



Independent DPHI Compliance Audit

SSI-8609189 – Upper South Creek Water Recycling Centre

Trigalana Environmental Pty Ltd
26 June 2025

Independent Environmental Audit 4

**SSI-8609189 – Upper South Creek Advanced
Water Recycling Centre**

Trigalana Environmental Pty Ltd
Audit Date: 29 April 2025

Independent Environmental Audit 4

SSI-8609189 – Upper South Creek Advanced Water Recycling Centre

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Executive Summary

Trigalana Environmental Pty Ltd has been engaged by Sydney Water Corporation (SWC) (the Proponent) to undertake the 4th Independent Environmental Audit (IEA) of the Upper South Creek Water Advanced Water Recycling Centre (AWRC), identified as Critical State Significant Infrastructure (CSSI) 8609189 (the Project).

This report presents the findings of the 4th IEA (IA4) and covers the period from the site inspection for the 3rd IEA on 28th October 2024 to the date of the site inspection for this 4th IEA on 29 April 2025. The audit included a site inspection, consultation with Project stakeholders and a review of management plans, documents, and management records.

The Project was approved by the Minister for Planning on 28th November 2022. The Project involves the concept and Stage 1 construction and operation of the AWRC at Kemps Creek, that will provide a centralised wastewater service to enable development of the Western Sydney Aerotropolis Growth Area (WSAGA) and Southwest Growth Area (SWGA). The CSSI concept involves the staged development of the Upper South Creek AWRC operating to treat an average dry weather flow of up to 100 ML/day at ultimate capacity.

The Stage 1 development of the Upper South Creek AWRC is the focus of this audit and involves construction and operation of:

- A sewage treatment plant at Kemps Creek, sized to treat an average dry weather flow of up to 50 ML/day during Stage 1
- Approximately 17 kilometres (km) of pipeline for the transmission of treated effluent from the AWRC to the Nepean River at Wallacia (treated water pipeline)
- Approximately 24 km of pipeline for the transmission of brine from the AWRC to the sewage reticulation system at Lansdowne
- New infrastructure from the AWRC to South Creek, to release excess treated effluent and stormwater during significant wet weather events
- A new green space area around the AWRC, adjacent to South Creek and Kemps Creek
- Energy generation and resource recovery activities, including renewable energy generation from solar panels and/or co-generation, and production of biosolids for beneficial re-use.

The purpose of this audit was to undertake an assessment and review of compliance with CSSI 8609189 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan (CEMP) and Sub-plans. Specifically, this audit was required to satisfy Condition A37 of CSSI 8609189 which requires Independent Audits of Stage 1 of the development to be carried out in accordance with the Independent Audit Department of Planning, Housing and Infrastructure (DPHI) Independent Audit Post Approval Requirements (IAPARs), 2020.

The findings of the audit are:

- Activities undertaken at the time of the audit include construction activities at the AWRC site. Works on the brine and treated water pipeline are complete and associated construction risk (noise dust and traffic) have been effectively eliminated
- Key environmental issues including erosion and sediment control, dust, traffic, heritage, biodiversity, working hours noise and vibration are being managed effectively and in general accordance with the approved Construction Environmental Management Plan (CEMP) and specialist Sub-plans
- A total of **218** conditions were assessed. No non compliances were identified during the audit. Appropriate actions have been taken to address non compliances and recommendations made by the previous audit
- Two recommendations are made by this audit, in relation to contamination investigations and the Environment Protection Licence premises maps
- Two key strengths were identified relating to proactive stakeholder engagement and a high standard of rehabilitation of riparian areas

- A total of 3 complaints have been received during the audit period; appropriate actions have been taken by SWC/JHG to address each complaint. The complaints management system appears to be effective
- Independent appointments including the Environmental Representative (ER) and the Acoustics Advisor (AA) are performing their respective roles in accordance with the Conditions of Approval
- The environmental impacts observed during the audit are generally within the predictions made in the EIS; work was observed to be within the EIS Project boundary.

In summary, a high standard of environmental and compliance performance has been achieved to date with SWC and the contractor, John Holland Group (JHG) able to demonstrate the effective implementation of Project systems and management plans for the current stage of construction.

IAPAR Compliance Table

Table 1 demonstrates how the requirements of the IAPARs have been met in this audit report.

Table 1: Independent Audit Post Approval Requirements (IAPARs) compliance table

Section	IAPAR Requirement	Addressed
Introduction		
4.2.1	• Background of the project	Sections 1.1 and 1.2
	• Audit team (including qualifications and experience)	Section 1.5
	• Audit objectives	Section 1.6
	• Audit period and scope	Section 1.7
Audit Methodology		
4.2.2	• Documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s)	Appendix A
	• How the audit scope was developed	Section 2.1
	• A summary of the audit process adopted to determine the compliance status and assess if documents are adequate	Section 2.3
	• Details of site inspections undertaken	Section 2.5 Appendix D
	• Site personnel interviewed including their name and position title	Section 2.4
	• Meanings of compliance status descriptors used, as set out in this document.	Section 2.9
	• A summary of the consultation undertaken	Section 3.7
	• A list of the approvals and documents audited	Appendix B
4.2.3	• A summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances	Section 3.1
	• Exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique noncompliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance	Section 3.1
	• Brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action	Section 3.2
	• A brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement	Section 3.2

Section	IAPAR Requirement	Addressed
	<ul style="list-style-type: none"> Other matters considered relevant by the auditor 	None Identified
	<ul style="list-style-type: none"> Documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation 	Section 3.4
	<ul style="list-style-type: none"> A summary of complaints and the adequacy of responses to and management of complaints 	Section 3.3
	<ul style="list-style-type: none"> Details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents 	Section 3.4
	<ul style="list-style-type: none"> An assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development 	Section 3.5
	<ul style="list-style-type: none"> Evidence collected through site inspections undertaken during the audit 	Section 2.5
	<ul style="list-style-type: none"> Evidence to support compliance assessments by personnel during the audit 	Appendix B
	<ul style="list-style-type: none"> A brief discussion of any continual environmental management improvement opportunities identified as part of the audit 	Section 3.1
	<ul style="list-style-type: none"> Key strengths of the developments environmental management system and performance identified by the auditor. 	Section 3.1
4.2.4	<ul style="list-style-type: none"> Recommendations and opportunities for improvement 	Section 3.1
Appendices		
4.2.5	<ul style="list-style-type: none"> A copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 	Appendix A
	<ul style="list-style-type: none"> A completed Independent Audit Table with all relevant conditions of consent, identifying each requirement with compliance status assessed 	Appendix B
	<ul style="list-style-type: none"> Documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee 	Appendix C
	<ul style="list-style-type: none"> Completed and signed Independent Audit Declaration Form(s); 	Appendix E
	<ul style="list-style-type: none"> Any reports prepared by the agreed technical specialist(s), as required 	Not Applicable

1 Introduction

This report presents the findings of the Independent Environmental Audit (IEA) of the Upper South Creek Water Advanced Water Recycling Centre (AWRC) identified as Critical State Significant Infrastructure (CSSI) 8609189 (the Project). The IEA was conducted by Trigalana Environmental Pty Ltd and covers the period from the site inspection for the 3rd IEA on 28th October 2024 to the date of the site inspection for this 4th IEA on 29 April 2025. This IEA has been carried out in accordance with the Department of Planning, Housing and Infrastructure (DPHI) Independent Audit Post Approval Requirements (IAPARs), 2020.

1.1 Project overview

The AWRC will provide wastewater services for the Western Sydney Aerotropolis Growth Centre and Southwest Growth Area. The Project is being constructed in the Penrith, Canterbury - Bankstown, Wollondilly Shire and Fairfield City local government areas and includes:

- A new Advanced Water Recycling Centre (AWRC) to collect and treat wastewater from businesses and homes
- The production of 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 between 3 – 14 days per annum
- 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.

Figure 1 shows the approved Project as described in the EIS.

1.2 Project Approval

The Project is designated State Significant Infrastructure (SSI) and was subject to an Environmental Impact Statement (EIS). The EIS, with accompanying documents were publicly displayed between 21 October and 17 November 2021. Following public display, response to submissions and further studies, the Project was approved by the NSW Minister for Planning on the 28 November 2022. The Project instrument of approval (SSI 8609189) documents 219 conditions that are to be complied with during the construction and operational phases of the Project.

Following Project determination, the Project Approval was modified as follows.

- **SSI-8609189-Modification 1 (26 May 2023):** Removal of the 4.5km environmental flows pipeline from the Project approval. This included removing the trenched and tunnelled sections of pipeline and release structure at Warragamba River
- **SSI-8609189-Modification 2 (10 October 2023):** Realignment of the treated water and brine pipelines and relocation of the flow, splitter structure and valve station, and the addition of temporary underbore return lines for the HDD crossings at the Nepean River, Jerrys Creek and Badgerys Creek during construction

At the time of this Audit, a third modification had been submitted to DPHI, to revise operational concentration limits, however had not been determined.

1.3 Supplementary Approvals and Licences

In addition to the Planning Approval, several other approvals have been obtained as follows.

- Commonwealth Controlled Activity Approval (EPBC 2020/8816) administered by the Commonwealth Department of Climate Change, Energy, Environment and Water (DCCEW)

- Environment Protection Licence 21800, administered by the NSW Environment Protection Authority (NSW EPA).

1.4 Construction Activities

Pre-construction (low impact works) commenced on 20th February 2023 with Construction commencing on 28th of August 2023. [Table 2](#) describes the pipeline construction phases and key activities that are being undertaken progressively and are at different stages along the project alignment.

Table 2: Pipeline Construction Phases and Key Activities

Phase	Key Activities
Phase 1 – Site Establishment	<ul style="list-style-type: none"> • Low impact works at the AWRC site including geotechnical and utility investigations, contamination testing and heritage salvage works • Removal of existing structures (AWRC) • Install traffic control and delineate site • Traffic control • Ancillary construction works such as roads, site compounds and fencing • Plant and equipment delivery • Clearing.
Phase 2 – Excavation	<ul style="list-style-type: none"> • Excavate trenches, drilling pits (trenchless construction) and install shoring • Dewater excavation • Waste disposal.
Phase 3 – Pipe Installation	<ul style="list-style-type: none"> • Pipe delivery and placement of the section of the pipes near the trench in a line (pipe stringing) • Field bending of pipe • Welding of each section of pipe together into one continuous length • Pipe lowering into trench • Pulling pipe through bore (trenchless construction) • Backfilling • Inspection and test of pipes.
Phase 4 - Commissioning	<ul style="list-style-type: none"> • Pipe pressure testing and disinfection • Discharging commissioning wastewater.
Phase 5 – Landscaping and restoration	<ul style="list-style-type: none"> • Topsoil placement and restoration.

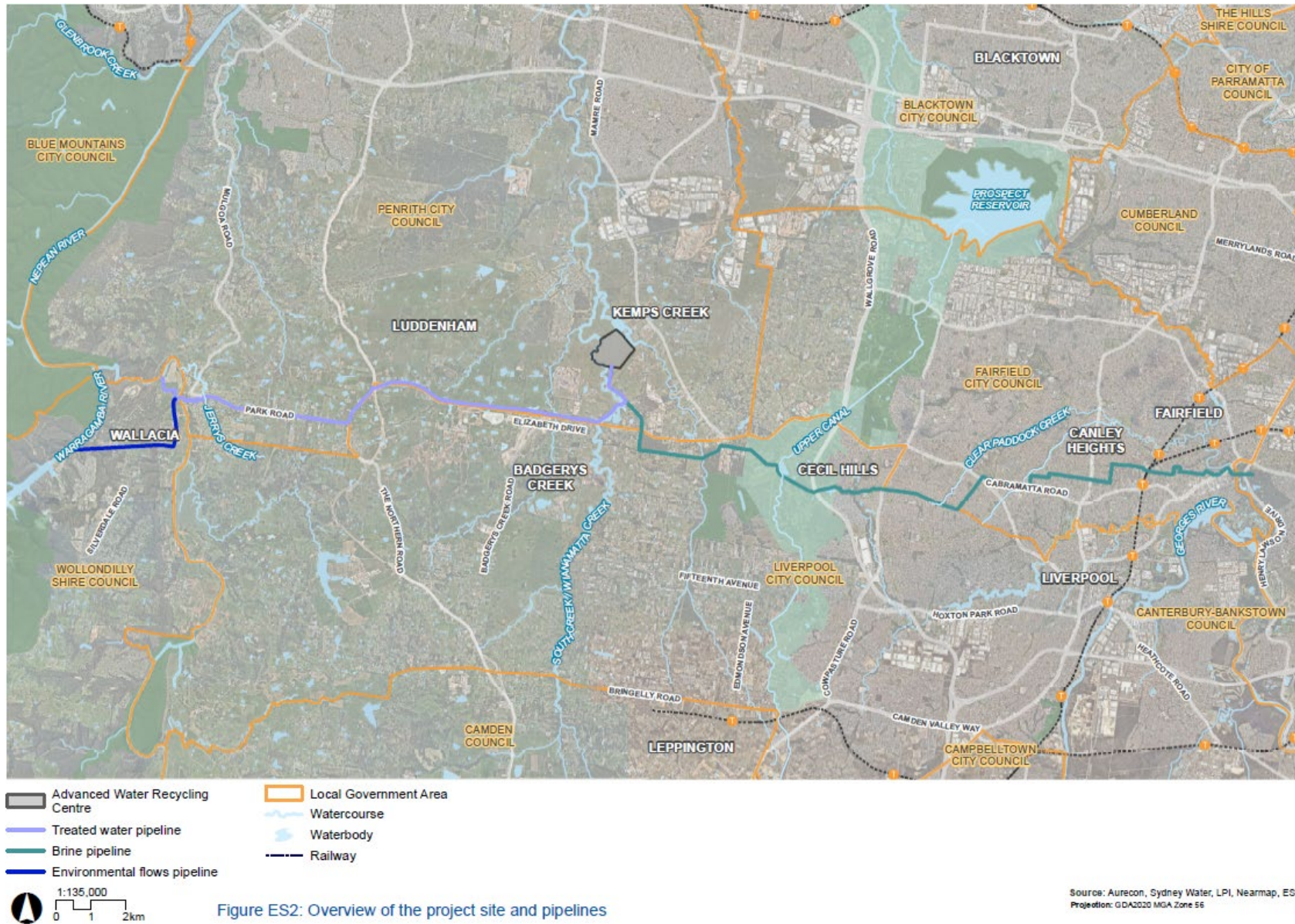


Figure 1: Project Location as described in the EIS

1.5 Audit Team

Trigalana Environmental Pty Ltd has been appointed to undertake this IEA. The Auditor was approved by DPHI in accordance with Condition A38. Details of the Auditor are provided in [Table 3](#).

Table 3: Audit Team

Name and Role	Qualifications	Key Experience
Richard Peterson – Lead Auditor	B. E Civil M. Environmental Management Management Systems Auditing Leading Management Systems Audit teams Exemplar Global Lead Auditor	27 years of environmental management experience in the infrastructure sector. Has undertaken over 100 audits including independent DPHI audits for major infrastructure Projects including: <ul style="list-style-type: none"> • M7 M12 upgrade • EnergyConnect - Western • Crudine Ridge Windfarm • Sapphire Windfarm • Rye Park Windfarm • Albion Park Bypass • Walla Walla Solar Farm • Warrell Creek to Nambucca Heads • Northern Road upgrade • Tweed Valley Hospital • Windsor Bridge.

The DPHI Letter of approval for the Auditor is provided in Appendix A.

1.6 Audit Objectives

The key objective of the IEA was to assess compliance of the Project with the Ministers Conditions of Approval (MCoA) (SSI 8609189), and the implementation of management plans as outlined in the MCoA. The audit aims to recognise good practices while providing practical and reasonable recommendations for improvement that can be implemented throughout the Project as construction progresses.

1.7 Audit Scope and Period

This is the 4th IEA for the Project. This audit has been undertaken in accordance with Condition A37 of the MCoA as outlined in [Table 4](#).

Table 4: Independent Audit – Requirements

Condition Reference	Condition	Comment
A37	Independent Audits of Stage 1 of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020)	This audit was undertaken within six months of the date of the site inspection of the 3rd IEA on 28th October 2024 and in accordance with the IAPARs. Table 1 demonstrates how this Audit meets the requirements of the IAPAR's.

2 Audit Methodology

2.1 Scope Development

The audit scope was developed in consideration of:

- NSW DPHI Independent Audit Post Approval Requirements (May 2020)
- Project Conditions of Approval (SSI 8609189) as modified, dated 10 October 2023
- Stakeholder feedback from relevant government agencies including:
 - DPHI
 - NSW EPA
 - Heritage NSW
 - Local Councils
 - Transport for NSW.

The scope of the audit did not include an assessment of compliance with any supplementary approvals or licences.

2.2 Stakeholder Consultation – Key Issues

In undertaking the audit, key issues raised by the government agencies groups that are relevant to the audit are summarised in Section 3.4.

2.3 Summary of Audit Processes

To complete the audit, the following was undertaken:

- Opening Meeting
- Site inspection, noting environmental practices and controls
- Audit Interviews
- Review of documents and records
- Closing meeting.

2.4 Opening and Closing Meetings

An opening meeting was held on site on 29th April 2025 where the Auditor provided an overview of the audit process and confirmed the agenda for the audit. The following people were in attendance:

- Cheryl Cahill, Environmental Lead, Sydney Water
- Kate Bavor, Environmental Graduate, Sydney Water
- Alyce Harrington, Environment and Approvals Director, John Holland

The closing meeting was held following the site inspection and audit interview, where the Auditor noted observations and recommendations as well as the process for finalising the audit report.

2.5 Site Inspection

A site inspection was undertaken on Tuesday 29th April 2025. The weather was generally fine with some rain intermittent patches of rain throughout the day. Active works being undertaken at the time of the inspection included:

- Concrete pours, plant and equipment fitout, building construction, materials and waste storage at the AWRC Site
- Progressive implementation and maintenance of environmental controls, internal access roads, fencing etc
- Permanent landscaping and maintenance of the riparian area at the Vegetation Management Plan Zone (adjacent to the AWRC site) and the RMB 12 site
- At the time of the audit site inspection the following works were complete:
 - Construction of both the brine and treated water pipelines
 - Permanent creek crossings including scour protection
 - Rehabilitation work along the pipelines and creek crossings
 - Demobilisation of construction compounds
 - Installation of the solar farm at the AWRC.

Observations made during the site inspection are presented in [Table 5](#). A photographic record of observations made during the site inspection is provided in Appendix D.

Table 5: Site inspection observations

Location	Notes	Photograph Ref (Appendix D)
Advanced Water Recycling Centre (AWRC)		
Main Construction Site	<ul style="list-style-type: none"> Construction of digesters, sludge thickening, polymer storage, brine tanks and the membrane bioreactor was underway with external concrete structures nearing completion The installation of mechanical components (pipe systems) had commenced The internal haul road was constructed with stabilised DGB. A 10km per hour speed restriction was imposed to reduce dust A water cart was in operation to suppress dust on active haul roads. Dust was not noticeable issue at the time of the site inspection A High Efficiency Structure (HES) had been constructed and was operational at the time of the audit inspection Hazardous chemicals including flammable liquids were separated, segregated and labelled and stored within a bunded and ventilated container Mobile bunds were utilised for short term spill protection at work fronts Spill kits were provided to clean up any spilt material Carparking areas were hardstand to prevent erosion and dust generation. Tree protection zones (TPZ's) were established with no materials observed to be stored within the TPZ's. Car park lighting was low level and directed downwards Stockpiles and formation batters have been stabilised to minimise dust generation and erosion. Irrigation systems was provided to promote ground cover growth Compliant advisory signage was observed at the site entrance Evidence of weed management was observed Appropriate waste and recycling facilities were provided on site Wastes were segregated and labelled to maximise recycling opportunities. 	1-12
Vegetation Management Plan Zone (VMPZ)	<ul style="list-style-type: none"> Plantings were in a relatively juvenile state An irrigation system had been installed to ensure the health and viability of plantings Fauna fences were installed Jute mesh and coir logs were provided around the creek banks to promote bank stability and prevent erosion Felled timber from project clearing activities has been retained for re-use as habitat enhancement The AWRC outlet channel was under construction with erosion and sediment controls consisting of rock (lined channel) and a water quality boom with silt curtain attachment within South Creek. 	13-23
Pipelines		
RMB 12 Site	<ul style="list-style-type: none"> Waterway crossing of Kemps Creek had been restored. Rock had been placed within the creek to provide stabilisation and scour protection 	23-28

Location	Notes	Photograph Ref (Appendix D)
	<ul style="list-style-type: none"> Small trees were planted within a wire and stake protection structure Previously disturbed areas for pipeline construction have been rehabilitate with a high level of groundcover observed. 	
South Creek Restoration Works	<ul style="list-style-type: none"> Waterway crossing of South Creek had been restored. Rock had been placed within the creek to provide stabilisation and scour protection Previously disturbed areas for pipeline construction have been rehabilitate with a high level of groundcover observed. 	29-32

2.6 Document Review

In undertaking the audit, a broad range of documents were reviewed or referred to including:

- Project conditions of approval (SSI 8609189)
- Project Environmental Impact Statement
- Environmental Management Plans, developed in accordance with the Project Conditions
- Correspondence with relevant authorities
- Consultation records
- Specialist reports
- Records of implementation of the environmental management plans including checklists, inspection reports, waste records etc.

A detailed list of the documents reviewed in undertaking the audit is provided in Appendix B - Audit Table.

2.7 Compliance Descriptors

The compliance status of each condition was determined using the relevant descriptors as described in the IAPARs and summarised in [Table 6](#).

Table 6 - Compliance Descriptors

Status	Description
Compliant (C)	Sufficient verifiable evidence to demonstrate that all elements of the requirement have been completed
Non- Compliant (NC)	One or more specific elements of the conditions or requirements have not been complied with within the scope of the audit
Not Triggered (NT)	A requirement has an activation or timing trigger that has not been met at the time when the audit was undertaken

3 Audit Findings

3.1 Compliance Performance

A summary of compliance performance is provided in [Table 7](#). [Table 8](#) provides details of non-compliances, observations and recommendations.

Table 7: Compliance summary

Section	Number of Conditions	Compliant	Non-Compliant	Not Triggered
A	48	39	0	9
B	12	12	0	0
C	18	18	0	-
D	4	0	0	4
E	136	86	0	50
Total	218	155	0	63

Table 8: Non-compliances, Observations and Recommendations

Condition No.	Details of Condition	Auditor Observations	Recommendation for Improvement	Finding
Non-compliances identified by the auditor				
N/A	N/A	No non- compliances were identified by the Auditor.	N/A	N/A
Non compliances identified by SWC/JHG				
N/A	N/A	No non- compliances were identified by Sydney Water or John Holland Group	• N/A	N/A
Observations and recommendations made by the Auditor				
N/A	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> <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. 	<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>	Observation

Condition No.	Details of Condition	Auditor Observations	Recommendation for Improvement	Finding
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 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>	<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 This approach has been endorsed by the JHG hygienist and documented in the Remedial Action Plan for the pipelines. 	<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 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>	Observation
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 NSW EPA accredited Site Auditor.</p>			

3.2 Summary of Agency Notices, Orders, Penalty Notices and Prosecutions

There have been no agency notices, orders, penalty notices or prosecutions received during the Audit period.

3.3 Community Complaints

During the audit period, a total of 3 community complaints were received. This represents a significant decrease in the frequency of complaints from previous audit periods reflecting the eliminated noise, vibration, dust, property, access and traffic risks now the pipeline activities are complete, and site compounds have been demobilised. Details of complaints received, and actions taken are summarised in Table 9. Implementation of the complaints management procedure appears to be effective.

Table 9: Complaints summary and actions taken

Date	Details of Complaint	Action taken
10/12/24	Noise from the AWRC site	The site supervisor reinforced with the site crew to minimise noise generation to reduce impacts to adjacent neighbours. The resident was advised of JHG's immediate actions and provided a general update on that specific scope of works. Noise monitoring was offered however this was not taken up by the resident. The resident was satisfied with the update.
18/3/25	Loose pit lids rattling as cars drive over them	More cushioning installed under the pit lids with a reduction in noise when vehicles drove over. Further inspection of the lids was undertaken to evaluate whether tightening of the lid was required. Resident was contacted and provided with the details of the actions taken.
18/3/25	Loose pit lids rattling as cars drive over them	Lids were repaired and the resident advised that she noticed a significant difference. The resident thanked the team for their assistance.

3.4 Environmental Events

SWC/JHG maintain an environmental events register which identifies and tracks the close out of outstanding actions, incidents, environmental events or non-conformances, as well, unexpected finds and report only events.

Based on the information provided in the events register, the Auditor has concluded that none of the events reported have resulted in potential or actual environmental harm (and are therefore not classified as an incident in accordance with the Consent), therefore there is no requirement to notify the Department or the NSW EPA of these events.

3.5 Actions from previous audits

The status of implementation of the recommendations from the third IEA, October 2024 has been included in Table 10.

Table 10: Actions from the previous IEA

Condition No.	Summary of Non-Compliance/Observation	Previous Recommendation	Evidence of implementation / Status
Non-Compliances identified by the Auditor during the previous audit period			
N/A	N/A	No non- compliances were identified by the Auditor during the previous audit period	N/A
Self-Reported Non-Compliances during the previous audit period			
C12	<p>During an ER inspection on 2/9/24 dust was observed being generated at numerous locations across the site due to a combination of high winds and dry ground conditions. The ER considered there was insufficient priority of resourcing and application of dust mitigation to assist with the management of dust at the locations observed, including at Fowlers Farm and the C6 Compound at Wallacia.</p> <p>A Non-compliance (NC-240902-01) was raised in relation to dust management on the Project and a Non-Compliance Report was prepared, dated 6/9/24 and submitted to Sydney Water, DPHI and the ER. Dust mitigation was not being undertaken as required under the Project's Air Quality CEMP Sub-plan, specifically mitigation measures AQ14, AQ31 and AQ38, resulting in dust generation from site.</p> <p>During subsequent ER inspection undertaken on 09/09/2024 and 16/09/2024, additional dust management measures, including more frequent and targeted use of the water cart was observed, consistent with the corrective actions proposed in the CoA A45 Non-compliance report.</p> <p>The associated Non-compliance (NC-240902-01) was closed by the ER on 09/09/2024</p>	<p>Ongoing planning and execution of works to ensure:</p> <ul style="list-style-type: none"> Weather forecasts are undertaken daily When hot, dry and windy conditions are forecast, ensure adequate resources (water carts) are available to suppress dust Ensure water carts are not used for purposes other than dust suppression during hot/ windy weather. Ongoing stabilisation of exposed soil to reduce the risk of fugitive dust emissions. <p>Regular visual monitoring and implement stop work protocol for dust activities such as excavation and working within stockpiles.</p>	<p>As observed during the Audit site inspection, construction of the pipelines and rehabilitation of exposed areas is now complete, thereby eliminating the risk of a dust related incident in these areas. Dust management practices at the AWRC site included a sealed carpark, speed limit restrictions, water carts and a street sweeper. Exposed surfaces were being progressively stabilised to reduce dust. Photographic evidence was provided to the Auditor demonstrating implementation of these measures during the audit period.</p> <p>Status - Closed</p>

Condition No.	Summary of Non-Compliance/Observation	Previous Recommendation	Evidence of implementation / Status
Observations and recommendations made by the Auditor during the previous audit period			
E67	Plant maintenance (watering and weeding) must continue during construction and operation on land owned by Sydney Water. Sydney Water must continue plant maintenance on other land specified in the Rehabilitation Management Plan under Condition E19 and Condition E20 and committed to in the documents listed in Condition A1 for the maintenance period specified, in consultation with EHG and relevant landowner(s), as required. Should any plant loss occur during the maintenance period, the plants should be replaced by the same plant species and growth form (i.e. a tree with a tree and local native provenance species where the original planting was of local native provenance) unless it is determined by a suitably qualified person that a different species is more suitable for that location.	<p>The prevalence of Sticky Nightshade was observed during the audit site inspection, particularly around the AWRC project site, including the sediment basin and areas surrounding the disturbed project footprint.</p> <p>It was noted during the audit site inspection and interview that weeding contractors have been engaged and are implementing weed control protocols.</p>	<p>Evidence of weeding was observed during the audit site inspection with records provided to the Auditor demonstrating the ongoing implementation of the weed management plan.</p> <p>With the installation of permanent landscaping and rehabilitation of riparian zones, ongoing weed management is required (particularly during warm and wet periods) to ensure proliferation of weeds does not occur.</p> <p>Status - Ongoing</p>
E110	<p>Waste generated during construction and operation must be dealt with in accordance with the following priorities:</p> <p>(a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;</p> <p>(b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and</p> <p>(c) where re-using, recycling or recovering waste is not reasonably practicable, waste must be treated or disposed of.</p>	<p>While a high standard of housekeeping was observed across multiple sites, there were some areas within the AWRC site where waste materials and litter was stored outside the designated waste storage bins. Chemicals were observed to be stored on the ground adjacent to a chemical storage container and the spill kit in place was depleted.</p> <p>Reinforcement and messaging via toolbox talk and other appropriate means of the importance of good housekeeping and the correct use of bins provided. The project should ensure a process is in place and implemented for checking and replenishing spill kits across the site.</p>	<p>An improvement in housekeeping at the AWRC site was observed with chemicals stored within the appropriate storage containers.</p> <p>Appropriate waste skip bins were provided on site with no inappropriate storage of waste observed during the audit inspection.</p> <p>An email reminder was issued to the project team reminding them of the requirements to utilise the waste and recycling facilities provided and avoid any littering.</p> <p>Status - Closed</p>

Condition No.	Summary of Non-Compliance/Observation	Previous Recommendation	Evidence of implementation / Status
C12	<p>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.</p> <p>A diesel cell used for refuelling was located adjacent to the HES basin, posing a risk of water pollution in the event of a leak or spill.</p>	<p>Review the risk assessment for refuelling to ensure requirements for positioning of refuelling equipment near waterways is addressed. Move the diesel refuelling cell to an appropriate location away from the HES Basin, and ensure controls are implemented as per the risk assessment.</p>	<p>As observed during the audit site inspection, the diesel refuelling cell has been relocated away from the HES basin.</p> <p>Status - Closed</p>

3.6 Adequacy of Environmental Management Plans

The management plans implemented for the construction phase have been prepared by suitably qualified personnel, endorsed by the independent Environmental Representative, and approved by DPHI following consultation with relevant stakeholders. The Plans meet the conditions of approval and other relevant legislative requirements. The management plans are adequate for the current scope of work and were observed to be implemented effectively in the field. As noted in the Audit Schedule (Appendix B), the preparation of operational management plans (such as the odour management plan) has commenced.

3.7 Stakeholder Consultation Outcomes

Issues raised by project stakeholders that were consulted with prior to undertaking the audit are summarised in [Table 11](#) below with the auditor's response to each issue.

Table 11: Key stakeholder issues and auditor response

Organisation	Key Issues/Comments	Auditor Response
Department of Planning, Housing and Infrastructure	<ul style="list-style-type: none"> DPHI did not request any additional issues for inclusion within the scope of the Audit that are not already captured by the Consent, and the Department's Independent Audit Post Approval Requirements (May 2020). DPHI requested consultation with the following organisations as part of the Audit: NSW Environment Protection Authority <ul style="list-style-type: none"> Fairfield Council, Liverpool Council, Wollondilly Council, Penrith Council and Canterbury Council Heritage NSW Transport for NSW (M12) 	<ul style="list-style-type: none"> As requested by DPHI, further consultation was undertaken with the parties as noted in DPHI's response and referenced below.
Liverpool Council	<p>The Department has primary responsibility for assessing compliance with conditions of consent in relation to environmental emissions (i.e. noise, air, water, land) during the construction and operational phases of the project. Consequently, you may wish to make further enquiries with the NSW EPA and NSW Department of Planning, Housing and Infrastructure.</p> <p>Furthermore, it is requested that the scope of the audit encompasses all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the Construction Environmental Management Plan (Conditions C1 to C12) and sub-plans relating to air quality (Condition C4), surface water and ground water management (Condition C6), soils and contamination (Condition C8), noise and vibration (Condition C10) and construction monitoring programs (Conditions C13-C18).</p> <p>Please also consider any other matters raised by the Department, regulatory requirements, Project performance and industry best practice.</p>	<ul style="list-style-type: none"> Both EPA and DPHI have been consulted with as noted in this table. The scope of the Audit encompasses these requirements. Refer to Section 3.6 for an assessment of the Construction Environmental Management Plan and Sub Plans and Appendix B for a detailed assessment of compliance with these conditions. The Auditor confirms these matters have been considered by the Audit.
Penrith Council	<ul style="list-style-type: none"> No response received 	<ul style="list-style-type: none"> Not applicable.
Wollondilly Council	<ul style="list-style-type: none"> No response received 	<ul style="list-style-type: none"> Not applicable.

Organisation	Key Issues/Comments	Auditor Response
Heritage NSW (Heritage Council)	<ul style="list-style-type: none"> Heritage NSW notes conditions E29-E32 of the conditions of consent and the Heritage CEMP Sub plan and associated archaeological methodologies and compliance with these documents Requirement to prepare and issue an Aboriginal Cultural Heritage Excavation report within 24 months of the completion of the excavations 	<ul style="list-style-type: none"> Sufficient evidence was provided by SWC to demonstrate compliance with the conditions of consent and the Heritage CEMP subplan Salvage work is complete, and the preparation of the Aboriginal Heritage excavation report has commenced The final report is required to be submitted in 2026 (24 months following the completion of salvage work) Refer to the Auditors response to conditions E29-E32 in the Independent Audit Table (Appendix B) for further details
NSW EPA	<ul style="list-style-type: none"> No response received 	<ul style="list-style-type: none"> Not applicable
Transport for NSW (M12)	<ul style="list-style-type: none"> The M12 projects interactions with USCAWRC are minimal now with our M12 central package nearing construction completion. Pavement conditions on Clifton Ave maybe worth seeking confirmation that requirements for remediation have been met 	<ul style="list-style-type: none"> Noted. There was no visually noticeable damage to the pavement conditions on Clifton Avenue observed during the Audit site inspection or reported during the Audit period. Following completion of the construction activities SWC will be required to undertake a post construction condition survey of Clifton Avenue to identify any damage and any remedial work to be undertaken.

3.8 Assessment of Compliance with Predictions in the Environmental Impact Statement (Key Environmental Risks)

An assessment of construction impacts against those predicted in the Environmental Impact Statement prepared by SWC (September 2021) is provided in [Table 12](#).

Table 12: Comparison with EIS Predictions

Category	EIS Prediction (Summary)	Auditor Assessment
Water Quality	<ul style="list-style-type: none"> Direct impacts on waterways (where construction activities are required for pipeline crossings and release structures) Indirect impacts from potential erosion and sedimentation. Impacts are not expected to be significant and can be effectively mitigated through standard management measures for erosion and sediment control Some waterways will be crossed using tunnelling methods which will minimise impacts 	<ul style="list-style-type: none"> No direct or indirect surface water impacts have been identified during the audit period Erosion and sediment controls installed and maintained to prevent offsite impact with regular inspections by CPESC High efficiency sediment basin installed at AWRC site Waterway crossings using HDD methods were used to minimise and avoid impacts with controls in place for open trenching across waterways where site constraints permitted Where open trenching across waterways was necessary (such as Oaky and Cosgroves Creek), this was undertaken with the involvement of specialists including geomorphologist, aquatic ecologist and CPESC Waterway crossings have been re-instated with rock scour protection and riverbank stabilisation It may be reasonably concluded that the water quality impacts of the Project to date are within the predictions documented in the EIS.
Terrestrial Biodiversity	<ul style="list-style-type: none"> Removal of up to 13.77 ha of native vegetation. Seven individual threatened plants will be removed because of the Project. A range of management measures will be implemented to minimise biodiversity impacts including pre-clearance surveys, delineating no-go zones to protect vegetation and Upper South Creek Sydney Water will also implement a Biodiversity Offset Strategy to offset residual impacts 	<ul style="list-style-type: none"> Clearing activities are now complete Compliance with the clearing limits is being managed with consistency assessments undertaken to assess and minimise clearing Pre-clearance site inspections undertaken with the project ecologist to identify opportunities to reduce vegetation clearing A register has been established to record and monitor clearing activities There have been no reported incidents of clearing beyond the project boundary during the audit period Clearing undertaken is within the predictions made in the EIS and in compliance with the limits prescribed in the MCoA
Flooding	<ul style="list-style-type: none"> The Project will have a negligible impact on flood behaviour and downstream flooding and will not result in detrimental impacts to other developments or land. Small potential impact on flooding where construction activities encroach on flood-prone land on South Creek, Nepean River and other waterways. 	<ul style="list-style-type: none"> No incidents or complaints relating to flooding have been identified during the audit period It may be reasonably concluded that the flooding impacts of the Project to date are within the predictions documented in the EIS.

Category	EIS Prediction (Summary)	Auditor Assessment
	<ul style="list-style-type: none"> Construction activities on flood-prone land may change local flooding characteristics, displacing floodwaters and causing downstream flood levels to increase. Flooding has the potential to impact construction activities by creating hazardous working conditions, and displacing temporary buildings, equipment or materials. 	
Air Quality	<ul style="list-style-type: none"> Dust may be generated, for short periods of time, from earthworks at the AWRC site and along the pipeline alignments. Standard construction management measures for dust control can effectively manage these impacts 	<ul style="list-style-type: none"> Appropriate measures installed to minimise the generation of dust including water carts, streetsweeper, speed control, progressive rehabilitation groundcover and application of a soil binder No complaints relating to dust was reported during the audit period. Construction of pipelines, demobilisation of site compounds and rehabilitation of exposed surfaces has significantly reduced the risk of dust generation It may be reasonably concluded that the air quality impacts of the Project to date are within the predictions documented in the EIS.
Noise and Vibration	<ul style="list-style-type: none"> Noise management levels likely to be exceeded at six sensitive receivers, but only when worst-case noise generation and propagation scenarios are considered. This will be reduced (by up to 10 dBA) with management measures. Noise impacts from pipeline construction are typically short-term for individual receivers as the construction process involves activities moving along the pipeline alignment. The significance of impacts during construction will be greatest where work is required outside of standard construction hours (such as the environmental flows pipeline and along the brine pipeline alignment), where sensitive receivers are located within 100 m of construction activities, and where construction activities are required for extended periods. 	<ul style="list-style-type: none"> One noise and zero vibration complaints were received during the audit period. Complaint responses were reviewed and deemed to be adequate Acoustic Advisor oversees the implementation of noise controls, management plans and reviews OOH work applications Temporary acoustic barriers installed to reduce noise impacts Assessment and approvals for any OOH works undertaken Construction of pipelines, demobilisation of site compounds and rehabilitation of exposed surfaces has significantly reduced noise and vibration risks It may be reasonably concluded that the noise and vibration impacts of the Project to date are within the predictions documented in the EIS.
Visual and Landscape	<ul style="list-style-type: none"> Both the pipeline and AWRC components of the Project will have temporary landscape character and visual impacts during construction Character impacts during construction are associated with visible construction activities and machinery and the removal of vegetation, including mature trees. The duration of impacts will be longer in some locations such as the AWRC site and compounds and shorter in others such as pipeline construction areas, where construction moves progressively along the alignment. Depending on the location and its sensitivity, the significance of impacts ranges from negligible to high but these will only be temporary. 	<ul style="list-style-type: none"> Visual impacts observed during the audit site inspection were minor, temporary and consistent with the predictions made in the EIS No visual and landscape related complaints have been received during the audit period. Rehabilitation work at the RBM12 site, Cosgrove's, Oakey and Kemps Creek have improved the visual amenity in the local environment It may be reasonably concluded that the visual and landscape impacts of the Project to date are within the predictions documented in the EIS.

Category	EIS Prediction (Summary)	Auditor Assessment
Construction Traffic	<ul style="list-style-type: none"> Majority of construction vehicle movements will be to and from the AWRC site, with vehicle movements between the AWRC and Northern Road at peak times estimated at about 400 light vehicle movements and 300 heavy vehicle movements each day. Pipeline construction will also generate construction traffic, particularly associated with construction compounds including those required for tunnelling near Bents Basin Road, at Wallacia and in Cabravale Park, Cabramatta. Construction work for pipelines will also temporarily disrupt active transport (through disruptions to footpaths and cycleways), public transport (through temporary displacement of bus stops) and access to properties and parking in some areas. Disruptions are typically short-term in any one location as pipeline construction moves along the alignment. 	<ul style="list-style-type: none"> Zero traffic related complaints were received during the audit period. No traffic impacts exceeding the predictions in the EIS have been identified Construction of pipelines, demobilisation of site compounds has significantly reduced the risk of traffic related incidents It may be reasonably concluded that the traffic impacts of the Project to date are within the predictions documented in the EIS.
Socio Economic	<ul style="list-style-type: none"> Communities close to the construction activities, may experience negative socio-economic impacts mainly relating to temporary traffic, access and noise impacts and to some personal property and open space. These can cause amenity and nuisance issues and reduce social cohesion where they disrupt people's everyday activities. With management measures, most of these negative socio-economic impacts reduce to moderate or low in significance. Construction impacts are unlikely to impact the economic or demographic profile of the suburbs directly affected, or the wider Western Sydney community. Construction impacts on land use will also be minor, with temporary impacts on land use on portions of some properties while infrastructure is built. The exception is the impact on the AWRC facility site itself, which Sydney Water will acquire from the current landowner. 	<ul style="list-style-type: none"> Appropriate management plans, strategies and controls have been prepared and implemented to minimise amenity, noise and property access during the construction phase The complaint handling process was reviewed during the audit and found to be effective Construction of pipelines, demobilisation of site compounds and rehabilitation of exposed surfaces has significantly reduced the risk of socio-economic impacts It may be reasonably concluded that the socio-economic impacts of the Project to date are within the predictions documented in the EIS.
Aboriginal Heritage	<ul style="list-style-type: none"> Some Aboriginal archaeological items will be impacted by Project construction. Project design has avoided all items with high significance and impacts on items with low or moderate significance have been minimised. No further impacts to Aboriginal heritage items and sites are expected during Project operation. 	<ul style="list-style-type: none"> Known Aboriginal heritage artefacts were salvaged prior to ground disturbance in accordance with the Heritage Management Plan. The final salvage report is being prepared Areas of heritage significance within and near the project boundary were avoided where possible and designated as "no go" zones on advice from the project archaeologist No unexpected finds of Aboriginal heritage value were reported during the audit period No incidents relating to Aboriginal Heritage were reported during the audit period It may be reasonably concluded that the Aboriginal heritage impacts of the Project to date are within the predictions documented in the EIS.

Category	EIS Prediction (Summary)	Auditor Assessment
Non-Aboriginal Heritage	<ul style="list-style-type: none"> The Project has the potential to create moderate impacts on non-Aboriginal heritage items during construction, particularly the Fleurs Radio Telescope site, the South, Kemps and Badgerys Creek Confluence Weirs Scenic Landscape and the Blaxland Farm. There is minimal potential for impacts during operation 	<ul style="list-style-type: none"> The non-Aboriginal heritage investigation and archival recording program was implemented prior to Construction in accordance with the Heritage Management Subplan. The non-Aboriginal heritage excavation program was completed in August 2024, and the excavation report has been prepared No impacts to non-Aboriginal heritage items were identified during the audit period No unexpected finds of non-Aboriginal archaeological heritage were reported during the audit period No incidents relating to Non-Aboriginal Heritage were reported during the audit period It may be reasonably concluded that the non aboriginal heritage impacts of the Project to date are within the predictions documented in the EIS.
World and National Heritage	<ul style="list-style-type: none"> The Project is not located within the boundary of any World or National heritage-listed items so will not have any direct impacts on any listed items. 	<ul style="list-style-type: none"> No impacts to World and National Heritage areas were reported during the audit period It may be reasonably concluded that impacts to World or National heritage listed items are within the predictions documented in the EIS.

3.9 Assessment of Compliance with Predictions in the Environmental Impact Statement (Project Boundary)

The original Environmental Impact Statement and modifications (MOD1, determined 26/05/23 and MOD 2, determined 10/10/23) defined the proposed Project boundaries. A review of site maps for the AWRC site, route maps for the pipelines and the Auditor's observations during the site inspection (including the distribution of survey pegs in bushland areas) found that the construction works are confined to the approved site boundaries.

Where works have been required outside of the project boundary (but within the EIS nominated impact assessment area), the Sydney Water Consistency Assessment Framework has been utilised to confirm whether the project change is consistent with the approved Upper South Creek Advanced Water Recycling Centre Environmental Impact Statement, dated September 2021 and Amendment Report dated March 2022 and a project modification is not required.

During the audit period, ten Consistency Assessments were prepared by JHG and reviewed by SWC. Eight have been approved and two are in progress. The consistency assessments related to a range of issues including working outside the assessment area, changes that retained mature vegetation to minimise impact and leaving hardstand and project materials at demobilised work areas at the request of the property owner.

A list of the CA number and titles is presented in [Table 13](#) below:

Table 13: Consistency Assessments Approved During the Audit Period

CA Ref No.	CA Name	CA Description	Approval Date
CA047	AWRC Southern Access Rd Stormwater drainage line	Drainage line from Seymour White along Paper Road, southern boundary	6/3/25

CA Ref No.	CA Name	CA Description	Approval Date
CA048	Retained imported materials (shooting centre)	Hardstand areas left behind at request of property owners, shooting centre	19/11/24
CA048	AWRC treatment process	CA to demonstrate consistency of the AWRC treatment process with the EIS (with reference to the 'flexibility' sort in the EIS)	in progress
CA050	Retained imported materials (C12)	Item, materials left behind at request of property owners at the C12 compound	19/12/24
CA051	LV HDD Edith St Extension	Extension of the boundary immediately adjacent LV HDD Edith St	3/12/24
CA052	Retained imported materials (WSP)	Hardstand areas left behind at request of property owners at WSP	20/12/24
CA053	Retained imported materials (Lennox reserve)	Items/materials left behind at request of property owner (Lennox reserve)	3/12/24
CA054	Retained imported materials (Fowlers farm)	Items/materials left behind at request of property owner (Fowlers farm)	20/12/24
CA055	Retained imported materials (Fowlers reserve)	Items/materials left behind at request of property owner (Fowlers reserve)	in progress
CA 056	Retained imported materials (Landsdowne Reserve)	Items/materials left behind at request of property owner (Landsdown reserve)	3/12/24

3.10 Key Strengths

Key strengths identified during the audit are as follows:

- As noted in previous audits, restoration work for creek crossings has been reported to be a high standard. During this Audit, further rehabilitation and final landscaping work has been observed at the RMB12 Site, Kemps Creek, South Creek and the Vegetation Management Plan Zone adjacent to the AWRC site. Retained timber has been beneficially re-used for habitat features and watering systems established to ensure the health of plants. Creek beds have been stabilised with habitat rocks. As noted in the Auditors response to Condition E116, an assessment has been undertaken by a specialist ecologist and botanist that concluded:

“the works at Oaky Creek, Cosgrove Creek, South Creek, Nepean River and an unnamed tributary of Kemps Creek have been restored to an improved standard by mitigating and reducing future erosion potential by battering, reshaping and rock armouring the bed and banks of these creeks, installing coir logs above the creek banks to grow and further stabilise the banks. Aquatic and riparian habitat has been enhanced from the introduction of habitat rocks, the removal of invasive plant species and litter within the creek, and the revegetation and installation of fallen logs within the riparian zone. This will provide a foundation of habitat for native aquatic and riparian fauna”

- A pro-active approach to the community engagement program, focusses on school engagement and skills development. During the audit period, seven events have been held with local schools and to date the project team, through school visits (incursions and excursions) and careers expos, the project team has spoken to over 660 students about the project and careers in construction. Students have been hosted for their week-long work experience placement along with many trainees through the school's infrastructure program.

Appendix A DPHI Auditor Approval

Our ref: SSI-8609189-PA-36

Your ref: Sydney Water

via Major Projects Portal

21 July 2023

Attention: Ms Cheryl Cahill, Environment Lead, Sydney Water

Subject: Upper South Creek Advanced Water Recycling Centre – agreement to independent auditor

Dear Cheryl

I refer to your letter dated 10 July 2023 (PA-36) requesting the Planning Secretary's agreement to suitably qualified, experienced, and independent persons as independent environmental auditors of the Upper South Creek Water Advanced Water Recycling Centre (SSI-8609189).

NSW Planning has reviewed the information you have provided against the *Independent Audit Post Approval Requirements*. NSW Planning is satisfied that the nominees are certified with Exemplar Global as lead auditors in environmental management systems, are suitably experienced in state significant projects, and have supplied declarations of independence.

Consequently, I can advise that under Condition A38 of SSI-8609189, the Planning Secretary has agreed to the following auditors:

- Mr Richard Peterson, Trigalana Environmental, as lead auditor
- Ms Josephine Heltborg, Morasey and GreenEdge Environmental Consulting, as alternate auditor

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the *Independent Audit Post Approval Requirements*. Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor(s) for future audits.

Should you wish to discuss the matter further, please contact Ms Alex Sands at compliance@planning.nsw.gov.au.

Yours sincerely,



Alex McGuirk

A/Team Leader Compliance – Government Projects
NSW Planning

As nominee of the Planning Secretary

Appendix B Independent Audit Table

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
A1	<p>The Proponent must carry out Stage 1 of the CSSI in accordance with the terms of this approval and generally in accordance with the:</p> <p>(a) Upper South Creek Advanced Water Recycling Centre Environmental Impact Statement, dated September 2021; (b) Upper South Creek Advanced Water Recycling Centre Submissions Report, dated March 2022; (c) Upper South Creek Advanced Water Recycling Centre Amendment Report, dated March 2022; (d) Upper South Creek Advanced Water Recycling Centre Submissions Report – Project Amendments, dated April 2022; (e) Response to DPHI RFI 1, regarding responses to advice received on the Response to Submissions Report (dated, 1 June 2022, 1 July 2022, and 11 July 2022); (f) Response to DPHI RFI 2, regarding additional information on Flood Impact Assessment (dated, 11 July 2022). (g) In accordance with modification application SSI-8609189 Mod 1 and supporting documentation (h) In accordance with modification application SSI 8609189-Mod 2 and supporting documentation</p>	<ul style="list-style-type: none"> Consistency Assessment Register updated to 03/04/25 USC (Enviro and Approvals) Obligations and Compliance Tracking Register_MASTER (3).xls CA 047 Amendments to Southern Drainage Swale dated 6/3/25 CA 048 Retained Imported Material on Site Post Construction - Western Sydney Parklands (WSP) dated 19/12/24 MOD 1 Removal of Environmental Flows Pipeline, 26/5/23 MOD 2 (Pipeline Realignments), 10/10/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>The project is being undertaken generally in accordance with the terms and conditions of this approval and the environmental assessment documentation. Consistency Assessments (CAs) are undertaken to ensure consistency with project approvals (and documents listed) and a register is maintained.</p> <p>During the audit period 8 Consistency Assessments were approved. Two examples were provided to the Auditor as follows:</p> <ul style="list-style-type: none"> CA047 Amendments to the Southern Drainage Swale, endorsed 6/3/25 CA048 Retained Imported Material on Site Post Construction - Western Sydney Parkland, endorsed 19/12/24 <p>Two Modifications were approved in previous audit periods:</p> <ul style="list-style-type: none"> MOD 1 - to remove pipeline and release structure from Warragamba River (26/5/23) MOD 2 - Pipeline Realignments (10/10/23) <p>It was noted in the Audit interview that a third modification is underway and is being currently consulted with Agencies. The proposed modification is for changes to operational discharge limits.</p>	Compliant
A2	<p>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>	<ul style="list-style-type: none"> Documents reviewed as noted in this audit report USC (Enviro and Approvals) Obligations and Compliance Tracking Register_MASTER (3).xls Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>Sydney Water Corporation (SWC) and John Holland Group (JHG) were able to demonstrate through the preparation, review, approval and the implementation of the Construction Environmental Management Plan (CEMP) and Sub-plans that the commitments and obligations set out in the documents listed in Condition A1 are being fulfilled.</p> <p>A compliance tracking register has been prepared and is used as an internal management tool to track ongoing compliance with the planning approval.</p> <p>Both SWC and JHG have experienced and dedicated teams along with specialist consultants and advisors to implement the CEMP and Sub-plans in the field with independent oversight provided by the ER and the AA. Environmental monitoring is undertaken for key environmental aspects including noise, vibration and water quality.</p>	Compliant
A3	<p>In the event of an inconsistency between:</p> <p>(a) the terms of this approval and any document listed in Condition A1 inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in Condition A1 inclusive, the most recent document will prevail to the extent of the inconsistency.</p> <p>Note: For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Consistency Assessment Register updated to 03/04/25 CA 047 Amendments to Southern Drainage Swale dated 6/3/25 CA 048 Retained Imported Material on Site Post Construction - Western Sydney Parklands (WSP) dated 19/12/24 	<p>As noted above, Consistency Assessments are undertaken to ensure all activities are consistent with the terms of approval.</p> <p>No inconsistencies are known to have been identified to date.</p>	Compliant
A4	<p>The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to:</p> <p>(a) the environmental performance of Stage 1 of the CSSI; (b) any document or correspondence in relation to Stage 1 of the CSSI; (c) any notification given to the Planning Secretary under the terms of this approval; (d) any audit of the construction or operation of Stage 1 of the CSSI; (e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); (f) the carrying out of any additional monitoring or mitigation measures; and (g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>Observed evidence throughout the audit concludes the Proponent has complied with the various written requirements and directions issued by DPHI during the audit period.</p>	Compliant
A5	<p>This approval lapses five years after the date on which it is granted, unless Work has physically commenced on or before that date.</p>	<ul style="list-style-type: none"> SSI 8609189 Planning Approval ,dated 10/10/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>The project was approved on 28/11/22. Work commenced on 20/2/23, within 5 years of the project approval date.</p>	Compliant
A6	<p>The maximum capacity of the AWRRC must not exceed an average dry weather flow (ADWF) of 50 megalitres per day (ML/day) under Stage 1.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>SWC confirmed the maximum capacity of the AWRRC Stage 1 is 35 ML/d, less than the criteria in this condition.</p>	Compliant
A7	<p>References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of this approval, unless otherwise approved by the Planning Secretary.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>Noted</p>	Compliant
A8	<p>Any document that must be submitted or action taken within a timeframe specified in or under the terms of this approval may be submitted or undertaken within a later timeframe agreed in writing with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident or a non-compliance.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Email chain between Sydney Water and DPHI RE__External_RE_USC - SSI-8609189 - UDLP - timeframe for additional components, dated 29/8/24 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI - 86091980-PA-117) - Conditions E 63, E64 and E65 Approval of revised Urban Design and Landscape Plan" dated 20/11/24 	<p>As noted in IA # 3, The due date for submission of the Urban Design Landscape Plan (UDLP) was requested to be extended to 4/10/24 from 30/6/24.</p> <p>The UDLP approval letter included a timeframe for the revised UDLP, including the LMP and VMP to be submitted to DPHI by 1 June 2024.</p> <p>Emails between Sydney Water and DPHI discussing the need for an extension, dated 29/8/24 were provided as evidence during IA3. The UDLP was subsequently approved by DPHI on 20/11/24. A further update or a new plan will be required for incorporation of landscaping for the greenspace.</p>	Compliant
A9	<p>Where the terms of this approval require consultation to be undertaken, evidence of the consultation undertaken must be submitted to the Planning Secretary and ER (as relevant) with the corresponding documentation. The evidence must include:</p> <p>(a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval; (b) a log of the dates of engagement or attempted engagement with the identified party; (c) documentation of the follow-up with the identified party where engagement has not occurred to confirm that they do not wish to engage or have not attempted to engage after repeated invitations; (d) outline of the issues raised by the identified party and how they have been addressed; and (e) a description of the outstanding issues raised by the identified party and the reasons why they have not been addressed.</p>	<ul style="list-style-type: none"> Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI-8609189) - Approval of Construction Environmental Management Plan, Sub-plans monitoring programs and Out of Hours Work Protocol, dated 8/8/23 Upper South Creek, Advanced Water Recycling Centre and Pipelines CoA9 Consultation Summary Report - Air Quality Plan, dated 26/5/23 Upper South Creek, Advanced Water Recycling Centre and Pipelines CoA9 Consultation Summary Report - Works in South Creek Rev01, dated 14/6/24 Upper South CoA E19 and E20 Creek Rehabilitation Management Plan, RMB12 Lands - Kemps Creek, Rev05, dated 23/5/24 DPHI Letter to SWC RE: Approval of Rehabilitation Management Plan, dated 30/5/24 DOCCEW Letter to JHG RE: Post approval consultation - conditions E19 and E20 - Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-84) Rehabilitation Management Plan RMB 12 lands - Kemps Creek, dated 12/4/24 Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>As noted in previous audits, DPHI Letter of approval notes the CEMP and Sub-plans have been prepared in consultation with NSW EPA, EHS, DPHI Water, DPI Fisheries, Water NSW, SES, TfNSW, Heritage NSW, Penrith City Council, Fairfield City Council, Liverpool City Council, Wollondilly Shire Council, and the City of Canterbury Bankstown Council (where required under these conditions).</p> <p>Condition A9 Consultation reports are appended to each Sub-plan.</p> <p>There have been no A9 consultation summary reports prepared during the IA#4 Audit period. SWC noted that the next document that will trigger consultation in accordance with this condition is for the Operational Noise Review.</p>	Compliant
A10	<p>Stage 1 of the CSSI may be constructed and operated in stages (including but not limited to temporal, location or activity based staging). Where staged construction and/or operation is proposed, a Staging Report (for either or both construction and operation as the case may be) must be prepared. The Staging Report must be endorsed by the ER and then submitted to the Planning Secretary for information no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).</p> <p>Note: Unless otherwise specified in this approval, early works are a stage of construction.</p>	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines Project - Stage 1 Staging Report Rev 2, dated 8/6/23 Letter from BB Enviro to Sydney Water RE: SSI 8609189 - Upper South Creek Advanced Water Recycling Centre (Environmental Representative (ER Endorsement) of the Stage 1 Staging Report, dated 13 June 2023 DPHI Post Approval form reference 20230613231227 Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>The Staging Report was submitted to the Department on 13/6/23 2023 following endorsement by the Environmental Representative (ER) and within the timeframe required by this condition.</p> <p>There have been no changes to the project staging since the previous audit. Consideration is currently being given to a staged approach to operation, with the Operational Staging Report to be submitted prior to Operation. No changes were made to project staging during the audit period.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
A11	<p>The Staging Report must:</p> <p>(a) if staged construction is proposed, set out how the construction of the whole of Stage 1 of the CSSI will be staged, including details of Work and activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;</p> <p>(b) if staged operation is proposed, set out how the operation of the whole of Stage 1 of the CSI will be staged, including details of activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant);</p> <p>(c) specify how compliance with conditions will be achieved across and between each of the stages of Stage 1 of the CSSI; and</p> <p>(d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.</p> <p><i>Note: A Staging Report may reflect the staged construction and operation of Stage 1 of the project through geographical activities, temporal activities or activity-based contracting and staging.</i></p>	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines Project - Stage 1 Staging Report Rev 2, dated 8/6/23 Letter from BB Enviro to Sydney Water RE: SSI 8609189 - Upper South Creek Advanced Water Recycling Centre (Environmental Representative [ER Endorsement] of the Stage 1 Staging Report, dated 13 June 2023 DPHI Post Approval form reference 20230613231227 Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>The Staging Report includes the required information and was endorsed by the Environmental Representative. The Staging Report notes that Stage 1 Construction of the Project will include:</p> <ul style="list-style-type: none"> - Advanced Water Recycling Centre (AWRC) - Infrastructure from the AWRC to South Creek, to release excess treated water during significant wet weather events - A treated water pipeline from the AWRC to the Nepean River at Wallacia Weir, to release high-quality treated water - A brine pipeline from the AWRC connecting into Sydney Water's existing wastewater system to transport brine to the Malabar Wastewater Treatment Plant. <p>There have been no changes to the Staging Report during the audit period.</p>	Compliant
A12	Where staging is proposed, Stage 1 of the CSSI must be staged in accordance with the Staging Report.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	Construction works observed during the site inspection were consistent with those described in the Staging Report as noted above in Condition A11.	Compliant
A13	Where staging is proposed, the terms of this approval that apply or are relevant to the Work or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	Noted	Compliant
A14	Where changes are proposed to the staging of construction or operation, a revised Staging Report must be prepared, endorsed by the ER and submitted to the Planning Secretary for information no later than one month prior to the proposed change in the staging.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	No changes to the staging of the project are known to have occurred or are currently proposed.	Not Triggered
A15	<p>Strategies, plans or programs required by this approval can be submitted on a progressive basis, with the agreement of the Planning Secretary.</p> <p>With the agreement of the Planning Secretary, the Proponent may prepare the updated strategy, plan or program without undertaking all the consultation required under the applicable condition in this approval.</p> <p>Nothing in this condition prevents the preparation of either separate or combined strategies, plans or programs required under this approval.</p> <p><i>Notes:</i></p> <p><i>1. While any strategy, plan or program may be submitted on a progressive basis, the Proponent must ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times; and</i></p> <p><i>2. If the submission of any strategy, plan or program is to be undertaken in a progressive manner, then the relevant strategy, plan or program must clearly describe the specific stage to which strategy, plan or program applies, the relationship of this stage to future stages, and the trigger for updating the strategy, plan or program.</i></p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	The Secretary's approval to submit plans or strategies on a progressive basis is not known to have been sought.	Not Triggered
A16	<p>Construction ancillary facilities (excluding minor construction ancillary facilities established under Condition A19) that are not identified by description and location in the documents listed in Condition A1 can only be established and used in each case if:</p> <p>(a) they are located within or immediately adjacent to the construction boundary; and</p> <p>(b) they are not located next to sensitive land use(s) (including where an access road is between the facility and the land use), unless the landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location; and</p> <p>(c) they have no impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and</p> <p>(d) the establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts.</p>	<ul style="list-style-type: none"> Ancillary Facility Diligence Assessment - Compounds C6, C7, C7 and C12 SWC Functional Inspection Action List, dated 3/6/24 SWC Functional Inspection Action List, dated 13/5/24 Audit Interview 29/04/25 Site Inspection 29/04/25 	At the time of the Audit site inspection all construction ancillary facilities have been demolished. No non compliances with the requirements of this condition were identified by this Audit (IA #4) or previous audits.	Compliant
A17	<p>Before the establishment of a construction ancillary facility that is required prior to the approval of a CEMP (excluding minor construction ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A19), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the construction ancillary facility(ies). The Site Establishment Management Plan must be prepared in consultation with the relevant council and government agencies. The Plan must be endorsed by the ER and then submitted to the Planning Secretary for approval one month before the establishment of any construction ancillary facility(ies). The Site Establishment Management Plan must detail the management of the construction ancillary facility(ies) and include:</p> <p>(a) a description of activities to be undertaken during establishment of the construction ancillary facility(ies) (including scheduling and duration of Work to be undertaken at the site);</p> <p>(b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s);</p> <p>(c) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken prior to the commencement of site establishment work;</p> <p>(d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to:</p> <p>(i) meet the performance outcomes stated in the documents listed in Condition A1, and</p> <p>(ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and</p> <p>(e) a program for monitoring the performance outcomes, including a program for construction noise monitoring during site establishment works.</p> <p>Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each construction ancillary facility.</p> <p><i>Note: This plan is only needed before a CEMP is approved. Once a CEMP is approved a Site Establishment Management Plan(s) is not required and any ancillary facilities not approved under a Site Establishment Management Plan must be included in the CEMP.</i></p>	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Document Number: USCP-JHG-MPL-ENV-0008 Revision: A DPHI Approval dated 08/08/2023 their ref:SSI-8609189 Audit Interview 29/04/25 Site Inspection 29/04/25 	Site Establishment was identified in Table 1.2 of the CEMP which was approved on 23/8/23. SWC confirmed site establishment commenced after 23/8/23, and therefore there was no requirement for a separate Site Establishment Management Plan (SEMP).	Compliant
A18	The use of a construction ancillary facility must not commence until the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition C4 and relevant Construction Monitoring Programs required by Condition C13 have been approved by the Planning Secretary.	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Document Number: USCP-JHG-MPL-ENV-0008 Revision: A DPHI Approval dated 08/08/2023 their ref:SSI-8609189 Audit Interview 29/04/25 Site Inspection 29/04/25 	As noted for Condition A17, the use of construction ancillary facilities did not commence until the CEMP was approved (excluding minor ancillary facilities assessed as low impact work under Condition A19 (and endorsed by the ER).	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
A19	<p>Minor construction ancillary facilities can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria:</p> <p>(a) are located within or immediately adjacent to the construction boundary; and</p> <p>(b) have been assessed by the ER to have -</p> <p>(i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (DECC, 2009) (ICNG), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and</p> <p>(ii) minimal environmental impact with respect to waste management and flooding, and</p> <p>(iii) no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval.</p>	<ul style="list-style-type: none"> Upper South Creek, Advanced Water Recycling Centre, Consistency Assessment, Additional Construction Compound, dated 21/12/23 Upper South Creek, Advanced Water Recycling Centre, Consistency Assessment, Additional Construction Compound, dated 21/12/23 Upper South Creek, Advanced Water Recycling Centre, Consistency Assessment, Additional Construction Compound, dated 21/12/23 Minor Construction Ancillary Facility - Horizontal Directional Drilling (HDD) Pipe String Out- Monash Place, Environmental impact assessment project change, Minor Construction Ancillary Facility Assessment, dated 30/1/24 Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>Appropriate assessments have been undertaken against the criteria documented in this condition with a broad range of assessments and ER endorsements provided to the Auditor.</p> <p>Minor Ancillary Facilities had been decommissioned at the time of the Audit</p>	Compliant
A20	<p>Boundary screening must be erected between construction ancillary facilities (excluding minor construction ancillary facilities) and adjacent to sensitive land use(s) for the duration of the time that the construction ancillary facility is in use, unless otherwise agreed with the owner and occupier of the adjacent sensitive land use(s).</p> <p>Boundary screening must minimise visual impacts on adjacent sensitive land use(s).</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>As noted in previous audits, appropriate screening was installed at the C10 site compound between the adjacent residents and the compound. The C10 compound has now demobilised and has been returned to SWC for other projects</p> <p>The AWRC site is located in a sparsely populated area and adjacent to the existing M12 construction site. There were no known sensitive receivers that would be visually impacted by the works.</p>	Compliant
A21	All Independent Appointments required by the terms of this approval must have regard to Seeking approval from the Department for the appointment of independent experts (DPIE, 2020). All Independent Appointments must hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Acoustics Advisors" dated 16/12/22 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives" dated 16/12/22 Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling • Agreement to independent auditor, dated 21/07/22 Audit Interview 29/04/25 Site Inspection 29/04/25 	Independent experts including the ER, AA and the Independent Auditor all hold current membership of relevant bodies as noted in DPHI approval letters. There has been no change to the ER or the AA during the audit period.	Compliant
A22	<p>The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must:</p> <p>(a) facilitate and assist the Planning Secretary in any such audit; and</p> <p>(b) make it a term of their engagement of an Independent Appointment that the Independent Appointment facilitate and assist the Planning Secretary in any such audit.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	The Planning Secretary is not known to have commissioned an audit of how an Independent Appointment has exercised their functions.	Not triggered
A23	<p>The Planning Secretary may withdraw its approval of an Independent Appointment should they consider the Independent Appointment has not exercised their functions in accordance with this approval.</p> <p>Note: Conditions A22 and A23 apply to all Independent Appointments including the ER and AA.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	The Planning Secretary is not known to have withdrawn their approval of an Independent Appointment.	Not triggered
A24	Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	<ul style="list-style-type: none"> Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives, dated 16/12/22 Audit Interview 29/04/25 Site Inspection 29/04/25 	The appointment of the ER on the 16/12/22 was prior to the commencement of Work on 20/2/23.	Compliant
A25	The Planning Secretary's approval of an ER must be sought no later than one month before the commencement of Work.	<ul style="list-style-type: none"> Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives, dated 16/12/22 Audit Interview 29/04/25 Site Inspection 29/04/25 	The appointment of the ER on the 16/12/22 was prior to the commencement of Work on 20/2/23.	Compliant
A26	The proposed ER must meet the requirements of the Environmental Representative Protocol (Department of Planning and Environment, October 2018) and must be a suitably qualified and experienced person(s) who was not involved in the preparation of the documents listed in Condition A1, and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it.	<ul style="list-style-type: none"> Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives, dated 16/12/22 Audit Interview 29/04/25 Site Inspection 29/04/25 	The ER and Alternate ER are experienced and meet the requirements of this condition.	Compliant
A27	More than one ER may be engaged for Stage 1 of the CSSI, in which case the functions to be exercised by an ER under the terms of this approval may be carried out by any ER that is approved by the Planning Secretary for the purposes of Stage 1 of the CSSI.	<ul style="list-style-type: none"> Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives, dated 16/12/22 Audit Interview 29/04/25 Site Inspection 29/04/25 	Two ER's have been appointed and approved by DPHI.	Compliant
A28	<p>For the duration of the Work until the completion of construction, or as agreed with the Planning Secretary, the approved ER must:</p> <p>(a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of Stage 1 of the CSSI;</p> <p>(b) consider and inform the Planning Secretary on matters specified in the terms of this approval;</p> <p>(c) consider and recommend to the Proponent any improvements that may be made to Work practices to avoid or minimise adverse impact to the environment and to the community;</p> <p>(d) review documents identified in Conditions A10, A17, C1, C4 and C13 and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so:</p> <p>i) make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or</p> <p>ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary/Department);</p> <p>Note: The written statement must be made via the Major Projects Portal.</p>	<ul style="list-style-type: none"> Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Biodiversity CEMP with minor updates to the Weed and Pathogen Management Procedure (Appendix F)" dated 31/10/24 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision D, dated 26/11/24 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Surface Water and Groundwater CEMP Sub plan, Revision D, dated 11/2/25 Letter from BB Enviro to SWC titled "Environmental Representative (ER) Review of Local Roads Approval Document dated 15/11/24 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision D" dated 2/12/24 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Soils and Contamination CEMP Sub-plan, Revision B" dated 3/12/24 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Traffic and Transport CEMP Sub-plan, Revision D" dated 11/12/24 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision D" dated 2/12/24 Environmental Representative (ER) Site inspection report - date of inspection 17/2/25 	<p>The ER is performing their role as required by this condition. Substantial documented evidence was provided to demonstrate their involvement to date which was confirmed through an interview with the ER undertaken as part of this audit.</p> <p>Evidence included copies of ER Inspection Reports, ER Monthly Reports and endorsement letters for the revised biodiversity CEMP, Noise and Vibration Management Plan, Surface Water Management Plan and the Local Roads Approval document. Emails between SWC and the ER were also provided demonstrating consultation with and provision of documents to the ER for information/review.</p>	

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
	<p>(e) regularly monitor the implementation of the documents listed in Conditions A10, A17, C1, C4 and C13 to ensure implementation is being carried out in accordance with the document and the terms of this approval;</p> <p>(f) as may be requested by the Planning Secretary, help plan or attend audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A37 of this approval;</p> <p>(g) as may be requested by the Planning Secretary, assist in the resolution of community complaints;</p> <p>(h) review the appropriateness of any activities reliant on the definition of Low Impact Work;</p> <p>(i) consider or assess the impacts of minor construction ancillary facilities comprising lunch sheds, office sheds and portable toilet facilities as required by Condition A19 of this approval;</p> <p>(j) consider any minor amendments to be made to the Site Establishment Management Plan, Community Communications Strategy, CEMP, CEMP Sub-plans and monitoring programs without increasing impacts to nearby sensitive land uses or that comprise updating or are of an administrative nature, and are consistent with the terms of this approval and the Site Establishment Management Plan, Community Communications Strategy, CEMP, CEMP Sub-plans and monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval; and</p> <p>(k) prepare and submit to the Planning Secretary and other relevant regulatory agencies (where requested by those agencies), for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports." The Environmental Representative Monthly Report must be submitted within seven days following the end of each month for the duration of the ER's engagement for Stage 1 of the CSSI, or as otherwise agreed by the Planning Secretary.</p>	<ul style="list-style-type: none"> Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for February 2025 Project: SSI-9609189- Upper South Creek Advanced Water Recycling Centre" dated 7/3/25 Environmental Representative (ER) Site Inspection report - date of inspection 3/03/25 Environmental Representative (ER) Site Inspection report - date of inspection 17/03/25 Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for March 2025 Project: SSI-9609189- Upper South Creek Advanced Water Recycling Centre" dated 7/4/25 Environmental Representative (ER) Site Inspection report - date of inspection 31/3/25 Environmental Representative (ER) Site Inspection report - date of inspection 14/4/25 Environmental Representative (ER) Site Inspection report - date of inspection 28/4/25 Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for April 2025 Project: SSI-9609189- Upper South Creek Advanced Water Recycling Centre" dated 7/5/25 Email from SWC to BB Enviro titled "CA 047_AWRC Southern Drainage Swale Re-alignment_Signed PDF" dated 13/3/25 DPHI Post Approval form reference 704825 DPHI Post Approval form reference 70707032 DPHI Post Approval form reference 7080433 DPHI Post Approval form reference 7035221 Email from SWC to JHG, cc BB Enviro titled "AWRC Stormwater Discharge Drainage Line CA_signed and consolidated.pdf, AWRC Stormwater Discharge Drainage Line CA_SW.doc" dated 19/1/25 Email from SWC to JHG, /BB Enviro titled "CA 52 Retaining Imported Material - WSP Access Track" dated 19/12/24 Email from SWC to JHG, /BB Enviro titled "Retention of Imported Material Fowlers Farm, Retention of Imported Material Fowlers Farm" dated 20/12/25 DPHI Post Approval form reference 704825 ER Audit Interview 30/05/25 		Compliant
A29	<p>The Proponent must provide the ER with documentation requested in order for the ER to perform their functions specified in Condition A28 (including preparation of the ER monthly report), as well as:</p> <p>(a) the complaints register (to be provided on a weekly basis where complaints have been received or as requested); and</p> <p>(b) a copy of any assessment carried out by the Proponent of whether proposed Work is consistent with the approval (which must be provided to the ER before the commencement of the subject Work).</p> <p><i>Note: Personal details of the complainant are not to be provided to the ER unless otherwise agreed to or requested by the complainant.</i></p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 ER Audit Interview 30/05/25 Various emails from SWC to the ER providing project information (as noted in Condition A28 above) 	The ER confirmed they are provided with the relevant information as required by this condition. Evidence was provided to the Auditor demonstrating the provision of relevant information for information, review or endorsement as noted in condition A28 above.	Compliant
A30	A suitably qualified and experienced Acoustics Advisor(s) (AA) in noise and vibration management, who is independent of the design and construction personnel, must be nominated by the Proponent and engaged for the duration of Work and for no less than six months following completion of construction of Stage 1 of the CSSI.	<ul style="list-style-type: none"> Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Acoustics Advisors" dated 16/12/22 Audit Interview 29/04/25 Site Inspection 29/04/25 	SWC have appointed a team of acoustic experts to perform the role of Acoustics Advisor (AA) for the project.	Compliant
A31	Work must not commence until an AA has been approved by the Planning Secretary.	<ul style="list-style-type: none"> Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Acoustics Advisors" dated 16/12/22 Audit Interview 29/04/25 Site Inspection 29/04/25 	The AA was approved by the Planning Secretary on the 16/12/22. Work commenced on 20/2/23, after approval of the appointment.	Compliant
A32	<p>The Proponent must cooperate with the AA by:</p> <p>(a) providing access to noise and vibration monitoring activities as they take place;</p> <p>(b) providing for review of noise and vibration plans, assessments, monitoring reports, data and analyses undertaken; and</p> <p>(c) considering any recommendations to improve practices and demonstrating, to the satisfaction of the AA, why any recommendation is not adopted.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 AA Interview, 29/05/25 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 7/12/24 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 15/1/25 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 7/02/25 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 7/12/24 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 7/03/25 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 7/04/25 Acoustics Advisor Endorsement (CNVMP - Rev D) - Sydney Water Upper South Creek Project, dated 14/1/25 Acoustics Advisor Site Inspection Report, OOHW Inspection - Tuesday January 2025 - Cabramatta West Restoration, dated 21/1/25 Email from Acoustic Studio to JHG titled "USC AWRC ONR - follow up questions" dated 20/2/25 	<p>The AA confirmed SWC/JHG has been co-operative and has provided them with access to the necessary information in accordance with this condition.</p> <p>As observed during the Audit site inspection, the noise and vibration risk has been reduced significantly with the completion of pipeline works in sensitive neighbourhoods with future work focussed at the AWRC site which is located away from sensitive receivers.</p> <p>Evidence of the AA's involvement during the Audit period included monthly AA reports provided to DPHI, endorsement of the revised Construction Noise and Vibration Management Plan as well as the AA site inspection report for out of hours work undertaken during the Cabramatta Road West, restoration works. Evidence was also provided to the Auditor confirming the AA's involvement in the Operational Noise Review (ONR) prepared in accordance with Condition E56.</p>	Compliant
A33	The Proponent may nominate additional suitably qualified and experienced persons to assist the lead AA for the Planning Secretary's approval.	<ul style="list-style-type: none"> Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of Lead and Alternative Acoustics Advisors, dated 16/12/22 Audit Interview 29/04/25 	Three alternatives to the Lead AA have been approved by DPHI.	Compliant
A34	<p>The approved AA must:</p> <p>(a) receive and respond to communication from the Planning Secretary in relation to the performance of Stage 1 of the CSSI in relation to noise and vibration;</p> <p>(b) consider and inform the Planning Secretary on matters specified in the terms of this approval relating to noise and vibration;</p> <p>(c) consider and recommend to the Proponent, improvements that may be made to avoid or minimise adverse noise and vibration impacts;</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 AA Interview, dated 28/11/24 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 7/12/24 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 15/1/25 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 07/02/25 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 7/12/24 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 7/03/25 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project, dated 7/04/25 	<p>The AA is performing their role in accordance with the requirements of this condition and is provided with the information and access to the site in order for them to perform the role. Key activities the AA is involved with are:</p> <ul style="list-style-type: none"> - Preparation of a monthly report issued to DPHI - Site inspections, undertaken both during the day and also during Out of Hours Works (e.g Cabramatta Road Restoration Works) - Attendance at fortnightly post approvals compliance meetings with DPHI. Includes DPHI, SWC, ER, and JHG - Undertaking spot noise checks 	

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
	<p>(d) review proposed night-time Works to determine if sleep disturbance would occur and recommend measures to avoid sleep disturbance or appropriate additional alternative mitigation measures;</p> <p>(e) review noise and vibration documents required to be prepared under the terms of this approval, and should they be consistent with the terms of this approval, endorse them before submission to the Planning Secretary (if required to be submitted to the Planning Secretary) or before implementation (if not required to be submitted to the Planning Secretary);</p> <p>(f) regularly monitor the implementation of all noise and vibration documents required to be prepared under the terms of this approval to ensure implementation is in accordance with what is stated in the document(s) and the terms of this approval;</p> <p>(g) notify the Planning Secretary of noise and vibration incidents in accordance with Conditions A43 and A45 of this approval;</p> <p>(h) in conjunction with the ER, the AA must:</p> <p>(i) as may be requested by the Planning Secretary, help plan, attend or undertake audits of noise and vibration management of Stage 1 of the CSSI including briefings, and site visits,</p> <p>(ii) in the event that conflict arises between the Proponent and the community in relation to the noise and vibration performance of Stage 1 of the CSSI, follow the procedure in the Community Communication Strategy approved under Condition B2 to attempt to resolve the conflict, and if it cannot be resolved, notify the Planning Secretary,</p> <p>(iii) consider relevant minor amendments made to the Site Establishment Management Plan, CEMP, relevant sub-plans and noise and vibration monitoring programs that require updating or are of an administrative nature, and are consistent with the terms of this approval and the management plans and monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, endorse the amendment, (this does not include any modifications to the terms of this approval),</p> <p>(iv) review the noise impacts of minor construction ancillary facilities, and</p> <p>(v) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, a Monthly Noise and Vibration Report detailing the AA's actions and decisions on matters for which the AA was responsible in the preceding month. The frequency of this report can be changed if agreed by the Planning Secretary. The Monthly Noise and Vibration Report must be submitted within seven days following the end of each month for the duration of the AA's engagement for Stage 1 of the CSSI, or as otherwise agreed by the Planning Secretary.</p>	<ul style="list-style-type: none"> Acoustics Advisor Endorsement (CNVMP - NEV U) - Sydney Water Upper South Creek Project, dated 14/12/25 Acoustics Advisor Site Inspection Report, OOHW Inspection - Tuesday January 2025 - Cabramatta West Restoration, dated 21/1/25 Email from Acoustic Studio to JHG titled "USC AWRC ONR - follow up questions" dated 20/2/25 	<p>- Preparation of site inspection reports.</p> <p>- Endorsement of updates to the CNVMP</p> <p>The AA noted that no requests from the Planning Secretary have been made to undertake any targeted acoustic audits. The AA noted that limited document reviews were undertaken during the audit period and SWC/JHG are generally proactive in managing noise and communicating with the AA.</p>	Compliant
A35	The Department must be notified in writing of the dates of commencement of Works, construction and operation at least one month before those dates.	<ul style="list-style-type: none"> Various Letters from SWC to DPHI: Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Notification of commencement of works in accordance with Condition A35, dated 9/12/22, 19/5/23, 24/8/23 Letter from SWC to DPHI RE: Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Amended Notification of commencement of works in accordance with Condition A35, dated 17/2/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	DPHI were notified at least one month prior to the commencement of Work and the commencement of Construction. When changes to the commencement dates occurred due to delays in obtaining CEMP and Commonwealth approval, subsequent notifications were issued to DPHI advising them of the revised date.	Compliant
A36	If the construction or operation of Stage 1 of the CSSI is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of the commencement of that stage.	<ul style="list-style-type: none"> Various Letters from SWC to DPHI RE: Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Notification of commencement of works in accordance with Condition A35, dated 9/12/22, 19/5/23, 24/8/23 Letter from SWC to DPHI RE: Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Amended Notification of commencement of works in accordance with Condition A35, dated 17/2/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	As above DPHI was notified of the commencement of Stage 1 Construction in accordance with the requirements of this condition.	Compliant
A37	Independent Audits of Stage 1 of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).	<ul style="list-style-type: none"> This audit report 	This Audit was commissioned and is being undertaken in accordance with the DPHI Post Approval Audit Requirements (2020). This audit has been undertaken within 6 months of the previous audit as required by the DPHI guideline.	Compliant
A38	Proposed independent auditors must be agreed to in writing by the Planning Secretary before the commencement of an Independent Audit. This condition does not apply to the engagement of auditors required under Condition E105.	<ul style="list-style-type: none"> Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Agreement to Independent Auditor" dated 21/7/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	The Auditors were approved by DPHI on the 21/7/23 prior to the commencement of the initial audit.	Compliant
A39	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (DPIE, 2020), upon giving at least four weeks' notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>The Planning Secretary has not requested the initial and subsequent audits to be undertaken at different times.</p> <p>An Independent Audit extension letter was issued by DPHI on 21/12/23 allowing Independent Audits to be submitted to the Department within 3 months of the site inspection, rather than 2 months as previously agreed (note this applied for audits undertaken over the XMAS, new years period)</p>	Compliant
A40	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (DPIE, 2020), the Proponent must:	<ul style="list-style-type: none"> Table 1, Response to Audit Findings - Following completion of Audit undertaken on 28th and 29th October 2024 Email from DPHI to Sydney Water titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - SSI-8609189-PA-132" dated 10/1/25 Email from SWC to JHG/SWC titled "3rd Independent Compliance Audit" dated 13/1/25 Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (AWRC and Pipelines Project (CSSI 8609189): Provision of independent audit report and submission of response to audit findings in accordance with conditions A40 and A41" dated 10/1/25 Audit Interview 29/04/25 	The 3rd Independent Audit Report and response was available on the SWC website as required by this condition. As noted in condition A41 below, the Audit report and response to Audit findings was submitted to DPHI within the required timeframe.	Compliant
A41	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (DPIE, 2020).	<ul style="list-style-type: none"> Audit Interview 29/04/25 Email from DPHI to Sydney Water titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - SSI-8609189-PA-132" dated 10/1/25 Email from SWC to JHG/SWC titled "3rd Independent Compliance Audit" dated 13/1/25 Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (AWRC and Pipelines Project (CSSI 8609189): Provision of independent audit report and submission of response to audit findings in accordance with conditions A40 and A41" dated 10/1/25 DPHI Post Approval form reference 0055102 	The 3rd Independent Audit Report and response was provided to DPHI on 10/1/25 and was available on the SWC website as required by this condition. The site inspection for IA3 was conducted on 28/10/24, so submission was within the 2 month timeframe required by Conditions A41 was complied with.	Compliant
A42	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (DPIE, 2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Operational requirement	Not triggered
A43	The Planning Secretary must be notified via the Major Projects Website as soon as possible and no later than 12 hours after the Proponent becomes aware of an incident. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the location and nature of the incident.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Environmental Events Register_dated 30/4/25 	The Auditor was provided with a copy of the incident register for the Audit period. The incidents were relatively minor in nature and did not trigger the requirement to notify DPHI or other agencies as required by the conditions of this consent.	Not triggered
A44	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A of this approval.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	As above. There were no reportable incidents raised during the audit period.	Not triggered
A45	The Planning Secretary must be notified via the Major Projects Website within seven days after the Proponent becomes aware of any non-compliance. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one), identify the condition/s against which the CSSI is non-compliant, the nature of the non-compliance, the reason for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	As noted in the Audit interview, there have been no non compliances reported during the Audit period.	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
A46	A non-compliance which has been notified as an incident under Condition A43 does not need to be notified as a non-compliance.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Noted	Not Triggered
A47	Heavy vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and CSSI application number to enable immediate identification by a person viewing the heavy vehicle. No more than one set of project markings can be displayed on a heavy vehicle at any point of time.	<ul style="list-style-type: none"> Photographs showing the name and CSSI number John Holland Data and Digitalisation, SpoilTrak User Manual Audit Interview 29/04/25 Site Inspection 29/04/25 	There were no vehicles (spoil trucks or other) observed during the audit site inspection that had markings from other projects. As noted in previous audits, a procedure has been developed and implemented that requires the checking of project stickers at the main gate.	Compliant
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.	https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppersouthcreek-advanced-water-recycling-centre.html?refid=SWTID7&projectName=Upper%20South%20Creek%20Advanced%20Water%20Recycling%20Centre&cc=dxBwZxIrb3V0aGlyZWVrQHN5ZG5leXhkdGVyZW5kSSh0== <ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	Appropriate signage was displayed at the AWRC site entrance detailing Condition A48 requirements,. The relevant information was also provided on the project website.	Compliant
B1	<p>A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication about construction and operation of Stage 1 of the CSSI with:</p> <p>(a) the community (including adjoining affected landowners and businesses, and others directly impacted by Stage 1 of the CSSI);</p> <p>(b) Aboriginal people, Registered Aboriginal Parties (RAPs) and LALCs; and</p> <p>(c) the relevant councils and relevant government agencies.</p>	<ul style="list-style-type: none"> Community & Stakeholder Engagement Plan (CSEP) Upper South Creek Advanced Water Recycling Centre and Pipelines, dated August 2023 Letter from DPHI to SWC titled " Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-B5)" dated 20/1/23 Letter from BB Enviro to SWC titled "Environmental Representative (ER) Review and approval - Community and Stakeholder Engagement Plan (CSEP) Rev D, SSI 8609189 - Upper South Creek Advanced Water Recycling Centre" dated 2/2/24 241101_L_USC_CSEP Rev E_ER Approval Letter, dated 1/11/24 TW_ FOR REVIEW_ USC AWRC & Pipelines CSEP Rev E, dated 17/10/24 Audit Interview 29/04/25 	<p>The Community Communication Strategy (CCS) includes the relevant information as required by this condition and was approved by DPHI on 20/1/23.</p> <p>Some minor amendments to the Community and Stakeholder Engagement Plan (CSEP) were made during the previous audit period with Revision D of the CSEP endorsed by the ER on 2/2/24.</p> <p>The CSEP was revised during the previous (IA #3) audit period and the ER approved Revision E in a letter dated 1/11/24.</p>	Compliant
B2	<p>The Community Communication Strategy must:</p> <p>(a) identify people, organisations, councils and agencies to be consulted during the design and Work phases of Stage 1 of the CSSI;</p> <p>(b) identify details of the community and its demographics;</p> <p>(c) identify timing of consultation;</p> <p>(d) set out procedures and mechanisms for the regular distribution of accessible information including to RAPs, LOTE, Culturally and Linguistically Diverse, and vulnerable communities about or relevant to Stage 1 of the CSSI;</p> <p>(e) identify opportunities for education within the community about construction sites;</p> <p>(f) detail the measures for advising the community in advance of upcoming construction including upcoming out-of-hours work as required by Condition E43;</p> <p>(g) detail measures for consulting with Fairfield City Council about disruption to Cabravale Leisure Centre car park and potential investigation of an alternate brine pipeline alignment at this location;</p> <p>(h) provide for the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community(ies) for Stage 1 of the CSSI;</p> <p>(i) detail the role and responsibilities of the Public Liaison Officer(s) engaged under Condition B6;</p> <p>(j) set out procedures and mechanisms:</p> <p>(i) through which the community can discuss or provide feedback to the Proponent;</p> <p>(ii) through which the Proponent will respond to enquiries or feedback from the community; and</p> <p>(iii) to resolve any issues and mediate any disputes that may arise in relation to the environmental management and delivery of Stage 1 of the CSSI, including disputes regarding rectification or compensation;</p> <p>(k) address who will engage with the community, relevant councils and agencies.</p>	<ul style="list-style-type: none"> Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines 4/10/23 USC-JHG-MPL-CSR-0002 Letter from DPHI to SWC titled " Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-B5)" dated 20/1/23 241101_L_USC_CSEP Rev E_ER Approval Letter, dated 1/11/24 TW_ FOR REVIEW_ USC AWRC & Pipelines CSEP Rev E, dated 17/10/24 Audit Interview 29/04/25 	The Community Communication Strategy (CCS) includes the relevant information as required by this condition and was approved by DPHI on 20/1/23.	Compliant
B3	The Community Communication Strategy must be submitted to the Planning Secretary and be approved prior to the commencement of any Work.	<ul style="list-style-type: none"> Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines 4/10/23 USC-JHG-MPL-CSR-0002 Letter from DPHI to SWC titled " Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-B5)" dated 20/1/23 Audit Interview 29/04/25 	The Community Communication Strategy was approved by DPHI on 20/1/23 prior to Work commencing on the 20/2/23.	Compliant
B4	Work for the purposes of Stage 1 of the CSSI must not commence until the Community Communication Strategy has been approved by the Planning Secretary.	<ul style="list-style-type: none"> Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines 4/10/23 USC-JHG-MPL-CSR-0002 Letter from DPHI to SWC titled " Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-B5)" dated 20/1/23 Audit Interview 29/04/25 	The Community Communication Strategy was approved by DPHI on 20/1/23 prior to Work commencing on the 20/2/23.	Compliant
B5	The Community Communication Strategy as approved by the Planning Secretary, including any minor amendments approved by the ER, must be implemented for the duration of the Work and for 12 months following the completion of construction.	<ul style="list-style-type: none"> Audit Interview 29/04/25 One month lookahead notification May 2025 One month lookahead notification April 2025 One month lookahead notification March 2025 One month lookahead notification February 2025 One month lookahead notification January 2025 One month lookahead notification December 2024 USC Complaints Register up to date as of 26/3/25 Nightwork on Badu Muru Grove, Kemps Creek Project Information Notification 26.2.25 One Month Work Lookahead notification - August 2024 Noise and Vibration fact sheet Complaints Register 	Substantial evidence was reviewed by the Auditor to demonstrate the effective implementation of the Community Communications Strategy throughout the audit period. Minor updates were made to the CCS during the Audit period in relation to the green space.	Compliant
B6	A Public Liaison Officer must be appointed to assist the public with questions and complaints they may have at any time during Work. The Public Liaison Officer must be available at all times that Work is occurring.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	The JHG Community Relations Manager is the nominated Public Liaison Officer (PLO) and has suitable and relevant experience to perform the role. There has been no change in the PLO role during the audit period	Compliant
B7	<p>A Complaints Management System must be prepared and implemented before the commencement of any Work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of Stage 1 of the CSSI. The Complaints Management System must be consistent with Sydney Water's Complaint Policy (Document number: 735107, version 4, dated 27 October 2021).</p> <p>Note: In the situation where there are different entities constructing and operating Stage 1 of the CSSI, continuity of access to the Complaints Management System must be maintained.</p>	<ul style="list-style-type: none"> Flyer dated 5 August 2023 "Start of work and how you can talk to us - Upper South Creek Advanced Water Recycling Centre" Complaints Policy, Appendix B Noise and Vibration COMP Sub-plan Complaints Policy, Appendix I Community and Stakeholder Engagement Plan Audit Interview 29/04/25 Site Inspection 29/04/25 Automatic email response (example) USC Complaints Register up to date as of 26/3/25 	Consultation Manager is the complaints system and has been implemented for the duration of the project. Supporting information regarding the complaints system and SWC Policy is provided on the project website.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
B8	<p>The following information must be available to facilitate community enquiries and manage complaints one month before the commencement of Work and for 12 months following the completion of construction:</p> <p>(a) a 24-hour toll free telephone number for the registration of complaints and enquiries about Stage 1 of the CSSI;</p> <p>(b) a postal address to which written complaints and enquiries may be sent;</p> <p>(c) an email address to which electronic complaints and enquiries may be transmitted; and</p> <p>(d) a mediation system for complaints unable to be resolved, consistent with Sydney Water's Complaint Policy (Document number: 735107, version 4, dated 27 October 2021 or its subsequent versions), and inclusive of escalation of a complaint to an independent dispute resolution body.</p> <p>This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.</p>	<ul style="list-style-type: none"> Complaints Policy, Appendix B Noise and Vibration CEMP Sub-plan Complaints Policy, Appendix J Community and Stakeholder Engagement Plan Audit Interview 29/04/25 <p>https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppersouthcreek-advanced-water-recycling-centre.html?refid=SWTID7&projectName=Upper%20South%20Creek%20Advanced%20Water%20Recycling%20Centre&cce=dXBwZXIzb3V0aGNyZWVrQHNSZG5leXdhbGVyLnNvb5ShdQ==</p>	<p>During the Audit period, the website has changed with the USC project information incorporated into the broader SWC website.</p> <p>The website includes the following details:</p> <ul style="list-style-type: none"> - Complaints and enquiries line (1800 064 127) - Email uppersouthcreek@sydneywater.com.au - Post PO Box 160 Kemps Creek NSW 2178 - Complaints system that is linked to the latest version of the SWC complaints policy <p>The SWC information including an interpreter service covering ten different languages.</p>	Compliant
B9	<p>A Complaints Register must be maintained recording information on all complaints received about Stage 1 of the CSSI during the carrying out of any Work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the:</p> <p>(a) number of complaints received;</p> <p>(b) the date and time of the complaint;</p> <p>(c) the method by which the complaint was made;</p> <p>(d) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;</p> <p>(e) nature of the complaint;</p> <p>(f) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and</p> <p>(g) if no action was taken, the reason(s) why no action was taken.</p>	<ul style="list-style-type: none"> Complaints Register up to date as of 26/3/25 	<p>"Consultation Manager" has been established to record, monitor and close out complaints. In addition an excel spreadsheet is produced to track and monitor complaints.</p> <p>The Consultation Manager/excel spreadsheet includes all of the information as required by this condition.</p> <p>Further details of complaints received during the audit period are provided in Section 3.3 of the main audit report.</p>	Compliant
B10	<p>Complainants must be advised of the following information before, or as soon as practicable after, providing personal information:</p> <p>(a) the Complaints Register may be forwarded to government agencies, including the Department (Department of Planning and Environment, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150), to allow them to undertake their regulatory duties;</p> <p>(b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies;</p> <p>(c) the supply of personal information by the complainant is voluntary; and</p> <p>(d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement).</p> <p>The Collection Statement must be included on the Proponent or development website to make prospective complainants aware of their rights under the Privacy and Personal Information Protection Act 1998 (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.</p>	<p>https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppersouthcreek-advanced-water-recycling-centre.html?refid=SWTID7&projectName=Upper%20South%20Creek%20Advanced%20Water%20Recycling%20Centre&cce=dXBwZXIzb3V0aGNyZWVrQHNSZG5leXdhbGVyLnNvb5ShdQ==</p>	<p>The project website includes a statement that addresses these requirements. When complainants contact the project, it is normally done by email. The stakeholder is contacted and verbally advised of this information. Community contact cards provide details of the project website.</p> <p>Emailed respondents include an automatic bounce back which states "Please note that complaints received by our project are recorded in a complaints register that may be forwarded to government agencies, including the Department of Planning and Environment. By providing personal information, the complainant authorises Sydney Water and its delivery partner John Holland to provide that information to government agencies. The supply of personal information is voluntary and you have the right to contact government agencies to collect personal information held about you or to correct or amend that information".</p>	Compliant
B11	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	<p>https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppersouthcreek-advanced-water-recycling-centre.html?refid=SWTID7&projectName=Upper%20South%20Creek%20Advanced%20Water%20Recycling%20Centre&cce=dXBwZXIzb3V0aGNyZWVrQHNSZG5leXdhbGVyLnNvb5ShdQ==</p>	The Planning Secretary is not known to have requested a copy of the Complaints Register. A summary is provided to DPHI via the ER Monthly Report.	Not triggered
B12	<p>A website or webpage providing information in relation to Stage 1 of the CSSI must be established before commencement of Work and be maintained for the duration of construction, and for a minimum of 24 months following the completion of construction of Stage 1 of the CSSI. The following up-to-date information (excluding confidential, private, commercial information or any other information that the Planning Secretary has approved to be excluded) must be published before the relevant Work commences and maintained on the website or dedicated pages including:</p> <p>(a) information on the current implementation status of Stage 1 of the CSSI;</p> <p>(b) a copy of the documents listed in Condition A1, and any documentation relating to any modifications made to the CSSI or the terms of this approval;</p> <p>(c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval;</p> <p>(d) a copy of each statutory approval, licence or permit required and obtained in relation to Stage 1 of the CSSI;</p> <p>(e) a copy of the current version of each document required under the terms of this approval; and</p> <p>(f) a copy of the audit reports required under this approval.</p> <p>Where the information / document relates to a particular Work or is required to be implemented, it must be published before the commencement of the relevant Work to which it relates or before its implementation.</p> <p>All information required in this condition must be provided on the Proponent's website, ordered in a logical sequence and which is easy to navigate.</p> <p><i>Note: The intention of this condition is to increase transparency and for information/documents required as part of the approval to be provided proactively and publicly in an easily accessible manner. Where information is exempted by this condition, it is intended that these documents are provided in their redacted form.</i></p>	<p>https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppersouthcreek-advanced-water-recycling-centre.html?refid=SWTID7&projectName=Upper%20South%20Creek%20Advanced%20Water%20Recycling%20Centre&cce=dXBwZXIzb3V0aGNyZWVrQHNSZG5leXdhbGVyLnNvb5ShdQ==</p>	<p>During the Audit period, the website has changed with the USC project information incorporated into the broader SWC website. A new dedicated page has been prepared that includes the following information:</p> <ul style="list-style-type: none"> - Community newsletters and notifications - Community updates - Start of work notices - Compliance Reports - Staging report - Independent Environmental Audits and responses to audit findings - Construction Environmental Management Plans - Plans and reports such as annual sustainability reports, urban design and landscape plan - Licences and permits including the Environment Protection Licence and Premises Maps - Community Agreements - Cultural and linguistically diverse fact sheets - Additional information including FAQ's, photos, videos and project timeline 	Compliant
C1	A Construction Environmental Management Plan (CEMP) must be prepared having regard to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). The CEMP must detail how the performance outcomes, commitments and mitigation measures specified in the documents list in Condition A1 will be implemented and achieved during construction.	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Document Number: USCP-IHG-MPL-ENV-0008 Revision: A 22/08/2023 Audit Interview 29/04/25 	A Construction Environmental Management Plan (CEMP) has been prepared in accordance with this condition. Sufficient evidence was reviewed by the auditor that demonstrates the effective implementation of the plan on site.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
C2	<p>The CEMP must provide:</p> <p>(a) a description of activities to be undertaken during construction (including the scheduling of construction);</p> <p>(b) details of environmental and social policies, guidelines and principles to be followed in the construction of Stage 1 of the CSSI;</p> <p>(c) a program for ongoing analysis of the key environmental and social impact risks arising from the activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of construction of Stage 1 of the CSSI;</p> <p>(d) details of how the activities described in subsection (a) of this condition will be carried out to:</p> <p>(i) meet the performance outcomes stated in the documents listed in Condition A1 and as required by this approval; and</p> <p>(ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition;</p> <p>(e) an inspection program detailing the activities to be inspected and frequency of inspections;</p> <p>(f) a protocol for managing and reporting any:</p> <p>(i) incidents; and</p> <p>(ii) non-compliances with this approval or statutory requirements;</p> <p>(g) procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction;</p> <p>(h) a list of all the CEMP Sub-plans required in respect of construction, as set out in Condition C4. Where staged construction of Stage 1 of the CSSI is proposed, the CEMP must also identify which CEMP Sub-plan applies to each of the proposed stages of construction;</p> <p>(i) an organisational chart including description of the roles and environmental responsibilities for relevant employees and any independent appointments;</p> <p>(j) for training and induction for employees, including contractors and sub-contractors, in relation to environmental, social and compliance obligations under the terms of this approval;</p> <p>(k) for periodic review and update of the CEMP and all associated plans and programs; and</p> <p>(l) measures to manage bushfire hazard and risk during construction.</p> <p>Note: CEMP(s) may reflect the construction of the project through geographical activities, temporal activities or activity based staging.</p>	<ul style="list-style-type: none"> • Surface Water & Groundwater CEMP Sub-plan (USCP-JHG-MPL-ENV-0001) • Flood Emergency Response CEMP Sub-plan (USCP-JHG-MPL-ENV-0002) • Soils & Contamination CEMP Sub-plan (USCP-JHG-MPL-ENV-0003) • Biodiversity CEMP Sub-plan (USCP-JHG-MPL-ENV-0004) • Traffic & Transport CEMP Sub-plan (USCP-JHG-MPL-ENV-0005) • Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) • Noise & Vibration CEMP Sub-plan (USCP-JHG-MPL-ENV-0007) • Air Quality CEMP Sub-plan (USCP-JHG-MPL-ENV-0009) • Waste & Resource Use CEMP Sub-plan (USCP-JHG-MPL-ENV-0010) • Outgoing letter from ER to DPHI 25/08/2023 Subject: Environmental Representative (ER) review and approval – Revised CEMP and Subplans – Rev A • SSI-8609189 – Upper South Creek Advanced Water Recycling Centre • DPHI Approval dated 08/08/2023 their ref:SSI-8609189 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Traffic and Transport CEMP Sub-plan, Revision C" dated 20/8/24 	The CEMP includes the relevant information and was endorsed by the independent Environmental Representative prior to approval by DPHI on 8/8/23.	Compliant
C3	The CEMP (and relevant CEMP sub-plans) must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one month before the commencement of construction, or where construction is staged, no later than one month before the commencement of each stage.	<ul style="list-style-type: none"> • ER recommendation letter 25/08/2023 from BBEnviro to SWC • DPHI Approval dated 08/08/2023 their ref:SSI-8609189 • Audit Interview 29/04/25 	The CEMP was endorsed by the ER on 21/4/23 and approved by DPHI on 8/8/23. Construction commenced on 28/8/23.	Compliant
C4	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.	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189) - Approval of Construction Environmental Management Plan, Subplans monitoring programs and Out of Hours Work Protocol, dated 8/8/23 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Soils and Contamination CEMP Sub-plan, Revision B" dated 3/12/24 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Traffic and Transport CEMP Sub-plan, Revision D" dated 11/12/24 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision D, dated 2/12/24 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Surface Water and Groundwater CEMP Sub plan, Revision D, dated 11/2/25 • MP Revisions Schedule dated 30/5/25 • Audit Interview 29/04/25 	<p>The DPHI Letter of Approval notes the CEMP and Sub-plans have been prepared in consultation with EPA, EH, DPHI Water, DPI Fisheries, Water NSW, SES, TNSW, Heritage NSW, Penrith City Council, Fairfield City Council, and Liverpool City Council. Consultation reports have been prepared for all CEMP and Sub-plans that require consultation and were appended to each Sub-plan.</p> <p>Minor amendments were made to the Biodiversity, Construction Noise and Vibration, Surface and Groundwater Sub-plans during the audit period and were endorsed by the ER.</p> <p>A Management Plan Schedule was sighted and is maintained by the project to track plan updates.</p>	Compliant
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> <p>(c) the relevant terms of this approval will be complied with; and</p> <p>(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.</p>	<ul style="list-style-type: none"> • CEMP Sub-plans as above • Audit Interview 29/04/25 	The CEMP Sub-plans include the relevant information and were endorsed by the Independent Environmental Representative.	Compliant
C6	<p>The Surface Water and Groundwater CEMP Sub-Plan must be prepared by a suitably qualified expert and include, but not limited to:</p> <p>(a) measures to achieve compliance with the NSW Government Wianamatta South Creek waterway health objectives and construction phase stormwater management targets, in accordance with the Wianamatta MUSIC modelling toolkit and Technical Guidance for Achieving Wianamatta South Creek Stormwater Management Targets (DPHI, 2022);</p> <p>(b) detail erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book';</p> <p>(c) detail all off-site flows from the AWRC site;</p> <p>(d) the Dewatering Procedure and Drilling Fluid Management Procedure as committed to in the documents listed in Condition A1.</p>	<ul style="list-style-type: none"> • Surface Water & Groundwater CEMP Sub-plan (USCP-JHG-MPL-ENV-0001) • Audit Interview 29/04/25 	The Surface and Groundwater CEMP Sub-plan was prepared by a suitably qualified expert and contains the relevant information as required by this condition. A minor amendment to the Surface and Groundwater CEMP was made and endorsed by the ER during the Audit period.	Compliant
C7	The Flood Emergency Response CEMP Sub-Plan must include measures for managing flood risks during construction and address flood recovery.	<ul style="list-style-type: none"> • Flood Emergency Response CEMP Sub-plan (USCP-JHG-MPL-ENV-0002) • Audit Interview 29/04/25 	The Flood Emergency Sub-plan includes the relevant information as required by this condition. No changes to the FESP were made during the Audit period.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
C8	<p>The Soils and Contamination CEMP Sub-Plan 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. The Soils and Contamination CEMP Sub-Plan must include measures to address any contamination found during construction. The Soils and Contamination CEMP Sub-Plan must include (but not limited to):</p> <p>(a) details of construction activities and their locations which have the potential to expose areas known to contain, or potentially contain, contaminated soils and/or other contaminated materials;</p> <p>(b) measures for the handling, treatment and management of hazardous and contaminated soils and materials, including measures to manage and/or minimise worker and public health and safety risks with regard to exposure to contamination;</p> <p>(c) a description of how the effectiveness of the actions and measures for managing contamination impacts would be monitored during the proposed works, clearly indicating how often this monitoring would be undertaken, the locations where monitoring would take place, and how the results of the monitoring would be recorded and reported;</p> <p>(d) measures to identify contamination during Works;</p> <p>(e) measures to manage acid sulfate soils;</p> <p>(f) measures to manage asbestos finds; and</p> <p>(g) measures to detail unexpected finds consistent with the Unexpected Finds Procedure for Contamination required under Condition E88. The procedure must include details of who will be responsible for implementing the Unexpected Finds Procedure for Contamination and the roles and responsibilities of all parties involved.</p> <p>The Soils and Contamination CEMP Sub-Plan must be reviewed by the Site Auditor engaged under Condition E74. The Site Auditor must issue interim audit advice or a relevant site audit statement stating whether they consider the Soils and Contamination CEMP Sub-Plan to be adequate. Once reviewed by the Site Auditor and approved by the Planning Secretary, the Soils and Contamination CEMP Sub-Plan must be implemented throughout the duration of construction.</p>	<ul style="list-style-type: none"> • Soils & Contamination CEMP Sub-plan (USCP-JHG-MPL-ENV-0003) • Audit Interview 29/04/25 	<p>The Soils and Contamination CEMP subplan was prepared by a suitably qualified expert and contains the relevant information as required by this condition.</p> <p>No changes to the plan were made during the audit period.</p>	Compliant
C9	<p>The Biodiversity CEMP Sub-Plan must be prepared by a suitably qualified and experienced ecologist and include, but not limited to:</p> <p>(a) details of the measures to avoid and minimise disturbance to native vegetation, and other habitat of native flora and fauna species;</p> <p>(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;</p> <p>(c) measures to prevent the spread of weeds, pathogens and to manage biosecurity;</p> <p>(d) protocols for incidental finds of threatened species and ecological communities within the construction boundary;</p>	<ul style="list-style-type: none"> • Biodiversity CEMP Sub-plan (USCP-JHG-MPL-ENV-0004) • Audit Interview 29/04/25 	<p>The Biodiversity CEMP Sub-plan was prepared by a suitably qualified expert and contains the relevant information as required by this condition. Minor changes to the Biodiversity CEMP subplan were endorsed by the ER during the Audit period.</p>	Compliant
C10	<p>The Noise and Vibration CEMP Sub-Plan must include, but not limited to:</p> <p>(a) details of all sensitive land use(s) (including noise and vibration sensitive working areas) that are potentially exposed to construction noise and vibration;</p> <p>(b) construction noise and vibration performance criteria for Stage 1 of the CSSI;</p> <p>(c) details of mitigation and management measure and procedures that will be implemented to manage construction noise and vibration impacts;</p> <p>(d) construction timetabling, in particular construction activities outside of standard hours; and</p> <p>(e) measures to minimise cumulative construction impacts and the likelihood for construction fatigue from both concurrent activities and other projects in the area.</p>	<ul style="list-style-type: none"> • Noise & Vibration CEMP Sub-plan (USCP-JHG-MPL-ENV-0007) • Audit Interview 29/04/25 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision D, dated 26/11/24 	<p>The Noise and Vibration CEMP subplan was prepared by a suitably qualified expert and contains the relevant information as required by this condition.</p> <p>Minor amendments were made to the Noise & Vibration Sub-plan during the audit period and were endorsed by the ER.</p>	Compliant
C11	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary.	<ul style="list-style-type: none"> • DPHI Approval dated 08/08/2023 ref-SSI-8609189 • Audit Interview 29/04/25 	Construction commenced after the CEMP and subplans were approved by the Planning Secretary	Compliant
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.	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Biodiversity CEMP with minor updates to the Weed and Pathogen Management Procedure (Appendix F)" dated 31/10/24 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision D, dated 26/11/24 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Surface Water and Groundwater CEMP Sub plan, Revision D, dated 11/2/25 • MP Revisions Schedule dated 30/5/25 • Site Photos - various 	<p>CEMP and Sub-plans are being implemented as required by this condition.</p> <p>Minor amendments were made to the Biodiversity, Construction Noise and Vibration, Surface and Groundwater Sub-plans during the audit period and were endorsed by the ER.</p> <p>A Management Plan Schedule was sighted and is maintained by the project to track plan updates.</p> <p>As noted in 1A3, a non compliance was raised in relation to the failure to effectively implement dust management measures as documented in the CEMP.</p> <p>As observed during the Audit site inspection, construction of the pipelines and rehabilitation of exposed areas is now complete, thereby eliminating the risk of a dust related incident in these areas. Dust management practices at the AWRC site included a sealed carpark, speed limit restrictions, water carts and a street sweeper. Exposed surfaces were being progressively stabilised to reduce dust. Photographic evidence was provided to the Auditor providing evidence of the implementation of appropriate dust controls throughout the Audit period including use of water cart, streetsweeper etc.</p>	Compliant
C13	<p>The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies identified for each to compare actual performance of construction of Stage 1 of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP: Required Construction Monitoring Programs Relevant government agencies to be consulted for each Construction Monitoring Program</p> <p>(a) Surface water quality EPA, EH&G, DPHI Water, DPI Fisheries, WaterNSW and relevant council(s)</p> <p>(b) Groundwater EPA, DPHI Water</p> <p>(c) Noise and vibration EPA, WaterNSW and relevant council(s)</p>	<ul style="list-style-type: none"> • Surface Water Quality Monitoring Program - CEMP Appendix B1 – Surface Water and Groundwater Management Sub Plan • Groundwater Monitoring Program CEMP Appendix B1 – Surface Water and Groundwater Management Sub Plan • Letter from BB Enviro to SWC RE: ER Review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision B, dated 17/6/24 • Letter from BB Enviro to SWC RE: ER Review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision C, dated 17/9/24 • Noise and Vibration Monitoring Program CEMP Appendix B5 – Noise and Vibration Management Sub Plan • Noise & Vibration CEMP Sub-plan (USCP-JHG-MPL-ENV-0007) • Upper South Creek Advanced Water Recycling Centre and Pipelines, Noise and Vibration Subplan, Rev C dated 15/8/24 • Upper South Creek Advanced Water Recycling Centre and Pipelines, Noise and Vibration Subplan, Rev D dated 26/11/24 • Acoustic Advisor Endorsement - Upper South Creek Project - review of Noise and Vibration CEMP Subplan dated 17/9/24 • Upper South Creek Advanced Water Recycling Centre and Pipelines NVSCP Appendix E Noise and Vibration Monitoring Program Rev C dated "15/8/24 • Audit Interview 29/04/25 	<p>The Construction Monitoring Programs are included in the relevant CEMP Sub-plans and were prepared in consultation with relevant agencies as noted above.</p> <p>Following IA#2, the Noise and Vibration Monitoring Plan was amended to address the non compliance with reporting timelines (as noted in IA#2)</p>	Compliant
C14	<p>Each Construction Monitoring Program (CMP) must have consideration of SMART principles and provide:</p> <p>(a) details of baseline data available;</p> <p>(b) details of baseline data to be obtained and when;</p> <p>(c) details of all monitoring of the project to be undertaken;</p> <p>(d) the parameters of the project to be monitored;</p> <p>(e) the frequency of monitoring to be undertaken;</p> <p>(f) the location of monitoring;</p> <p>(g) the reporting of monitoring results and analysis results against relevant criteria;</p> <p>(h) details of the methods that will be used to analyse the monitoring data;</p> <p>(i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicate unacceptable project impacts; and</p> <p>(j) any consultation to be undertaken in relation to the monitoring programs.</p>	<ul style="list-style-type: none"> • Surface Water Quality Monitoring Program - CEMP Appendix B1 – Surface Water and Groundwater Management Sub Plan • Groundwater Monitoring Program CEMP Appendix B1 – Surface Water and Groundwater Management Sub Plan • Noise and Vibration Monitoring Program CEMP Appendix B5 – Noise and Vibration Management Sub Plan • Audit Interview 29/04/25 	<p>The Construction Monitoring Programs include the relevant information as required by this condition, and were endorsed by the ER and approved by DPHI.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
C15	The CMP(s) must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one month before the commencement of construction, or where construction is staged, no later than one month before the commencement of each stage.	<ul style="list-style-type: none"> ER recommendation letter 25/08/2023 from BBEnviro to SWC DPHI Approval dated 08/08/2023 their ref:SSI-8609189 Audit Interview 29/04/25 	Monitoring programs were endorsed by the ER and submitted to DPHI progressively in April/May 2023. The monitoring programs were approved by DPHI as part of the CEMP package and are appendices to the relevant Sub-plans. Construction commenced on 28/8/23, more than one month after submission of the CEMP and Sub-plans to DPHI.	Compliant
C16	Construction must not commence until the relevant CMP(s) have been approved by the Planning Secretary and all relevant baseline data for the specific construction activity has been collected.	<ul style="list-style-type: none"> DPHI Approval dated 08/08/2023 their ref:SSI-8609189 7837350ddbe0e3d3e54f9bb23cb65c7f_Approval_Letter_USC_AWRC_CEMP_Signed_8_August_2023.pdf Audit Interview 29/04/25 	Monitoring programs were endorsed by the ER and submitted to DPHI progressively in April/May 2023. The monitoring programs were approved as part of the CEMP package and are appendices to the relevant Sub-plans. Construction commenced on 28/8/23, more than one month after submission of the CEMP and Sub-plans to DPHI.	Compliant
C17	The CMP(s), as approved, including any minor amendments approved by the ER, must be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary, whichever is the greater.	<ul style="list-style-type: none"> Noise and Vibration Monitoring Program CEMP Appendix B5 Noise and Vibration Management Sub-plan Upper South Creek, Advanced Water Recycling Centre and Pipelines, Surface Water and Groundwater CEMP and Sub-plans USC Advanced Water Recycling Centre and Pipelines, Noise and Vibration Construction Monitoring Report, Rev 0 dated 6/1/25 USC Advanced Water Recycling Centre and Pipelines, Groundwater Monitoring Report, Rev 02 dated 05/03/25 USC Advanced Water Recycling Centre and Pipelines, Surface Water Monitoring Report Rev 1 dated 25/11/24 	<p>Construction Monitoring Programs for Noise and Vibration, Groundwater and Surface Water continue to be implemented, as evidenced in corresponding monitoring reports for the August 2023-February 2024 period.</p> <p>Monitoring reports for March-August 2024 were in draft at the time of the audit interview.</p>	Compliant
C18	<p>The results of the CMP(s) must be submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant CMP.</p> <p><i>Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.</i></p>	<ul style="list-style-type: none"> USC Advanced Water Recycling Centre and Pipelines, Noise and Vibration Construction Monitoring Report, Rev 1 dated 6/1/25 USC Advanced Water Recycling Centre and Pipelines, Groundwater Monitoring Report, Rev 02 dated 05/03/25 USC Advanced Water Recycling Centre and Pipelines, Surface Water Monitoring Report Rev 1 dated 25/11/24 CEMP Relevant Authorities Register Email from JHG to WaterNSW titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Letter from DCCCEW titled "Upper South Creek - Construction Monitoring Report for March and August 2024 (SSI-8609189) dated 18/3/25 Email from JHG to OEH titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to DPIE Water Assessments titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to EPA titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to DPIRD titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Letter from JHG to DPI (Fisheries) titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to Penrith City Council titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to Canterbury Bankstown Council titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to Fairfield City Council titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to Liverpool City Council titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to Penrith City Council titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to BCS titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from JHG to Wollondilly Shire Council titled "USC Construction Monitoring Reports, March to August 2024" dated 11/3/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI- 8609189-PA-147)" dated 8/4/25 Email from BB Enviro to SWC titled "Construction Groundwater Report" dated 31/5/25 DPHI Post Approval form reference 8003547 	Construction Monitoring Reports for Noise and Vibration, Groundwater and Surface Water continue to be implemented with reporting undertaken 6 monthly. Evidence was provided to the Auditor demonstrating the relevant reports have been submitted to the relevant agencies as required by this condition including EPA, local councils, WaterNSW, DPIE Water, DPI (Fisheries) and EHG. Monitoring reports are provided to the ER, although this is not a specific requirement of this condition.	Compliant
D1	An Operational Environmental Management Plan (OEMP) must be prepared having regard to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). The OEMP must detail how the performance outcomes, commitments and mitigation measures made and identified in the documents listed in Condition A1 will be implemented and achieved during operation. Condition D1 does not apply if Condition D2 of this approval applies.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Operational requirement	Not triggered
D2	<p>An OEMP is not required for Stage 1 of the CSSI if the Proponent has a certified Environmental Management System (EMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that through the certified EMS or equivalent:</p> <p>(a) the performance outcomes, commitments and mitigation measures, made and identified in the documents listed in Condition A1, and specified relevant terms of this approval can be achieved;</p> <p>(b) issues identified through ongoing risk analysis can be managed; and</p> <p>(c) procedures are in place for rectifying any non-compliance with this approval identified during compliance auditing, incident management or any other time during operation.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Operational requirement	Not triggered
D3	The OEMP or evidence of EMS certification or equivalent as agreed with the Planning Secretary, must be submitted to the Planning Secretary for information no later than one month before the commencement of operation of Stage 1 of the CSSI.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Operational requirement	Not triggered
D4	The OEMP or certified EMS or equivalent, as submitted to the Planning Secretary and amended from time to time, must be implemented for the duration of operation of Stage 1 of the CSSI, and the OEMP or EMS certification or equivalent must be made publicly available before the commencement of operation.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Operational requirement	Not triggered
E1	In addition to the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1, all reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants, including odours during the construction and operation of Stage 1 of the CSSI.	<ul style="list-style-type: none"> Air Quality CEMP Sub-plan (USCP-JHG-MPL-ENV-0009) Rev B, dated 19/8/24 Site Inspection 29/04/25 	<p>Section 8 of the Air Quality CEMP subplan describes measures to be implemented to minimise air quality impacts</p> <p>As noted in 1A3, a non compliance was raised in relation to the failure to effectively implement dust management measures as documented in the CEMP.</p> <p>As observed during the Audit site inspection, construction of the pipelines and rehabilitation of exposed areas is now complete, thereby eliminating the risk of a dust related incident in these areas. Dust management practices at the AWRC site included a sealed carpark, speed limit restrictions, water carts and a street sweeper. Exposed surfaces were being progressively stabilised to reduce dust.</p> <p>No odour issues identified during the construction phase. No air quality or odour related complaints have been received during the audit period.</p>	Compliant
E2	The final design of the discharge stacks of each co-generation engine must include a sampling plane compliant with Australian Standard AS4323.1 Stationary source emissions – Selection of sampling positions (2021).	<ul style="list-style-type: none"> Audit Interview 29/04/25 	No co-generation for the project.	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E3	The Waste Gas Burner must be designed to comply with relevant provisions of Division 4 of Part 5 of the <i>Protection of the Environment Operations (Clean Air) Regulation 2021</i> .	<ul style="list-style-type: none"> Audit Interview 29/04/25 Upper South Creek Design Report, Revision 2, dated 13/8/24 (DRAFT) - excerpt only as at 31/10/24 Sydney Water Technical Specification – Waste Gas Burner Installations (D0001871) A19833-DS-001-1-Waste Gas Burners Data Sheet, 6/2/23 AWRC-SKH-P-4011-0001 [01] Digester-gas-system-sketch-pack-P&ID 	<p>As noted in IA#3, An excerpt of the DRAFT AWRC Design Report was provided to demonstrate compliance with Condition E3. The Design Report was still undergoing internal review at the time of IA3. The excerpt reflects its status at the time of pdf printing on 1/11/24.</p> <p>Section 15 of the AWRC Design Report addresses Anaerobic Digestion and Biogas Handling and confirms that two waste gas burners (duty/standby) are provided to allow any excess gas to be safely flared. Figure 23 in the report is a model extract showing its approximate location near-to the digestors ('gas flare').</p> <p>Table 54 of the AWRC Design Report provides a list of the relevant reference drawings (suite P4011), including the Waste Gas Burner #1 and #2. Detailed drawings P4011-15 and P4011-16 had not been developed at the time of IA3, however, the overarching 'digester gas system sketch pack' (P&ID) drawing P4011-1 has been prepared and issued for procurement purposes and was provided as evidence during the audit. The drawing Sheet 4 of 5 presents the location of waste gas burner #1 (labelled BNR6614).</p> <p>The data sheet for the burner was provided as evidence and states that the burner is compliant with Sydney Water Technical Specification – Waste Gas Burner Installations [D0001871]. The specification states that all waste gas burner installations must meet the relevant requirements of the POEO Act 1997 and its Clean Air Regulation (refer section 1.4).</p> <p>A copy of the Sydney Water specification was also provided as evidence.</p> <p>At the time of IA #4, the waste burner had not been installed yet noting that it may be introduced by Sydney Water at a later time when the amount of flows coming into the site are sufficient enough to justify or support the implementation of waste gas burners.</p>	Compliant
E4	All plant and equipment installed and used for the project must be: <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	<ul style="list-style-type: none"> Air Quality CEMP Sub-plan (USCP-JHG-MPL-ENV-0009) Audit Interview 29/04/25 Site Inspection 29/04/25 Equipment maintenance records Plant Prestart Mobile - JDM Monochrome Gantry Crane Singe Girder Top Running dated 28/3/25 USC -JH-FRM- PAE-001-11 Excavator Plant Pre-Acceptance Checklist dated 24/1/25 USC -JH-FRM- PAE-001-40 Woodchipper Plant Pre-Acceptance Checklist dated 19/3/25 USC -JH-FRM- PAE-001-76 Static Generator Plant Pre-Acceptance Checklist dated 10/5/25 	<p>Equipment was observed to be operating effectively with no visible exhaust plumes identified.</p> <p>Maintenance records for various items of equipment as required.</p>	Compliant
E5	Prior to the commencement of operation, the Proponent must prepare, implement and maintain an Odour Management Plan (OMP) for the AWRC. The OMP must be prepared by a suitably qualified and experienced person(s) in consultation with the EPA and submitted to the Planning Secretary for information.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Odour Management Plan, Rev 2 dated 27/5/25 	The preparation of the odour management plan has commenced and a draft document was provided to the Auditor as evidence. A project completions steering committee has been established between SWC and TJH - the Trillity John Holland Operations and Maintenance Joint Venture. At the time of IA #4, formal consultation with EPA had not commenced.	Not triggered
E6	The OMP must describe measures to minimise odour impacts associated with operation and include, but not necessarily limited to: <ul style="list-style-type: none"> (a) objectives and targets; (b) key performance indicators; (c) identification of all sources of odour associated with the operation; (d) a detailed description of odour mitigation methods and management practices; (e) a detailed description of the methods used for monitoring the effectiveness of the odour mitigation methods and management practices; (f) location, frequency and duration of monitoring; (g) details of proposed contingency measures should odour impacts occur; (h) a communications strategy for handling potential odour complaints that includes recording, investigation, reporting and actioning; and (i) system and performance review for continuous improvements. 	<ul style="list-style-type: none"> Audit Interview 29/04/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Odour Management Plan, Rev 2 dated 27/5/25 	<p>The Auditor reviewed the draft Odour management plan and notes the following:</p> <ul style="list-style-type: none"> Section 2 describes the objectives, targets and key performance indicators Section 4 describes the sources of odour Section 5 describes odour mitigation measures and management practices Section 6 describes the odour monitoring program Section 7 describes the contingency measures Section 8 describes the processes for communications and complaints management Section 9 describes processes for continual review and improvement. <p>SWC noted that the draft odour management plan has only recently been prepared and is currently being reviewed by SWC Odour specialists. The Auditor will undertake further review of the plan following review by the odour specialist and any further changes to the OMP</p>	Not triggered
E7	The Proponent must engage a suitably qualified and experienced person(s) to undertake post commissioning air emissions sampling to verify the emission performance of the co-generation engine.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	No co-generation for the project.	Not triggered
E8	The post commissioning sampling required under Condition E7 must occur within 3 months of the commissioning of the co-generation plant and corresponding air pollution controls.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	No co-generation for the project.	Not triggered
E9	Sampling at the co-generation engine ventilation outlet must be performed for all pollutants specified in column 1 of Table 3, using the methods listed in column 3 of Table 3. All sampling and analysis must be undertaken in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales. Table 3: Co-generation engine ventilation outlet criteria Pollutant Units of measure Sampling method Nitrogen dioxide Milligrams per cubic metre TM-11 Volatile organic compounds Milligrams per cubic metre TM-34 Carbon monoxide Milligrams per cubic metre TM-32 Temperature degrees Celsius TM-2 Velocity metres per second TM-2 Moisture Percent TM-22 Note: Where an alternative method is proposed to be used, this must be approved in writing by the EPA prior to its use.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	No co-generation for the project.	Not triggered
E10	A minimum of two rounds of sampling must be undertaken to provide a suitable characterisation of emissions. Sampling must be undertaken when plant/process conditions are representative of emissions during representative periods of normal operation.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Operational requirement	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E11	<p>An air emissions verification report must be prepared and submitted to the EPA and Planning Secretary for information no later than two months after completion of post commissioning sampling and monitoring. The air emissions verification report must contain, as a minimum, the following information:</p> <p>(a) a description of the process operating conditions at the time of sampling, including fuel usage rates and electricity generation (kWh);</p> <p>(b) a detailed description of the sampling location, including engineering drawings, schematics or photographs to support the description;</p> <p>(c) all information required to be reported under Section 4 of the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales;</p> <p>(d) comparison of measured emissions against the concentrations listed in Table 4:</p> <p>Table 4: Emission concentration standards</p> <p>Pollutant: Units of measure 100 percentile concentration standard Reference conditions Oxygen</p> <p>correction Averaging period Nitrogen dioxide Milligrams per cubic metre 450 Dry, 273K, 101.3 kPa 3.0%1 hour Volatile organic compounds (as n- propane) Milligrams per cubic metre 40 Dry, 273K, 101.3 kPa 3.0 1 hour</p> <p>(e) Where the comparison under Condition E11(d) identifies monitoring results greater than the 100th percentile concentration standard, the air emissions verification report must identify additional mitigation measures to achieve the concentration standards. A timeline for implementation of any additional mitigation measures identified must also be nominated within the report.</p> <p>Notes:</p> <p>1. Supporting evidence must be included which confirms that the plant/process was operating under normal, representative conditions at the time of sampling.</p> <p>2. The EPA may utilise information contained in the report submitted to include additional conditions in any EPL issued for the project, including emissions limits and requirements for ongoing monitoring.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 	Operational requirement	Not triggered
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.	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Upper South Creek Vegetation Clearing Register for the period from Project Commencement to 17/2/25 • Upper South Creek Advanced Water Recycling Centre and Pipelines Project, Pre-Clearance Assessment Report, Biosis. Revision 5 dated 19/10/23 • Upper South Creek Project - Clearing Permit Number AWRC- Clearing 013 dated 03/04/25 	<p>At the time of IA # 4, the majority of clearing activities had been completed with only minor clearing in the riparian zone at the AWRC site undertaken during the audit period. As noted in previous audits, to minimise flora and fauna impacts:</p> <ul style="list-style-type: none"> • A two stage process is implemented and is supervised by an experienced ecologist • Clearing permits are implemented which includes signoff by the project ecologist • A vegetation clearing tracker is maintained • Consistency Assessments are used to assess potential impacts to flora and fauna and note opportunities to reduce or eliminate clearing. • A project arborist is also engaged to minimise impacts to retained trees that will be retained. • A GIS system is used to track and monitor removed and retained trees. Field operators have access to the GIS database on their mobile phones. 	Compliant
E13	Impacts to plant community types and species credit species must not exceed those identified in Table 5 and Table 6.	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • USC Vegetation Clearing Tracker dated January 2025 	<p>At the time of the Audit, the substantial majority of clearing had been completed with only minor clearing undertaken in the riparian zone adjacent to the AWRC site.</p> <p>A vegetation clearing register has been developed and was provided to the Auditor as evidence. The Auditor assessed the clearing undertaken and notes that at this stage of the project, compliance with the clearing limits described in Tables 5 and 6 are being achieved. Further details are provided in the body of this audit report.</p>	Compliant
E14	<p>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:</p> <p>(a) acquiring and retiring "biodiversity credits" within the meaning of the BC Act; and / or</p> <p>(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</p> <p>(c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.</p> <p>Table 5: Ecosystem Credits to be Retired</p> <p>Table 6: Species Credits to be Retired</p> <p>Note: Excludes certified areas.</p>	<ul style="list-style-type: none"> • Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Evidence of retirement of Biodiversity Credits in accordance with Condition E16 in Satisfaction of Condition E14" dated 4/7/23 • Audit Interview 29/04/25 	<p>Appropriate evidence was provided to the Planning Secretary on 4 July 2023 and prior to the commencement of construction that demonstrated the retirement of the credits in accordance with this condition.</p> <p>No reduction in clearing credits was sought during the audit period.</p>	Compliant
E15	<p>Where evidence of compliance with the Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits (OEI, 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.</p> <p>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.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 	Noted	Compliant
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.	<ul style="list-style-type: none"> • Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Evidence of retirement of Biodiversity Credits in accordance with Condition E16 in Satisfaction of Condition E14" • Audit Interview 29/04/25 	Evidence of the retirement of credits in satisfaction of Condition E14 was provided to the Planning Secretary on 4/7/23. Letter was dated prior to the commencement of Construction in accordance with this condition.	Compliant
E17	<p>Where lands mapped as non-certified existing native vegetation (ENV) under the Order to confer biodiversity certification on the State Environmental Planning Policy (Sydney Regional Growth Centres) 2006 (the Order) are proposed to be impacted, the Proponent must prepare a Growth Centres Biodiversity Certification Offset Strategy. The strategy must:</p> <p>(a) be prepared in consultation with EHG and submitted to the Planning Secretary for approval prior to the commencement of construction;</p> <p>(b) be prepared in accordance with the Order;</p> <p>(c) detail how the Proponent proposes to meet the requirements specified under Relevant Biodiversity Measure (RBM) 8 of the Order; and</p> <p>(d) include the location of the offsets and the proposed measures to ensure the long-term protection of the offsets.</p> <p>Note: The Growth Centres Biodiversity Certification Offset Strategy under Condition E17 is only required in the event impacts on non-certified existing native vegetation (ENV) are proposed.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Email from SWC to DPHI titled "Upper South Creek Project- Biodiversity Offset Strategy" dated 17/5/24 • Letter from SWC to DPHI titled "Upper South Creek Biodiversity Offset Strategy, dated 9/5/23 	SWC have written to the Biodiversity and Conservation Division and advised that the Project will not impact this non-certified ENV. The area of non-certified ENV was on an indicative access road assessed in the EIS. Through construction planning the need to use this road has been eliminated.	Not triggered
E18	The Proponent must avoid direct or indirect impacts to ENV within RBM 12 red-hatched lands at Kemps Creek and Cross Street during construction of Stage 1 of the CSSI.	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	RBM12 lands have not been impacted at the time of the audit. Pipeline works were complete within previous disturbed RBM12 Corridor. RBM Rehabilitation Management Plan has been developed to restore disturbed areas in accordance with E19 and restoration works have commenced.	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
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.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines CoA9 Consultation Summary Report - Works in South Creek Rev01, dated 14/6/24 Upper South CoA E19 and E20 Creek Rehabilitation Management Plan, RMB12 Lands - Kemps Creek, Rev05, dated 23/5/24 DPHI Letter to SWC RE: Approval of Rehabilitation Management Plan, dated 30/5/24 DCCEEW Letter to JHG RE: Post approval consultation - conditions E19 and E20 - Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-84) Rehabilitation Management Plan RMB 12 lands - Kemps Creek, Rev 05 dated 23/05/24 Email from JHG to SWC RE: Revised RBM12-RMP for issue to DPHI, dated 23/5/24 DPHI Post Approval form 20240430083154 (submission to DPHI, dated 30/4/24) 	Preparation of the RBM12 Rehabilitation Management Plan has been completed in consultation with DPI Fisheries, BCS, DCCEEW, and Penrith City Council. Consultation with DCCEEW for the RBM12 Rehabilitation Management Plan was sighted as evidence. DCCEEW responded to the consultation issued in a letter dated 12/4/24. Approval of the Rehabilitation Management Plan was issued by DPHI in a letter dated 30/5/24. At the time of the Audit and as observed during the site inspection, rehabilitation of the RBM 12 lands was substantially complete with ongoing landscaping and maintenance undertaken during the Audit period.	Compliant
E20	The Rehabilitation Management Plan required under Condition E19 must be prepared in consultation with EHG and submitted to the Planning Secretary for approval one month before the commencement of construction in the RBM 12 red-hatched lands. The plan must include: (a) removal of all equipment, materials and environmental controls from site; (b) where like-for-like re-vegetation is not possible (for example, to minimise risk to pipelines from tree roots), consider vegetation suited to the infrastructure requirements and environmental conditions; (c) return disturbed areas to preconstruction ground level where practical; (d) rehabilitate areas of native vegetation removal to the highest ecological condition possible; (e) in areas of native vegetation removal, reuse felled vegetation (logs and tree-hollows) and other habitat features such as rocks and boulders to increase habitat values; (f) in areas of native vegetation removal, use locally sourced (local provenance) tube stock only. All species installed are to be locally indigenous and suitable and characteristic of the Plant Community Type (PCT) that would have originally occurred at the site; (g) where possible, reuse stockpiled vegetation as part of rehabilitation works; (h) where open trenching of waterways is required, enhance aquatic habitat and restore creeks to an improved state; and (i) preparation of six-monthly summary progress report(s) over the revegetation maintenance period, for submission to EHG for comment until EHG is satisfied that the vegetation is established.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines CoA9 Consultation Summary Report - Works in South Creek Rev01, dated 14/6/24 Upper South CoA E19 and E20 Creek Rehabilitation Management Plan, RMB12 Lands - Kemps Creek, Rev05, dated 23/5/24 DPHI Letter to SWC RE: Approval of Rehabilitation Management Plan, dated 30/5/24 DCCEEW Letter to JHG RE: Post approval consultation - conditions E19 and E20 - Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-84) Rehabilitation Management Plan RMB 12 lands - Kemps Creek, dated 23/05/25 Email from JHG to SWC RE: Revised RBM12-RMP for issue to DPHI, dated 23/5/24 DPHI Post Approval form 20240430083154 (submission to DPHI, dated 30/4/24) 	Preparation of the RBM12 Rehabilitation Management Plan has been completed in consultation with DPI Fisheries, BCS, DCCEEW, and Penrith City Council. Consultation with DCCEEW for the RBM12 Rehabilitation Management Plan was sighted as evidence. DCCEEW responded to the consultation issued in a letter dated 12/4/24. Approval of the Rehabilitation Management Plan was issued by DPHI in a letter dated 30/5/24. At the time of the Audit and as observed during the site inspection, rehabilitation of the RMB 12 lands was substantially complete with ongoing landscaping and maintenance undertaken during the Audit period.	Compliant
E21	The Proponent must minimise impacts to Key Fish Habitat (KFH) as defined in Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update).	<ul style="list-style-type: none"> Site Inspection 29/04/25 Progressive Erosion and Sediment Control Plan (PESCP), Nepean River Works - Construction of piling pad and creek stabilisation, dated 28/4/24 PESCP South Creek Diversion RevD, approved 30/6/24 CoA A9 Consultation Summary Report Works in South Creek Rev01, dated 14/6/24 EWMS Working in Waterways, Treated Water Pipeline and Brine Pipeline Alignment_signed Email from CPESC RE: South Creek diversion PESCP - Rev D, dated 11/7/24 Email from Ecologist RE: Supervision of infilling and aquatic fauna relocation of South Creek, dated 5/8/24 Nepean River Map - Vegetation Reduction Plan 	There were no works being undertaken in creeks or key fish habitat areas observed during the Audit with riparian rehabilitation works complete. As noted in previous audits, measures implemented to minimise impacts to Key Fish Habitat included: <ul style="list-style-type: none"> Preparation and implementation of Progressive Erosion and Sediment Control Plans (PESCPs) around creek and river crossings, endorsed by the CPESC, Geomorphologist and Ecologist Retention of riparian vegetation and tree roots (to avoid bank destabilisation) Use of HDD as a construction method where practical to avoid impacting creeks Specialist advice and review from aquatic ecologists, soil and water experts and geomorphologists on site supervision by aquatic ecologists during in stream work. EWMS are also prepared to identify environmental risks associated with the works and document controls for implementation. An A9 Consultation Report was also prepared for creek crossings, with evidence of consultation for the South Creek works examined during the audit. Consultation was undertaken with DPI Fisheries, DCCEEW BCS, DCCEEW Water and Penrith City Council, with evidence included in the Consultation Report.	Compliant
E22	The Proponent must take all reasonable and practicable measures to avoid open trenching of waterways, particularly Kemps Creek and South Creek, between late April and early June, and late October to late December, to minimise disruption of downstream and upstream Australian Bass migration.	<ul style="list-style-type: none"> Site Inspection 29/04/25 EIS Appendix J- Biodiversity Assessment Part 1 SEARS compliance table, Aquatic and Riparian Biodiversity Ecology Section. Email from habitat innovation to JHG dated 21/5/24 CPESC INSPECTION Prior to works, dated 1/8/24 CPESC INSPECTION Completion of Works, dated 18/9/24 	As noted in previous audits, open trenching works were previously undertaken in Cosgrove Creek. South Creek open trenching commenced in early August and was completed in about 3 weeks, outside the late April to early June avoidance timeframe pursuant to Condition E22. CPESC inspections prior to commencement and at completion of works were provided as evidence demonstrating the works at South Creek started in early August and were finished by 28/8/2024.	Compliant
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.	<ul style="list-style-type: none"> CoA E19 and E20 Rehabilitation Management Plan, RBM 12 Lands - Kemps Creek Revision 04, dated 30/4/24 Letter from Biosys to JHG RE: Pre-Clearance Survey for the Upper South Creek Advanced Water Recycling Centre, dated 31/7/24 AWRC tree removal sketch, dated 19/7/23 Internal JHG Email, dated 29/7/24 Upper South Creek Rolling Tree Register Upper South Creek Advanced Water Recycling Centre- online Workshop Photographic evidence - timber stockpiles EPA Waste Form, dated 11/4/23 Email from Featherdale Wildlife Park to JHG, dated 1/4/24 	Biosis has been engaged as the Project Ecologist and has conducted pre-clearance surveys to identify and mark habitat features to identify and map fauna habitat including tree hollows, bush rock and medium to large trees. JHG are working with the ecologist to identify opportunities to re-use such features within the final project landscaping and rehabilitation works. Timber is being retained on site for beneficial reuse at a later project stage. Some timber has been mulched and reused for erosion control. Reasonable efforts have also been made with various organisations to maximise reuse of native vegetation and other habitat features with varied results. Both Featherdale Wildlife Park and Defence Estate Orchard Hills have accepted vegetation for beneficial reuse. As observed during the site inspection, some retained tree logs have been placed as habitat features around the vegetation management area adjacent to the AWRC site. In previous audits, it was noted that some take up from Western Sydney Parklands has occurred.	Compliant
E24	Measures identified in the documents listed in Condition A1 to not worsen flood characteristics during operation or other measures that achieve the same outcomes, must be incorporated into the AWRC site detailed design of Stage 1 of the CSSI. The incorporation of these measures into the detailed design must be reviewed and endorsed by a suitably qualified flood consultant, who is independent of the project's design and construction, in consultation with directly affected landowners, EHG, and relevant council(s).	<ul style="list-style-type: none"> DPHI Post Approval form 20240430083154 Audit Interview 29/04/25 Upper South Creek Design Report, Revision 2, dated 13/8/24 (DRAFT) - excerpt only as at 31/10/24 (Section 6.4 Flooding Assessment & Appendix D) An excerpt of section 6.4 and Appendix D of the AWRC Design Report IFC drawing ST0079 0501-1 has been included App D - AWRC-DIV-MEM-CIV-0501-0004[A] Flood Modelling Assessment.pdf ST0079_0501-10[A].pdf 	As noted in previous audits, the AWRC Plant sits above the 1% AEP. Auditees advised the overland swale and southern drainage channel act as water retaining structures rather than water displacing structures during a flood. Flooding is addressed in the DRAFT AWRC Design Report. Section 6.4 looks specifically at flooding with respect to the site layout and general arrangement in relation to the 1% AEP level surrounding the site, including reference to a flood modelling assessment included in Appendix D of the report. An excerpt of section 6.4 and Appendix D of the AWRC Design Report were provided as evidence. IFC drawing ST0079 0501-1 was also provided as evidence to show the 1% AEP level at the AWRC site. The latest version of the Upper South Creek Design Report (rev 5) was provided to the Auditor	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E25	<p>Unless otherwise agreed by the Planning Secretary, Stage 1 of the CSSI must be designed and constructed to limit impacts on flooding characteristics in areas outside the project boundary, to those impacts documented in the amended Flood Impact Assessment (FIA) (July 2022) listed in Condition A1.</p> <p>Where the requirements set out in the amended FIA (July 2022) listed in Condition A1 cannot be met alternative flood levels or mitigation measures may be agreed to with the affected landowner.</p> <p>In the event that the Proponent and the affected landowner cannot agree on the measures to mitigate the impact as described in the amended FIA (July 2022) listed in Condition A1, the Proponent must engage a suitably qualified and experienced independent person to advise and assist in determining the impact and relevant mitigation measures.</p>	<ul style="list-style-type: none"> • DPHI Post Approval form 20240430083154 • Audit Interview 29/04/25 • Upper South Creek Design Report, Revision 5, GHD Jacobs dated 24/1/25 • IFC drawing ST0079 0501-1 has been included • App D - AWRRC-DIV-AREM-CIV-0501-0004[A] Flood Modelling Assessment.pdf • ST0079_0501-10[A] dated 24/7/24.pdf • KEMPS Creek Sewage Network, CIVIL Site Earthworks Finished Surface Contour Key Plan • Memorandum - Description of flood modelling results data and flood impacts dated 18/9/24 	<p>There were no construction activities observed during the site inspection that would be expected to result in unacceptable flooding impacts. The operational aspects of this condition have not been triggered. No flooding events or complaints related to flooding were recorded during the audit period.</p> <p>Flooding is addressed in the AWRRC Design Report. Section 6.4 looks specifically at flooding with respect to the site layout and general arrangement in relation to the 1% AEP level surrounding the site, including reference to a flood modelling assessment included in Appendix D of the report.</p> <p>An excerpt of section 6.4 and Appendix D of the AWRRC Design Report were provided as evidence.</p> <p>IFC drawing ST0079 0501-1 was also provided as evidence to show the 1% AEP level at the AWRRC site.</p> <p>The latest version of the Upper South Creek Design Report (rev 5) was provided to the Auditor</p>	Not triggered
E26	<p>Flood information including flood reports, models and geographic information system outputs, and work as executed information from a registered surveyor certifying finished ground levels and the dimensions and finished levels of all structures within the flood prone land, must be provided to the relevant council(s), EHG and the SES in order to assist in preparing relevant documents and to reflect changes in flood behaviour as a result of Stage 1 of the CSSI. The council(s), EHG and the SES must be notified in writing that the information is available no later than one month following the completion of construction. Information requested by the relevant council(s), EHG or the SES must be provided no later than six months following the completion of construction or within another timeframe agreed with the relevant council(s), EHG and the SES.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • LM 23208 - Discharge Structure Batter Sections, dated 12/11/24 • Kemps Creek Sewage Network, TWDM - Discharge Facility Earthworks Contour Plan - As Constructed dated 02/12/24 • Site Inspection 29/04/25 • Email from BCS to JHG titled "Upper South Creek (SSI 8906189) CoA E26 - flooding information for AWRRC pipelines" dated 19/12/24 • Email from JHG to NSW SES titled "Upper South Creek (SSI 8906189) CoA E26 - flooding information for AWRRC pipelines" dated 21/1/25 • Email from JHG to Wollondilly Shire Council titled "Upper South Creek (SSI 8906189) CoA E26 - flooding information for AWRRC pipelines" dated 19/12/24 • Email from JHG to EHG titled "Upper South Creek (SSI 8906189) CoA E26 - flooding information for AWRRC pipelines" dated 19/12/24 	<p>Although an operational requirement, the production of "As Built" drawings has commenced for pipelines and the Nepean River discharge.</p>	Not triggered
E27	<p>Prior to the commencement of construction within the green space area as mapped in Figure 4-7 and Figure 4-8 of the Environmental Impact Statement listed in Condition A1, the Proponent must prepare a Flood Impact and Risk Assessment (FIRA) for the proposed concept design of the green space area. The FIRA must incorporate all proposed elements (including but not limited to vegetation, walking paths, fences, irrigation area and outdoor learning spaces). The FIRA must be prepared by a suitably qualified and experienced flood consultant in consultation with EHG, and provided to the Planning Secretary for approval.</p> <p>Note: Condition E27 excludes construction of elements required for effective operation and management of operational components of the AWRRC plant. This includes release infrastructure to South Creek, fences around the AWRRC operational area and fire trail around the AWRRC operational area.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>Construction activities had not commenced in the green space at the time of the audit.</p>	Not triggered
E28	<p>The FIRA required under Condition E27 must address the performance outcome criteria specified in Table 9.1.2 of the draft Western Sydney Aerotropolis Development Control Plan 2021 (draft Aerotropolis DCP Phase 2, October 2021).</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>Construction activities had not commenced in the green space at the time of the audit.</p>	Not triggered
E29	<p>All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects or places of cultural significance except as authorised by this approval.</p>	<ul style="list-style-type: none"> • John Holland - Environmental Induction • Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) • Letter from Kelleher Knightingale to SWC titled "Completion of Archaeological Fieldwork, Upper South Creek Advanced Water Recycling Centre State Significant Infrastructure Approval (SSI 8609189) dated 12/9/23 • Letter from Kelleher Knightingale to SWC titled "Completion of Archaeological Fieldwork, Upper South Creek Advanced Water Recycling Centre State Significant Infrastructure Approval (SSI 8609189) dated 30/4/24 • Unexpected Finds and Human Remains Procedure • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>As noted in previous audits, aboriginal artefacts were salvaged from the AWRRC site prior to the commencement of excavation works. Kelleher Knightingale were appointed as the Aboriginal archaeologist to oversee the salvage and reporting work and confirmed on 12/9/23 that the fieldwork component of the salvage was complete for archaeological sites shown as "Areas Cleared of Aboriginal Heritage" (Figures 1-4) and noted that "Archaeological fieldwork is partially complete for Wallacia Weir (AFT 1) - partial". SWC/JHG noted that since the issue of the Kelleher report (12/9/23) that the fieldwork for Wallacia Weir has now been completed.</p> <p>At the time of IA4, the salvage report has commenced but not completed as there is a need for cataloguing the finds. There have been no unexpected finds or impacts on Aboriginal heritage reported during the audit period. The report is due for completion in 2026.</p> <p>The JHG Site Induction includes unexpected finds and stop work procedures in the event an item of heritage significance is discovered.</p> <p>The Heritage CEMP includes mitigation measures to be implemented during Construction.</p>	Compliant
E30	<p>The Registered Aboriginal Parties (RAPs) must be kept regularly informed about Stage 1 of the CSSI. The RAPs must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of Stage 1 of the CSSI.</p> <p>The Proponent must allow the RAPs an opportunity to undertake cultural salvage at each Aboriginal archaeological site identified for salvage in the Aboriginal Cultural Heritage Assessment Report (ACHAR) (June 2021) listed in Condition A1.</p> <p>Note: Details regarding ongoing engagement with RAP's must be provided in the Communication Strategy required under Condition B1.</p>	<ul style="list-style-type: none"> • Upper South Creek Project - Advanced Water Recycling Centre and Pipelines - CoA A9 Consultation Summary Report -Heritage CEMP Subplan, dated 14/7/23 • Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd, Upper South Creek Advanced Water Recycling Centre and Pipelines August 2023 • USCP-JHG-MPL-CSR-0002 • Upper South Creek, Advanced Water Recycling Centre, Aboriginal Participation Plan, Rev A dated 3/7/23 • Meeting Notes dated 8/2/24 • Meeting Notes dated 7/9/24 • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>As noted in previous Audits, Registered Aboriginal Parties were consulted with during the preparation of the Heritage CEMP Subplan with their comments addressed in the consultation report appended to the Heritage Sub-plan.</p> <p>The Communication Strategy provides details of consultation with the RAPs as required by this condition (refer to Appendix B and C).</p> <p>RAPs were directly engaged and paid during the salvage works at AWRRC and along pipelines (engaged by KNC under SWC direction).</p> <p>The Auditor was provided with several examples where local Aboriginal stakeholders have been engaged with including an online workshop held on 8/2/24 following workshops held in the previous audit period.</p> <p>The access road to the site was renamed from Paper Road to Badu Meru Grove, as discussed and agreed during online workshops with traditional custodians and RAPs.</p>	Compliant
E31	<p>At the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s) must be prepared by a suitably qualified person. The Aboriginal Cultural Heritage Excavation Report(s), must:</p> <p>(a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and</p> <p>(b) document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds).</p> <p>The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant council(s), LALC, the RAPs and local libraries within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).</p>	<ul style="list-style-type: none"> • Letter from Kelleher Knightingale to SWC titled "Completion of Archaeological Fieldwork, Upper South Creek Advanced Water Recycling Centre State Significant Infrastructure Approval (SSI 8609189) dated 12/9/23 • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>The fieldwork component is complete, with the last salvage last salvage on the project completed on 31/1/24. The Aboriginal Cultural Heritage Excavation Report(s) are due in 2026.</p> <p>Over 19,000 artefacts have been salvaged.</p> <p>Experienced consultant Kelleher Knightingale has been appointed to undertake this work.</p>	Not triggered
E32	<p>Where previously unidentified Aboriginal objects or places of cultural significance are discovered, all Work must immediately stop in the vicinity of the affected area. Works potentially affecting the previously unidentified objects and places must not recommence until Heritage NSW has been informed. The measures to consider and manage this process must be specified in the Unexpected Heritage Finds and Human Remains Procedure required by Condition E37 and include registration in the Aboriginal Heritage Information Management System (AHIMS).</p>	<ul style="list-style-type: none"> • John Holland - Environmental Induction • Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) • Audit Interview 29/04/25 	<p>No previously unidentified Aboriginal objects or places of cultural significance have been discovered to date.</p> <p>The site induction includes procedures to be followed in the event of an unexpected find with the Unexpected Finds Protocol included in the Heritage CEMP Sub-plan.</p>	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E33	Archival photographic digital recording must be undertaken as proposed in the documents listed in Condition A1 for all listed heritage items which will be affected by Stage 1 of the CSSI. The recording must be undertaken prior to the commencement of Work which may impact the items and sites. The Archival recording must be undertaken by a suitably qualified heritage specialist and prepared in accordance with NSW Heritage Office's How to Prepare Archival Records of Heritage Items (1998) and Photographic Recording of Heritage Items Using Film or Digital Capture (2006). A copy must be provided to Heritage NSW and the relevant council(s) and submitted as part of the Heritage Report required by Condition E35.	<ul style="list-style-type: none"> Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) Historical Test Excavation Report - PAS 1 and PAS 9, Artefact September 2023 Letter from Artefact to SWC titled "Archaeological Monitoring Excavation Results: Blaxlands Crossing PAS 3" dated 21/12/24 Letter from Artefact to SWC titled "Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS7) Salvage Area 1" dated 21/12/24 Letter from Artefact to SWC titled "Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS7) Salvage Area 1" dated 3/11/23 Audit Interview 29/04/25 	Artefact is engaged as the Heritage Consultant. Archival recording has been undertaken and the Heritage Report is being prepared.	Compliant
E34	Prior to commencement of archaeological excavation, the Proponent must nominate a suitably qualified Excavation Director who complies with Heritage NSW's Criteria for Assessment of Excavation Directors (September 2019) to oversee and advise on matters associated with historical archaeology. The Excavation Director must be present to oversee excavation, advise on archaeological issues, advise on the duration and extent of oversight required during archaeological excavations consistent with the Archaeological Research Design and Excavation Methodology included as part of the Environmental Impact Statement listed in Condition A1 .	<ul style="list-style-type: none"> SWC Internal email dated 25/11/22 Letter from Artefact to SWC titled "Upper South Creek Advanced Water Recycling Centre project - nomination of Excavation Director" dated 18/11/22 Letter from Artefact to SWC titled "Upper South Creek Advanced Water Recycling Centre project - response to excavation Directors Criteria" dated 18/11/22 Letter from Artefact to SWC titled "Upper South Creek Advanced Water Recycling Centre project - nomination of Secondary Excavation Director" dated 18/11/22 Audit Interview 29/04/25 	Artefact Heritage are an experienced Heritage Consultant and have nominated three Archaeological Directors for the project.	Compliant
E35	Following completion of archaeological excavation programs a Heritage Report must be prepared that includes: (a) the details of any archival recording, (b) further historical research undertaken (c) results of archaeological excavations (including artefact analysis and identification of a final repository for finds); and (d) details of any significant artefacts recovered, where they were located, and details of their ongoing conservation and protection in perpetuity. The report must be prepared in accordance with guidelines and standards required by Heritage NSW.	<ul style="list-style-type: none"> Archaeological Monitoring Excavation Results: Blaxlands Crossing (PAS 3), Artefact, December 2023 Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS 7) - Salvage Area 1, Artefact, December 2023 Upper South Creek AWRC Modification 2: Pipeline Alignments, Non Aboriginal (Historical Heritage Assessments, Artefact June 2023 Upper South Creek Advanced Water Recycling Centre, Historical Archaeological Test Excavation Report - PAS 1 and PAS 9, Artefact November 2023 Email from Artefact to SWC dated 21/11/23 Email from SWC to Artefact titled "Sydney Water USC Non Aboriginal Heritage Salvage" dated 19/8/25 Email from Artefact to SWC titled "USC AWRC PAS 7 - Salvage Area 2" dated 27/5/25 Upper South Creek, Advanced Water Recycling Centre, Archaeological Excavation Report, Report to Sydney Water, Artefact, Rev 1 dated 27/5/25 Audit Interview 29/04/25 Site Inspection 29/04/25 	As noted in IA# 3. Email from Artefact dated 8/5/24 confirms the salvage program is not complete (at that time), pending salvage of bridge remnants at South Creek. Final site investigations were complete on 19/8/24 At the time of the Audit a draft revision of the report was in an advanced stage of preparation and was submitted to SWC following the Audit site inspection and interview.	Not triggered
E36	The Heritage Report must be submitted to the Planning Secretary, Heritage NSW, the relevant council(s), relevant local libraries and relevant local historical societies no later than 12 months after the completion of archaeological excavation programs.	<ul style="list-style-type: none"> Archaeological Monitoring Excavation Results: Blaxlands Crossing (PAS 3), Artefact, December 2023 Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS 7) - Salvage Area 1, Artefact, December 2023 Upper South Creek AWRC Modification 2: Pipeline Alignments, Non Aboriginal (Historical Heritage Assessments, Artefact June 2023 Upper South Creek Advanced Water Recycling Centre, Historical Archaeological Test Excavation Report - PAS 1 and PAS 9, Artefact November 2023 Email from Artefact to SWC dated 21/11/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	Final site investigations were completed on the 19 August 2024. Significant work involved in documenting and cataloguing the artefacts. The draft heritage report has been completed and is currently being reviewed by the SWC heritage team. The heritage report is due to be completed by 19th of August 2025.	Not triggered
E37	An Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected heritage finds in accordance with any guidelines and standards prepared by Heritage NSW and the Heritage Council of NSW. The Unexpected Heritage Finds and Remains Procedure must be submitted to the Planning Secretary for information before the commencement of Work. The procedure must be included in the Heritage CEMP Plan required by Condition C4.	<ul style="list-style-type: none"> Upper South Creek - Advanced Water Recycling Centre and Pipelines, Heritage CEMP Subplan (Aboriginal, Non Aboriginal, World and National Heritage) - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 14/7/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	The Unexpected Finds and Human Remains Procedure is included as Appendix C of the Heritage Sub-plan . The procedure was submitted to DPHI prior to the commencement of Work. The UPF is also included in the environmental site induction as noted in Condition E38.	Compliant
E38	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of Work. Where archaeological investigations have been undertaken as a result of Unexpected Finds notifications then a Final Archaeological Report must be provided in accordance with Heritage Council guidance and standard requirements for final reporting under Excavation Permits. <i>Note: Human remains that are found unexpectedly during the carrying out of Work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.</i>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Unexpected Heritage Finds and Human Remains Procedure (included in site induction) Site Induction register (Environment) dated 9/4/25 	No unexpected heritage finds have been recorded or identified during the audit period. The Environmental component of the site induction includes the detailed unexpected finds procedure. A register of personnel inducted during the Audit period was provided to the Auditor.	Compliant
E39	A detailed land use survey must be undertaken to confirm sensitive land use(s) (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration, construction ground-borne noise and operational noise. The survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of activities which generate construction or operational noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Noise and Vibration CEMP Sub-plan required by Condition C4.	<ul style="list-style-type: none"> Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 	The detailed land use survey is presented in Appendix D of the Noise and Vibration Sub-plan.	Compliant
E40	Work must be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 1:00pm Saturdays; and (c) at no time on Sundays or public holidays.	<ul style="list-style-type: none"> OOH work register Site Environmental Plan (SEP)- AWRC USC AWRC Environmental Management Booklet USC Working Environmental Induction Site Induction Records 	The approved working hours are documented in the CNVMP and communicated to relevant personnel via project inductions. A comprehensive process for assessment and approval of work outside the approved hours has been established and implemented. At the time of the Audit, all work on the pipelines has been completed and the requirement for any out of hours works has substantially reduced.	Compliant
E41	Except as permitted by an EPL, highly noise intensive Works that result in an exceedance of the applicable NML at the same receiver must only be undertaken: (a) between the hours of 8:00 am to 6:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) if continuously, then not exceeding three hours, with a minimum cessation of Work of not less than one hour. For the purposes of this condition, 'continuously' includes any period during which there is less than one hour between ceasing and recommencing any of the Work.	<ul style="list-style-type: none"> Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 Site Environmental Plan (SEP)- AWRC USC AWRC Environmental Management Booklet USC Working Environmental Induction Site Induction Records Audit Interview 29/04/25 Site Inspection 29/04/25 	Working Hours have been communicated to the workforce via the site induction and an Environmental Management Booklet that has been issued to relevant project personnel.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E42	<p>Notwithstanding Conditions E40 and E41 Work may be undertaken outside the hours specified in the following circumstances (a, b, or c):</p> <p>(a) Safety and Emergencies, including:</p> <p>(i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or</p> <p>(ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm.</p> <p>On becoming aware of the need for emergency work in accordance with Condition E42(a), the AA, the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. Best endeavours must be used to notify all noise and/or vibration affected residents and owners/occupiers of properties identified sensitive land use(s) of the likely impact and duration of those works; or</p> <p>(b) Work that meets all of the following criteria:</p> <p>(i) construction that causes LAeq(15 minute) noise levels:</p> <ul style="list-style-type: none"> - no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and - no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land use(s); or <p>(ii) construction that causes:</p> <ul style="list-style-type: none"> - continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or - intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006). <p>(c) By Approval, including:</p> <p>(i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or</p> <p>(ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E43; or</p> <p>(iii) negotiated agreements with directly affected residents and sensitive land use(s).</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	It was noted during the Audit interview that there has not been a requirement to undertake emergency works in accordance with this condition during the Audit period.	Not triggered
E43	<p>An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of Work which is outside the hours defined in Conditions E40, and that are not subject to an EPL. The Protocol must be submitted to and approved by the Planning Secretary before commencement of the out-of-hours work. The Protocol must be prepared in consultation with the ER, AA and EPA. The Protocol must include:</p> <p>(a) identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where:</p> <p>(i) the ER and AA review all proposed out-of-hours activities and confirm their risk levels,</p> <p>(ii) low risk activities can be approved by the ER in consultation with the AA, and</p> <p>(iii) high risk activities that are approved by the Planning Secretary;</p> <p>(b) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria;</p> <p>(c) a process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of Condition E55. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land use(s) would be exposed to, including the number of noise awakening events;</p> <p>(d) procedures to facilitate the coordination of out-of-hours work including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided; and</p> <p>(e) notification arrangements for affected receivers for approved out-of-hours work and notification to the Planning Secretary of approved low risk out-of-hours works.</p> <p>This condition does not apply if the requirements of Condition E42(a) or (b) are met.</p> <p>Note: If the Work is subject to an EPL and the EPA does not endorse extended hours as part of the EPL, the extended hours can not be considered under this Protocol.</p>	<ul style="list-style-type: none"> • DPHI Approval dated 08/08/2023 their ref-SSI-8609189 • Environment Protection Licence EPL No 21800 • Audit Interview 29/04/25 • Site Inspection 29/04/25 	The project has obtained an Environment Protection Licence (EPL 21800), OOH work is undertaken in accordance with the EPL, not under the OOHW Protocol.	Not triggered
E44	<p>Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration objectives:</p> <p>(a) construction 'Noise affected' NMLs established using the Interim Construction Noise Guideline (DECC, 2009);</p> <p>(b) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure);</p> <p>(c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives";</p> <p>(d) 85 T385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and</p> <p>(e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage).</p> <p>Work that exceeds the noise management levels and/or vibration criteria must be managed in accordance with the Noise and Vibration CEMP Sub-plan required by Condition C4, as applicable.</p> <p>Note: The ICNG identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction NML.</p>	<ul style="list-style-type: none"> • Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 • Road Occupancy Licence No: 2384190 dated 1/12/24 • Upper South Creek Project, Noise Monitoring Field Form dated 01/03/25 • Upper South Creek Project - Out of Hours Works Permit - AWRC Eastern Rising Mains dated 6/3/25 • Photographic records - various 	<p>As observed during the Audit site inspection, the works on the pipelines are complete, thereby significantly reducing the Noise and Vibration risks. Construction activities at the AWRC site are being undertaken in an industrial setting with any noise and vibration sensitive receptors located a substantial distance from the site activities.</p> <p>Limited out of hours works were undertaken during the Audit period at the Cabramatta West road site under a road occupancy licence and OOH works permit. The permit documents the mitigation measures considered and employed including non tonal reversing alarms, application of buffer distances and community notifications.</p> <p>These measures are considered to be 'Reasonable and Feasible' and consistent the Construction Noise and Vibration Management Plan.</p>	Compliant
E45	<p>Mitigation measures must be applied when the following residential ground-borne noise levels are exceeded:</p> <p>(a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and</p> <p>(b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A).</p> <p>The mitigation measures must be outlined in the Noise and Vibration CEMP Sub-plan, including in any Out-of-Hours Work Protocol, required by Condition E43.</p>	<ul style="list-style-type: none"> • Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 	No activities have occurred during the audit period that would result in ground-borne noise that would exceed these levels. Activities observed are unlikely to result in ground-borne noise generation.	Compliant
E46	Noise generating Work in the vicinity of community, religious, educational institutions, noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) resulting in noise levels above the NMLs must not be timetable during sensitive periods, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution.	<ul style="list-style-type: none"> • Audit Interview • Site Inspection 	Assessed as compliant by previous audits. It was noted during the audit interview that there have not been any activities within the vicinity of sensitive receivers as noted in this condition during the Audit period. This is consistent with observations made by the Auditor for both IA#3 and IA#4.	Not triggered
E47	At no time can noise generated by construction exceed the National Standard for exposure to noise in the occupational environment of an eight-hour (8hr) equivalent continuous A-weighted sound pressure level of LAeq,8h of 85 dB(A) for any employee working at a location near the CSSI.	<ul style="list-style-type: none"> • USC Advanced Water Recycling Centre and Pipelines, Noise and Vibration Construction Monitoring Report, Rev 0 dated 6/1/25 	Noise monitoring undertaken demonstrates compliance with this condition. The recorded noise levels are below the 85dBA threshold.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E56	<p>An Operational Noise Review (ONR) must be prepared to confirm noise control measures that would be implemented for the operation of Stage 1 of the CSSI. The ONR must be prepared in consultation with relevant council(s) and the EPA and must:</p> <p>(a) confirm the appropriate operational noise and vibration objectives and levels for surrounding development, including existing sensitive land use(s);</p> <p>(b) confirm the operational noise predictions based on the final design. Confirmation must be based on an appropriately calibrated model(s) (which has incorporated noise monitoring, and concurrent traffic counting, where necessary for calibration purposes). The assessment must specifically include verification of noise levels at all fixed facilities, based on noise monitoring undertaken at appropriately identified noise catchment areas surrounding the facilities;</p> <p>(c) identify all noise and vibration mitigation measures including location, type and timing of mitigation measures, with a focus on:</p> <p>(i) source control and design; and</p> <p>(ii) 'best practice' achievable noise and vibration outcome for each activity;</p> <p>(d) include a consultation strategy to seek feedback from directly affected landowners on the noise measures; and</p> <p>(e) procedures for the management of operational noise complaints, including investigation and monitoring (subject to complainant agreement).</p> <p>The ONR must be verified by the AA or an independent acoustic expert. The ONR must be undertaken at the projects expense and submitted to the Planning Secretary for information at least 12 months prior to the commencement of operation, unless otherwise agreed by the Planning Secretary.</p> <p>The identified noise measures must be implemented and the ONR must be made publicly available.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Upper South Creek Advanced Water Recycling Centre - Operational Noise Review, Renzo Tonin, dated 22/5/25 • USC Project - Acoustic Advisor Review - Operational Noise and Vibration Review Rev 5 dated 4/12/24 • Email from JHG to AA/ ER titled "E56 ONR Comments" dated 27/5/25 	<p>An Operational Noise Review (ONVR) has been prepared by Renzo Tonin, and has been issued to relevant stakeholders (EPA and Council) for comments. The ONR was also reviewed by the AA and the ER. The most recent version has been updated to incorporate AA and stakeholder consultation comments. Table 3.1 of the ONR notes the requirements of this condition and provides ONR references to where the specific requirements of this condition have been addressed. Further assessment for compliance will be undertaken in future Audits following finalisation of the ONR and submission to DPHI.</p>	Not triggered
E57	<p>Within 12 months of the commencement of operation of Stage 1 of the CSSI, monitoring of operational noise must be undertaken to compare actual noise performance of Stage 1 of the CSSI against the noise performance predicted in the review of noise mitigation measures required by Condition E56.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	Operational requirement	Not triggered
E58	<p>Stage 1 of the CSSI must be constructed in a manner that minimises visual impacts of construction sites. For example, decorative hoarding, landscaping and/or vegetative screening of ancillary facilities, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, including recognition of Country.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>The main construction site compound is located in an area with low visual sensitivity. Pipeline works have been completed and compounds demobilised, effectively eliminating visual impacts in visually sensitive residential areas. Rehabilitation activities, particularly along waterways has created a natural visual appearance, an improvement when compared to the pre-construction condition (particular at creek crossings, riparian zones and RBM12 lands.</p> <p>OOH works inspections are undertaken by the AA which include a review of potential lighting impacts. Carpark lights at the AWRC compound are oriented in a downward direction to avoid spillage.</p> <p>The Environmental Inspection Form (INS 0039287) includes lighting as an issue to be assessed during site inspections. No complaints have been received regarding visual impacts during the audit period.</p>	Compliant
E59	<p>Stage 1 of the CSSI must be constructed and operated with the objective of minimising light spillage to surrounding properties. All lighting associated with the construction and operation of Stage 1 of the CSSI must be consistent with the requirements of AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting, relevant Australian Standards in the series AS/NZ 1158 – Lighting for Roads and Public Spaces, and National Airports Safeguarding Framework (NASF) Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports.</p> <p>Additionally, mitigation measures must be provided to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.</p> <p><i>Note: The outcomes of this condition must be demonstrated in the Urban Design and Landscape Plan.</i></p>	<ul style="list-style-type: none"> • Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Letter from DPHI to SWC titled "Upper South Creek, Advanced Water Recycling Centre (SSI-8609189 pa-52) • Site Inspection form INS 0039287 	<p>The main construction site compound is located in an area with low visual sensitivity. Pipeline works have been completed and compounds demobilised, effectively eliminating visual impacts in visually sensitive residential areas. Rehabilitation activities, particularly along waterways has created a natural visual appearance at some locations, an improvement when compared to the pre-construction condition.</p> <p>OOH works inspections are undertaken by the AA which include a review of potential lighting impacts. Carpark lights at the AWRC compound are oriented in a downward direction to avoid spillage.</p> <p>The Environmental Inspection Form (INS 0039287) includes lighting as an issue to be assessed during site inspections. No complaints have been received regarding visual impacts.</p>	Compliant
E60	<p>Temporary and permanent active transport facilities along the pipeline alignment must be designed, constructed and/or rectified in accordance with:</p> <p>(a) the process set out in the Movement and Place Framework (NSW Government) including:</p> <p>(i) the Walking Space Guide: Toward Pedestrian Comfort and Safety (TfNSW, 2020); and</p> <p>(ii) the Cycleway Design Toolbox: Designing for Cycling and Micromobility (TfNSW, 2020).</p> <p>(b) the Guide to Road Design Part 6A: Paths for Walking and Cycling (Austroads 2017) where not otherwise covered by (a);</p> <p>(c) relevant Australian Standards (AS) such as 1428.1-2009 Design for access and mobility; and</p> <p>(d) relevant Crime Prevention Through Environmental Design (CPTED) principles.</p> <p><i>Note: In the event of an inconsistency, the latest guidance document prevails to the extent of the inconsistency.</i></p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>There have been no impacts to Active Transport Links (ATLs) at this stage in the project. Temporary or permanent ATLs are not proposed to be constructed.</p>	Not triggered
E61	<p>The place making, design and landscape outcomes for the AWRC site of Stage 1 of the CSSI must be:</p> <p>(a) informed by and be consistent with the Upper South Creek Advanced Water Recycling Centre Urban Design Report, dated July 2021 (provided as Attachment A to RFI 1, dated 1 June 2022) and identified in the documents listed in Condition A1, including but not limited to the objectives and design principles, requirements, and opportunities; and</p> <p>(b) prepared in consultation with the community (including the affected landowners and businesses or a representative of the businesses), LALCs, RAPs and relevant council(s).</p>	<ul style="list-style-type: none"> • Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water • Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI-860989-PA-39) - Conditions E63, E64 and E65 - Approval of the Urban Design and Landscape Plan, dated 29/11/23 • Email chain between Sydney Water and DPHI RE: _External_ RE_ USC - SSI-8609189 - UDLP - timeframe for additional components, dated 29/8/24 • Revised UDLP Revision 8, dated 4/10/24 • External: Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-117), dated 4/10/24 • DPHI Letter to Sydney Water RE: SSI-8609189-PA-117 - Condition E63 - Revised UDLP - Request for Additional Information, dated 30/10/24 • Upper South Creek, Advanced Water Recycling Centre and Pipelines, Odour Management Plan, Rev 2 dated 27/5/25 • Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (AWRC and Pipelines Project (CSSI 8609189): Response to RFI for Revised Urban Design and Landscaping Plan (UDLP) SSI-8609189-PA-117) dated 12/11/24 • Upper South Creek, Advanced Water Recycling Centre and Pipelines, Urban Design and Landscape Plan, Revision 8 dated 4/10/24 • Audit Interview 29/04/25 	<p>The Stage 1 Urban Design and Landscape Plan (UDLP) was approved by DPHI on 29/11/23. The UDLP was subsequently revised to include the Landscape Management Plan (LMP) and Vegetation Management Plan (VMP) as appendices. The revised UDLP including LMP and VMP was submitted to DPHI for approval on 4/10/24.</p> <p>The submission date for the revised UDLP, including LMP and VMP was requested to be extended to 4/10/24 after the initial submission date of 1/6/24 was missed. Emails between Sydney Water and DPHI discussing the need for an extension, dated 29/8/24 were provided as evidence. NB: It is noted that discussion for a need for extension was initiated by Sydney Water after the timeframe for submission of the UDLP (1/6/24) had passed. DPHI agreed that the missed timeframe would not be considered a non-compliance and Sydney Water confirmed no vegetation or landscaping works had commenced associated with the UDLP.</p> <p>NB: On 30/10/24 DPHI issued a letter requesting additional information in relation to the revised UDLP, LMP and VMP. The project will need to provide further information to DPHI to support compliance with Condition E61(a) and E65(a).</p> <p>NB: on 20/11/24, DPHI approved the revised UDLP noting the UDLP has been revised to include the Vegetation Management Plan (VMP) and Landscape Management Plan (LMP) required by the Departments Approval Letter (dated 29/11/23), to inform vegetation and landscaping requirements on the AWRC's site and adjacent to the South Creek corridor. The DPHI letter of approval excludes any components to be captured as part of the proposed Greenspace Masterplan, which is still under development.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E62	Where Work results in the temporary removal of a recreational or community use, and no similar use with sufficient capacity for regular users is located within two (2) kilometres of the site, then a temporary facility of comparable scale must be provided for the duration of the use of that site.	<ul style="list-style-type: none"> • Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRG-TRA-PLN-DES-0001 Rev 5, dated 13/11/23 • Audit Interview 29/04/25 • Site Inspection 29/04/25 	There have not been any works completed on the project during the audit period that has resulted in the temporary removal of a recreational or community use.	Not triggered
E63	<p>An Urban Design and Landscape Plan (UDLP) must be prepared for the AWRG site to document and illustrate the permanent built works and landscape design of Stage 1 of the CSSI and how these works are to be maintained. The UDLP must be:</p> <p>(a) prepared by a suitably qualified and experienced person(s) in place, urban and landscape design and bush regeneration;</p> <p>(b) prepared in consultation with relevant council(s) and the community, including affected landowners and businesses;</p> <p>(c) submitted to the Planning Secretary for approval no later than one month before the construction of permanent built surface works and/or landscaping in the area to which the UDLP applies; and</p> <p>(d) implemented during construction and operation of Stage 1 of the CSSI.</p> <p><i>Note: The UDLP may be developed and considered in stages to facilitate design progression and construction. Any such staging and associated approval would need to facilitate a cohesive final design and not limit final design outcomes.</i></p>	<ul style="list-style-type: none"> • Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Memo from JHG to SWC RE: CSSI 8609189 - USC AWRG Condition of Approval (CoA) E63, E65, E65 Urban Design and Landscape Plan, dated 26/9/23 • Letter from SWC to DPHI RE: Upper South Creek Advanced Water Recycling Centre (SSI 8609189): Notification of proposed staging of the Urban Design Plan and Landscape Plan (UDLP) (Condition E63-E65) in accordance with the Staging Report (Condition A10), dated 29/9/24 • Revised UDLP Revision 8, dated 4/10/24 • External_ Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-117), dated 4/10/24 • DPHI Letter to Sydney Water RE: SSI-8609189-PA-117 - Condition E63 - Revised UDLP - Request for Additional Information, dated 30/10/24 • Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI - 86091890-PA-117) - Conditions E 63, E64 and E65 Approval of revised Urban Design and Landscape Plan" dated 20/11/24 • Audit Interview 29/04/25 	<p>As noted in IA #3, The Urban Design and Landscape Plan (UDLP) has been prepared and was approved by DPHI on 29/11/23.</p> <p>SWC wrote to DPHI requesting approval to adopt a staged approach to the delivery of the UDLP noting that the works undertaken are core structural elements. External finishes and landscaping works were yet to commence at the time of the audit.</p> <p>On 29/9/23 DPHI approved the construction of structural concrete works prior to the ULDP as follows:</p> <ul style="list-style-type: none"> - Oxidation ditches - MBR - Inlet works - Digestors <p>The revised UDLP including LMP and VMP addresses the requirements of Condition E63 and was submitted to DPHI for approval on 4/10/24 with DPHI approval issued on 20/11/24.</p> <p>The DPHI letter of approval was for works outlined in the revised UDLP (revision 08, dated 04/10/24) and excludes any components to be captured as part of the Greenspace Masterplan.</p>	Compliant
E64	<p>The UDLP must document how the following matters have been considered in the design and landscaping of the project:</p> <p>(a) the requirements of Conditions E61 to E62;</p> <p>(b) the requirements of the Wildlife Management Plan under Condition E130;</p> <p>(c) demonstrated integration of Crime Prevention Through Environmental Design (CPTED) principles;</p> <p>(d) Designing with Country and the principles and objectives of the draft Connecting with Country Framework;</p> <p>(e) the finalised version of the draft guideline "Recognise Country – Draft Guidelines for development in the Aerotropolis";</p> <p>(f) constraints associated with bushfire, flooding and airport safeguarding;</p> <p>(g) vegetation management that considers the principles of Guidelines for Vegetation Management Plans on Waterfront Land (NSW Office of Water, DPI 2012), draft Western Sydney Aerotropolis Riparian Revegetation Strategy, and the tree planting provisions in the draft Western Sydney Aerotropolis Development Control Plan – Phase 2 (October 2021);</p> <p>(h) architectural design to soften the industrial aesthetic;</p> <p>(i) integrating heritage character of the site with treatment and finishes of the new design; and</p> <p>(j) inputs from relevant experts in architecture, landscape architecture, bushfire management, heritage, revegetation, ecology, wildlife hazard management and flooding.</p>	<ul style="list-style-type: none"> • Sydney Water - Upper South Creek Advanced Water Recycling Centre, Urban Design and Landscape Plan Stage 1, Tract, Rev 5, dated 13/11/23 • Revised UDLP Revision 8, dated 4/10/24 • External_ Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-117), dated 4/10/24 • DPHI Letter to Sydney Water RE: SSI-8609189-PA-117 - Condition E63 - Revised UDLP - Request for Additional Information, dated 30/10/24 • Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI - 86091890-PA-117) - Conditions E 63, E64 and E65 Approval of revised Urban Design and Landscape Plan" dated 20/11/24 • Audit Interview 29/04/25 	<p>The UDLP is comprehensive and addresses the requirements of this condition.</p> <p>DPHI approved the UDLP Stage 1 on 29/11/23 (Revision 5, dated 13/11/23), which excluded any vegetation and landscaping requirements under Conditions E64 and E65. The UDLP addresses the requirements of this condition.</p> <p>The revised UDLP including LMP and VMP was submitted to DPHI for approval on 4/10/24 and subsequently approved on 20/11/24.</p>	Compliant
E65	<p>The UDLP must include descriptions and visualisations (as appropriate) of:</p> <p>(a) the design of the permanent built elements for the AWRG site including their form, materials and detail;</p> <p>(b) place, design and landscape outcomes for the proposed green space area, consistent with the Upper South Creek Advanced Water Recycling Centre Urban Design Report, dated July 2021 (provided as Attachment A to RFI 1, dated 1 June 2022) and identified in the documents listed in Condition A1;</p> <p>(c) the design of the project landform and landscaping elements;</p> <p>(d) the type and design of public and open space;</p> <p>(e) details of strategies to rehabilitate, regenerate or revegetate disturbed areas with local native species; and</p> <p>(f) management and routine maintenance standards and regimes for design elements and landscaping Work (including adequate watering of plants following planting depending on forecast weather conditions and weed management) to ensure the success of the design and landscape outcomes.</p> <p>Unless otherwise agreed with the Planning Secretary, construction of permanent built work or landscaping that are the subject of the UDLP must not be commenced (in the area to which the UDLP applies) until the UDLP has been approved by the Planning Secretary.</p>	<ul style="list-style-type: none"> • Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRG-TRA-PLN-DES-0001 Rev 5 dated 13/11/23 • Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-52) - Condition E65-Request to commence construction of permanent built work prior to approval of the Urban Design and Landscape Plan, dated 29/9/23 • Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-39) - Condition E63,E64 E65 Approval of the Urban Design and Landscape Plan, dated 29/11/23 • Revised UDLP Revision 8, dated 4/10/24 • External_ Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-117), dated 4/10/24 • DPHI Letter to Sydney Water RE: SSI-8609189-PA-117 - Condition E63 - Revised UDLP - Request for Additional Information, dated 30/10/24 • Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI - 86091890-PA-117) - Conditions E 63, E64 and E65 Approval of revised Urban Design and Landscape Plan" dated 20/11/24 • Audit Interview 29/04/25 	<p>On 29/9/23 DPHI approved the construction of structural concrete works prior to the ULDP submission as follows:</p> <ul style="list-style-type: none"> - Oxidation ditches - MBR - Inlet works - digestors <p>DPHI approved the UDLP Stage 1 on 29/11/23 (Revision 5, dated 13/11/23), which excluded any vegetation and landscaping requirements under Conditions E64 and E65. The UDLP addresses the requirements of this condition.</p> <p>The revised UDLP including LMP and VMP was submitted to DPHI for approval on 4/10/24.</p> <p>NB: On 30/10/24 DPHI issued a letter requesting additional information in relation to the revised UDLP, LMP and VMP. The project will need to provide further information to DPHI to support compliance with Condition E61(a) and E65(a).</p> <p>NB: on 20/11/24, DPHI approved the revised UDLP noting the UDLP has been revised to include the Vegetation Management Plan (VMP) and Landscape Management Plan (LMP) required by the Departments Approval Letter (dated 29/11/23), to inform vegetation and landscaping requirements on the AWRG site and adjacent to the South Creek corridor. The DPHI letter of approval excludes any components to be captured as part of the proposed Greenspace Masterplan, which is still under development.</p>	Compliant
E66	<p>The ongoing maintenance and operation costs of urban design, open space, landscaping and recreational items and work implemented for the AWRG site as part of this approval remain the Proponent's responsibility until satisfactory arrangements have been put in place for the transfer of the asset to the relevant authority. Before the transfer of assets, the Proponent must maintain items and work to at least the design standards established in the UDLP, required by Condition E65.</p> <p>The Planning Secretary must be advised of the date of transfer of the asset(s) to the relevant authority.</p>	<ul style="list-style-type: none"> • Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRG-TRA-PLN-DES-0001, dated 26/07/2023 • Revised UDLP Revision 8, dated 4/10/24 • External_ Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-117), dated 4/10/24 • DPHI Letter to Sydney Water RE: SSI-8609189-PA-117 - Condition E63 - Revised UDLP - Request for Additional Information, dated 30/10/24 • Audit Interview 29/04/25 • Site Inspection 29/04/25 	The latest version of the UDLP (approved by DPHI on 20/11/24) includes the Vegetation Management Plan (Appendix A) and the Landscape Management Plan (Appendix B). Both documents provide details of maintenance activities to be undertaken during the operational phase.	Not triggered
E67	Plant maintenance (watering and weeding) must continue during construction and operation on land owned by Sydney Water. Sydney Water must continue plant maintenance on other land specified in the Rehabilitation Management Plan under Condition E19 and Condition E20 and committed to in the documents listed in Condition A1 for the maintenance period specified, in consultation with EHG and relevant landowner(s), as required. Should any plant loss occur during the maintenance period, the plants should be replaced by the same plant species and growth form (i.e. a tree with a tree and local native provenance species where the original planting was of local native provenance) unless it is determined by a suitably qualified person that a different species is more suitable for that location.	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Infrastructure Approval SSI-8609189, Appendix B • Upper South CoA E19 and E20 Creek Rehabilitation Management Plan, RMB12 Lands - Kemps Creek, Rev05, dated 23/5/24 • DPHI Letter to SWC RE: Approval of Rehabilitation Management Plan, dated 30/5/24 • JHG email titled "Updated Quote" dated 25/11/24 • Marsupial Landscape Management - Site Report Kemps Creek dated 14/4/25 • JHG email titled "Pipeline Weed Spraying" dated 14/2/24 • Weed Spraying Maps.pptx 	<p>Evidence of plant watering observed during the Audit site inspection included the establishment of irrigation systems in the Vegetation Management Zone.</p> <p>The Auditor was provided with evidence of weeding activities undertaken during the Audit period including photographic records of treated weeds and a site report (from a specialist landscape maintenance company) with records of weeding activities targeting sticky night shade.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E68	The Proponent must identify the utilities and services (hereafter "services") potentially affected by construction to determine requirements for diversion, protection and/or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. The Proponent in consultation with service providers must ensure that disruption to services resulting from Stage 1 of the CSI are avoided where practical and advised to customers.	<ul style="list-style-type: none"> Activity Method Statement - Upper South Creek Pipelines, Pipeline Installation AMS USC/00025 Rev 0 dated 9/10/23 Upper South Creek Pipelines - Communication History with TransGrid dated 30/01/24 Upper South Creek Pipelines Endeavour Interface Meeting Minutes dated 21/9/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	As noted in previous audits, work activity planning includes the identification of inground services through a number of processes including Dial Begore You Dig, potholing and survey. Meetings are held with external service providers including TransGrid, Jemena and Endeavour Energy to discuss and negotiate potential impacts to services and relocation requirements.	Compliant
E69	The Proponent must offer pre-construction surveys to the owners of surface and sub-surface structures and other relevant assets identified at risk from vibration, including all listed heritage items and buildings/structures of heritage significance as identified in the documents listed in Condition A1. Where the offer is accepted, the survey must be undertaken by a suitably qualified and experienced engineer and/or building surveyor prior to the commencement of vibration generating Works that could impact on the structure/asset. The results of each survey must be documented in a Pre-construction Condition Survey Report and the report must be provided to the owner of the item(s) surveyed no later than one month before the commencement of all other potentially impacting Works.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 AusDilaps - Geotagged Pre-Construction Survey OPT (Upper Canal South Creek), 24 July 2023 230710 Property Condition Survey Letter 1 dated 12/7/23 230710 Property Condition Survey Letter 3 dated 14/8/23 230710 Property Condition Survey Letter 2 dated 23/2/24 AusDilaps - Geotagged Pre-Construction Survey OPT 6 Curtain Street, Cabramatta, 12/8/23 Master AWRC - Dilap Schedule rev 1.xls 	Pre-construction surveys have been undertaken. The auditor was provided with a copy of the pre-construction survey undertaken of the upper canal heritage structure in addition to examples of pre-construction surveys for properties that may be impacted by the works. Appropriate notification letters are provided to residents advising them of the property condition survey process. A register of properties surveyed is kept up to date.	Compliant
E70	Where pre-construction surveys have been undertaken in accordance with Condition E69, subsequent post-construction surveys of the structure / asset must be undertaken by a suitably qualified and experienced engineer and/or building surveyor to assess damage that may have resulted from the vibration-generating Works. The results of the post-construction surveys must be documented in a Post-Construction Condition Survey Report for each item surveyed. The Post-construction Condition Survey Reports must be provided to the owner of the structures/assets surveyed, and no later than four months following the completion of construction activities that have the potential to impact on the structure / asset.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Master AWRC - Treated Post Construction Property Survey Schedule-rev1, as at 1/11/24 Ausdilaps OPT-33835 USC AWRC Post-Construction Condition Survey, 22 Park Road Wallacia, dated 8/10/24 Ausdilaps's OPT-33835 USC AWRC Post-Construction Condition Survey, 24 Greendale Road Wallacia, dated 11/10/24 Ausdilaps - OPT-33835, Upper South Creek AWRC - Kemps Creek NSW, Post Construction Geotagged Condition Survey, dated 15/10/24 Ausdilaps's OPT-33835 USC AWRC Post-Construction Condition Survey, Sports Bar, 1 Bartley Street Canly Vale NSW 2166, 15/10/25 Letter from SWC to Cabravale Diggers titled "Upper South Creek Advanced Water Recycling Centre - Post Construction Property Condition Survey" dated 25/9/24 	Post-construction surveys undertaken during the Audit period were for the following properties: <ul style="list-style-type: none"> Sports Bar, 1 Bartley Street, Canley Vale Council Assets, 1 Bartley Street, Canley Vale 24 Greendale Road, Wallacia 600-602 Cabramatta Road West. The surveys were undertaken by Ausdilaps, specialist building inspectors. Evidence was provided to the Auditor to confirm the survey reports were submitted to the property owner.	Compliant
E71	Where damage has been determined to occur as a result of Stage 1 of the CSI, the Proponent must carry out rectification at its expense and to the reasonable requirements of the owner of the structure/asset within nine months of the completion of construction activities that have the potential to create damage unless another timeframe is agreed with the owner. Alternatively, the Proponent may pay compensation for the damage as agreed with the owner.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Email from ERM to JB5G titled "Upper South Creek - Validation Reporting - Pipelines" dated 26/9/24 	It was noted during the Audit interview that there has been no property damage reported during the Audit period	Not triggered
E72	Prior to the commencement of any Work, erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'. In the South Creek catchment, controls must also be in accordance with the construction phase targets and sediment and erosion control design principles outlined in the Technical Guidance for Achieving Wianamatta South Creek Stormwater Management Targets (DPHI, 2022).	<ul style="list-style-type: none"> Progressive Erosion and Sediment Control Plan - Kemps Creek Sewerage network, Site Compound 12, General Arrangement, 13/9/23 Farm Dam Entry ESCP dated 13/9/23 Kemps Creek Sewerage Network - Generic Cross Sections, General Arrangement dated 25/10/23 Soil Conservationist Site Inspection Report 14/2/25 Soil Conservationist Site Inspection Report 6/3/25 Soil Conservationist Site Inspection Report 26/3/25 Audit Interview 29/04/25 Site Inspection 29/04/25 	Erosion and Sediment Control Plans (ESCPs) have been prepared and implemented for work sites. A CPESC has been appointed and is consulted during preparation of the ESCPs. The CPESC undertakes routine inspection every 2-3 weeks to review compliance. The ERSed controls observed during the audit were generally a high standard with a High Efficiency Sediment Basin installed at the AWRC site which was observed to be operational. Jute mesh and seeding had commenced in rehabilitation areas and was observed to be well maintained and watered during the audit site inspection, with evidence of vegetation growth in some areas. Site accesses were stabilised and dust was not a noticeable issue during the audit. The erosion and sediment control risk has been significantly reduced with the completion of pipelines, the demobilisation of site compounds and the rehabilitation of creek crossings.	Compliant
E73	The Proponent must engage a Certified Professional in Erosion and Sediment Control (CPESC) with minimum five years' experience to oversee all construction and sediment controls required for the AWRC.	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines soils & Contamination CEMP Sub-plan Soil Conservationist Site Inspection Report 14/2/25 Soil Conservationist Site Inspection Report 5/3/25 Soil Conservationist Site Inspection Report 26/3/25 Audit Interview 29/04/25 Site Inspection 29/04/25 	A CPESC has been appointed and is consulted during preparation of the ESCPs. The CPESC undertakes routine inspection every 2-3 weeks to review compliance. The CPESC was also involved in the review of construction methodologies for waterway crossings and the discharge point at the Nepean River.	Compliant
E74	A NSW EPA accredited Site Auditor(s) must be engaged before the commencement of contamination investigations until the completion of construction to ensure that any Work required in relation to contamination is appropriately managed. The Site Auditor is to be provided with all documentation relevant to the consideration of contamination risk and the management of contamination for the project, including previous site audits and site audit statements. The Site Auditor is to review all relevant documentation and provide a written opinion on the contamination risk and the appropriateness of the reports and any proposed management measures of the site, including (but not limited to): (a) the contamination aspects of management and monitoring plans in Conditions C1 and C4 including any updates or amendments to those plans; (b) the review of the Proponent's risk rating for Areas of Environmental Concern (AECs) in Condition E76; (c) Sampling and Analysis Quality Plan in Condition E77; (d) Detailed Site Investigation Report(s) in Condition E79; (e) Remedial Action Plans in Condition E83; (f) Unexpected Finds Procedure for Contamination in Condition E88; and (g) Post-remediation validation reports.	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines soils & Contamination CEMP Sub-plan Audit Interview 29/04/25 Site Inspection 29/04/25 	A NSW EPA accredited Site Auditor has been engaged. Evidence was provided of their involvement throughout the project to date, including the issue of Interim Advice letters. Assessments were ongoing and the project was not yet up to a stage where a Site Audit Report or Site Audit Statement could be issued. Refer to Condition E75 for more detail.	Compliant
E75	Evidence that the NSW EPA accredited Site Auditor has reviewed each of the plans and reports listed in Condition E74, and has issued an interim audit advice or a relevant Site Audit Statement regarding the appropriateness of those plans or reports, must be provided when the plan or report is submitted to the Planning Secretary for information. Where the NSW EPA accredited Site Auditor confirms that no further investigations are warranted, Conditions E76 to E82 do not apply.	<ul style="list-style-type: none"> Letter from JB5G to SWC titled "L04 Interim Audit Advice (0503-2307-04) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Soils and Construction Environmental Management Subplan" dated 12/5/23 Letter from JB5G to SWC titled "L06 Interim Audit Advice (0503-2307-05) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Plant Sampling and Analysis Quality Plan, 22/6/23 Letter from JB5G to SWC RE: L10 Interim Audit Advice (0503-2307-10) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Remedial Action Plan for Pipelines Alignment, dated 22/12/23 Letter from JB5G to SWC RE: L11 Interim Audit Advice (0503-2307-11) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre - Review of the updated Remedial Action Plan for Pipelines Alignment, dated 20/3/24 DPHI Post Approval Form - 20230901061601 DPHI Post Approval Form - 20230901061601 Audit Interview 29/04/25 	As noted in previous Audits, a total of 11 Interim Advice letters have been issued by the EPA Accredited Site Auditor to date. Interim Advice letters state the following documents were reviewed: <ul style="list-style-type: none"> Soils and Contaminated Land Impact Assessment Preliminary Site Investigation Options assessment Preliminary Site Investigation Detailed Site Investigation Memorandum re Hazardous Materials Survey Soils and Construction Environmental Management Plan Unexpected finds procedure for contamination Updated remedial action plan for pipelines alignment. Post Approval forms were provided as evidence and confirm submission of the Interim Advice letters to the Department as required. There were no new IA letters prepared during the IA4 audit period.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E76	The NSW EPA accredited Site Auditor must be engaged to review the risk rating for AECs identified in Appendix N (Soils and Contamination Impact Assessment) of the Environmental Impact Statement listed in Condition A1. Following this review, the Site Auditor must issue an interim audit advice confirming whether the risk rating has been undertaken appropriately.	<ul style="list-style-type: none"> Letter from JBSG to SWC titled "L03 Interim Audit Advice (0503-2307-03) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Soils and Contaminated Land Impact Assessment" dated 17/3/23 Letter from JBSG to SWC titled "L05 Interim Audit Advice (0503-2307-05) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Soils and Contaminated Land Impact Assessment - Pipelines" dated 16 May 2023 Audit Interview 29/04/25 Site Inspection 29/04/25 	<p>Risk Reviews were undertaken in accordance with Condition E76 with Interim Advice issued by the EPA accredited Site Auditor.</p> <p>Refer to Condition E75 for more detail.</p>	Compliant
E77	Prior to the commencement of construction, a Sampling and Analysis Quality Plan (SAQP) for medium and high risk AECs, as confirmed by the Site Auditor and identified in the documents referred to in Condition E76, must be prepared to ensure that field investigations and analyses will be undertaken in a way that enables the collection and reporting of reliable data to meet project objectives, including the relevant site characterisation requirements of the detailed site investigations. The SAQP must: <p>(a) be prepared (or reviewed and approved) by consultants 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; and</p> <p>(b) be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the <i>Contaminated Land Management Act 1997</i> (CLM Act).</p>	<ul style="list-style-type: none"> Sampling and Analysis Quality Plan, Upper South Creek Advanced Water Recycling Centre, ERM, 6/62/3 Letter from JBS&G to SWC titled "L06 Interim Audit Advice (0503-2307-06) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of USC AWRC Plant Sampling and Analysis Quality Plan" dated 22/6/23 Letter from JBS&G to SWC titled "L07 Interim Audit Advice (0503-2307-07) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Pipelines Sampling and Analysis Quality Plan" dated 14/8/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	Sampling and Analysis Quality Plans (SAQPs) were prepared for both the AWRC site and pipelines. The SAQPs were both reviewed by the EPA accredited Site Auditor with Interim Advice provided.	Compliant
E78	For medium to high-risk AECs as confirmed by the NSW EPA accredited Site Auditor, Detailed Site Investigations(s) must be conducted to determine the full nature and extent of the contamination at project areas identified in the SAQP(s). The Detailed Site Investigations(s) must: <p>(a) be prepared (or reviewed and approved) by consultants 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> <p>(b) be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the CLM Act; and</p> <p>(c) state if the land within the project footprint is suitable for the proposed use or if the land requires remediation to be made suitable for the proposed use.</p>	<ul style="list-style-type: none"> Letter from JBS&G to SWC titled "L09 Interim Audit Advice (0503-2307-09) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Plant Site 6/9/23 Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 USC AWRC Pipeline Spoil Characterisation Report, ERM 19/12/23 USC AWRC Pipeline Spoil Characterisation Report, ERM 8/4/24 Audit Interview 29/04/25 Site Inspection 29/04/25 	ERM has conducted Detailed Site Investigations (DSIs) as required by this condition. The DSIs have been reviewed by the EPA accredited Site Auditor and Interim Audit Advice issued. JHG maintain a register of DSIs so they can be tracked and updated.	Compliant
E79	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>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 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> <p>Notes:</p> <p>1. <i>Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports for separate contaminated sites.</i></p> <p>2. <i>Where Detailed Site Investigation(s) have already been undertaken for contaminated soils, materials, groundwater or sediments, and the Site Auditor agrees that these Detailed Site Investigation(s) are appropriate in determining the nature and extent of contamination, they do not need to be undertaken again for the purposes of this condition.</i></p>	<ul style="list-style-type: none"> Letter from JBS&G to SWC titled "L09 Interim Audit Advice (0503-2307-09) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Plant Site 6/9/23 Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 	<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 This approach has been endorsed by the JHG hygienist and documented in the Remedial Action Plan for the pipelines. At the time of the Audit, DPHI has not requested a copy of any DSI, the compliant finding (for this audit) relates to the AWRC DSI. <p>Recommendation</p> <p>For full 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. The Auditor will undertake further assessment of the compliance status of this 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>	Compliant
E80	The Detailed Site Investigation Report must provide details on: <p>(a) primary sources of contamination, for example potentially contaminating activities, infrastructure (such as underground storage tanks, fuel line, sumps or sewer lines) or site practices;</p> <p>(b) contaminant dispersal in air, hazardous ground gases, surface water, groundwater, soil vapour, separate phase contaminants, sediments, infrastructure (e.g. concrete), biota, soil and dust;</p> <p>(c) contaminant characterisation and behaviour (volatility, leachability, speciation, degradation products and physical and chemical conditions on-site which may affect how contaminants behave);</p> <p>(d) potential effects of contaminants on human health, including the health of occupants of built structures (for example arising from risks to service lines from hydrocarbons in groundwater, or risks to concrete from acid sulphate soils) and the environment;</p> <p>(e) potential and actual contaminant migration routes including potential preferential pathways;</p> <p>(f) the adequacy and completeness of all information available for use in the assessment of risk and for making decisions on management requirements, including an assessment of uncertainty;</p> <p>(g) the review and update of the conceptual site model from the preliminary and detailed site investigations;</p> <p>(h) nature and extent of any existing remediation (such as impervious surface cappings); and</p> <p>(i) whether the land is suitable (for the intended final land use) or can be made suitable through remediation.</p>	<ul style="list-style-type: none"> Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 Audit Interview 29/04/25 Letter from JBS&G to SWC RE: L09 Interim Audit Advice (0503-2307-09) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Plant Site, dated 6/9/23 	Noted as compliant for the current stage of the project works. The DSI for the AWRC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09.	Compliant
E81	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 NSW EPA accredited Site Auditor. <p>Notes:</p> <p>1. <i>The intention of this condition is to require Detailed Site Investigation(s) of locations identified as an area of potential contamination to be completed before any form of excavation including the use of hand tools to expose soil to prevent unacceptable risk to human health or the environment on or off site.</i></p> <p>2. <i>This condition does not prevent disturbance required to complete the Detailed Site Investigation(s).</i></p> <p>3. <i>This condition does not prevent other activities that do not disturb the land where the ER has reviewed the appropriateness of those activities in accordance with Condition A28(i).</i></p>	<ul style="list-style-type: none"> Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 Audit Interview 29/04/25 Letter from JBS&G to SWC RE: L09 Interim Audit Advice (0503-2307-09) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Plant Site, dated 6/9/23 	The DSI for the AWRC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09. Refer to the Auditors response to Condition E79 (above) - regarding the DSI for the pipelines component of the project.	Compliant
E82	Any recommendations made in the Detailed Site Investigation Report for changes to management measures in the CEMP sub-plan(s) must be incorporated into the relevant subplan required by Condition C4, unless otherwise approved by the Planning Secretary.	<ul style="list-style-type: none"> Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 Audit Interview 29/04/25 	The DSI for the AWRC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09. Refer to the Auditors response to Condition E79 (above) - regarding the DSI for the pipelines component of the project.	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E83	<p>Where remediation is required to make land suitable for the final intended land use, a Remedial Action Plan must be prepared and/or reviewed and approved by consultants 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> <p>The Remedial Action Plan must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the CLM Act and must include measures to remediate the contamination at the site to ensure the site will be made suitable for the final intended land use.</p> <p><i>Note: Nothing in this condition prevents the Proponent from preparing individual Remedial Actions Plan(s) for separate contaminated sites.</i></p>	<ul style="list-style-type: none"> Remediation Action Plan, Upper South Creek Advanced Water Recycling Centre, John Holland, 29/8/23 Remediation Action Plan, Upper South Creek Advanced Water Recycling Centre - Pipelines, John Holland, 6/3/24 Letter from SWC to DPHI Titled "Upper South Creek Advanced Water Recycling Centre: Provision of Remedial Action Plan (RAP) in accordance with Condition E84 Letter from JBSG to SWC titled "L08 Interim Audit Advice (0503-2307-08) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Remedial Action Plan - Plant Site" dated 30/8/23 Letter from JBSG to SWC titled "L10 Interim Audit Advice (0503-2307-10) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Remedial Action Plan for Pipelines Alignment" dated 22/12/23 Letter from JBSG to SWC titled "L11 Interim Audit Advice (0503-2307-11) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the updated Remedial Action Plan for Pipelines Alignment" 20/3/24 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189) Remediation Action Plan - Pipelines Audit Interview 29/04/25 	<p>A Remedial Action Plan (RAP) has been prepared for the AWRC site and submitted to the Department with the EPA Site Auditor's Interim Audit advice.</p> <p>An additional RAP was prepared for the pipelines and approved by DPHI on 21/3/24 following review and endorsement by the EPA Site Auditor. The DPHI approval noted the RAP had been reviewed by the EPA Site Auditor with corresponding Interim Audit Advice provided.</p> <p>Stockpiles on AWRC classified in accordance with the NEPM.</p>	Compliant
E84	<p>If remediation is required to make land suitable for the final intended land use, then prior to commencing with the remediation, the Proponent must submit the Remedial Action Plan(s) and an interim audit advice from a NSW EPA accredited Site Auditor to the Planning Secretary for information, which considers that the Remedial Action Plan is appropriate and that the site can be made suitable for the proposed land use. The Remedial Action Plan must be implemented and any changes to the Remedial Action Plan must be approved in writing by the NSW EPA accredited Site Auditor.</p>	<ul style="list-style-type: none"> Remediation Action Plan, Upper South Creek Advanced Water Recycling Centre, John Holland, 29/8/23 Remediation Action Plan, Upper South Creek Advanced Water Recycling Centre - Pipelines, John Holland, 6/3/24 Letter from SWC to DPHI Titled "Upper South Creek Advanced Water Recycling Centre: Provision of Remedial Action Plan (RAP) in accordance with Condition E84 Letter from JBSG to SWC titled "L08 Interim Audit Advice (0503-2307-08) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Remedial Action Plan - Plant Site" dated 30/8/23 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189) Remediation Action Plan - Pipelines Letter from ERM to JHG titled "Asbestos Clearance Certificate - Upper South Creek Advanced Water Recycling Centre, Lennox Reserve Construction Support Compound, Canley Vale NSW, dated 6/3/25 Letter from ERM to JHG titled "Waste Classification Report - Lennox Reserve, Canley Vale, dated 14/2/25 Sydney Water - Report Action RA 15316 dated 13/12/24 10 Wheeler Pickup/Tipping Form dated 27/2/25, 28/2/25 EHO Consulting report "Asbestos Air Monitoring - Certificate of Analysis - Monitoring during soil loadout, Lennox Reserve, Willowbank Cres, Canley Vale NSW 2166" dated 27/2/25 Various Photos Audit Interview 29/04/25 	<p>As noted in previous Audits, a Remedial Action Plan (RAP) has been prepared for the AWRC site and submitted to the Department with the EPA Site Auditor's Interim Audit advice.</p> <p>An additional RAP was prepared for the pipelines and approved by DPHI on 21/3/24 following review and endorsement by the EPA Site Auditor. The DPHI approval noted the RAP had been reviewed by the EPA Site Auditor with corresponding Interim Audit Advice provided.</p> <p>During the IA#4 Audit period, some additional remediation work was undertaken at Lennox Reserve. Evidence provided to the Auditor to demonstrate the work was undertaken in a controlled manner included the following:</p> <ul style="list-style-type: none"> Asbestos clearance certificate with details of a visual inspection and sampling of ground surface following remediation of soils containing bonded asbestos fragments Waste classification report Environmental inspection report Waste disposal tipping reports Air monitoring reports. Photographic evidence showing geofabric/plastic covering of asbestos stockpiles. <p>At the time of IA #4, the remediation report for Lennox Reserve had not been completed. An encapsulation cell has been developed at the AWRC site to manage ACM spoil from around structures that were in place on the AWRC site.</p>	Compliant
E85	<p>For any land confirmed as a moderate to high risk area of potential contamination by the NSW EPA accredited Site Auditor as per Condition E76, a Section A1 or A2 Site Audit Statement (accompanied by an Environmental Management Plan) and its accompanying Site Audit Report, which state that the contaminated land disturbed by the Work has been made suitable for the intended land use, must be submitted to the Planning Secretary and relevant council(s) after remediation and no later than one month before the commencement of operation of Stage 1 of the CSSI.</p> <p><i>Note: Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.</i></p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 <p>Wont be completed until Site validation report is complete</p>	The Site Validation Report (SVR) and Site Audit Statement (SAS) has not been prepared to date.	Not triggered
E86	<p>Contaminated land must not be used for the purpose approved under the terms of this approval until a Section A1 or A2 Site Audit Statement is obtained which states that the land is suitable for that purpose and any conditions on the Section A Site Audit Statement have been complied with.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Required upon the completion of construction.	Not triggered
E87	<p>Any recommendations to minimise risk to human health or the environment or for the management of contamination arising, the NSW EPA accredited Site Auditor review, advice or audits must be incorporated into the relevant CEMP sub-plan and implemented.</p>	<ul style="list-style-type: none"> Letter from JBSG to SWC RE: L04 Interim Audit Advice (0503-2307-04) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Soils and Construction Environmental Management Subplan, dated 125/23 Audit Interview 29/04/25 	Interim Advice (L04) provides detailed comments on the Soil and Contamination Sub-plan. Interim Advice notes the EPA Auditor's comments have been satisfactorily addressed. Updates to the Soil and Contamination Sub-plan are reviewed by ERM and the EPA Site Auditor as required.	Compliant
E88	<p>An Unexpected Finds Procedure for Contamination must be prepared before the commencement of Work and must be followed should unexpected contamination or asbestos (or suspected contamination) be excavated or otherwise discovered. The procedure must include details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved. The Procedure must be reviewed by the Site Auditor and interim audit advice or a Section B Site Audit Statement provided certifying that the Unexpected Finds Procedure is appropriate. The Unexpected Finds Procedure must be submitted to the Planning Secretary for approval at least one month prior to the commencement of Work and a copy of the interim audit advice or Section B Site Audit Statement attached. The Unexpected Finds Procedure for Contamination must be implemented throughout Work.</p> <p><i>Note: Nothing in this condition prevents the Unexpected Finds Procedure for Contamination required under Condition E88 to be submitted for approval as part of the Soils and Contamination CEMP Sub-Plan under Condition C8.</i></p>	<ul style="list-style-type: none"> Appendix C Soils and Contamination CEMP Sub-plan Enviro Consulting - Asbestos inspection report - Monash Place and Hebblewaite Place Bonnyrigg, dated 29/2/24 Sydney Water Report Action RA14055 Unknown Stockpile Dumping, dated 19/8/24 ERM Waste Classification Report - Fly-Tipped Waste, Elizabeth Drive Luddenham, dated 26/8/24 E89 and 91 Sustainability Dashboard (April 2025) Bingo waste dockets x2 (29.08 & 26.4 Tonnes), dated 13/9/24 	<p>The Unexpected Finds Procedure for Contamination is included as Appendix C of the Soil and Contamination Sub-plan.</p> <p>During the previous audit period, several unexpected asbestos finds were encountered. Adequate evidence was provided to demonstrate the implementation of the Unexpected Finds Procedure.</p>	Compliant
E89	<p>A Sustainability Strategy must be prepared and implemented to achieve a minimum "Gold" Design" and "As built" rating under the Infrastructure Sustainability Council Infrastructure v2.1 rating tool, or at least "Excellent" under v1.2.</p>	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines Sustainability Management Plan Document No: USCP-JHG-MPLPMT 009 Revision No: B dated 21/1/24 Email from DPHI to SWC, dated 3/11/23 DPHI Post Approval form 20231103061008 John Holland Case Study - Sand to Glass and Back Again: A Circular Tale of Sustainable Construction Rev00, dated 6/2/2024 JHG Sustainability CSF Tracker - Snapshot, as at 1/11/24 E89 and 91 Sustainability Dashboard (April 2025) E89 and 91 Sustainability Dashboard (January 2025) Audit Interview 29/04/25 	<p>The sustainability strategy commits to a "Gold" Rating".</p> <p>Examples of sustainability initiatives employed and implemented on the project was discussed. The project has implemented a recycled pipe bedding sand alternative, utilising blended glass sand.</p> <p>A snapshot of the JHG Sustainability CSF Tracker was reviewed and indicated the DR1 Submission Completion Rate was at 100% with 79.22 points ready for submission as of April 2025. It was noted that progress towards reaching the gold standard is being achieved. A sustainability initiative recently implemented involves the replacement of recycled gyprock in place of gypsum.</p>	Compliant
E90	<p>Evidence that the minimum rating in Condition E89 have been achieved must be provided to the Planning Secretary for information within one month of receiving the ratings.</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Not required to be undertaken prior to the completion of the project and the attainment of the final rating.	Not triggered
E91	<p>The Sustainability Strategy must be implemented throughout design, construction and operation, and be submitted to the Planning Secretary for information.</p>	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines Sustainability Management Plan Document No: USCP-JHG-MPLPMT 009 Revision No: Email from DPHI to SWC dated 3/11/23 Upper South Creek Sustainable Asphalt Trial - Case Study February 2024 Photographic Evidence - Worm Farm Septic System IS v 2.1 Infrastructure Sustainability Rating - Presentation Audit Interview 29/04/25 	<p>Both JHG and SWC have appointed sustainability professionals to oversee the implementation of the Sustainability Strategy. The Sustainability Strategy was issued to DPHI on 3/11/23.</p> <p>Several initiatives have been implemented throughout the project including a sustainable asphalt trial, a septic system worm farm and more recently the replacement of recycled gyprock in the place of gypsum.</p> <p>A snapshot of the JHG Sustainability CSF Tracker was reviewed and indicated the DR1 Submission Completion Rate was at 100% with 79.22 points ready for submission as of April 2025. It was noted that progress towards reaching the gold standard is being achieved.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E92	<p>A Water Reuse Strategy must be prepared, which sets out options for the reuse of collected stormwater and groundwater during construction and operation. The Water Reuse Strategy must include, but not be limited to:</p> <p>(a) evaluation of reuse options; (b) details of the preferred reuse option(s), including indicative volumes of water to be reused, proposed reuse locations and/or activities, proposed treatment (if required), and any additional licences or approvals that may be required; (c) measures to avoid misuse of stormwater and groundwater as potable water; (d) consideration of the public health risks from reuse of stormwater or groundwater; (e) a time frame for the implementation of the preferred reuse option(s).</p> <p>The Water Reuse Strategy must be prepared based on best practice and advice sought from relevant agencies, as required. The Strategy must be applied during construction and operation.</p> <p>Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail before the commencement of construction.</p> <p>A copy of the Water Reuse Strategy must be made publicly available prior to the commencement of construction. If reuse is only proposed during operation, then the Strategy must be made publicly available prior to the commencement of operation.</p> <p><i>Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational phases of the CSSI.</i></p>	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines CoA E92 Construction Water Reuse Strategy Rev B, dated 4/10/23 Water Reuse Dashboard - screenshot as at 1/11/24 	<p>The Construction Water Reuse Strategy addresses these requirements and has been provided on the SWC website. The strategy was approved by DPHI on 10/10/23.</p> <p>It was noted that an operational water re-use strategy is proposed to be developed for the operational phase.</p>	Compliant
E93	Access to all utilities and properties must be maintained during construction, where practicable, unless otherwise agreed with the relevant utility owner, landowner or occupier.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	At the time of the Audit (IA # 4), all works on the pipelines had completed. There were no property access issues identified by the Audit.	Compliant
E94	Any property access physically affected by Stage 1 of the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Pre-construction customer agreement- working with property owners dated 10/3/24 Pre-construction customer agreement- working with property owners dated 10/3/24 Consistency Assessment for road repairs of roads noted within the EIS and LRA Photographs - Various 	As observed during the IA#3 audit site inspection, property access has been re-instated to its pre-existing condition following pipeline trenching works. Pre-construction agreements were provided to the Auditor as part of IA #3 as evidence of compliance with this condition. Photographic evidence was provided to the Auditor demonstrating the re-instatement of driveways	Compliant
E95	Local roads that are proposed to be used by heavy vehicles (for the purposes of Stage 1 of the CSSI) that are immediately adjacent to the construction boundary and ancillary facilities, and that are not identified for use by heavy vehicles in the documents listed in Condition A1, must be approved by the Planning Secretary as part of the Traffic and Transport Management CEMP Sub-plan.	<ul style="list-style-type: none"> Upper South Creek, Advanced Water Recycling Centre and Pipelines - Local Roads Approval, Document Number: USCP-JHG-MPL-ENV-012, Revision F dated 4/9/23 DPHI Post Approval Form - 20230904231901 Audit Interview 29/04/25 Letter from DPHI to SWC titled "Approval of the Traffic and Transport CEMP Sub-plan, Local Roads Approval, and Construction Parking and Access Strategy" dated 24/11/23 	There have been no incidents or non-compliances related to local road use reported during the audit period. DPHI approved the use of local roads on 24/11/23. No new local road approvals have been required during the audit period. A minor amendment was made to the Edith St local road (refer to E96 below)	Compliant
E96	<p>All requests to the Planning Secretary under Condition E95 must include the following:</p> <p>(a) a swept path analysis; (b) demonstration that the use of local roads by heavy vehicles for the Stage 1 of the CSSI will not compromise the safety of pedestrians and cyclists or the safety of two-way traffic flow on two-way roadways; (c) provide details as to the date of completion of the road dilapidation surveys for the subject local roads; (d) measures that will be implemented to avoid where practicable the use of roads past schools, aged care facilities and child care facilities during their peak operation times; and (e) written advice from an appropriately qualified professional on the suitability of the proposed heavy vehicle route which takes into consideration items (a), (b), (c), and (d) of this condition.</p>	<ul style="list-style-type: none"> Upper South Creek, Advanced Water Recycling Centre and Pipelines - Local Roads Approval, Document Number: USCP-JHG-MPL-ENV-012, Revision F dated 4/9/23 DPHI Post Approval Form - 20230904231901 Letter from DPHI to SWC titled "Approval of the Traffic and Transport CEMP Sub-plan, Local Roads Approval, and Construction Parking and Access Strategy" dated 24/11/23 Letter from BB Enviro to SWC titled "Review of Local Roads Approval Document" dated 15/11/24 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Traffic and Transport CEMP Sub-plan, Revision D" dated 11/12/24 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-123), dated 15/3/24 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-86091890-PA-123) - Condition E95 and E96 - Approval of revised Local Roads Approval for use of Edith Street" dated 22/11/24 Memorandum - Upper South Creek Advanced Water Recycling Centre and Pipelines Project - Local Roads Approval Rev 8" dated 13/11/24 DPHI Post Approval Form S051030 Upper South Creek Advanced Water Recycling Centre and Pipelines, Traffic and Transport CEMP Subplan, Rev D dated 29/11/24 	<p>The Request for Local Roads Approval was submitted to the Department on 4/9/23 and was approved by DPHI on 24/11/23.</p> <p>During the Audit period, a minor amendment to the Local Road Approval for Edith was endorsed by the ER on the 11/11/24 and approved by DPHI on the 22/11/24. DPHI requested the updated Local Roads Approval to be appended to the updated version of the Traffic and Transport CEMP subplan. This was subsequently updated and endorsed by the ER on 11/12/24</p>	Compliant
E97	<p>The locations of all heavy vehicles used for spoil haulage must be monitored in real time and the records of monitoring be made available electronically to the Planning Secretary and the EPA upon request for a period of no less than one year following the completion of construction.</p> <p><i>Note: Refer to Condition A47 in relation to vehicle identification.</i></p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Spoiltrack Dashboard (Screenshot as at 1/11/24) Spoiltrack - user manual 	<p>As noted in previous audits, an electronic monitoring and management system is in place and implemented (SPOIL TRAK) which provides a Realtime monitoring system.</p> <p>A screenshot of SPOILTRAK data was presented as evidence during previous audits and includes graphs tracking Spoil Weight by Load Site and Spoil Weight by Sump Site. Details can be searched including Waste Classification, Load Date and Load Site.</p> <p>There have been no known requests from EPA or DPHI for monitoring data or information.</p>	Compliant
E98	Before any local road is used by a heavy vehicle for the purposes of the Stage 1 of the CSSI, a Road Dilapidation Report must be prepared for the road. A copy of the Road Dilapidation Report must be provided to the relevant council(s) within three weeks of completion of the survey and no later than one month prior to the road being used by heavy vehicles associated with Stage 1 of the CSSI.	<ul style="list-style-type: none"> Pre-construction Condition Survey - OPT 31522 Upper South Creek AWRC Kemps Creek NSW, - AUSDIAPAS Document Transmittal Ref JH-TRANSMIT-000063 dated 4/9/23 Document Transmittal Ref JH-GCOR-000456 - dated 25/8/23 JHG internal email dated 4/9/23 	Evidence was provided to the Auditor demonstrating the dilapidation surveys have been issued to Council.	Compliant
E99	<p>If damage to roads occurs as a result of Stage 1 of the CSSI, the Proponent must either (at the relevant road authority's discretion):</p> <p>(a) compensate the relevant road authority for the damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-works as identified in the Road Dilapidation Report(s).</p>	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Consistency Assessment for road repairs of roads noted within the EIS and the LRA dated 21/12/23 Fairfield City Council Tax Invoice - FCC Permanent Restoration Scope, Asphalt Work, dated 31/12/24 John Holland Remittance Advice dated 9/1/25 Letter from Fairfield City Council to JHG titled "Council Assets Restoration for Upper South Creek AWRC - Pipeline Works" dated 12/12/24 	As noted in IA2 and 3, some damage to local roads has occurred during the previous Audit period, to East Parade Fairfield. SWC/JHG noted (in the IA2 Audit interview) that minor road repairs were completed on East Parade earlier in the year. Council have written to JHG confirming these works have been completed to a satisfactory standard. Confirmation of payments to Council were provided to the Auditor as evidence.	Compliant
E100	Safe pedestrian and cyclist access must be maintained around Work sites during construction. In circumstances where pedestrian and cyclist access is restricted or removed due to construction activities, a proximate alternative route which complies with relevant standards, unless otherwise endorsed by an independent, appropriately qualified and experienced person, must be provided (including signposting) prior to the restriction or removal of the impacted access.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Upper South Creek, Transport and Traffic Management Plan, dated 4/2/23 	At the time of the IA #4 site inspection, all pipeline works on roads with pedestrian interfaces were complete. No impacts to pedestrian or cyclists were observed during the Audit site inspection.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E101	<p>Vehicles (including light and heavy vehicles) associated with Stage 1 of the CSSI must be managed to:</p> <p>(a) minimise parking on public roads;</p> <p>(b) minimise idling and queuing on state and regional roads;</p> <p>(c) not carry out marshalling of construction vehicles near sensitive land user(s);</p> <p>(d) not block or disrupt access across pedestrian or shared user paths at any time; and</p> <p>(e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the Traffic and Transport Management CEMP Sub-plan.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Upper South Creek, Traffic and Transport CEMP Sub-plan RevC, dated 15/8/24 	<p>At the time of the IA #4 site inspection, all pipeline works on roads and in residential areas were complete. A large carpark was in operation at the AWRRC site with no vehicles observed parked or idling on Clifton Avenue. There were no instances observed or reported where pedestrian or shared user paths have been blocked.</p> <p>Spoil haulage activities have been completed. Refer also to the Auditors response to condition E97 regarding spoil tracking during the transportation of spoil.</p>	Compliant
E102	<p>A Construction Parking and Access Strategy must be prepared to identify and mitigate impacts resulting from on- and off-street parking changes during construction in highly urbanised settings. The Strategy must include, but not necessarily be limited to:</p> <p>(a) achieving the requirements of Condition E101;</p> <p>(b) confirmation and timing of the removal of on- and off-street parking associated with construction of Stage 1 of the CSSI;</p> <p>(c) parking surveys of all parking spaces to be removed or occupied by the CSSI workforce in the vicinity of the tunnelling compounds at Cabravale Leisure Centre and Bartley Street, Cabramatta to determine current demand during peak, off-peak, school drop off and pickup, weekend periods and during special events;</p> <p>(d) consultation with affected stakeholders utilising existing on- and off-street parking stock which will be impacted as a result of construction;</p> <p>(e) assessment of the impacts to on- and off-street parking stock taking into consideration, occupation by the CSSI workforce, outcomes of consultation with affected stakeholders and considering the impacts of special events;</p> <p>(f) identification of mitigation measures to manage impacts to stakeholders as a result of on-and off-street parking changes including, but not necessarily limited to, staged removal and replacement of parking, and provision of alternative parking arrangements;</p> <p>(g) mechanisms for monitoring, over appropriate intervals, to determine the effectiveness of implemented mitigation measures;</p> <p>(h) details of shuttle bus service(s) to transport the CSSI workforce to construction sites from public transport hubs and off-site car parking facilities (where these are provided) and between construction sites;</p> <p>(i) provision of contingency measures should the results of mitigation or monitoring indicate implemented measures are ineffective; and</p> <p>(j) provision of reporting of monitoring results to the Planning Secretary and relevant council(s) at three monthly intervals.</p> <p>The Construction Parking and Access Strategy must be submitted to the Planning Secretary for information at least one month before the commencement of any construction that reduces the availability of existing parking. The Strategy must be implemented before impacting on on-street parking and incorporated into the Traffic and Transport Management CEMP Sub-plan.</p>	<ul style="list-style-type: none"> • Upper South Creek Advanced Water Recycling Centre and Pipelines Traffic & Transport CEMP Sub-plan Revision B, dated 22/11/24 • Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Parking and Access Strategy • CEMP Sub-plan Document No: USCP-JHG-MPL-ENV-0013 Revision G • DPHI Post Approval Form 20230907042209 • Letter from DPHI to SWC titled "Approval of the Traffic and Transport CEMP Sub Plan • Local Roads Approval, and Construction Parking and Access Strategy, dated 24/11/23 	<p>The Construction Parking and Access Strategy (CPAS) meets the requirements of this condition and was submitted to DPHI on 7/9/23.</p> <p>The CPAS was approved on 24/11/23.</p> <p>The overarching TTCSP has been updated to incorporate the CPAS.</p> <p>The Local Roads Approval (LRA) and CPAS were included in the TTCSP.</p>	Compliant
E103	<p>During construction, all reasonably practicable measures must be implemented to maintain pedestrian and vehicular access to, and parking in the vicinity of, businesses and affected properties. Disruptions are to be avoided, and where avoidance is not possible, minimised. Where disruption cannot be minimised, alternative pedestrian and vehicular access, and parking arrangements must be developed in consultation with affected businesses and implemented prior to the disruption. Adequate signage and directions to businesses must be provided prior to, and for the duration of, any disruption.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Traffic Guidance Scheme - Plan Number TGS-CAB-MEA-NB-1208 dated 19/7/23 • Traffic Guidance Scheme - Plan Number TGS-CAB-WB-2301 Rev 2-1208 dated 19/7/23 	<p>At the time of the IA #4 site inspection, all pipeline works on roads involving interfaces with businesses and affected properties were complete. No impacts to businesses or properties were observed during the Audit site inspection.</p>	Compliant
E104	<p>Stage 1 of the CSSI (including new or modified local roads, parking, pedestrian and cycle infrastructure) must be designed to meet relevant design, engineering and safety guidelines, including the Austroads Guide to Traffic Management.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>No new or permanently modified local road, parking, permanent infrastructure etc. observed.</p>	Not triggered
E105	<p>An independent Road Safety Audit must be undertaken to assess the safety performance of new or permanently modified local road, parking, pedestrian and cycle infrastructure provided as part of Stage 1 of the CSSI (including ancillary facilities) to ensure that they meet the requirements of relevant design, engineering and safety guidelines, including Austroads Guide to Traffic Management.</p> <p>The audit(s) must be undertaken by an appropriately qualified and experienced person during detailed design development (audit of plans) and prior to opening (pre-opening audit).</p> <p>The audit findings and recommendations of the detailed design plans (audit of the plans) must be actioned prior to construction of the relevant infrastructure. The pre-opening audit findings and recommendations must be actioned prior to the relevant infrastructure being made available for use. All audit findings must be made available to the Planning Secretary on request, within the timeframe stated in the request.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>No new or permanently modified local road, parking, permanent infrastructure etc. observed.</p>	Not triggered
E106	<p>The Proponent must assess whether detailed design of the project would result in any increase to operational traffic movements identified in the documents listed in Condition A1 for the AWRRC site, and submit the assessment to the Planning Secretary for information. If any such changes to operational traffic movements are identified, the Proponent must prepare a Road Network Performance Plan in consultation with the relevant council(s) and TfNSW. The Plan must be prepared to address the following:</p> <p>(a) an updated analysis, including modelling of traffic impacts to the adjoining road network, as a consequence of Stage 1 of the CSSI;</p> <p>(b) an assessment of the performance of the road network, inclusive of the Clifton Avenue / Elizabeth Drive intersection; and</p> <p>(c) mitigation measures to manage any predicted traffic performance impacts.</p> <p>If a Road Network Performance Plan is triggered under this condition, it must be submitted to the Planning Secretary, relevant council(s) and TfNSW for information six months prior to the operation of Stage 1 of the CSSI. The mitigation measures in the Plan must be implemented by the Proponent before the operation of Stage 1 of the CSSI.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>Operational requirement.</p>	Not triggered
E107	<p>A Utilities Management Strategy must be prepared and implemented for all utility Work undertaken as a result of Stage 1 of the CSSI. The Strategy must identify how utility Work will be defined and managed. The Utilities Management Strategy must include:</p> <p>(a) The functions of the Utility Coordination Manager as required by Condition E109;</p> <p>(b) A description of all utility Work to be undertaken; and</p> <p>(c) Management measures to be implemented to manage dust, noise, traffic, access, lighting and other relevant impacts associated with utility Work.</p> <p>The Utilities Management Strategy must be submitted to the Planning Secretary for information at least one month before the commencement of utility Work.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Rev A, dated 22/08/2023 	<p>The Utilities Management Strategy (UMS) has been incorporated into the CEMP. Section 3.3.12 of the UMS includes the responsibilities of the Utilities Coordinator.</p>	Compliant
E108	<p>Nothing in this approval permits the carrying out of any utility Work not required for the purpose of the Stage 1 of the CSSI.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>There have not been any utility works undertaken as part of the project to date that are not required for the construction of the SSI, and have not been included under another approval.</p>	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E109	A Utility Coordination Manager must be appointed for the duration of Stage 1 of the CSSI Work. The role of the Utility Coordination Manager must include, but not be limited to: (a) the management and coordination of all utility Work associated with the delivery of Stage 1 of the CSSI, to ensure respite is provided to the community; (b) providing advice to the Public Liaison Officer(s) regarding upcoming utility Work, including the scope of the Work and the responsibility for the Work; and (c) investigating complaints received from the Public Liaison Officer(s) relating to utility Work and providing a response to the Public Liaison Officer(s).	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Upper South Creek Advanced Water Recycling Centre and Pipelines CEMP RevA, dated 22/08/2023 	A Utility Coordination Manager (UCM) has been appointed for the project. The CEMP describes the roles and responsibilities of the UCM.	Compliant
E110	Waste generated during construction and operation must be dealt with in accordance with the following priorities: (a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; (b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and (c) where re-using, recycling or recovering waste is not reasonably practicable, waste must be treated or disposed of.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 AWRC Waste Tracking Register USC Pipelines Waste Tracking Register Site Inspection Record INS-006833 05/11/24 JHG Email titled "Waste Management and the Use of Office Waste Bins" dated 5/2/25 JHG Waste Dashboard - Screenshot as at 1/11/24 	<p>Appropriate waste and recycling bins have been provided on site. The standard of housekeeping at the AWRC site was high and improved from the previous Audit (IA #3). Separate waste tracking registers have been established and maintained for the AWRC and pipelines. The registers are comprehensive and include details of:</p> <ul style="list-style-type: none"> Waste classification Waste source Quantity Transportation company Waste facility and EPL details <p>Evidence of communications to the site team regarding waste management and the use of office waste bins was provided to the Auditor in response to recommendations from the previous audit.</p> <p>Routine site inspections cover a range of issues relating to waste management including:</p> <ul style="list-style-type: none"> Planning and permitting for waste management Induction and training Waste segregation Transport and disposal Reporting 	Compliant
E111	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the EPL in force for Stage 1 of the CSSI, or be done in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , as the case may be.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	Waste is not imported to the site.	Not triggered
E112	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , or to any other place that can lawfully accept such waste.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 AWRC Waste Tracking Register USC AWRC Pipeline Spoil Characterisation Report, ERM 19/12/23 USC AWRC Pipeline Spoil Characterisation Report, ERM 8/4/24 	A Waste Tracking Register has been prepared and is maintained. The register includes details of the materials and their destination, including the docket number and the EPL reference of the receiving site.	Compliant
E113	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	<ul style="list-style-type: none"> Bingo Industries Waste Delivery Docket # 12898 dated 19/10/23 S143 Certificate - Defence Establishment Orchard Hills dated 9/10/23 Resource Reporting Tracking Schedule USC Waste and Resource Use Subplan Document USCP-JHG-MPL-ENV-0010 Rev B dated 30/8/24 Environment Protection Licences (EPLs 11539, 11815, 20593, 5713, 5186, 10699) Imported Materials Tracking - Pipelines Bingo Industries, Monthly Waste Report - John Holland dated March 2025 	<p>Section 6.1 of the Construction Waste Management Sub-plan includes procedures for the classification of waste streams.</p> <p>JHG has developed and maintain a register to track and record the disposal of waste materials off site. This includes the destination of the material, its classification and the details of the Environment Protection Licence (EPL).</p>	Compliant
E114	Works on waterfront land and within watercourses must have regard to Guidelines for controlled activities on waterfront land – Riparian Corridors (NRAR, 2018), Controlled activities on waterfront land – Guidelines for watercourse crossings on waterfront land (NSW Office of Water, 2013) and Policy and Guidelines for Fish Habitat Conservation and Management (DPI Fisheries, 2013). This includes outlets and watercourse crossings.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 Guidelines for controlled activities on waterfront land – Riparian Corridors (NRAR, 2018), Controlled activities on waterfront land – Guidelines for watercourse crossings on waterfront land (NSW Office of Water, 2013) Policy and Guidelines for Fish Habitat Conservation and Management (DPI Fisheries, 2013). Environmental Work Method Statement - Working around and Within Waterways, dated February 2024 Progressive Erosion and Sediment Control Plan (PESC), Oaky Creek, Cosgroves Creek, dated 17/2/24 CoA9 Consultation Summary Report - Works In Oaky Creek and Cosgrove Creek, Rev 1, dated 2/3/24 	<p>As noted in IA3, the Auditor reviewed the guidelines noted in this condition and the methodologies observed in the documents and during the site inspection and is satisfied the requirements of this condition have been met.</p> <p>Environmental Work Method Statements (EWMS) and Progressive Erosion and Sediment Control Plans (PESCPs) have been sighted and are consistent with the principles of these guidelines.</p> <p>At the time of this IA#4, all works within creeks have been completed and rehabilitated to a high standard (refer to the Auditors response to E116 for further details).</p> <p>Ongoing maintenance will be required particularly for rehabilitated creek crossings/riparian areas.</p>	Compliant
E115	Suitably qualified expert(s) must agree to methods of construction of pipelines across waterways and through shallow aquifers, in consultation with relevant State and/or local authorities.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 EWMS Working in Waterways, Treated Water Pipeline and Brine Pipeline Alignment_signed Progressive Erosion and Sediment Control Plan (PESCP), Nepean River Works - Construction of piling pad and creek stabilisation, dated 28/4/24 PESCP South Creek Diversion RevD, approved 30/6/24 CoA A9 Consultation Summary Report Works in South Creek Rev01, dated 14/6/24 Email from CPESC RE: South Creek diversion PESCP - Rev D, dated 11/7/24 Email from Ecologist RE: Supervision of infilling and aquatic fauna relocation of South Creek, dated 5/8/24 Nepean River Map - Vegetation Reduction Plan 	<p>The following experts were involved in the development of the construction EWMS and PESCPs:</p> <ul style="list-style-type: none"> - Soil and Water expert (Certified Practicing Erosion and Sediment Control) - Aquatic Ecologist - Geomorphologist 	Compliant
E116	Drainage feature crossings (permanent and temporary watercourse crossings and stream diversions) and drainage swales and depressions must be carried out taking into consideration relevant guidelines and designed by a suitably qualified and experienced person.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 EWMS Working in Waterways, Treated Water Pipeline and Brine Pipeline Alignment_signed Progressive Erosion and Sediment Control Plan (PESCP), Nepean River Works - Construction of piling pad and creek stabilisation, dated 28/4/24 PESCP South Creek Diversion RevD, approved 30/6/24 CoA A9 Consultation Summary Report Works in South Creek Rev01, dated 14/6/24 Email from CPESC RE: South Creek diversion PESCP - Rev D, dated 11/7/24 Email from Ecologist RE: Supervision of infilling and aquatic fauna relocation of South Creek, dated 5/8/24 South Creek, Rock Chute Typical Details, Detailed Design (As constructed), rev C dated 18/10/24 Soil Conservationists Site Report dated 14/1/25 Letter from Habitat Innovation and Management to JHG dated 23/1/25 Nepean River Map - Vegetation Reduction Plan 	<p>Temporary waterway crossings were designed and supervised by appropriate experts taking into consideration relevant guidelines and standards. Rehabilitation of waterway crossings is now complete. An assessment was undertaken by a specialist ecologist and botanist on 14 January, 2025 to evaluate the restoration works undertaken.</p> <p>Highlights of the assessment are as follows:</p> <p>Oaky Creek and Cosgroves Creek</p> <p>The rehabilitation works have restored both Oaky and Cosgroves Creek to an improved state by mitigating and reducing future potential erosion by battering, re-shaping and rock armouring the bed and banks of these creeks, installing coir logs above the creek banks and the sill within the creek bank. This will allow the natural generation of plants in the creek banks to grow and further stabilise the banks.</p> <p>South Creek</p> <p>These rehabilitation works have restored South Creek to an improved state by mitigating the erosion and reducing further erosion from the removal of the culvert, backfilling the scour hole, battering and re-shaping the creek bank and installing the submerged dam wall and coir logs. Aquatic and riparian habitat has been enhanced from the introduction of habitat rocks, and a rock batter chute which will re-instate a fish passage, and the revegetation of a riparian zone, which will reduce potential erosions and create habitat for native aquatic and riparian fauna.</p> <p>Nepean River</p> <p>Rehabilitation works have restored this section of the Nepean River to an improved state by mitigating the erosion and reducing further erosion from reshaping the creek bank, constructing and diverting surface water flow towards a rock batter chute, and installing coir logs. Aquatic and riparian habitat has been enhanced from the introduction of habitat rocks, and the revegetation of the riparian zone, which will reduce potential erosion and create habitat for native aquatic and riparian fauna.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E117	Rehabilitation and revegetation of the riparian corridor and banks of watercourses impacted by Stage 1 of the CSSI must be commenced within three months of the completion of the watercourse Work and any other Work required in the riparian corridor.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Site Inspection 29/04/25 	At the time of this IA#4, all works within creeks have been completed and rehabilitated to a high standard (refer to the Auditors response to E116 for further details.	Compliant
E118	The Proponent must ensure sufficient water entitlement is held in a Water Access License(s) (WAL) to account for the maximum predicted take for each water source prior to the take occurring.	<ul style="list-style-type: none"> Water Access Licence - Reference WAL 44922 dated 28/9/23 Audit Interview 29/04/25 Site Inspection 29/04/25 	A Water Access Licence (WAL) has been obtained. Underboring activities that may have resulted in impacts to groundwater are now complete.	Compliant
E119	The Proponent must develop and implement an ongoing Water Quality Monitoring Program (WQMP) to assess the impacts of the AWRC effluent discharges on water quality. The WQMP must include: (a) monitoring of treated effluent from the AWRC under different release streams; (b) monitoring of waterways that may be impacted by AWRC discharges (including comparison with baseline and upstream conditions). (c) details of the sampling frequency, analysis, and locations used in the program; (d) reporting requirements for the program to the EPA, including consideration of any expanded Beachwatch monitoring program in the Hawkesbury Nepean catchment.	<ul style="list-style-type: none"> Appendix E Upper South Creek Advanced Water Recycling Centre and Pipelines Surface Water & Groundwater CEMP Sub-Plan Revision A SWC Internal Email titled "draft WQMP to support EPL" dated 17/2/25 Operational Water Quality Monitoring Plan, Bady Yarragul Water Resource Recovery Facility (WRRF) Sydney Water Audit Interview 29/04/25 	<p>An Operational Water Quality Monitoring Plan has been prepared.</p> <ul style="list-style-type: none"> Section 3.1 addresses the monitoring requirements for the WRRF Section 3.2 addresses the monitoring requirements for receiving water quality monitoring (Nepean River and South Creek discharge locations) <p>At the time of the Audit, the WQMP had been issued to EPA for comment.</p> <p>Auditor Note: The compliant finding relates to the development of the WQMP (not implementation), further assessment will be required in the operational audit to assess compliance regarding implementation</p>	Compliant
E120	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.	<ul style="list-style-type: none"> Audit Interview 29/04/25 SWC Internal Email titled "draft WQMP to support EPL" dated 17/2/25 Operational Water Quality Monitoring Plan, Bady Yarragul Water Resource Recovery Facility (WRRF) Sydney Water 	As noted above, the OQMP has been prepared and submitted to EPA. At the time of IA 4, SWC had not received comments from the EPA.	Not triggered
E121	The Proponent must develop and implement a monitoring program to assess wet weather infiltration into the sewer network connected to the AWRC. The program must include: (a) monitoring of sewer infiltration rates throughout the AWRC sewer catchment from the commencement of operation onward; (b) proposed investigative actions and potential remedial actions for wet weather infiltration in the sewer network in the event that high wet weather infiltration is identified; and (c) reporting requirements for the program to the EPA.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Wet Weather Infiltration Monitoring Program, for the sewer network connected to the Badu Yarragul Water Resource Recovery Facility (WRRF), Sydney Water SWC Internal Email titled "E122 Wet Weather Infiltration into the Sewer Network_draft for EPA" dated 10/3/25 USC EPA Consultation register dated 6/3/25 	<p>SWC has prepared a wet weather infiltration monitoring program for the sewer network connected to the AWRC. The draft program was issued to EPA for consultation.</p> <ul style="list-style-type: none"> Section 2 addresses wet weather infiltration and flow monitoring Section 2.2 addresses investigative and remedial actions in the event of a high wet weather infiltrations Section 2.4 addresses reporting program requirements <p>Auditor Note: The compliant finding relates to the development of the monitoring program (not implementation), further assessment will be required in the operational audit to assess compliance regarding implementation</p>	Compliant
E122	The monitoring program required under Condition E121 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. Note: 1. Part C-B of Schedule 2 of this approval provides additional water quality assessment and monitoring requirements that must be met. 2. The WQMP and monitoring program to assess wet weather infiltration into the sewer network must be provided to the Planning Secretary and/or the EPA upon request. 3. The WQMP and monitoring program to assess wet weather infiltration into the sewer network are required to be updated on an ongoing basis throughout operation of Stage 1 of the CSSI.	<ul style="list-style-type: none"> Audit Interview 29/04/25 	Operational Requirement. Based on the current program, this work is programmed for completion in 2025.	Not triggered
E123	Surface water drainage on the AWRC site as part of Stage 1 of the CSSI must be designed, constructed and operated to achieve compliance with the NSW Government Wianamatta South Creek waterway health objectives and construction and operational phase stormwater management targets, in accordance with the Wianamatta MUSIC modelling toolkit and Technical Guidance for Achieving Wianamatta South Creek Stormwater Management Targets (DPHI, 2022).	<ul style="list-style-type: none"> Audit Interview 29/04/25 Upper South Creek Design Report, Revision 2, dated 13/8/24 (DRAFT) - excerpt only as at 31/10/24 (Section 23 Drainage and Stormwater Treatment) Surface Water & Groundwater CEMP Sub-plan, Section 2.2 & 7.5 	<p>Stormwater drainage and treatment is addressed in the DRAFT AWRC Design Report. Section 23 was provided as an excerpt as evidence during the audit and addresses compliance with the NSW Government Wianamatta South Creek waterway health objectives and construction and operational phase stormwater management targets. Section 23.6.4 looks specifically at the MUSIC modelling undertaken.</p> <p>The construction-phase elements of Condition E123 are addressed in the USC Surface Water & Groundwater CEMP Sub-plan (section 2.2 nominated as a target, section 7.5 for implementation).</p> <p>The design and operational phase are addressed in the AWRC Design Report. An excerpt of section 23 of the AWRC Design Report was provided as evidence during the audit.</p> <p>The Upper South Creek Design Report had not been finalised at the time of IA4.</p>	Not triggered
E124	If construction stage stormwater discharges are proposed, a Water Pollution Impact Assessment will be required to inform licensing consistent with section 45 of the POEO Act. Any such assessment must be prepared in consultation with the EPA and be consistent with the National Water Quality Guidelines, with a level of detail commensurate with the potential water pollution risk.	<ul style="list-style-type: none"> Letter from EPIC Environmental to JHG RE: Upper South Creek Advanced Water Recycling Centre Water Pollution Impact Assessment for Construction Stage Stormwater Discharges, dated 27 October 2023 Letter from EPIC Environmental to JHG (untitled) dated 24/1/24 Audit Interview 29/04/25 	<p>A Water Pollution Impact Assessment (WPIA) has been prepared and issued to the EPA in accordance with the EPL.</p> <p>An additional assessment was undertaken in relation to proposed hydrostatic testing along the brine and treated water pipelines that would result in discharges of water into the environment.</p>	Compliant
E125	The Proponent must undertake further hydrological and hydraulic modelling for the AWRC site based on the detailed design of Stage 1 of the CSSI to determine the ability of the receiving stormwater drainage systems to effectively convey pavement drainage from Stage 1 of the CSSI where it is proposed to discharge these flows to council or Sydney Water receiving stormwater drainage systems. The modelling must be undertaken in consultation with the relevant council(s) and the outcomes documented in the Stormwater Drainage Report required under Condition E126.	<ul style="list-style-type: none"> Audit Interview 29/04/25 Upper South Creek Design Report, Revision 2, dated 13/8/24 (DRAFT) - excerpt only as at 31/10/24 (Section 23 Drainage and Stormwater Treatment) Surface Water & Groundwater CEMP Sub-plan, Section 2.2 & 7.5 	<p>This condition is not applicable as the AWRC stormwater drainage system is not connected to a receiving stormwater drainage system where discharge of these flows occurs to council or Sydney Water receiving stormwater drainage systems.</p> <p>Section 23.5 of the DRAFT Upper South Creek Design Report provides a summary of the AWRC stormwater system design and the conveyance system via which the stormwater received within the operational plant area is managed, including roadside drains and swales, stormwater pits and pipes, roof drainage, etc. via a GPT, stormwater first flush, oil and water separator, bioretention basin, and detention basin prior to discharge from site (into the Green Space and eventually making its way to South Creek).</p> <p>Section 23.5.4 of the DRAFT Upper South Creek Design Report provides a summary of the AWRC effluent outfall channel which carries plant discharge from the water treatment process to South Creek.</p>	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E126	<p>The Stormwater Drainage Report must be prepared at least one month prior to the commencement of any new permanent drainage Works, modifications or connections to existing drainage Works, construction of hard surfaces that are associated with the operation of the project and would result in runoff to existing council or Sydney Water stormwater drainage systems. The Stormwater Drainage Report must:</p> <p>(a) assess the potential impacts of pavement drainage discharges from Stage 1 of the CSSI drainage systems on the receiving environment and capacity of council(s) or Sydney Water's drainage infrastructure;</p> <p>(b) identify all mitigation measures to be implemented where pavement drainage from Stage 1 of the CSSI drainage systems are predicted to adversely impact on the receiving environment or capacity of council or Sydney Water drainage infrastructure; and</p> <p>(c) set out a clear time frame for the implementation of mitigation measures.</p> <p>Nothing in this condition prevents the Proponent from preparing separate Stormwater Drainage Reports for pavement discharges to the drainage system provided that each report is prepared at least one month prior to the subject Works/discharges commencing.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Upper South Creek Design Report, Revision 2, dated 13/8/24 (DRAFT) - excerpt only as at 31/10/24 (Section 23 Drainage and Stormwater Treatment) • Surface Water & Groundwater CEMP Sub-plan, Section 2.2 & 7.5 	<p>This condition is not applicable as the AWRC stormwater drainage system is not connected to a receiving stormwater drainage system where discharge of these flows occurs to council or Sydney Water receiving stormwater drainage systems.</p> <p>Section 23.5 of the DRAFT Upper South Creek Design Report provides a summary of the AWRC stormwater system design and the conveyance system via which the stormwater received within the operational plant area is managed, including roadside drains and swales, stormwater pits and pipes, roof drainage, etc. via a GPT, stormwater first flush, oil and water separator, bioretention basin, and detention basin prior to discharge from site (into the Green Space and eventually making its way to South Creek).</p> <p>Section 23.5.4 of the DRAFT Upper South Creek Design Report provides a summary of the AWRC effluent outfall channel which carries plant discharge from the water treatment process to South Creek.</p>	Not triggered
E127	<p>All new or modified drainage systems associated with Stage 1 of the CSSI must be designed to:</p> <p>(a) where they connect with council(s) or Sydney Water drainage system, meet the capacity constraints to receive and convey the proposed flows from Stage 1 of the CSSI, or otherwise upgrade council(s) or Sydney Water drainage system at the Proponent's expense, in consultation with the relevant council(s);</p> <p>(b) minimise impacts on the receiving environment at the final outflow point resulting from any additional flow volume (including, but not limited to scour, flooding, water quality impacts, and impacts on riparian vegetation, aquatic ecology and property); and</p> <p>(c) ensure mitigation measures are implemented where increased flows through cross drainage systems adversely impact on council or Sydney Water drainage infrastructure and the receiving environment.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	<p>This condition is not applicable as the AWRC stormwater drainage system is not connected to a receiving stormwater drainage system where discharge of these flows occurs to council or Sydney Water receiving stormwater drainage systems.</p> <p>Section 23.5 of the DRAFT Upper South Creek Design Report provides a summary of the AWRC stormwater system design and the conveyance system via which the stormwater received within the operational plant area is managed, including roadside drains and swales, stormwater pits and pipes, roof drainage, etc. via a GPT, stormwater first flush, oil and water separator, bioretention basin, and detention basin prior to discharge from site (into the Green Space and eventually making its way to South Creek).</p> <p>Section 23.5.4 of the DRAFT Upper South Creek Design Report provides a summary of the AWRC effluent outfall channel which carries plant discharge from the water treatment process to South Creek.</p>	Not triggered
E128	<p>Prior to the commencement of operation of Stage 1 of the CSSI, the Proponent must submit a report to the Planning Secretary, the EPA and EHG for information, that provides an update on the status of implementing any proposed stormwater harvesting system(s) across the Western Sydney Parkland City that connect to the AWRC.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	Operational requirement.	Not triggered
E129	<p>The Proponent must consider the provisions of the <i>Airports (Protection of Airspace) Regulation 1996</i> for any intrusions into prescribed airspace, including:</p> <p>(a) constructing permanent structures, such as buildings, into the protected airspace;</p> <p>(b) temporary structures such as cranes protruding into the protected airspace; or</p> <p>(c) activities causing non-structural intrusions into the protected airspace, such as air turbulence from stacks or vents, smoke, dust, steam or other gases or particulate matter.</p> <p>If any of the above components result in an impact on protected airspace, then approval is required in accordance with the <i>Airports Act 1996</i> and the <i>Airports (Protection of Airspace) Regulation 1996</i>.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Aviation Risk Assessment, Upper South Creek Advanced Water Recycling Centre, GHD/Jacobs dated 28/1/25 	<p>An aviation risk assessment has been undertaken in to assess the risks of the AWRC as they relate to the new Western Sydney Airport which is being constructed nearby. The Risk Assessment covered the following risks:</p> <ul style="list-style-type: none"> • Wildlife Strikes • Distractions to pilots • Intrusions into the protected airspace of Airports. <p>The Risk Assessment noted that the proposed height of all fixed structures on the AWRC do not penetrate into the OLS (protected airspace), therefore it may be reasonably concluded that an approval in accordance with the Airports Act is not required.</p>	Compliant
E130	<p>Prior to the commencement of operation of Stage 1 of the CSSI, the Proponent must prepare a Wildlife Management Plan to identify the project's contribution to increased risk of wildlife strikes by aircraft. The Wildlife Management Plan must include:</p> <p>(a) wildlife monitoring surveys and regular wildlife hazard assessments;</p> <p>(b) wildlife awareness and management training for operational staff;</p> <p>(c) implementation of activities to reduce hazardous bird populations;</p> <p>(d) adoption of wildlife deterrent technologies to reduce hazardous bird populations;</p> <p>(e) performance indicators to evaluate implementation and compliance;</p> <p>(f) a review process to regularly assess implementation against performance indicators, identify gaps, and ensure currency; and</p> <p>(g) roles and responsibilities for plan implementation and review.</p> <p>The Wildlife Management Plan must be submitted to the Planning Secretary, Western Sydney Airport and DPI Agriculture for information prior to the commencement of operation of Stage 1 of the CSSI, and be implemented throughout operation.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	Although this is an operational requirement, it was noted that the preparation of the Wildlife Management Plan has commenced.	Not triggered
E131	Condition Deleted		Condition Deleted by MOD 1	N/A
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> <p>(i) contribute to the Outstanding Universal Value (OUV) of the Greater Blue Mountains Area; and</p> <p>(ii) are identified in the documents listed in Condition A1 as potentially impacted during Stage 1 of the CSSI;</p> <p>(b) relevant water quality monitoring data; and</p> <p>(c) photos at each monitoring point.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	No impacts to World Heritage Areas at the time of the audit.	Not triggered
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 Heritage place, that is attributable to the project and exceeds the impacts described in the documents listed in Condition A1;</p> <p>(c) effectiveness of mitigation measures implemented, and any necessary additional mitigation measures; and</p> <p>(d) any corrective actions that may be required and/or have been employed.</p> <p>The World Heritage monitoring report must be provided to EHG for information within one month of completion of each annual report.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	Operational requirement.	Not triggered
E134	<p>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 <i>National Parks and Wildlife Act 1974</i> (NPW Act) or the <i>National Parks and Wildlife Regulation 2019</i>.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Site Inspection 29/04/25 	No work is known to have been undertaken within the Blue Mountains National Park. The boundary of the Blue Mountains National Park is the Centreline of the Nepean River.	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E135	<p>At least one month prior to the commencement of construction of the AWRC development (except for construction of those works that are outside the scope of the hazard studies), or within such further period as the Planning Secretary may agree, the Proponent must prepare and submit to the Planning Secretary the studies set out under subsections (a) to (b) below (the pre-construction studies). Construction, other than of works, must not commence until recommendations have been considered and, where appropriate, acted upon. With respect to the Fire Safety Study, the study must meet the requirements of Fire and Rescue NSW.</p> <p>(a) a Final Hazard Analysis of the AWRC development, prepared generally consistent with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis' and Multi-Level Risk Assessment. The Final Hazard Analysis must:</p> <p>(i) include a final site layout including dangerous goods storage locations;</p> <p>(ii) provide verification to Australian Standards for the storage and handling of the dangerous goods stored on the AWRC site including, but not limited to:</p> <ul style="list-style-type: none"> · flammable dangerous goods (Class 3); and · corrosive liquids (Class 8). <p>The verification should be focused on key elements such as separation distances described in the relevant standard and critical controls.</p> <p>(b) A Fire Safety Study for the AWRC development. This study must cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems (NSW HMPCC, 1994). The study must meet the requirements of Fire and Rescue NSW.</p>	<ul style="list-style-type: none"> • Memo from JHG to SWC titled "CSSI8609189 - USC AWRC Condition of Approval E135 Hazards and Risks" dated 18/7/23 • Letter from SWC to DPHI titled " Upper South Creek Advanced Recycling Centre Request for Extension of Time for provision of deliverables required under condition 135 • Audit Interview 29/04/25 • Site Inspection 29/04/25 • Final Hazard Analysis, GHD/Jacobs Revision 2 dated 22/3/24 • Final Hazard Analysis, GHD/Jacobs Revision 5 dated 14/3/25 • Letter from DPHI to SWC titled " Water Recycling Centre E 135 - Final Hazard Analysis and Fire Safety Study" dated 27/3/23 • Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-130) Condition E135 - Final Hazard Analysis and Fire Safety Study - Request for Additional Information" dated 21/2/25 • Fire Safety Study, GHD, Jacobs, Revision 2 dated 26/4/24 • Fire Safety Study, GHD, Jacobs, Revision 2 dated 14/3/25 • Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - E135 - Final Hazard Analysis and Fire Safety Study" dated 27/3/25 	<p>The Final Hazard Analysis and the Fire Safety Study have been prepared and were issued to DPHI on 15/4/24. DPHI responded on 15/4/24 noting the Department does not have any comments on the studies at this time. As noted in the previous audit, an extension of time was granted from DPHI for the completion of the studies.</p> <p>Appendix A of the Fire Safety Study provides details of FRNSW review. FRNSW comments are tabulated in Appendix A with a response from the author (GHD) which describes how the comments have been addressed within the document.</p> <p>Section 1.2 of the Final Hazard Analysis confirms the Scope of the FHA includes:</p> <ul style="list-style-type: none"> - a final layout including dangerous goods storage locations (Section 2.1) - confirmation the FHA is undertaken in accordance with the Departments HIPAP 4 and HIPAP 6 - Provides verification to Australian Standards for the storage and handling of the dangerous goods stored on the AWRC site including but not limited to Hazard Identification (HAZID), analysis and assessment of process and environmental hazards <p>On 21/2/25, DPHI wrote to SWC requesting SWC to submit a revised FHA and FSS that addresses comments provided by DPHI. The documents were re-issued to DPHI with the FHA and FSS approved by DPHI on 27/3/25</p>	Compliant
E136	<p>The Proponent must develop and implement the plans and systems set out under subsections (a) to (c) below, no later than two months prior to the commencement of the commissioning of the AWRC development, or within such further period as agreed with the Planning Secretary.</p> <p>(a) arrangements covering the transport of dangerous goods including details of routes to be used for the movement of vehicles carrying dangerous goods to the AWRC development. The routes must be selected in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11, 'Route Selection'. Suitable routes identified in the study must be used except where departures are necessary for local deliveries or emergencies;</p> <p>(b) a comprehensive Emergency Plan and detailed emergency procedures for the AWRC development. The Emergency Plan must include consideration of the safety of all people outside of the AWRC development who may be at risk from the AWRC development. The plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning';</p> <p>(c) a document setting out a comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. The document must clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records must be kept on-site and must be available for inspection by the Planning Secretary upon request. The Safety Management System must be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'. This document is not required if the Proponent has a certified Safety Management System (SMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that the certified SMS or equivalent addresses these requirements.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 • Memo from JHG to SWC titled "CSSI-8609189 USC AWRC memo re condition of approval E136 Pre commissioning deliverables" dated 25/2/25 • Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - E 136 - Pre commissioning Reports" dated 23/4/25 • Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-121" dated 19/3/25 	<p>JHG have documented in their Memo to SWC the implementation of the project Work, Health and Safety Management System to meet the requirements of this condition, noting that commissioning has been incorporated into the various levels of risk management documentation prepared including Workplace Risk Assessment, Activity Statements etc).</p> <p>This information was provided to DPHI with no comments received.</p>	Compliant
E137	<p>Within twelve months after the commencement of operation of Stage 1 of the CSSI, and every five years thereafter, or at such intervals as the Planning Secretary may agree, the Proponent must carry out a comprehensive Hazard Audit in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5 'Hazard Audit Guidelines' of the AWRC development. The Hazard Audit must be carried out at the Proponent's expense by a qualified person or team, who have been approved by the Planning Secretary and are independent of the development.</p>	<ul style="list-style-type: none"> • Audit Interview 29/04/25 	Operational requirement.	Not triggered

Appendix C Stakeholder Consultation Records

Appendix C-1 Correspondence Issued

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Tuesday, 22 April 2025 3:39 PM
To: DPE PSVC Compliance Mailbox
Subject: SSI 8609189 - Upper South Creek Advanced Water Recycling Facility - Independent Environmental Audit # 4 Consultation

To whom it may concern,

The fourth (third ongoing) Environmental Audit is planned to commence on the 29th of April 2025 and concluded on the 29th of June 2025.

The purpose of this email is to formally consult with the Department to:

- Seek feedback from the Department regarding any specific issues that the Department would like to be focused on by the audit
- Confirm whether the Department would like me to consult with any other stakeholders in preparation for the audit in addition to the following (noting that these are the organisations that were consulted with for the initial audit.:
 - NSW Environment Protection Authority
 - Fairfield Council, Liverpool Council, Wollondilly Council, Penrith City Council, Canterbury Council
 - Heritage NSW
 - Transport for NSW (M12)

If the Department could provide a response by 16th of May 2025, that would be greatly appreciated.

Many thanks in advance



Richard Peterson | Director

Trigalana Environmental Pty Ltd

M: 0429 227 775

E: richard.peterson-trigalana@outlook.com

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4th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Tue 22/04/2025 4:03 PM

To mail@fairfieldcity.nsw.gov.au <mail@fairfieldcity.nsw.gov.au>; lcc@liverpool.nsw.gov.au <lcc@liverpool.nsw.gov.au>; Canterbury Bankstown Council <council@cbc.city.nsw.gov.au>; Penrith City Council - RECORDS <council@penrith.city>; Wollondilly Shire Council <council@wollondilly.nsw.gov.au>

To whom it may concern

Thank you for your input to previous audits undertaken for the Upper South Creek Project

I have now been appointed to undertake the fourth independent audit

Details of the project can be found here [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning Housing and Infrastructure \(nsw.gov.au\)](#).

The audit will be undertaken in accordance with the [Independent Audit – Post Approval Requirements – Requirement 2 – May 2020 \(nsw.gov.au\)](#).

The purpose of this email is to initiate formal consultation with Council so if there are any issues Council would like me to consider during the audit, they may be included in the audit schedule.

In this regard, a response by 16th of May 2025 would be greatly appreciated.

Please call me on the numbers below if you have any questions.

Many thanks



Richard Peterson | Director

Trigalana Environmental Pty Ltd

M: 0429 227 775

E: Richard.peterson-trigalana@outlook.com

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Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Wed 23/04/2025 11:39 AM

To info@epa.nsw.gov.au <info@epa.nsw.gov.au>

Hi EPA

I have been appointed to undertake the fourth independent audit of the Upper South Creek Project being constructed by John Holland (EPL # 21800)

Details of the project can be found here [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning Housing and Infrastructure \(nsw.gov.au\)](#).

The audit will be undertaken in accordance with the [Independent Audit – Post Approval Requirements – Requirement 2 – May 2020 \(nsw.gov.au\)](#).

The purpose of this email is to initiate formal consultation with EPA so if there are any issues EPA would like me to consider during the audit, they may be included in the audit schedule.

In this regard, a response by 16th of May 2025 would be greatly appreciated.

Many thanks



Richard Peterson | Director

Trigalana Environmental Pty Ltd

M: 0429 227 775

E: Richard.peterson-trigalana@outlook.com

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richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Tuesday, 22 April 2025 3:55 PM
To: OEH HD Heritage Mailbox
Subject: 4th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

To OEH

Thank you for your input to previous audits undertaken for the Upper South Creek Project

I have now been appointed to undertake the fourth independent audit

Details of the project can be found here [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning Housing and Infrastructure \(nsw.gov.au\)](#)

The audit will be undertaken in accordance with the [Independent Audit – Post Approval Requirements – Requirement 2 – May 2020 \(nsw.gov.au\)](#)

The purpose of this email is to initiate formal consultation with Heritage NSW so if there are any issues Heritage NSW would like me to consider during the audit, they may be included in the audit schedule.

In this regard, a response by 16th of May 2025 would be greatly appreciated.

Please call me on the numbers below if you have any questions.

Many thanks



Richard Peterson | Director
Trigalana Environmental Pty Ltd

M: 0429 227 775

E: richard.peterson-trigalana@outlook.com

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Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Tue 22/04/2025 3:46 PM

To Daniel Saunders <Daniel.Saunders@transport.nsw.gov.au>

Cc Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>

Hi Dan

I am currently preparing for the fourth independent of the Upper South Creek Advanced Water Recycling Centre, adjacent to the M12 Project boundary

Details of the project can be found here [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning Housing and Infrastructure \(nsw.gov.au\)](#).

The audit will be undertaken in accordance with the [Independent Audit – Post Approval Requirements – Requirement 2 – May 2020 \(nsw.gov.au\)](#).

The purpose of this email is to initiate formal consultation with TfNSW so if there are any TfNSW would like me to consider during the audit, they may be included in the audit schedule.

In this regard, a response by 16th of May 2025 would be greatly appreciated.

More than happy to discuss.

Many thanks



Richard Peterson | Director

Trigalana Environmental Pty Ltd

M: 0429 227 775

E: Richard.peterson-trigalana@outlook.com

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Appendix C-2 Correspondence Received

RE: SSI 8609189 - Upper South Creek Advanced Water Recycling Facility - Independent Environmental Audit # 4 Consultation

From Astrid Christensen <astrid.christensen@planning.nsw.gov.au>

Date Mon 28/04/2025 10:20 AM

To richard.peterson-trigalana@outlook.com <richard.peterson-trigalana@outlook.com>

Cc Rob Sherry <Rob.Sherry@planning.nsw.gov.au>; Nicholas Kumar <nicholas.kumar@dpie.nsw.gov.au>

Good morning Richard,

Thank you for the opportunity to provide input into the upcoming independent audit for the Upper South Creek Advanced Water Recycling Facility.

- NSW Planning does not have any additional specific issues to be focused on during the 4th independent audit.
- NSW Planning does not request any additional agencies be consulted, beyond the agencies listed in your email below.

Please do not hesitate to contact me if you have any further questions.

Kind regards,

Astrid Christensen (she/her)
Senior Compliance Officer – Government Projects
Development Assessment & Sustainability
Department of Planning, Housing and Infrastructure

P (02) 9274 6170 | **E** Astrid.Christensen@planning.nsw.gov.au |
4PSQ, 12 Darcy Street, Parramatta, NSW, 2150
www.dphi.nsw.gov.au



The Department of Planning, Housing and Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: Richard Peterson <richard.peterson-trigalana@outlook.com>

Sent: Tuesday, 22 April 2025 3:38 PM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Subject: SSI 8609189 - Upper South Creek Advanced Water Recycling Facility - Independent Environmental Audit # 4 Consultation

Our ref: HMS ID 10145

Richard Peterson
Director
Trigalana Environmental Pty Ltd
richard.peterson-trigalana@outlook.com

Independent Environmental Audit – State Significant Infrastructure

Proposal: Upper South Creek Advanced Water Recycling Centre

Major Project reference: SSI-8609189

Received: 22 April 2025

Dear Mr Peterson,

Thank you for your referral seeking comment from Heritage NSW on the scope for the fourth Independent Environmental Audit for the above State Significant Infrastructure (SSI) project. Thank you for the continued opportunity to comment on the project. Our comments are as follows.

1. Environmental Heritage

Heritage NSW (as delegate of the Heritage Council of NSW) provided responses to the Department of Planning Housing and Infrastructure (DPHI) at various stages of the project's approval process including the Secretary's Environmental Assessment Requirements, Environmental Impact Statement and Response to Submissions stages. Post approval, Heritage NSW provided advice to the proponent on the *Upper South Creek Advanced Water Recycling Centre and Pipelines Heritage CEMP Sub-plan* (HCSP). All works must comply with the final approved HCSP.

2. Aboriginal Cultural Heritage

Heritage NSW notes conditions E29 to E32 of the Conditions of Consent and the HCSP (and associated archaeological methodologies) for archaeological investigations and compliance with these documents. Of note is the required compliance with the conditions regarding the preparation and issue of an Aboriginal Cultural Excavation Report(s) within 24 months of the completion of Aboriginal archaeological excavations.

It is recommended that the DPHI compliance team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with the Conditions of Consent for this project.

If you have any questions about this correspondence, please contact Anna Simanowsky, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au.

Yours sincerely,

Alison Lamond

Alison Lamond

A/Manager

Major Projects

Heritage NSW

Department of Climate Change, Energy, the Environment and Water

As Delegate under *National Parks and Wildlife Act 1974*

As Delegate of the Heritage Council of NSW

6 May 2025

RE: 4th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

From Neil Ramsay <RamsayN@liverpool.nsw.gov.au>
Date Thu 1/05/2025 12:01 PM
To Richard Peterson <richard.peterson-trigalana@outlook.com>
Cc Steven Tuntevski <TuntevskiS@liverpool.nsw.gov.au>

Dear Richard,

I refer to your enquiry dated 22nd April 2025 regarding the fourth independent audit for SSI-8609189- Upper South Creek Advanced Water Recycling Centre. It is requested that the audit is undertaken in accordance with Conditions A37-A42 of SSI-8609189 and the Department's 2020 *Independent Audits Post Approval Requirements* (or IAPAR).

The Department has primary responsibility for assessing compliance with conditions of consent in relation to environmental emissions (i.e. noise, air, water, land) during the construction and operational phases of the project. Consequently, you may wish to make further enquiries with the NSW EPA and NSW Department of Planning, Housing and Infrastructure.

To enable a comprehensive review to be undertaken, it would be necessary to identify all conditions of consent applicable to the phase of the development being audited. Consistent with Section 3.3 of the IAPAR, the auditor must review the environmental performance of the development with consideration for the Environmental Impact Statement and assess the adequacy of the Environmental Management Plans and sub-plans. In this regard, it would be appreciated if you could review consultation, management and monitoring program requirements for the construction phase of the Project including: incident and non-compliance notification and reporting (Conditions A43 to A46); community communication strategy and complaints management system (Condition B1-B11).

Furthermore, it is requested that the scope of the audit encompasses all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the Construction Environmental Management Plan (Conditions C1 to C12) and sub-plans relating to air quality (Condition C4), surface water and ground water management (Condition C6), soils and contamination (Condition C8), noise and vibration (Condition C10) and construction monitoring programs (Conditions C13-C18).

Please also consider any other matters raised by the Department, regulatory requirements, Project performance and industry best practice.

I appreciate your assistance with this matter.

Regards,

Neil Ramsay
Senior Environmental Health Officer



02 8711 7654 | RamsayN@liverpool.nsw.gov.au
Customer Service: 1300 36 2170 | 50 Scott Street Liverpool, NSW 2170, Australia
   www.liverpool.nsw.gov.au



We acknowledge the traditional custodians of the land that now resides within Liverpool City Council's boundaries, the Darug and Dharawal nations and pay our respects to their Elders past, present and future.

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From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Tuesday, 22 April 2025 4:03 PM
To: mail@fairfieldcity.nsw.gov.au; LCC <LCC@liverpool.nsw.gov.au>; Canterbury Bankstown Council <council@cbcity.nsw.gov.au>; Penrith City Council - RECORDS <council@penrith.city>; Wollondilly Shire Council <council@wollondilly.nsw.gov.au>
Subject: 4th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

To whom it may concern

Thank you for your input to previous audits undertaken for the Upper South Creek Project

I have now been appointed to undertake the fourth independent audit

Details of the project can be found here [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning Housing and Infrastructure \(nsw.gov.au\)](#)

The audit will be undertaken in accordance with the [Independent Audit – Post Approval Requirements – Requirement 2 – May 2020 \(nsw.gov.au\)](#).

The purpose of this email is to initiate formal consultation with Council so if there are any issues Council would like me to consider during the audit, they may be included in the audit schedule.

In this regard, a response by 16th of May 2025 would be greatly appreciated.

Please call me on the numbers below if you have any questions.

Many thanks



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

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RE: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

From Daniel Saunders <Daniel.Saunders@transport.nsw.gov.au>

Date Fri 2/05/2025 4:44 PM

To Richard Peterson <richard.peterson-trigalana@outlook.com>

Cc Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>

Hi Richard, thanks for reaching out to team. Our projects interactions with your project are minimal now with our M12 central package nearing construction completion. Pavement conditions on Clifton Ave maybe worth seeking confirmation that requirements for remediation have been meet.

Regards

Daniel Saunders

Senior Manager Environment & Sustainability (Acting)

Safety, Policy, Environment and Regulation

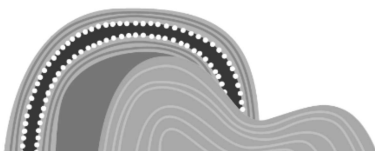
Transport for NSW

M 0475 605 723 **E** Daniel.Saunders@transport.nsw.gov.au

transport.nsw.gov.au



**Transport
for NSW**



I acknowledge the Aboriginal people of the country on which I work, their traditions, culture and a shared history and identity. I also pay my respects to Elders past and present and recognise the continued connection to country.

OFFICIAL

Appendix D Site Photographs

Advanced Water Recycling Centre (AWRC) Main Construction Site



Photo 1: Sludge thickening and polymer storage units undergoing construction



Photo 2: Digesters undergoing construction



Photo 3: Solar farm



Photo 4: High efficiency Basin

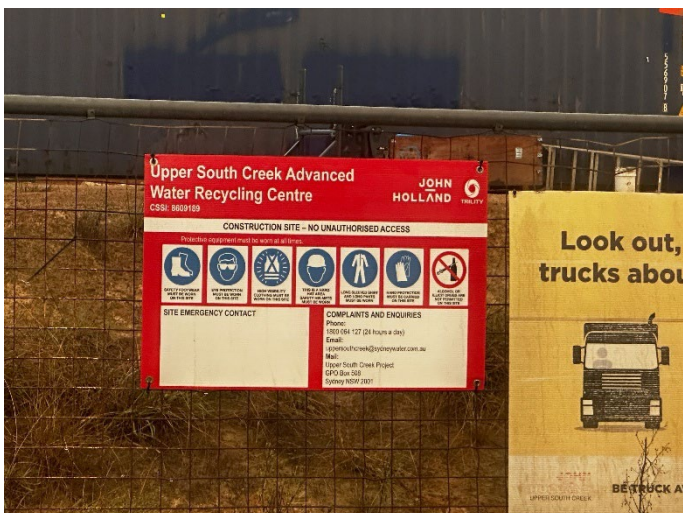


Photo 5: Project signage



Photo 6: Internal haul road and speed restriction signage



Photo 7: Tree protection fencing and sealed carpark



Photo 8: Low level carpark lighting



Photo 9: Spill kit



Photo 10: Mobile bunds and chemical storage container



Photo 11: Chemical storage cage



Photo 12: Permanent landscaped mound

AWRC Site – Vegetation Management Plan Zone (VMPZ)



Photo 13: General vegetation management plan zone



Photo 14: Landscape plantings, irrigation system and snake fence



Photo 15: Landscape plantings and re-used timber habitat feature



Photo 16: Jute mesh erosion control and creek protection



Photo 17: South creek embankment stabilisation



Photo 18: South creek embankment stabilisation



Photo 19: South creek embankment stabilisation and fauna fence



Photo 20: AWRC overflow outlet bank stabilisation works



Photo 21: AWRC outlet and erosion controls



Photo 22: South Creek oil and sediment boom

RMB 12 Site



Photo 23: Access track



Photo 24: Pipeline rehabilitation



Photo 25: Permanent stream bank and scour protection



Photo 26: Permanent stream bank and scour protection



Photo 27: Permanent landscape plantings

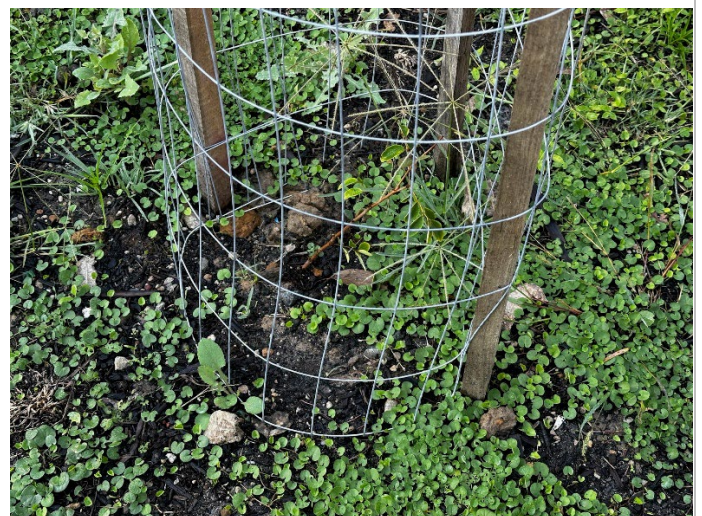


Photo 28: Sapling protection structure

South Creek Restoration Works



Photo 29: Pipeline restoration



Photo 30: Pipeline restoration and retained riparian vegetation



Photo 31: Pipeline restoration and creek scour protection



Photo 32: Pipeline restoration and creek scour protection

Appendix E Auditor Declaration

Project name	Upper South Creek Water Recycling Centre
Consent Number	SSI 8609189
Description of Project	Construction and operation of a sewage treatment plant at Kemps Creek sized to treat an average dry weather flow of up to 50 ML/day. approximately 17 km of pipeline for the transmission of treated water from the AWRC to the Nepean River at Wallacia (treated water pipeline) and approximately 24 km of pipeline for the transmission of brine from the AWRC to the sewage reticulation system at Lansdowne
Proponent	Sydney Water Corporation
Date	26 June 2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:


I declare that

- (i) the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- (ii) the findings of the audit are reported truthfully, accurately and completely;
- (iii) I have exercised due diligence and professional judgement in conducting the audit;
- (iv) I have acted professionally, objectively and in an unbiased manner;
- (v) I am not related to any proponent, owner or operator of the Project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- (vi) I do not have any pecuniary interest in the audited Project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- (vii) neither I nor my employer have provided consultancy services for the audited Project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- (viii) I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the Project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit. If the person knows that the information is false or misleading in a material respect. The proponent of an approved Project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to the false and misleading information; section 307Bv (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor Richard Peterson

Signature 

Qualification BE Civil, M Environmental Management

Company: Trigalana Environmental Pty Ltd

