

Table 1: Response to Audit Findings – Following completion of Audit undertaken 29th April 2025

CoA No	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponents Proposed Action	Proposed Due Date
Non- Compliances (identified in audit period)					
	No non-compliances were identified by the Auditor or reported within the audit period by Sydney Water or John Holland Group				
Recommendations/ Observations					
NA	The recommendation is not linked to any specific condition. The Environment Protection Licence is referenced throughout the conditions of consent and is a key approval for the construction and operation of the Project.	<p>Construction of pipeline activities is now complete and construction compounds have been demobilised. The completion of these activities and the rehabilitation of creeks, disturbed areas and the demobilisation of site compounds has effectively eliminated construction related impacts including noise, vibration, dust and water quality in these locations.</p> <p>Construction activities are being undertaken in accordance with Environmental Protection Licence (EPL) 21800, held by John Holland. The premises map associated with this EPL are provided on the project website and include the pipelines and associated work compounds that have now been demobilised.</p> <p>The project undertakes regular reviews of the EPL premise maps as construction progresses to identify locations where it is appropriate to descope them from the current version of the maps. This activity is undertaken within the following context:</p>	<p>As no further construction activities are planned for the pipelines or demobilised compound sites, it is appropriate that the EPL premises are revised to exclude these areas from the EPL.</p> <p>It is recommended the premise maps are revised and resubmitted to EPA as appropriate and placed on the project website.</p> <p>It is also recommended the Pollution Incident Response plan, required by the EPL is reviewed and update to exclude the pipeline works and reflect the activities undertaken at the AWRC site.</p>	<p>As noted, JHG (as licensee) undertakes regular reviews of the EPL premise maps as construction progresses to identify locations where it is appropriate to descope them from the current version of the maps. This activity is undertaken following confirmation from the CPESC that there is adequate stabilisation prior to removing any remaining controls and with consideration of final site restoration arrangement, which may require access to site.</p> <p>The premise maps will be reviewed by end of July, during which time it is also expected that the EPL will be transferred to Sydney Water.</p>	31/07/2025

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		<ul style="list-style-type: none"> • support from the project CPESC to confirm that there is adequate stabilisation prior to removing any remaining controls • closing out final site restoration arrangement as agreed with the relevant landowner, where relevant, which may require access to site 			
E79	<p>A Detailed Site Investigation Report must be submitted to the Planning Secretary upon request following the completion of the Detailed Site Investigation(s) required by Condition E78.</p> <p>The Detailed Site Investigation Report must be prepared in accordance with:</p> <p>(a) the land use criteria applicable to the final land use at the opening of Stage 1 of the CSSI. Where the final land use is unknown the most stringent criteria for the land use assumed in the documents listed in Condition A1 is to be applied; and</p> <p>(b) relevant guidelines made or approved by the EPA under section 105 of the CLM Act</p>	<p>At the time of the Audit, a detailed site investigation and report was completed for the AWRC site with soil contamination testing completed for the pipelines section. The Auditor was advised (at the time of the audit) it was proposed to address the requirement for the pipelines DSI through the preparation of a separate soils validation report that would be issued to the NSW EPA Accredited Site Contamination Auditor in accordance with condition E74 (g). This would facilitate the issue of a Section A1 or A2 Site Audit Statement in accordance with condition E85.</p> <p>The Auditor understands:</p> <ul style="list-style-type: none"> • The EPA Site Auditor is satisfied with the technical aspects of this approach, although this has not been formally confirmed 	<p>For compliance with conditions E79 and E81 to be achieved:</p> <ul style="list-style-type: none"> • Justification of the above approach should be submitted to and agreed by DPHI • Subject to agreement with DPHI, the soils validation report is issued to the EPA Accredited Site Auditor in accordance with condition E74 (g) <p>The Auditor notes that Condition A15 provides an opportunity to combine strategies, plans and programs.</p> <p>The Auditor will undertake further assessment of the compliance status of this</p>	<p>The strategy for the preparation of the Pipelines DSI was detailed in the Remediation Action Plan developed for the pipelines, which was accepted by the auditor (as noted in IAA L10) and provided to DPHI for information.</p> <p>Since the audit, a draft Pipelines DSI has been developed and is currently under review and will be sent to the EPA accredited site auditor once final. This will also form part of the Site Validation Report, where it will be accompanied by additional spoil classification information pertaining to the spoil excavated along the</p>	31/08/2025

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	<p>including Consultants Reporting on Contaminated Land: Contaminated Land Guidelines (NSW EPA 2020).</p> <p>The report must be prepared by a Contaminated Land Consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.</p>	<ul style="list-style-type: none"> This approach has been endorsed by the JHG hygienist and documented in the Remedial Action Plan for the pipelines. 	<p>condition during the next Independent Environmental Audit pending the implementation of the above recommendation (or other actions taken by SWC/JHG) and the Auditors review of any correspondence with DPHI in the next Audit period relating to this condition.</p>	<p>pipelines outside the AECs and other records.</p> <p>SWC and JHG will review the recommendation to seek agreement from DPHI on combining strategies by 31/08/2025. Clarification on the interpretation of these conditions has already been requested from DPHI in correspondence sent 05/05/2025. No formal response has been received to date.</p>	
E81	<p>Detailed Site Investigation Reports must be reviewed by the NSW EPA accredited Site Auditor in accordance with Condition E74 and all recommendations made by the NSW EPA accredited Site Auditor implemented before Work commencing that could result in any disturbance of any land confirmed as a moderate to high-risk area of potential contamination by the</p>				

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