

Table 1: Response to Audit Findings – Following completion of Audit undertaken 9th April 2026

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					
A2	Stage 1 of the CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	<p>The Auditor notes that the project is reaching its final stages of construction with commissioning and operational activities to commence thereafter. The change in project stage will:</p> <ul style="list-style-type: none"> necessitate a shift in the projects risk profile from construction to operational related risks result in a likely change in project personnel and organisational responsibility for managing environmental and compliance outcomes 	<p>Based on the Auditors experience, the following recommendations are made:</p> <ul style="list-style-type: none"> Review approval conditions, the CEMP and specialist subplans, and close out any construction related obligations. Keep a register of closeout items Review and retire any construction related environmental management plans and communicate this to DPHI prior to the commencement of operations. Remove retired management plans from the Project website. Induct any new personnel/organisations into the compliance obligations 	<p>As the Project nears completion, many of these recommendations will be actioned, including:</p> <p>The project compliance tracking program will be updated and maintained to use as a handover instrument, noting conditions that are compliant and fully implemented and those that will be outstanding and need to be monitored and managed during operation.</p> <p>The CEMP and sub plans will be retired, as they are construction plans. Environmental management for the project will then be managed under the OEMP and Sydney Water's/ Trility's EMS (dependent on location, with the facility to be managed by Trility).</p> <p>The contents of the Project website will be maintained for 24 months post construction in accordance with condition B12.</p> <p>Personnel involved in operational management and compliance matters will be inducted, as Trility will have a</p>	Prior to operation, currently forecast for Q1 2027.

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				separate induction for the facility once operation commences.	
A48	The CSSI name; application number; telephone number, postal address and email address required under Condition B8 of this approval must be made available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also be provided on the website required under Condition B12 of this approval.	On the day of the inspection, the signage was not in place. It was noted that the fence that the sign was attached to had been removed temporarily by the landscaping contractor. As noted in previous Audits, the sign was previously installed on ATF fencing prior to the commencement of construction and was observed to be in place during previous Audit inspections.	The project is still in construction and it is recommended that the sign is re-instated for the remainder of the project to ensure stakeholders are aware of project and contact details	Project CSSI sign will be reinstated and maintained at the entrance to the main AWRC compound until operation commences.	Reinstatement of sign by 30/06/2026
E19	The Proponent must prepare a Rehabilitation Management Plan to revegetate and restore impacted RBM 12 red-hatched lands at Kemps Creek, mapped within the amended impact assessment area at Appendix B. Rehabilitation must occur as soon as practical after construction of the brine pipeline mapped at Appendix B, or as otherwise agreed with relevant landowner(s) or EHG.	As noted during the previous Audit, CPHR have expressed concerns to SWC regarding rehabilitation works and the RBM12 site. During the Audit period, CPHR have met with DPHI twice to work through their concerns. Constraints to meeting CPHR expectations include land ownership and property owner activities that impact the success of rehabilitation. SWC appear to be taking reasonable steps to resolve the issue, including investigating alternatives that may be acceptable to DPHI and CPHR. At the time of the Audit the issue had not been resolved, however SWC appear to have committed to working collaboratively with CPHR and DPHI to progress a practical and compliant resolution. This may include a further project modification. In the meantime, JHG are continuing to maintain the existing established plants in accordance with the RBM12 RMP, noting the landowner constraints.	Continue to work with CPHR and DPHI to reach a practical solution that all parties are satisfied with.	Resolution of the issues at RBM12 is ongoing and the Project will be guided by advice received from DPHI, who are liaising with CPHR. SWC and JHG will work together to seek an outcome to resolve the longstanding landowner constraints.	Prior to operation, currently forecast for Q1 2027.

