quantity Cleared (ha)	Sum of Cleared (ha)	Clearing Limit (ha)	Quantity Remaining (ha)	% Cleared
State	724 - Broad-leaved Ironbark – Grey Box – Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion	Thinned	0.503	0.522	1.58	1.058	33%
		Scattered Trees	0.019				
	725 - Broad-leaved Ironbark – Melaleuca decora shrubby open forest on clay soils of the Cumberland Plain, Sydney Basin Bioregion	Scattered Trees	0.006	0.006	0.01	0.004	60%
	835 - Forest Red Gum – Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion	Intact	0.129	1.54	2.81	1.27	55%
		Thinned	0.979				
		Scattered Trees	0.432				
	849 - Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	Intact	0.223	1.829	4.48	2.651	41%
		Thinned	1.054				
		Scattered Trees	0.552				
	1105 - River Oak open forest of major streams, Sydney Basin Bioregion and South East Corner Bioregion	Thinned	0.054	0.054	0.26	0.206	21%
1800 - Swamp Oak open forest on riverflats of the Cumberland Plain and Hunter valley	Thinned	0.183	0.202	0.92	0.718	22%	
	Scattered Trees	0.019					
Commonwealth	Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest	-	0.425	0.425	1.44	1.015	30%
	Spiked Rice-flower habitat	-	0.771	0.771	1.64	0.869	47%
Other	Urban Native/Exotic	-	1.304	1.304	N/A	-	-

Appendix B – Plans and Implementation

Plan	Revision Status	Implementation Notes
Construction Environmental Management Plan (CEMP)	Rev B Issue date: 05/08/2024	<p>The CEMP has been implemented since the commencement of construction to ensure the USC project works complies with relevant legislation, EPBC 2020/8816 conditions, State Infrastructure Approval (SSI-8609189) and the EIS mitigation measures to minimise environmental risks through the implementation of the management measures documented in the plan and accompanying sub-plans. Over the reporting period, this has included the implementation of the monitoring and inspection program, reporting and closing any actions, assessing consistency of minor design or methodology changes, undertaking audits, tracking compliance and planning and managing works to manage potential impacts on the environment.</p> <p>The only remaining construction ancillary facility associated with the Project is the main compound located adjacent to the AWRC, as all compounds previously established along the pipeline corridors were demobilised and restored within the previous reporting period. Project works, particularly those within or near sensitive environments or considered high-risk activities, such as works near waterways and protected or native vegetation, have been assessed and planned using the approach documented in the CEMP. This has included the development of site and/ or activity specific Environmental Work Method Statements (EWMS) and Site Environmental Plans.</p> <p>Site inductions have been undertaken for all staff involved on the project, including the delivery of an environmental component. Additional training has been undertaken, including toolbox talks and activity specific training, such as restoration management and erosion and sediment control management and maintenance.</p> <p>There were no amendments to the CEMP in the reporting period.</p>
Biodiversity CEMP Sub Plan (BCSP)	Rev E Issue date: 22/10/2024	<p>Mitigation and management measures detailed in the sub plan have been implemented since the commencement of construction to minimise the potential impacts to biodiversity as a result of the project. While there was no clearing or impact to protected matters within the reporting period, over the duration of the Project, clearing has been managed to minimise the volume of clearing undertaken and ensure conditional clearing limits are not exceeded. Offsets for biodiversity credits were obtained prior to the commencement of construction and this was provided to the Department.</p> <p>Pre-clearing inspections, surveys and reports have been undertaken and prepared prior to clearing commencing to ensure only vegetation approved for removal was cleared. This included the implementation of measures for the removal of habitat trees and features and identify areas of weed infestation. Native vegetation clearing has been minimised to the greatest extent practicable to reduce impacts on protected matters, Threatened Ecological Communities (TECs), threatened species and their habitat. During preclearing surveys, native vegetation or habitat features marked to be cleared were assessed for reuse opportunities. During the reporting period, salvaged logs were used in restoration works along the South Creek riparian corridor bordering the AWRC and as part of landscaping works within the AWRC operational footprint.</p> <p>Rehabilitation Management Plans were developed in accordance with the provisions included in the BCSP and restoration works completed in the previous reporting period have been subject to maintenance works during the reporting period. This included for the South Creek riparian zone adjacent to the AWRC and other landscaping works within and surrounding the operational footprint of the AWRC. Weed management has been undertaken in accordance with the weed and pathogen</p>

Plan	Revision Status	Implementation Notes
		<p>management procedure included in the sub plan and ongoing plant and weed maintenance works have also been undertaken to ensure biodiversity values are enhanced. Development of the Greenspace masterplan was progressed during the reporting period, detailing the approach to restore the pasture land outside the operational footprint (but within the Sydney Water owned land parcel) to Cumberland Plain Woodland.</p> <p>Site inductions have been undertaken for all staff involved on the project, including a biodiversity specific component detailing protected matters located within or near the project, conditional clearing limits and mitigation measures to be implemented. Specific training has also been undertaken for those included in any restoration works.</p> <p>There were no amendments to the BCSP in the reporting period.</p>
Heritage CEMP Sub Plan (HCSP)	Rev B Issue date: 18/08/2024	<p>The management measures of the HCSP have been implemented to avoid, minimise or manage impacts to items and areas of Aboriginal, non-Aboriginal, World and National Heritage significance since the commencement of construction. The Aboriginal and non-Aboriginal investigation, archival recording and salvage programs required under the State Infrastructure Approval, EIS and documented in the HCSP have been completed. The non-indigenous heritage report, required under NSW SSI8609189 conditions E35 and E36 was completed in the reporting period and provided to DPHI and the nominated Councils and libraries. The Aboriginal Cultural Heritage Excavation Report, required under NSW SSI8609189 condition E31 is being drafted and will provide an analysis for the over 20,000 artefacts unearthed during the salvage program.</p> <p>Works have been managed to ensure there is no disturbance or adverse impact to heritage items outside the project boundary or retained heritage sites. Clearance letters were previously prepared for all heritage items/ areas approved for disturbance, and there has been no amendment to these within the reporting period. The unexpected heritage finds and human remains procedure is implemented, however, there have been no unexpected finds during the reporting period.</p> <p>Site inductions have been undertaken for all staff involved on the project, including a heritage specific component detailing areas of retained heritage significance on/ near the project and mitigation and control measures to be implemented. Specific training has also been undertaken for works in close proximity to areas of heritage significance, including the retained telescope antennae on the AWRC site, noting designated no-go zones.</p> <p>A Heritage Interpretation Framework has been developed to address how heritage elements from the site's Aboriginal and Scientific heritage are incorporated into themes and displays for various audiences and visitors to the USC AWRC, which will be renamed after operation to the Badu Yarragul Water Resource Recovery Facility. Implementation of the various displays and interpretative panels has commenced during the reporting period, with the aim to have these completed prior to operation.</p> <p>There were no amendments to the HCSP in the reporting period.</p>
Operational Water Quality Monitoring Program (WQMP)	Rev 2, Issue Date 15/0/2025	<p>The operational WQMP was prepared to address the obligations under the State Infrastructure Approval conditions E119 and E120 and support the operational Environmental Protection Licence monitoring requirements required during the future operation of the AWRC facility. It was prepared in conjunction with the Sydney Water field service team and was provided to NSW DPHI for information and to the NSW EPA for review under the State Infrastructure Approval obligations. It was</p>

Plan	Revision Status	Implementation Notes
		<p>subsequently provided to the Department for approval in accordance with condition 8, with approval received on 6th March 2026.</p> <p>The WQMP is yet to be implemented, as noted in condition 8, it relates to operational requirements associated with monitoring effluent discharge impacts on the water quality of receiving waterways.</p>
Other Relevant Sub Plans (not required by Conditions)		
Surface Water and Groundwater CEMP Sub Plan (SWGCSPP)	Rev E Issue date: 07/07/2025	<p>The management measures of the SWGCSP have been implemented to avoid, minimise or manage impacts to surface water and groundwater. Since the commencement of construction, vegetation clearing and earthworks have progressed within the construction footprint of the AWRC and active works areas of the pipeline alignments. Works along the pipeline alignment were progressive and erosion and sediment (ERSED) controls were installed around active work sites, supported by site-specific Erosion and Sediment Control Plans (ESCPs) developed in accordance with the ESC Procedure under the guidance of the Certified Professional in Erosion and Sediment Control (CPESC). Pipeline works are complete and were actively managed to limit the duration of open excavations and on completion of the works, progressively stabilised and restored. Regular inspections of ERSED controls within and surrounding the AWRC site, including pre and post rainfall events, have been undertaken over the reporting period to ensure installed controls are maintained and effective. Training has been undertaken with personnel involved in the management of stormwater and sediment controls on site.</p> <p>Works at the AWRC involved the use of the Onsite Detention Basin (OSD), which was converted into a High Efficiency Sediment (HES) basin. The discharge of construction water offsite (after ensuring compliance with discharge criteria specified within the Environment Protection Licence (EPL)) has been managed and monitored in accordance with the requirements of the SWGCSP. All construction water captured on the AWRC has been managed through site controls and mitigation measures in the sub plan in accordance with the Dewatering Procedure, eg pumping to OSD basin, reuse of water for dust suppression or release offsite (after testing and confirmation EPL criteria are met). Numerous large concrete pours have been undertaken at the AWRC during the construction of various structures. These have been managed to ensure washout water is appropriately managed in accordance with mitigation measures in the sub plan. Within the reporting period, the OSD HES basin has been converted into a bioretention basin in accordance with the permanent design to manage stormwater generated from the operational footprint of the site, after passing through the first flush tank.</p> <p>Baseline and construction monitoring of waterways potentially impacted by the construction works has been undertaken over the reporting period, in accordance with the Surface Water Quality Monitoring Program (SWQMoP). Groundwater monitoring has also been undertaken at the AWRC in accordance with the Groundwater Quality Monitoring Program. Minimal groundwater has been encountered within excavations and trenches on the project.</p> <p>Amendments to the sub-plan within the reporting period constituted a minor change under the State Infrastructure Approval and included updates to EPL references as the licence was transferred from the principal contractor to Sydney Water and then modified to include operational obligations.</p>
Soil and contamination	Rev C	The management measures of the SCCSP have been implemented since the commencement of construction to avoid, minimise or manage contamination and soil risk in accordance with the Project's legal, planning, and contractual requirements.

Plan	Revision Status	Implementation Notes
CEMP Sub plan (SCCSP)	Issue date: 7/07/2025	<p>Remedial Action Plans (RAPs) have been prepared for both the AWRC site and pipelines. Detailed Site investigations (DSI) have been undertaken for the AWRC and pipelines for medium and high risk areas of environmental concern, in accordance with the Sampling and Analysis Quality Plan noted in the sub plan. The Pipelines DSI was subject to further in-situ testing during the pipeline installation works and these were finalised in an updated DSI within the reporting period. The Pipelines Site Validation Report has been drafted and reviewed, pending inclusion of final import/ export qualities. These additional plans have been reviewed and endorsed (where final) by the EPA accredited Site Auditor and interim audit advice records have been obtained for each, where required.</p> <p>All contamination works for the project are managed by a site hygienist, in regular liaison with the Site Auditor, to ensure compliance with expected contamination management processes. There have been no unexpected contamination finds within the reporting period.</p> <p>Records are maintained and the site hygienist is progressing with the development of the AWRC Site Validation Report, which will document all imported soil classification records, including material imported from the pipelines to the AWRC and the waste classification records of all exported material disposed of to landfill. Where residual contamination is retained on-site, such as within the ACM encapsulation cell at the AWRC, the Site Validation Report will also be accompanied by a Long-term Environmental Management Plan (LTEMP), which is currently being drafted.</p> <p>Amendments to the sub-plan within the reporting period constituted a minor change under the State Infrastructure Approval and included updates to the sustainability/ ISC references, EPL references and administrative changes throughout.</p>

Appendix C – State Infrastructure Approval conditions (SSI 8609189) referenced in Conditions

State Infrastructure Approval Condition No	Condition	Referred to under 2020/8816 Condition No	Additional Notes																		
C4	<p>The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan. Details of all information requested by an agency during consultation must be provided to the Planning Secretary as part of any submission of the relevant CEMP Sub-plan, including copies of all correspondence from those agencies as required by Condition A9.</p> <table border="1"> <thead> <tr> <th>Required CEMP Sub-plan</th> <th>Relevant government agencies to be consulted for each CEMP Sub-plan</th> </tr> </thead> <tbody> <tr> <td>a) Surface water and groundwater</td> <td>EPA, EHG, DPE Water, DPI Fisheries, WaterNSW and relevant council(s)</td> </tr> <tr> <td>b) Flood emergency response</td> <td>EHG, SES, relevant council(s)</td> </tr> <tr> <td>c) Soils and contamination</td> <td>EPA and relevant council(s)</td> </tr> <tr> <td>d) Biodiversity</td> <td>EHG, DPI Fisheries and relevant council(s)</td> </tr> <tr> <td>e) Noise and vibration</td> <td>EPA, WaterNSW and relevant council(s)</td> </tr> <tr> <td>f) Traffic and transport</td> <td>TfNSW and relevant council(s)</td> </tr> <tr> <td>g) Heritage (Aboriginal, non-Aboriginal, World and National heritage)</td> <td>Heritage NSW, EHG, WaterNSW and relevant council(s)</td> </tr> <tr> <td>h) Air quality</td> <td>EPA and relevant council(s)</td> </tr> </tbody> </table>	Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan	a) Surface water and groundwater	EPA, EHG, DPE Water, DPI Fisheries, WaterNSW and relevant council(s)	b) Flood emergency response	EHG, SES, relevant council(s)	c) Soils and contamination	EPA and relevant council(s)	d) Biodiversity	EHG, DPI Fisheries and relevant council(s)	e) Noise and vibration	EPA, WaterNSW and relevant council(s)	f) Traffic and transport	TfNSW and relevant council(s)	g) Heritage (Aboriginal, non-Aboriginal, World and National heritage)	Heritage NSW, EHG, WaterNSW and relevant council(s)	h) Air quality	EPA and relevant council(s)	3, 6, 7	The CEMP and sub-plans have been implemented since construction commenced on Monday 28 August 2023. The CEMP and relevant sub plans were made available to the listed agencies during the consultation process undertaken prior to the approval of the plans. The CEMP and sub plans were approved by the DPHI Planning Secretary on 8 August 2023 and the CEMP and subplans (listed under condition 6) were approved by the Department on 23 August 2023.
Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan																				
a) Surface water and groundwater	EPA, EHG, DPE Water, DPI Fisheries, WaterNSW and relevant council(s)																				
b) Flood emergency response	EHG, SES, relevant council(s)																				
c) Soils and contamination	EPA and relevant council(s)																				
d) Biodiversity	EHG, DPI Fisheries and relevant council(s)																				
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f) Traffic and transport	TfNSW and relevant council(s)																				
g) Heritage (Aboriginal, non-Aboriginal, World and National heritage)	Heritage NSW, EHG, WaterNSW and relevant council(s)																				
h) Air quality	EPA and relevant council(s)																				
C5	<p>The CEMP Sub-plans must state how:</p> <p>(a) the environmental performance outcomes identified in the documents listed in Condition A1 will be achieved;</p> <p>(b) the mitigation measures identified in the documents listed in Condition A1 will be implemented;</p>	3, 6	The CEMP Sub plans were developed to comply with all the listed requirements noted in the condition.																		

State Infrastructure Approval Condition No	Condition	Referred to under 2020/8816 Condition No	Additional Notes
	(c) the relevant terms of this approval will be complied with; and (d) issues requiring management during construction (including cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART (Specific, Measurable, Achievable, Realistic and Timely) principles.		
C9	The Biodiversity CEMP Sub-Plan must be prepared by a suitably qualified and experienced ecologist and include, but not limited to: (a) details of the measures to avoid and minimise disturbance to native vegetation, and other habitat of native flora and fauna species; (b) procedures for undertaking pre-clearance surveys for native fauna, including surveys by a suitably qualified and experienced ecologist to determine the presence of native fauna in the areas impacted by Stage 1 of the CSSI, and procedures and measures to manage their relocation; (c) measures to prevent the spread of weeds, pathogens and to manage biosecurity; (d) protocols for incidental finds of threatened species and ecological communities within the construction boundary; (e) proposed passive roost exclusion measures over the vertical shaft at the Warragamba environmental flows release structure, as committed to in the documents listed in Condition A1.	3, 6	The Biodiversity CEMP Sub Plan (BCSP) addressed the requirements listed in the condition. This was verified when the sub plan was approved by DPHI on 8 August 2023 under the State Infrastructure Approval and by the Department on 23 August 2023. The BCSP has been implemented on the Project since construction commenced. Note clause C9e was deleted from the State Infrastructure Approval, on approval of MOD1 (determined on 26 May 2023), which removed the 4.5km environmental flow pipeline from the project scope.
C11	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary.	3	Construction commenced on 28 August 2023, after approval of the CEMP and relevant sub plans by DPHI on 8 August 2023 under the State Infrastructure Approval and by the Department on 23 August 2023.

State Infrastructure Approval Condition No	Condition	Referred to under 2020/8816 Condition No	Additional Notes
C12	The CEMP and CEMP Sub-plans as approved, including any minor amendments approved by the ER, must be implemented for the duration of construction of Stage 1 of the CSSI.	3	<p>The CEMP and sub plans were approved prior to construction and have been implemented since construction commenced. Minor amendments to the CEMP and various CEMP sub plans have been endorsed by the Independent Environmental Representative (ER, required under the State Infrastructure Approval), and where these included revisions to the plans detailed in Condition 6, they have also been provided to the Department (refer to Conditions 12 and 13 – nil during reporting period).</p> <p>Subplans that have been amended within the reporting period include:</p> <ul style="list-style-type: none"> • Surface Water and Groundwater CEMP Sub-Plan – Rev E, 7/07/2025 • Soils and Contamination CEMP Sub-Plan – Rev C, dated 7/07/2025 • Air Quality CEMP Sub-Plan, Rev C, dated 07/07/2025 • Waste and Resource Use CEMP Sub-Plan, Rev D, dated 7/07/2025 • Noise and Vibration CEMP Sub-Plan, Rev E, dated 07/07/2025
E12	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities, threatened species and their habitat.	4	<p>Clearing impacts were assessed within the EIS, however, throughout the Project, opportunities to reduce clearing have been sought, wherever possible.</p> <p>A summary of the extent of clearing for both the Infrastructure Approval and EPBC 2020/8826 conditional clearing limits is provided in Appendix A, which notes there has been no exceedance of the conditional clearing limits. Only minimal clearing was undertaken during the reporting period, however this did not involve the clearing of any protected matters. No additional clearing for the Project is expected.</p>
E13	Impacts to plant community types and species credit species must not exceed those identified in Table 5 and Table 6.	4	<p>A summary of the extent of clearing for both the Infrastructure Approval and EPBC 2020/8826 conditional clearing limits is provided in Appendix A, which notes there has been no exceedance of the</p>

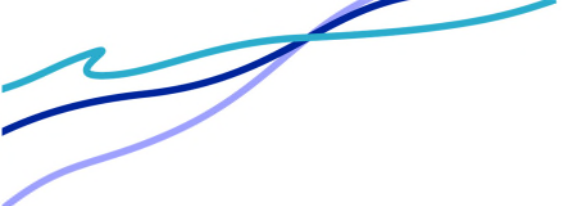
State Infrastructure Approval Condition No	Condition	Referred to under 2020/8816 Condition No	Additional Notes
			conditional clearing limits. Only minimal clearing was undertaken during the reporting period, however this did not involve the clearing of any protected matters.
E14	Prior to impacts on the biodiversity values of Stage 1 of the CSSI, the number and classes of ecosystem credits and species credits (like-for-like) as set out in Table 5 and Table 6, must be retired. The retirement of the credits must be carried out in accordance with the Biodiversity Conservation Act 2016, and can be achieved by: (a) acquiring and retiring “biodiversity credits” within the meaning of the BC Act; and / or (b) making a payment into the Biodiversity Conservation Fund of an amount equivalent to the class and number of ecosystem and species credits, as calculated by the Biodiversity Offsets Payment Calculator; and/or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.	4, 5	Prior to impacts on biodiversity values, biodiversity credits were obtained. Evidence of this was provided to the Department on 4 July 2023 via email to the post approval email listed in the Approval, in accordance with Condition 5. The Biodiversity Credits for the project comprised: <ul style="list-style-type: none"> • Payment and confirmation of purchase and retirement of credits to the Biodiversity Conservation Fund (BCF), as evidenced by the provided statement dated 2/06/23, with reference no. BCF557; and • Transfer and retirement of previously held biodiversity offsets, as evidenced by the provided correspondence from the DPE Biodiversity Offset Scheme Credits team issued 27/06/23, with retirement case ID: 00041471/CRE/RET. This was also evidenced on the provided extract of the transactions register sourced from the BOS Public Register.
E15	Where evidence of compliance with the Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits (OEH, 2017) for the purpose of applying the variation rules has been provided to the Planning Secretary, variation rules may be applied to retire the relevant ecosystem credits and species credits as set out in the BAM Biodiversity Credit Biodiversity Report (Variation). The variation rule does not apply to biodiversity credits for threatened species or threatened ecological communities that are listed as critically endangered under the Biodiversity Conservation Act 2016 or listed in any capacity under the Environment Protection and Biodiversity Conservation Act 1999.	4, 5	Not relevant, ancillary and variation rules were not pursued for the project.

State Infrastructure Approval Condition No	Condition	Referred to under 2020/8816 Condition No	Additional Notes
	Note: "Impacted site" in the application of the like-for-like offset rules is taken to be the subject land described in the Biodiversity Development Assessment Report and Project Amendments: Biodiversity Assessment referred to in Condition A1. The subject land is the disturbance footprint subject to assessment under the Biodiversity Assessment Method.		
E16	Evidence of the retirement of credits in satisfaction of Condition E14 must be provided to the Planning Secretary prior to impacts on biodiversity values.	4, 5	Evidence of the retirement of biodiversity credits was provided on 4 July 2023 to DPHI in accordance with the State Infrastructure Approval and the Department in accordance with condition 5.
E23	Stage 1 of the CSSI must maximise the reuse of native vegetation and other habitat features that have been approved for removal. Where reuse by the CSSI is not possible, relevant council(s), NSW National Parks & Wildlife Service, Western Sydney Parklands Trust, Greater Sydney Local Land Services, local Landcare groups, DPI Fisheries and any additional relevant government agencies must be consulted prior to the removal of vegetation and other habitat to determine if: (a) hollows, tree trunks (greater than 25-30 centimetres in diameter and 2-3 metres in length), mulch, bush rock and root balls salvaged from native vegetation impacted by the CSSI; and (b) collected plant material, seeds and/or propagated plants from native vegetation impacted by the CSSI, could be used by others in habitat enhancement and rehabilitation activities, before pursuing other disposal options. If the native vegetation and other habitat features can be reused by others, the Proponent must advise them and facilitate access for salvage.	3	During preclearing surveys, native vegetation or habitat features that were marked for clearing were identified and opportunities for reuse were sought. This included the retention and stockpiling of logs, trunks and root balls for use during future rehabilitation works on the project. During the reporting period, salvaged logs were used in restoration works along the South Creek riparian corridor bordering the AWRC and within the landscaping works within the AWRC operational footprint.
E119	The Proponent must develop and implement an ongoing Water Quality Monitoring Program (WQMP) to assess the	3, 8	The WQMP was prepared to support the operational Environmental Protection Licence monitoring requirements to be implemented during

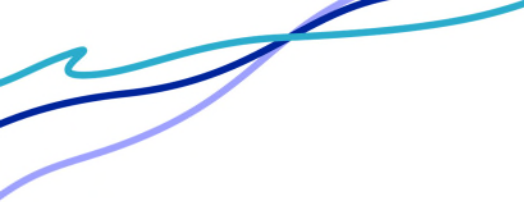
State Infrastructure Approval Condition No	Condition	Referred to under 2020/8816 Condition No	Additional Notes
	<p>impacts of the AWRC effluent discharges on water quality. The WQMP must include:</p> <p>(a) monitoring of treated effluent from the AWRC under different release streams;</p> <p>(b) monitoring of waterways that may be impacted by AWRC discharges (including comparison with baseline and upstream conditions). Monitoring must include upstream and downstream ambient water quality monitoring of receiving waters that may be impacted by the proposed Warragamba River release outlet, consistent with the documents listed in Condition A1;</p> <p>(c) details of the sampling frequency, analysis, and locations used in the program;</p> <p>(d) reporting requirements for the program to the EPA, including consideration of any expanded Beachwatch monitoring program in the Hawkesbury Nepean catchment.</p>		<p>the future operation of the AWRC facility. It was prepared in conjunction with the Sydney Water field services team and provided to NSW DPHI for information and to the NSW EPA for review under the State Infrastructure Approval obligations. The WQMP is yet to be implemented, as it relates to operational requirements associated with monitoring effluent discharge impacts on the water quality of receiving waterways.</p> <p>Note – wording specific to the Environmental Flows pipeline component of works was removed, with the determination of MOD1, which removed the 4.5km environmental flow pipeline from the project scope.</p>
E120	<p>The WQMP required under Condition E119 must be submitted to the EPA for review at least 18 months prior to the commencement of operation of Stage 1 of the CSSI, and must be approved by the EPA and submitted to the Planning Secretary for information at least one year prior to the commencement of operation of Stage 1 of the CSSI.</p>	3	<p>The operational WQMP was prepared in conjunction with the Sydney Water field services team and provided to NSW DPHI for information and to the NSW EPA for review to address condition obligations. It was subsequently provided to the Department for approval in accordance with condition 8, with approval received on 6th March 2026.</p> <p>Note – wording specific to remove approval obligations by the EPA was included in MOD3, at the request of the EPA.</p>

State Infrastructure Approval Condition No	Condition	Referred to under 2020/8816 Condition No	Additional Notes
E132	<p>The Proponent must prepare a World Heritage Monitoring Program (WHMP) to verify whether potential impacts on the Greater Blue Mountains Area World Heritage property and National Heritage place during Stage 1 of the CSSI are in accordance with impacts assessed in the documents listed in Condition A1. The WHMP must be prepared in consultation with EHG and submitted to the Planning Secretary and EHG for information prior to the commencement of operation of Stage 1 of the CSSI. The WHMP must include, but not necessarily limited to:</p> <p>(a) baseline and post-commissioning monitoring of representative attributes that:</p> <ul style="list-style-type: none"> (i) contribute to the Outstanding Universal Value (OUV) of the Greater Blue Mountains Area; and (ii) are identified in the documents listed in Condition A1 as potentially impacted during Stage 1 of the CSSI; <p>(b) relevant water quality monitoring data; and</p> <p>(c) photos at each monitoring point.</p>	3, 8	This is a pre-operation requirement – not yet triggered. However, baseline monitoring has been undertaken and the WHMP is currently being drafted.
E133	<p>Within twelve months after the commencement of operation of Stage 1 of the CSSI, and every year thereafter, unless otherwise agreed by the Planning Secretary, the Proponent must prepare an annual World Heritage monitoring report. The World Heritage monitoring report must include, but not necessarily limited to:</p> <p>(a) analysis of results from the WHMP under Condition E132, including verifying whether potential impacts are as predicted in the documents listed in Condition A1;</p> <p>(b) mitigation measures proposed, where the WHMP under Condition E132 identifies an impact on the Blue Mountains World Heritage Property and National</p>	3, 10	This is a post operation requirement – not yet triggered

State Infrastructure Approval Condition No	Condition	Referred to under 2020/8816 Condition No	Additional Notes
	Heritage place, that is attributable to the project and exceeds the impacts described in the documents listed in Condition A1; (c) effectiveness of mitigation measures implemented, and any necessary additional mitigation measures; and (d) any corrective actions that may be required and/or have been employed. The World Heritage monitoring report must be provided to EHG for information within one month of completion of each annual report.		
E134	No Work within Blue Mountains National Park (part of the Greater Blue Mountains Area) is to occur as part of Stage 1 of the CSSI (such as for investigations, monitoring or temporary construction compounds), unless authorisation is granted by the NSW National Parks and Wildlife Service under the National Parks and Wildlife Act 1974 (NPW Act) or the National Parks and Wildlife Regulation 2019.	3	No work or investigations have been undertaken within the Blue Mountains National Park.
C-B1	Prior to the discharge of any primary treated wet weather discharges from the AWRC, the Proponent must provide evidence to the Planning Secretary and the EPA that all reasonable and feasible measures have been implemented to minimise stormwater infiltration into the AWRC sewer catchment. This evidence must include confirmation of sewer planning, design and construction and quality assurance measures to ensure low infiltration into the AWRC sewer catchment.	3	This is an operation requirement (wet weather contingency) – not yet triggered. However, elements of this have been included in the Wet Weather Infiltration Sewer Monitoring Program which was developed by Sydney Water and submitted to DPHI and the EPA in accordance with condition E121 and E122 within the reporting period.
C-B7	Five years after the commencement of operation of Stage 1 of the CSSI, the Proponent must submit to the Planning Secretary and the EPA for information, an updated projection for when any potential future Stage 2 upgrade of the AWRC will be required to manage more than 50 ML/day ADWF, including:	3	This is a post operation requirement – not yet triggered



State Infrastructure Approval Condition No	Condition	Referred to under 2020/8816 Condition No	Additional Notes
	(a) the nature and degree of future impacts on receiving waters from the AWRC until any potential future Stage 2 upgrade occurs; and (b) whether the discharges from the future scenario in Condition C-B7(a) are protective of or contribute toward the achievement of the objectives, trigger values and/or criteria for water quality outlined in Condition C-B4(c).		



Appendix D – Copies of Correspondence Sent during Reporting Period

Cheryl Cahill

From: Cheryl Cahill
Sent: Thursday, 15 May 2025 3:31 PM
To: EPBC Monitoring
Cc: [REDACTED]
Subject: EPBC 2020-8816 Annual Compliance Report 2024-25 - Upper South Creek AWRC and pipelines Project
Attachments: Compliance report USC EPBC2020_8816_final for issue.pdf; 24447_USCAWRC_CommonwealthClearedAreas_20250305.cpg; 24447_USCAWRC_CommonwealthClearedAreas_20250305.dbf; 24447_USCAWRC_CommonwealthClearedAreas_20250305.prj; 24447_USCAWRC_CommonwealthClearedAreas_20250305.sbn; 24447_USCAWRC_CommonwealthClearedAreas_20250305.sbx; 24447_USCAWRC_CommonwealthClearedAreas_20250305.shp; 24447_USCAWRC_CommonwealthClearedAreas_20250305.shp.xml; 24447_USCAWRC_CommonwealthClearedAreas_20250305.shx

Good afternoon,

Please find attached a copy of the Annual Compliance report developed for the Upper South Creek Advanced Water Recycling Centre and Pipelines Project (EPBC 2020-8816) for the reporting period: 18 February 2024-17 February 2025, along with the shapefiles required under condition 31.

This report has also been uploaded to the project website, <https://www.sydneywatertalk.com.au/uppersouthcreek> and can be viewed under the document page, sourced here: <https://www.sydneywatertalk.com.au/53513/widgets/322594/documents/309272>

I can also provide the annual report and shapefiles via the Sigbox platform, however, my log-in credentials are currently expired and I will need them to be reset.

Please advise if you have any queries regarding this submission.

Thanks and regards,
Cheryl

Cheryl Cahill
Environment Lead
Major Projects

[REDACTED]
Level 7, 1 Smith Street
Parramatta NSW 2150

I work Monday, Tuesday, Thursday and Friday

Sydney
WATER

Cheryl Cahill

From: Cheryl Cahill
Sent: Tuesday, 24 June 2025 5:01 PM
To: [REDACTED]
Cc: Post Approval; epbcmonitoring
Subject: EPBC 2020/8816 Notification of Project modification under State Approval
Attachments: DCCEEW notification of SSI modification_240625_signed.pdf

Good afternoon,

Attached is a letter to inform the Department that a modification to the project has been approved by the NSW Department of Planning, Housing and Infrastructure. The modification was required to vary the concentration limits for treated water releases to Nepean River. The modification is considered consistent with the controlled action.

Please reach out if you have any questions or need any clarifications.

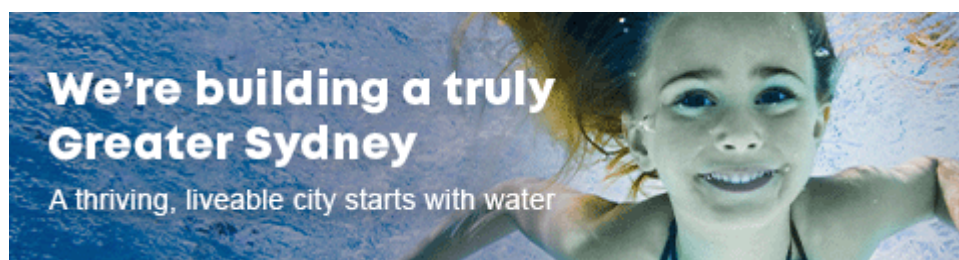
Thanks and regards,
Cheryl

Cheryl Cahill
Environment Lead
Major Projects

[REDACTED]
Level 7, 1 Smith Street
Parramatta NSW 2150

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Sydney
WATER



Sydney Water respectfully acknowledges the traditional custodians of the land and waters on which we work, live and learn. We pay respect to Elders past and present.

[Read more](#) about our commitment to reconciliation.

Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601
(sent via email to PostApproval@dcceew.gov.au, CC: James Newman)

Attn: James Newman, Harneet Puarr

26/06/2025

To whom it may concern,

Upper South Creek Advanced Water Recycling Centre (EPBC ref 2020/ 8816): Notification of modification (MOD3) to the State Approval (SSI 8609189)

Sydney Water are notifying the Department of the recent modification to the project, as exhibited in the EIS and Amendment Report, through the development of a Modification Report (MOD3) that was submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI). Whilst the EIS provided for flexibility in the project design via a staged approval process, this modification has arisen through Sydney Water's ongoing refinement of the detailed design during the construction phase.

The modification was required to vary the concentration limits for treated water releases to Nepean River to:

- account for potential impurities introduced by lime dosing of advanced treated water
- account for the risk of faecal coliform recontamination in storage tanks, pipework or sampling
- include separate limits for advanced and tertiary treated water.

Minor increases in concentrations of iron, aluminium, total suspended solids and faecal coliforms in treated water released to Nepean River were assessed downstream of the release. No additional impacts to aquatic ecology or recreational water users are anticipated compared to those assessed in the EIS. Concentrations of iron, aluminium, total suspended solids and faecal coliforms align with the waterway objectives. Overall, where additional impacts occur, they are minor, do not impact any Commonwealth protected matters or any Matters of National Environmental Significance (MNES) and do not change the significance of impacts assessed in the EIS.

MOD3 was approved as a modification to the CSSI approval by a delegate of the State Minister of Planning and Public Spaces on 20 June 2025. Minor changes to the State Approval (SSI 8609189) conditions do not impact the intent or requirements of the EPBC 2020/8816 conditions of approval. Further, the modification is considered consistent with the controlled action and the associated management action plans.

Should you have any queries in relation to this submission, please contact me on either [REDACTED]

Yours sincerely,

[REDACTED]

Cheryl Cahill

Environment Lead – Major Projects

Upper South Creek Advanced Water Recycling Centre Project

Sydney Water

Cheryl Cahill

From: Cheryl Cahill
Sent: Tuesday, 16 September 2025 6:15 PM
To: 'Post Approval'; 'epbcmonitoring'
Cc: 'James NEWMAN'; 'Harneet PUARR'
Subject: EPBC 2020/8816 - Submission of Water quality monitoring program for approval
Attachments: 2020_8816_DCCEEW letter_submission of WQMP_condition 8_signed.pdf; USC W119 Operational WQMP_for DCCEEW_for approval.pdf

To whom it may concern,

In accordance with condition 8 of the EPBC approval, 2020/8816, a Water Quality Monitoring Program (WQMP) is to be developed and approved by the Department prior to the commencement of operation. This monitoring program is attached and has been developed to address the obligations under the State Infrastructure Approval (SSI 8609189) conditions E119 and E120, as noted in the EPBC approval.

In accordance with these conditions, the WQMP has also been provided to the NSW EPA to support the operational Environmental Protection Licence that is required to support the ultimate operation of the AWRC facility.

Operation of the facility is programmed to commence in March - April 2026, prior to which the AWRC will be undergoing commissioning, operational readiness and process proving. To reduce delays to the operational commencement of the AWRC and allow time for comments to be addressed, could comments on the WQMP be returned on 17th December 2025 (3 months).

If you have any concerns with eh timeframe noted above or wish to seek clarification, please reach out on the contact details noted below.

Thanks and regards,
Cheryl

(note: previous email was recalled, as an error was noted on the return date to enable operational commencement)

Cheryl Cahill
Environment Lead
[Major Projects](#)

[REDACTED]
Level 7, 1 Smith Street
Parramatta NSW 2150

I work Monday, Tuesday, Thursday and Friday

Sydney
WATER

16/09/2025

Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601
(sent via email to PostApproval@dcceew.gov.au)

Attn: James Newman, Harneet Puarr, Warren Griffiths

To whom it may concern,

**Upper South Creek Advanced Water Recycling Centre (AWRC) (EPBC ref 2020/ 8816):
Submission of Operation Water Quality Monitoring Program for approval**

In accordance with condition 8 of the EPBC approval, 2020/8816, a Water Quality Monitoring Program (WQMP) is to be developed and approved by the Department prior to the commencement of operation. This monitoring program is attached and has been developed to address the obligations under the State Infrastructure Approval (SSI 8609189) conditions E119 and E120, as noted in the EPBC approval. In accordance with these conditions, the WQMP has also been provided to the NSW EPA to support the operational Environmental Protection Licence that is required to support the ultimate operation of the AWRC facility.

Operation is programmed to commence in March - April 2026, prior to which the AWRC will be undergoing commissioning, operational readiness and process proving. To reduce delays to the operational commencement of the AWRC and allow time for comments to be addressed, could comments on the WQMP be returned on **17th December 2025 (3 months)**.

Should you have any queries in relation to this submission, please contact me on either 0456 666 573 or Cheryl.Cahill@sydneywater.com.au.

Yours sincerely,



Cheryl Cahill

Environment Lead – Major Projects

Upper South Creek Advanced Water Recycling Centre Project

Sydney Water

16/09/2025

Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601
(sent via email to PostApproval@dcceew.gov.au)

Attn: James Newman, Harneet Puarr, Warren Griffiths

To whom it may concern,

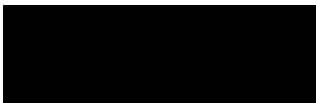
**Upper South Creek Advanced Water Recycling Centre (AWRC) (EPBC ref 2020/ 8816):
Submission of Operation Water Quality Monitoring Program for approval**

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Operation is programmed to commence in March - April 2026, prior to which the AWRC will be undergoing commissioning, operational readiness and process proving. To reduce delays to the operational commencement of the AWRC and allow time for comments to be addressed, could comments on the WQMP be returned on **17th December 2025 (3 months)**.

Should you have any queries in relation to this submission, please contact me on either 0456 666 573 or Cheryl.Cahill@sydneywater.com.au.

Yours sincerely,

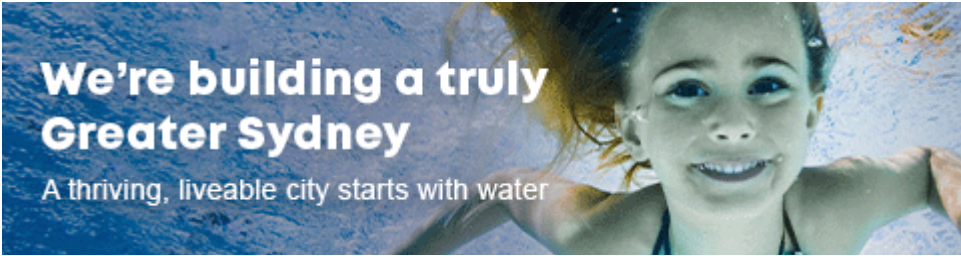


Cheryl Cahill

Environment Lead – Major Projects

Upper South Creek Advanced Water Recycling Centre Project

Sydney Water



Sydney Water respectfully acknowledges the traditional custodians of the land and waters on which we work, live and learn. We pay respect to Elders past and present.

[Read more](#) about our commitment to reconciliation.

Cheryl Cahill

From: Cheryl Cahill
Sent: Thursday, 25 September 2025 9:57 AM
To: 'Post Approval'
Subject: RE: [External] RE: EPBC 2020/8816 - Submission of Water quality monitoring program for approval [SEC=OFFICIAL]

Hi Katie,

Thanks for providing acknowledgement of receipt of the WQMP.

I understand that the Department has a high workload and review timeframes can be long, but ideally I was hoping that the review and approval of the plan could be completed by the end of the year. However, if the review cycles are sufficiently progressed within this timeframe, with feedback and updates (as needed) completed, perhaps the formal delegate approval can extend into the new year.

Hope this helps,
Cheryl

From: Post Approval <PostApproval@dceew.gov.au>
Sent: Thursday, 25 September 2025 9:50 AM
To: [REDACTED]
Subject: [External] RE: EPBC 2020/8816 - Submission of Water quality monitoring program for approval [SEC=OFFICIAL]

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

OFFICIAL

Hi Cheryl

Thank you for your email regarding EPBC approval 2020/8816 . Your request has been received and will be handled by NSW, ACT, Vic and Tas Post Approvals. Once the request has been allocated to an assessment officer they will be in contact if further information is required to progress the assessment.

I note that you have asked for comments by 17 December. As the Water Quality Management Program will need to be approved by the delegate, the process involves a period of assessment – where departmental comments are provided and iterations of the plan can occur – and then once the department is satisfied, a briefing package is submitted to the delegate for review and decision. So, for clarification, are you seeking a first round of comments on the plan from the department by 17 December or the actual decision by that date?

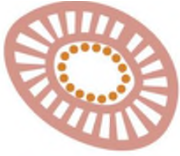
This clarification will help us in prioritising your request. We are currently experiencing high demand for our services which is resulting in delays in progressing submissions, so any further information around this will be helpful.

Many thanks,
Katie

Katie Tangney
Assistant Director

Environment Regulation Division | Environment Assessments (Vic, Tas) and Post Approvals Branch | Post Approvals Section (NSW, ACT, Vic, Tas)
Department of Climate Change, Energy, the Environment and Water
P [REDACTED]
Work days: Monday -Thursday

DCCEEW.gov.au ABN 63 573 932 849



We acknowledge the Traditional Owners of country throughout Australia and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past and present.

OFFICIAL

From: Cheryl Cahill <CHERYL.CAHILL@sydneywater.com.au>

Sent: Monday, 22 September 2025 12:45 PM

To: [REDACTED]

Subject: RE: EPBC 2020/8816 - Submission of Water quality monitoring program for approval

Good afternoon,

Just following up on the transmittal of the WQMP for the Upper South Creek AWRC project.

Wanted to confirm receipt of the plan and expectations on the timeframe for any comments/ approval.

The WQMP was submitted to the State Department (DPHI) in accordance with the State Infrastructure Approval and has since been accepted with no further comments (noting minor revision expected on receipt of operational licence from NSW EPL). See attached.

Happy to discuss on contact details noted in email chain below.

Thanks and regards,
Cheryl

From: Cheryl Cahill

Sent: Tuesday, 16 September 2025 6:15 PM

To: [REDACTED]

Subject: EPBC 2020/8816 - Submission of Water quality monitoring program for approval

To whom it may concern,

In accordance with condition 8 of the EPBC approval, 2020/8816, a Water Quality Monitoring Program (WQMP) is to be developed and approved by the Department prior to the commencement of operation. This monitoring

program is attached and has been developed to address the obligations under the State Infrastructure Approval (SSI 8609189) conditions E119 and E120, as noted in the EPBC approval.

In accordance with these conditions, the WQMP has also been provided to the NSW EPA to support the operational Environmental Protection Licence that is required to support the ultimate operation of the AWRC facility.

Operation of the facility is programmed to commence in March - April 2026, prior to which the AWRC will be undergoing commissioning, operational readiness and process proving. To reduce delays to the operational commencement of the AWRC and allow time for comments to be addressed, could comments on the WQMP be returned on **17th December 2025** (3 months).

If you have any concerns with the timeframe noted above or wish to seek clarification, please reach out on the contact details noted below.

Thanks and regards,
Cheryl

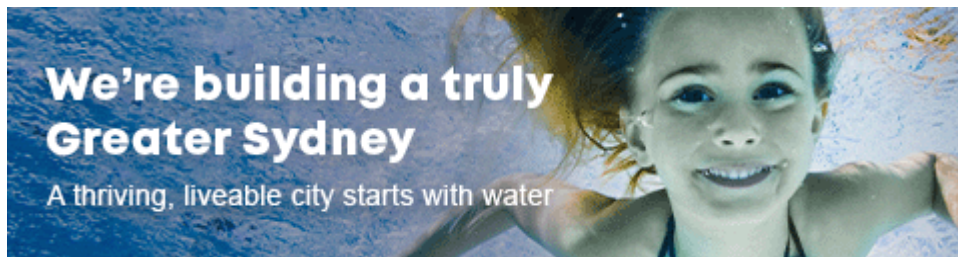
(note: previous email was recalled, as an error was noted on the return date to enable operational commencement)

Cheryl Cahill
Environment Lead
Major Projects



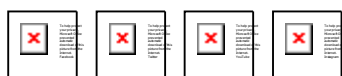
Level 7, 1 Smith Street
Parramatta NSW 2150

I work Monday, Tuesday, Thursday and Friday



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[Read more](#) about our commitment to reconciliation.



Our ref: SSI-8609189-PA-164

Cheryl Cahill
Environment Lead – Major Projects
Sydney Water Corporation
1 Smith Street
Parramatta NSW 2150

22 September 2025

**Subject: Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-164) –
Conditions E119 and E120 – Operational Water Quality Monitoring Program**

Dear Mrs Cahill,

I refer to your submission of the revised Operational Water Quality Monitoring Program (WQMP) (revision 2, dated 15 September 2025) under conditions E119 and E120 of the Upper South Creek Advanced Water Recycling Centre project (SSI-8609189). I also acknowledge your response to the Department's request for additional information.

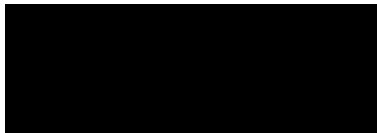
The Department acknowledges receipt of the WQMP and has no further comments on the document at this time. The Department understands the WQMP will be further revised upon receipt of any operational Environmental Protection Licence (EPL) issued by the NSW Environment Protection Authority (EPA) for the project. Please resubmit a revised version of the WQMP to the Department for information, once the final WQMP has been updated to address the relevant operational EPL requirements.

You are reminded that if there are any inconsistencies between the WQMP and the conditions of approval, the conditions prevail.

Please ensure you make the document publicly available on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact me on [REDACTED] or at [REDACTED]

Yours sincerely



Nathan Heath
A/Team Leader
Transport and Water Assessments

As nominee of the Planning Secretary