



Independent DPHI Compliance Audit

SSI-8609189 – Upper South Creek Water Recycling Centre

Trigalana Environmental Pty Ltd
10 January 2026

Independent Environmental Audit 5

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

Trigalana Environmental Pty Ltd
Audit Date: 27 October 2025

Independent Environmental Audit Report 5

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 5th 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 5th IEA (IA5) and covers the period from the site inspection for the 4th IEA on 29 April 2025 to the date of the site inspection for this 5th IEA on 27 October 2025. The audit included a site inspection, consultation with DPHI, councils and other agencies 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
- Planning for operational activities are underway with operational environmental management and water quality monitoring plans prepared
- A total of **218** conditions were assessed with no non compliances identified by the Audit. Appropriate actions have been taken to address recommendations made by the previous audit
- No complaints have been received or incidents reported during the audit period
- Three recommendations are made by this audit, in relation to the rehabilitation of RBM 12 lands and maintenance of rehabilitation activities at South Creek

- One key strength was identified by the Audit, relating to the systematic implementation of management plans and demonstration of continual improvement over the duration of the Project
- 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	<ul style="list-style-type: none"> Background of the project 	Sections 1.1 and 1.2
	<ul style="list-style-type: none"> Audit team (including qualifications and experience) 	Section 1.5
	<ul style="list-style-type: none"> Audit objectives 	Section 1.6
	<ul style="list-style-type: none"> Audit period and scope 	Section 1.7
Audit Methodology		
4.2.2	<ul style="list-style-type: none"> Documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s) 	Appendix A
	<ul style="list-style-type: none"> How the audit scope was developed 	Section 2.1
	<ul style="list-style-type: none"> A summary of the audit process adopted to determine the compliance status and assess if documents are adequate 	Section 2.3
	<ul style="list-style-type: none"> Details of site inspections undertaken 	Section 2.5
		Appendix D
	<ul style="list-style-type: none"> Site personnel interviewed including their name and position title 	Section 2.4
	<ul style="list-style-type: none"> Meanings of compliance status descriptors used, as set out in this document. 	Section 2.9
	<ul style="list-style-type: none"> A summary of the consultation undertaken 	Section 3.7
4.2.3	<ul style="list-style-type: none"> A list of the approvals and documents audited 	Appendix B
	<ul style="list-style-type: none"> A summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances 	Section 3.1
	<ul style="list-style-type: none"> 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
	<ul style="list-style-type: none"> Brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action 	Section 3.2
	<ul style="list-style-type: none"> 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 4th IEA on 29 April 2025 to the date of the site inspection for this 5th IEA on 27 October 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
- **SSI-8609189-Modification 3 (20 June 2025):** Vary the concentration limits of treated effluent releases to the Nepean River to:
 - Account for potential impurities introduced by lime dosing of advanced treated effluent
 - Account for the risk of faecal coliform recontamination in storage tanks, pipework or during sampling
 - Includes separate concentration limits for advanced and tertiary treated effluent

1.3 Supplementary Approvals and Licences

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

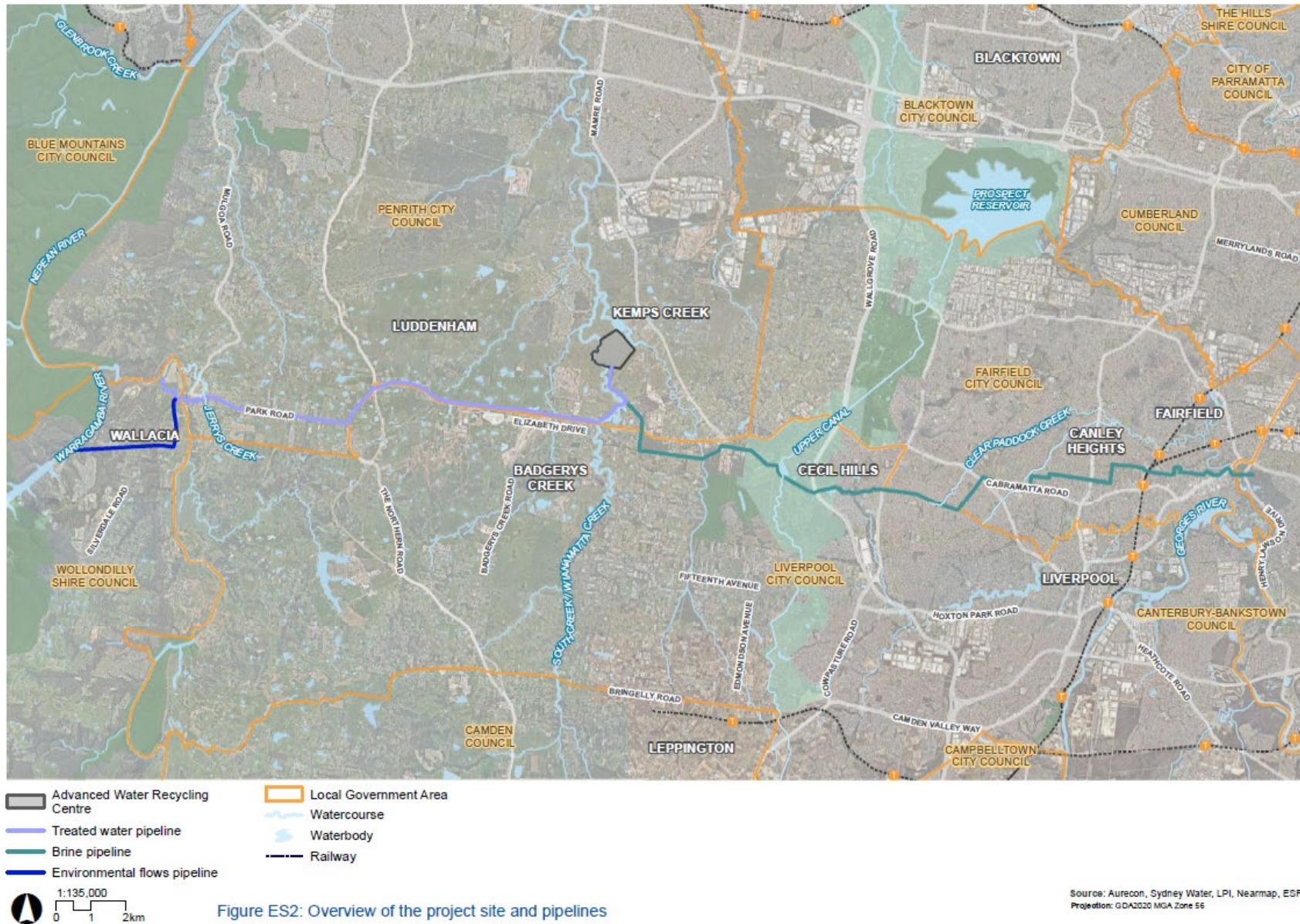
- Commonwealth Controlled Activity Approval (EPBC 2020/8816) administered by the Commonwealth Department of Climate Change, Energy, Environment and Water (DCCEW)
- Environment Protection Licence 21800, administered by the NSW Environment Protection Authority (NSW EPA).

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.



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	30 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"> • 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 5th 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 4 th IEA on 29th April 2025 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
 - 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 27th October 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
- Scott Fryer, Environmental Advisor, 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 27th October 2025. The weather was generally fine. 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
- Construction of permanent internal access roads and associated drainage
- Conversion of temporary construction sediment basins to operational water management ponds
- Landscaping and tree planting
- 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 along the pipelines

- 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 advanced with the installation of mechanical components (pipe systems) advanced • The internal haul road was constructed with stabilised DGB. A 10km per hour speed restriction was imposed to reduce dust • Permanent internal roads and drainage were under construction • Asset protection zone (perimeter road) was under construction • 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 • The High Efficiency Structure (HES) utilised for construction water management was being converted to an operational basin • A task observation was made of the sand placement activities within the operational basin, all material was wetted down prior to placement to prevent dust generation with no visible plumes observed • Wastes were segregated and labelled to maximise recycling • 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 were 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 • Construction site signage has been installed 	1-22
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 with permanent rock rip rap installed 	23-28

Location	Notes	Photograph Ref (Appendix D)
<ul style="list-style-type: none"> • 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. 		
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. • Small trees were planted within individual wire and stake tree guards • Previously disturbed areas for pipeline construction have been rehabilitated 	29-32
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 • Some planted trees and protection structures had fallen. It was noted that this was being caused by farm animals and was being managed in consultation with the landowner. 	33-34

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) as modified
- 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	11	10	0	1
C	18	18	0	0
D	4	1	0	3
E	137	100	0	37
Total	218	168	0	50

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 the Sydney Water of John Holland Group	N/A	N/A
Observations and recommendations made by the Auditor				
E20	<p>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:</p> <ul style="list-style-type: none"> (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; 	<p>At the time of the Audit and as observed during the site inspection, rehabilitation of the RBM 12 lands has been undertaken.</p> <p>Section 6.4 of the RMP required under Condition E19 notes the following:</p> <p><i>“Audits (both internal and external) undertaken to assess the effectiveness of environmental controls, compliance with this RMP and other relevant approvals, licenses and guidelines. An annual review of this plan will be undertaken and documented by a SQP to reflect any feedback from monitoring activities and any changes to management responses. Audit requirements are detailed in Section 3.9 of the CEMP”</i></p> <p>Section 6.5 of the RMP notes the following:</p>	<p>Undertake an internal audit of the Rehabilitation Management Plan during the next Audit period and provide findings of the Audit to CPHR with the initial 6 monthly report</p>	<p>Observation</p>

Condition No.	Details of Condition	Auditor Observations	Recommendation for Improvement	Finding
	<p>(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;</p> <p>(g) where possible, reuse stockpiled vegetation as part of rehabilitation works;</p> <p>(h) where open trenching of waterways is required, enhance aquatic habitat and restore creeks to an improved state; and</p> <p>(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.</p>	<p>Six monthly reports are required to provide documentation of the progress of the rehabilitation in the RBM12 impacted corridor. This is in accordance with CoA E20 (i), which requires six-monthly summary progress reports over the maintenance period be submitted to BCS for comment until BCS is satisfied that vegetation is sufficiently established at which time the maintenance period will end.</p> <p>The first six monthly report to EHG (now CPHR) is due to be submitted. A meeting with CPHR had occurred during the Audit period to discuss the rehabilitation of the RBM 12 activities undertaken to date. It was noted that CPHR raised some issues to SWC/JHG regarding the scope of the rehabilitation activities undertaken.</p>		
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.	As observed during the Audit site inspection, rehabilitation works at South Creek (along pipelines) have been completed however some of the plantings and their protective structures have been displaced. It was noted during the site inspection that this was due to farm animals and that the team were working through this issue with the farm owner. Replacement trees have been periodically installed.	<p>It is noted that this is an issue that will require ongoing management to ensure long term rehabilitation outcomes are achieved.</p> <p>In addition to the ongoing management actions planned by JHG, it is recommended redundant structures are removed to avoid them from being washed into South Creek.</p>	Observation

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

There were no community complaints received during the Audit period. 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.

3.4 Environmental Incidents

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 fourth IEA, April 2025 has been included in [Table 9](#).

Table 9: 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			
N/A	N/A	No non- compliances were identified by the Auditor during the previous audit period	N/A
Observations and recommendations made by the Auditor during the previous audit period			
E79	<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>	<p>To address this recommendation, the DSI for the pipelines was completed. The DSI was reviewed by the EPA accredited auditor and an interim advice issued on 5/9/25. Section 5 of the interim audit advice notes the following.</p> <p><i>"The auditor notes that the DSI (ERM, 2025) complies with the requirement that it be prepared/reviewed by a Certified Contaminated Land Consultant under consent condition E78. The report has been reviewed by Mr Peter Lavelle of ERM, certified under Environment Institute of Australia and New Zealand's (EIANZ) Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)).</i></p> <p><i>The auditor considers that the DSI (ERM 2025) is appropriate for the purposes of assessing the</i></p> <ul style="list-style-type: none"> <i>nature and extent of contamination, and to identify what, if any, remediation/management is required for the proposed land uses.</i>

Condition No.	Summary of Non-Compliance/Observation	Previous Recommendation	Evidence of implementation / Status
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>		<ul style="list-style-type: none"> <i>“The auditor is of the opinion that the site can be made suitable for the proposed land uses if the Pipelines RAP (ERM 2024) previously assessed by the auditor (L11, Table 1) is implemented successfully”</i> <p>STATUS – CLOSED</p>
	<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>As no further construction activities are planned for the pipelines or demobilised compound sites, it is appropriate that the EPL premises are revised to exclude these areas from the EPL.</p> <p>It is recommended the premise maps are revised and resubmitted to EPA as appropriate and placed on the project website.</p> <p>It is also recommended the Pollution Incident Response plan, required by the EPL is reviewed and update to exclude the pipeline works and reflect the activities undertaken at the AWRC site.</p> <p>JHG noted that 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>Since the previous Audit, the EPL has been transferred to Sydney Water with the latest version 31 October 2025 to include the Kemps Creek Sewage System and to incorporate operational requirements and limit conditions.</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, 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 10](#) below with the auditor's response to each issue.

Table 10: Key stakeholder issues and auditor response

Organisation	Key Issues/Comments	Auditor Response
Department of Planning, Housing and Infrastructure	<p>Storage of dangerous goods</p>	<p>There were minimal construction phase chemicals stored on site with bunded and ventilated storage containers provided. Mobile bunds were also provided for chemicals used in the field. Spill kits were available. There was no evidence observed during the site inspection (such as soil staining or odour) that would indicate a spillage had occurred during the audit period.</p>
	<p>Erosion and sediment controls and onsite water management</p> <p>Please consult with the stakeholders mentioned in your previous email as part of the audit.</p> <p>Please also include this email and any responses received from other stakeholders as evidence of consultation in the final audit report.</p>	<p>Erosion and Sediment Control Plans (ESCPs) have been prepared and implemented for work sites. An experienced Certified Professional in Erosion and Sediment Control (CPESC) has been appointed and is consulted during preparation of the ESCPs. The CPESC undertakes routine inspection every 2-3 weeks to review compliance.</p> <p>The ERSED controls observed during the audit were generally a high standard with a High Efficiency Sediment Basin installed at the AWRC site which, at the time of the site inspection was being converted to an operational basin.</p> <p>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.</p> <p>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.</p> <p>Permanent drainage infrastructure was being installed including internal kerb and gutter drainage, on site detention systems and drainage outlets. There was no pooling of water observed during the site inspection and no reported incidents of flooding during the Audit period.</p> <p>Noted. Consultation has been undertaken with relevant project stakeholders with their response documented in this table and copies of their responses provided in Appendix C</p>

Organisation	Key Issues/Comments	Auditor Response
Liverpool Council	<p>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 environmental performance of the development must be assessed with consideration for the Environmental Impact Statement to verify 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-A46); community communication strategy and complaints management system (Condition B1-B11).</p>	<p>Noted. The Audit has been undertaken in accordance with the IAPAR and includes and assessment of the adequacy of construction phase management plans. Appendix B provides further information.</p>
	<p>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) and related key issue conditions listed in Part E of the Approval.</p>	<p>Noted. The audit includes an assessment of the Construction Environmental Management plans and sub plans. Refer to Appendix B for further details.</p>
	<p>Furthermore, please consider any other matters raised by the Department, regulatory requirements, Project performance and industry best practice.</p>	<p>Refer to response to issues raised by DPHI as noted in this table above.</p>
Penrith Council	No response received	N/A
Wollondilly Council	No response received	N/A
Heritage NSW (Heritage Council)	No response received	N/A

Organisation	Key Issues/Comments	Auditor Response
NSW EPA	No response received	N/A
Transport for NSW (M12)	No response received	N/A

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 11**.

Table 11: 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 and was being converted to an operational basin at the time of the audit Waterway crossings using HDD methods were used to minimise and avoid impacts with controls in place for open trenching across waterways 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 monitoring 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. 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. 	<ul style="list-style-type: none"> No incidents or complaints relating to flooding have been identified during the audit period Construction of permanent drainage underway 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
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 Placement of sand within the operational basin was wetted down with no dust plumes observed 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"> No noise or vibration complaints were received during the audit period. Acoustic Advisor oversees the implementation of noise controls, management plans and reviews OOH work applications Construction of pipelines, demobilisation of site compounds and rehabilitation of exposed surfaces has significantly reduced noise and vibration risks so they are negligible 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 so they are now negligible 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 landuse 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 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

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"> It may be reasonably concluded that the Aboriginal heritage impacts of the Project to date are within the predictions documented in the EIS. 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 May 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 National Heritage and	<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 , MOD 2, determined 10/10/23) and MOD 3, determined 20/6/25 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.

As noted in previous audits, 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.

3.10 Key Strengths

Although there has been a decrease in the environmental and community risk with the completion of the pipelines, a systematic and planned approach has been adopted to manage and mitigate impacts with the project team able to demonstrate continual improvement throughout the course of the project. This has resulted in compliant outcomes with zero incidents or community complaints for the audit period.

Appendix A DPHI Auditor Approval

Department of Planning and Environment

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

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
A1 The Proponent must carry out Stage 1 of the CSSI in accordance with the terms of this approval and generally in accordance with the: (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 RF1 1, regarding response to advice received on the Response to Submissions Report (dated, 1 June 2022, 1 July 2022); (f) Response to DPHI RF1 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 (i) in accordance with modification application SSI-8609189-Mod 3 and supporting documentation	<ul style="list-style-type: none"> • USC (Enviro and Approvals) Obligations and Compliance Tracking Register_MASTER.xls • JHG/SWC Audit Interview 27/10/25 • SSI-8609189 MOD 1 dated 26/5/23 • SSI-8609189 MOD 2 dated 9/10/23 • SSI-8609189 MOD 3 dated 20/6/23 • Email from SWC to BB Enviro titled "CA's for assessment of retained material along the pipelines" dated 17/6/25 • Email from SWC to BB Enviro titled "CA's for layout and treatment process changes" dated 26/8/25 • Site Inspection 27/10/25 	<p>The project is being undertaken generally in accordance with the terms and conditions of this approval and the environmental assessment documentation. As noted in previous Audits, consistency Assessments (CAs) are undertaken to ensure consistency with project approvals (and documents listed) and a register is maintained. Six consistency assessments have been prepared and approved during the Audit period for:</p> <ul style="list-style-type: none"> - Assessment of retained material along the pipelines including at Lansdowne Reserve (CA56), Fowlers Reserve (CA 55) and Lennox Reserve (CA 53) - Layout and treatment process changes (CA 49) <p>Three modifications have been approved to date as follows:</p> <ul style="list-style-type: none"> - MOD 1 - to remove pipeline and release structure from Warragamba River (26/5/23) - MOD 2 - Pipeline Realignment (10/10/23) - MOD 3 - Changes to operational water discharge limits (20/6/25) 	Compliant
A2 Stage 1 of the CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	<ul style="list-style-type: none"> • Documents reviewed as noted in this audit report • USC (Enviro and Approvals) Obligations and Compliance Tracking Register_MASTER.xls • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	<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. 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 In the event of an inconsistency between: (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. 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.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	<p>As noted above and in previous audits, consistency assessments are undertaken to ensure all activities are consistent with the terms of approval. No inconsistencies are known to have been identified to date.</p>	Compliant
A4 The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to: (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.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	<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 This approval lapses five years after the date on which it is granted, unless Work has physically commenced on or before that date.	<ul style="list-style-type: none"> • SSI 8609189 Planning Approval as modified ,dated 10/10/23 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	<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 The maximum capacity of the AWRC must not exceed an average dry weather flow (ADWF) of 50 megalitres per day (ML/day) under Stage 1.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	<p>SWC confirmed the maximum capacity of the AWRC Stage 1 is 35 ML/d, less than the criteria in this condition.</p>	Compliant
A7 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.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	<p>Noted</p>	Compliant
A8 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.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • 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 - 86091890-PA-117) - Conditions E C2, E4a and E5c - Approval of revised Urban Design and Landscaping 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. 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. 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.</p>	Compliant
A9 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: (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.	<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 CoA13 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 12/4/24 	<p>As noted in previous audits, DPHI Letter of approval notes the CEMP and Sub-plans have been prepared in consultation with NSW EPA, EHG, DPHI Water, DPH Fisheries, Water NSW, SES, TNSW, 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>During this Audit period (IA5), consultation reports have been prepared for the following</p> <ul style="list-style-type: none"> - Odour management plan prepared in accordance with Condition E5 and E6 - Operational Water Quality Monitoring Plan, prepared in accordance with Conditions E119 and E120 - Wet Weather Infiltration monitoring program prepared in accordance with condition E130 - Wildlife Management Plan prepared in accordance with condition E130 <p>Condition A9 consultation reports are appended to each sub-plan.</p>	Compliant
A10 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). Note: Unless otherwise specified in this approval, early works are a stage of construction.	<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

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
A11 The Staging Report must: <ul style="list-style-type: none"> (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; (b) if staged operation is proposed, set out how the operation of the whole of Stage 1 of the CSSI 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); (c) specify how compliance with conditions will be achieved across and between each of the stages of Stage 1 of the CSSI; and (d) set out mechanisms for managing any cumulative impacts arising from the proposed staging. <p>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.</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 B8 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 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	<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"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	No changes to the staging of the project are known to have occurred or are currently proposed.	Not Triggered
A15 Strategies, plans or programs required by this approval can be submitted on a progressive basis, with the agreement of the Planning Secretary. <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>Notes:</p> <ol style="list-style-type: none"> 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 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. 	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	The Secretary's approval to submit plans or strategies on a progressive basis is not known to have been sought.	Not Triggered
A16 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: <ul style="list-style-type: none"> (a) they are located within or immediately adjacent to the construction boundary; and (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 (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 (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. 	<ul style="list-style-type: none"> • Ancillary Facility Diligence Assessment - Compounds C6, C7 and C12 • SWC Functional Inspection Action List, dated 3/6/24 • SWC Functional Inspection Action List, dated 13/5/24 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	At the time of the Audit site inspection all construction ancillary facilities have been demobilised. No non compliances with the requirements of this condition were identified by this Audit (IA #5) or previous audits.	Compliant
A17 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: <ul style="list-style-type: none"> (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); (b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s); (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; (d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to: <ul style="list-style-type: none"> (i) meet the performance outcomes stated in the documents listed in Condition A1, and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and (e) a program for monitoring the performance outcomes, including a program for construction noise monitoring during site establishment works. <p>Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each construction ancillary facility.</p> <p>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.</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 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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 • JHG/SWC Audit Interview 27/10/25 	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

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
A19 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: <ul style="list-style-type: none"> (a) are located within or immediately adjacent to the construction boundary; and (b) have been assessed by the ER to have: <ul style="list-style-type: none"> (i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the interim Construction Noise Guideline (DEC, 2009) (ICNG), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts; and (ii) minimal environmental impact with respect to waste management and flooding; and (iii) no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval. 	<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 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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. Minor Ancillary Facilities had been decommissioned at the time of the Audit with no more proposed for the remainder of the project	Compliant
A20 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). Boundary screening must minimise visual impacts on adjacent sensitive land use(s).	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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 The AWRC site is located in a sparsely populated area and adjacent to the existing M12 construction site. There are no observed sensitive receivers that would be visually impacted by the works.	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 	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 The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must: <ul style="list-style-type: none"> (a) facilitate and assist the Planning Secretary in any such audit; and (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. 	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	The Planning Secretary is not known to have commissioned an audit of how an Independent Appointment has exercised their functions.	Not triggered
A23 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. Note: Conditions A22 and A23 apply to all Independent Appointments including the ER and AA.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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 • JHG/SWC Audit Interview 27/10/25 	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 • JHG/SWC Audit Interview 27/10/25 	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 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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 • JHG/SWC Audit Interview 27/10/25 	Two ER's have been appointed and approved by DPHI.	Compliant
A28 For the duration of the Work until the completion of construction, or as agreed with the Planning Secretary, the approved ER must: <ul style="list-style-type: none"> (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of Stage 1 of the CSSI; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval; (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; (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: <ul style="list-style-type: none"> 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 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); Note: The written statement must be made via the Major Projects Portal. (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; (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; (g) as may be requested by the Planning Secretary, assist in the resolution of community complaints; (h) review the appropriateness of any activities reliant on the definition of Low Impact Work; (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; (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 (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.	<ul style="list-style-type: none"> • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Air Quality CEMP Sub Plan - Revision C, dated 24/10/25 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Soils and Contamination CEMP Sub Plan, Revision C" dated 24/10/25 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Surface Water and Groundwater CEMP Sub Plan, Revision E, dated 8/9/25 • Letter from BB Enviro to SWC titled "Environmental Representative (ER) Endorsement of the Waste and Resource Use CEMP Sub Plan Revision D" dated 30/10/25 • Email from BB Enviro to JHG titled "Revised AQSCMP (Rev C) for Review" dated 12/11/25 • Email from BB Enviro to JHG titled "Revised WRUCSMP (Rev D) for Review" dated 12/9/25 • Email from BB Enviro to JHG titled "Surface Water and Groundwater Construction Monitoring Reports - September 2024 to February 2025" dated 18/7/25 • Email from BB Enviro to JHG titled "E56 ONR Comments" dated 5/6/25 • Email from BB Enviro to JHG titled "USC Noise and Vibration Monitoring Report (March 2025 - August 2025) (Rev 1)_clear_SW_ER.docx" dated 30/10/25 • Email from BB Enviro to JHG titled "Surface and Groundwater Construction Monitoring Reports - September 2024 to February 2025" dated 12/08/25 • Email from BB Enviro to JHG titled "Surface Water Construction Monitoring Report - (Mar- Aug 2025) - for review" dated 30/10/25 • Email from BB Enviro to JHG titled "Revised SWGCSPM (Rev E) for review" dated 6/9/25 • Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for August 2025 Project: SSI-9609189-Upper South Creek Advanced Water Recycling Centre" dated 6/9/25 • Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for July 2025 Project: SSI-9609189-Upper South Creek Advanced Water Recycling Centre" dated 6/8/25 • Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for June 2025 Project: SSI-9609189-Upper South Creek Advanced Water Recycling Centre" dated 7/7/25 • Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for May 2025 Project: SSI-9609189-Upper South Creek Advanced Water Recycling Centre" dated 6/6/25 • Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for September 2025 Project: SSI-9609189-Upper South Creek Advanced Water Recycling Centre" dated 7/10/25 • Environmental Representative (ER) Site Inspection report - date of inspection 28/5/25 • Environmental Representative (ER) Site Inspection report - date of inspection 19/5/25 • Environmental Representative (ER) Site Inspection report - date of inspection 3/6/25 • Environmental Representative (ER) Site Inspection report - date of inspection 16/6/25 • Environmental Representative (ER) Site Inspection report - date of inspection 30/6/25 • Environmental Representative (ER) Site Inspection report - date of inspection 14/7/25 • Environmental Representative (ER) Site Inspection report - date of inspection 11/8/25 	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.	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
A29 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: <ul style="list-style-type: none"> (a) the complaints register (to be provided on a weekly basis where complaints have been received or as requested); and (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). Note: Personal details of the complainant are not to be provided to the ER unless otherwise agreed to or requested by the complainant.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • ER Audit interview 24/11/25 • Email from SWC to BB Enviro titled "CA's for assessment of retained material along the pipelines" dated 17/6/25 • Email from SWC to BB Enviro titled "CA's for layout and treatment process changes" dated 26/8/25 • Email from SWC to BB Enviro titled "MDS 3 approved and updated conditions" dated 24/6/25 • Email from JHG to BB Enviro titled "Weekly Copy of USC Complaints Register" dated 24/10/25 • Email from JHG to BB Enviro titled "Weekly Copy of USC Complaints Register" dated 25/08/25 • Email from JHG to BB Enviro titled "Weekly Copy of USC Complaints Register" dated 6/06/25 • Email from BB Enviro titled "Surface Water and Groundwater Construction Monitoring Reports - September 2024 to 	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 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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 • JHG/SWC Audit Interview 27/10/25 	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 The Proponent must cooperate with the AA by: <ul style="list-style-type: none"> (a) providing access to noise and vibration monitoring activities as they take place; (b) providing for review of noise and vibration plans, assessments, monitoring reports, data and analyses undertaken; and (c) considering any recommendations to improve practices and demonstrating, to the satisfaction of the AA, why any recommendation is not adopted. 	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • AA Interview, 19/11/25 • Acoustics Advisor Endorsement, Noise and Vibration Monitoring Report, September 2024 to February 2025, 12 August 2025, dated 12/8/25 • Email from JHG to Acoustic Studio titled "Noise and Vibration Construction Monitoring Report - September 2024- February 	The AA confirmed SWC/JHG has been co-operative and has provided them with access to the necessary information in accordance with this condition. 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 focused at the AWRC site which is located away from sensitive receivers. The AA noted that JHG have been generally co-operative in relation to the implementation of recommendations made to improve noise and vibration outcomes.	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 • JHG/SWC Audit Interview 27/10/25 	Three alternatives to the Lead AA have been approved by DPHI.	Compliant
A34 The approved AA must: <ul style="list-style-type: none"> (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; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval relating to noise and vibration; (c) consider and recommend to the Proponent, improvements that may be made to avoid or minimise adverse noise and vibration impacts; (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; (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); (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; (g) notify the Planning Secretary of noise and vibration incidents in accordance with Conditions A43 and A45 of this approval; (h) in conjunction with the ER, the AA must: <ul style="list-style-type: none"> (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, (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, (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), (iv) review the noise impacts of minor construction ancillary facilities, and (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. 	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: <ul style="list-style-type: none"> - Preparation of a monthly report issued to DPHI - Review and endorsement of the operational noise report - Review of the construction noise and vibration monitoring report - Site inspections, the AA noted the frequency has decreased, in line with the completion of pipeline and significant reduction in noise and vibration risk, the focus going forward will be on commissioning activities - Attendance at monthly post approvals compliance meetings with DPHI and the ER - Review OOH permits (for Information) -Endorsement of updates to the CNVMP 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. The pipelines have now been completed and construction noise and vibration risks in residential areas are therefore negligible to sensitive receivers. The AWRC site is located in sparsely populated with a reasonable buffer between the construction activities and the sensitive receivers.	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 	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 	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). The site inspection for IA4 was conducted on 29/4/25 and the site inspection for IA# 5 on 27/10/25 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 • JHG/SWC Audit Interview 27/10/25 	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"> • Email from DPHI to Sydney Water titled "Upper South Creek Advanced Water Recycling Centre - IEA #4 - Service Level Agreement" dated 14/8/25 • Email from DPHI to Sydney Water titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-157) dated 26/6/25 • SWC Email titled "4th Independent Audit and Response to Findings" 26/6/25 • 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 28/6/25 	The Planning Secretary has not requested the initial and subsequent audits to be undertaken at different times. 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)	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"> (a) review and respond to each Independent Audit Report prepared under Condition A37 or Condition A39; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report and response to it publicly available two months after submission to the Planning Secretary, or as otherwise agreed by the Planning Secretary. 	<ul style="list-style-type: none"> • Email from DPHI to Sydney Water titled "Upper South Creek Advanced Water Recycling Centre - IEA #4 - Service Level Agreement" dated 14/8/25 • Email from DPHI to Sydney Water titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-157) dated 26/6/25 • SWC Email titled "4th Independent Audit and Response to Findings" 26/6/25 • 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 28/6/25 	The 4th 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

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
A41	<p>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).</p> <ul style="list-style-type: none"> • Email from DPHI to Sydney Water titled "Upper South Creek Advanced Water Recycling Centre - IEA #4 - Service Level Agreement" dated 14/8/25 • Email from DPHI to Sydney Water titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-157) dated 26/6/25 • SWC Email titled "4th Independent Audit and Response to Findings" 26/6/25 	The 4th Independent Audit Report and response was provided to DPHI on 26/6/25 and was available on the SWC website as required by this condition. The site inspection for IA4 was conducted on 29/4/25, so submission was within the 2 month timeframe required by Conditions A41 was complied with.	Compliant
A42	<p>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.</p>	Operational requirement	Not triggered
A43	<p>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.</p>	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	<p>Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A of this approval.</p>	As above. There were no reportable incidents raised during the audit period.	Not triggered
A45	<p>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.</p>	As noted in the Audit interview, there have been no non compliances reported during the Audit period.	Not triggered
A46	<p>A non-compliance which has been notified as an incident under Condition A43 does not need to be notified as a non-compliance.</p>	Noted	Not Triggered
A47	<p>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.</p>	<p>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. At the time of IA#5, all spoil haulage activities have been completed.</p>	Compliant
A48	<p>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.</p>	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> <ul style="list-style-type: none"> (a) the community (including adjoining affected landowners and businesses, and others directly impacted by Stage 1 of the CSSI); (b) Aboriginal people, Registered Aboriginal Parties (RAPs) and LALCs; and (c) the relevant councils and relevant government agencies. 	<p>The Community Communication Strategy (CCS) includes the relevant information as required by this condition and was approved by DPHI on 20/1/23. Some minor amendments to the Community and Stakeholder Engagement Plan (CSEP) have been noted during previous audits.</p>	Compliant
B2	<p>The Community Communication Strategy must:</p> <ul style="list-style-type: none"> (a) identify people, organisations, councils and agencies to be consulted during the design and Work phases of Stage 1 of the CSSI; (b) identify details of the community and its demographics; (c) identify timing of consultation; (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; (e) identify opportunities for education within the community about construction sites; (f) detail the measures for advising the community in advance of upcoming construction including upcoming out-of-hours work as required by Condition E43; (g) detail measures for consulting with Fairfield City Council about disruption to Cabarale Leisure Centre car park and potential investigation of an alternate brine pipeline alignment at this location; (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; (i) detail the role and responsibilities of the Public Liaison Officer(s) engaged under Condition B6; (j) set out procedures and mechanisms: (k) through which the community can discuss or provide feedback to the Proponent; (l) through which the Proponent will respond to enquiries or feedback from the community; and (m) 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; (n) address who will engage with the community, relevant councils and agencies. 	<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>	Compliant
B3	<p>The Community Communication Strategy must be submitted to the Planning Secretary and be approved prior to the commencement of any Work.</p>	The Community Communication Strategy was approved by DPHI on 20/1/23 prior to Work commencing on the 20/2/23.	Compliant
B4	<p>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.</p>	The Community Communication Strategy was approved by DPHI on 20/1/23 prior to Work commencing on the 20/2/23.	Compliant
B5	<p>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.</p>	Substantial evidence was reviewed by the Auditor to demonstrate the effective implementation of the Community Communications Strategy throughout the audit period.	Compliant
B6	<p>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.</p>	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 of 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>	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

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
B8 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: (a) a 24-hour toll free telephone number for the registration of complaints and enquiries about Stage 1 of the CSSI; (b) a postal address to which written complaints and enquiries may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (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. This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.	<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 • JHG/SWC Audit Interview 27/10/25 <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&projectId=Upper%20south%20Creek%20Advanced%20Water%20Recycling%20Centre&co=dxBwZXjb3V0aGNyZWVrQHNS2G5leXhdGvYlmNbSShdQ==</p>	<p>During the previous Audit period, the website was 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 Kems 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 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: (a) number of complaints received; (b) the date and time of the complaint; (c) the method by which the complaint was made; (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; (e) nature of the complaint; (f) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and (g) if no action was taken, the reason(s) why no action was taken.	<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>There were no complaints received during the Audit period.</p>	Compliant
B10 Complainants must be advised of the following information before, or as soon as practicable after, providing personal information: (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; (b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies; (c) the supply of personal information by the complainant is voluntary; and (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). 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>https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/uppersouthcreek-advanced-water-recycling-centre.html?refid=SWTID7&projectId=Upper%20south%20Creek%20Advanced%20Water%20Recycling%20Centre&co=dxBwZXjb3V0aGNyZWVrQHNS2G5leXhdGvYlmNbSShdQ==</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&projectId=Upper%20south%20Creek%20Advanced%20Water%20Recycling%20Centre&co=dxBwZXjb3V0aGNyZWVrQHNS2G5leXhdGvYlmNbSShdQ==</p>	<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.</p>	Not triggered
B12 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: (a) information on the current implementation status of Stage 1 of the CSSI; (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; (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; (d) a copy of each statutory approval, licence or permit required and obtained in relation to Stage 1 of the CSSI; (e) a copy of the current version of each document required under the terms of this approval; and (f) a copy of the audit reports required under this approval. 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. 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. 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.	<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&projectId=Upper%20south%20Creek%20Advanced%20Water%20Recycling%20Centre&co=dxBwZXjb3V0aGNyZWVrQHNS2G5leXhdGvYlmNbSShdQ==</p>	<p>During the previous 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 - Culturally 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-JHG-MPL-ENV-0008 Revision: A 22/08/2023 • JHG/SWC Audit Interview 27/10/25 	<p>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.</p>	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
C2 The CEMP must provide:	<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 	<p>The CEMP includes the relevant information and was endorsed by the independent Environmental Representative prior to approval by DPHI on 8/8/23.</p> <p>Minor changes to several subplans were made during the Audit period and endorsed by the ER. Details are provided in the relevant conditions below.</p>	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 JHG/SWC Audit Interview 27/10/25 	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"> JHG/SWC Audit Interview 27/10/25 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 	<p>The DPHI Letter of Approval notes the CEMP and Sub-plans have been prepared in consultation with EPA, EHG, 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 Sub-plans that require consultation and were appended to each sub-plan.</p> <p>Minor amendments were made to the Surface and Groundwater, Air Quality, Soils and Contamination, Waste and Resource Management sub-plans during the audit period and were endorsed by the ER.</p> <p>No further consultation with agencies were required due to minor changes</p>	Compliant
C5 The CEMP Sub-plans must state how:	<ul style="list-style-type: none"> CEMP Sub-plans as above JHG/SWC Audit Interview 27/10/25 	The CEMP Sub-plans include the relevant information and were endorsed by the Independent Environmental Representative.	Compliant
C6 The Surface Water and Groundwater CEMP Sub-Plan must be prepared by a suitably qualified expert and include, but not limited to:	<ul style="list-style-type: none"> Surface Water & Groundwater CEMP Sub-plan (USCP-JHG-MPL-ENV-0001) JHG/SWC Audit Interview 27/10/25 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Surface Water and Groundwater CEMP Sub plan, Revision E, dated 8/9/25 	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) JHG/SWC Audit Interview 27/10/25 	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
C8 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):	<ul style="list-style-type: none"> Soils & Contamination CEMP Sub-plan (USCP-JHG-MPL-ENV-0003) Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Soils and Contamination CEMP Sub Plan, Revision C" dated 24/10/25 JHG/SWC Audit Interview 27/10/25 	The Soils and Contamination CEMP subplan was prepared by a suitably qualified expert and contains the relevant information as required by this condition. A minor change to the plan was made during the Audit period and endorsed by the ER	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
C9 The Biodiversity CEMP Sub-Plan must be prepared by a suitably qualified and experienced ecologist and include, but not limited to: (a) details of the measures to avoid and minimise disturbance to native vegetation, and other habitat of native flora and fauna species; (b) procedures for undertaking pre-clearance surveys for native fauna, including surveys by a suitably qualified and experienced ecologist to determine the presence of native fauna in the areas impacted by Stage 1 of the CSI; and procedures and measures to manage their relocation; (c) measures to prevent the spread of weeds, pathogens and to manage biosecurity; (d) protocols for incidental finds of threatened species and ecological communities within the construction boundary;	• Biodiversity CEMP Sub-plan (USCP-JHG-MPL-ENV-0004) • JHG/SWC Audit Interview 27/10/25	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 previous Audit period. No changes to the biodiversity CEMP subplan were made during the audit period.	Compliant
C10 The Noise and Vibration CEMP Sub-Plan must include, but not limited to: (a) details of all sensitive land use(s) (including noise and vibration sensitive working areas) that are potentially exposed to construction noise and vibration; (b) construction noise and vibration performance criteria for Stage 1 of the CSI; (c) details of mitigation and management measure and procedures that will be implemented to manage construction noise and vibration impacts; (d) construction timetabling, in particular construction activities outside of standard hours; and (e) measures to minimise cumulative construction impacts and the likelihood for construction fatigue from both concurrent activities and other projects in the area.	• Noise & Vibration CEMP Sub-plan (USCP-JHG-MPL-ENV-0007) • JHG/SWC Audit Interview 27/10/25 • 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	The Noise and Vibration CEMP subplan was prepared by a suitably qualified expert and contains the relevant information as required by this condition. Minor amendments were made to the Noise & Vibration Sub-plan during the previous audit period and were endorsed by the ER. It was noted during the Audit period that the CNVSP was currently under review.	Compliant
C11 Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary.	• DPHI Approval dated 08/08/2023 ref:SSI-8609189 • JHG/SWC Audit Interview 27/10/25	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 CSI.	• JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • Records reviewed by the Auditor as noted in this audit schedule.	CEMP and Sub-plans are being implemented as required by this condition. Minor amendments were made to the Biodiversity, Construction Noise and Vibration, Surface and Groundwater, Construction Waste Sub-plans during the audit period and were endorsed by the ER. Substantial evidence observed during the Audit site inspection and reviewed by the Auditor to demonstrate compliance with this condition.	Compliant
C13 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 CSI 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 (a) Surface water quality EPA, EHG, DPHI Water, DPI Fisheries, WaterNSW and relevant council(s) (b) Groundwater EPA, DPHI Water (c) Noise and vibration EPA, WaterNSW and relevant council(s)	• 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	The Construction Monitoring Programs are included in the relevant CEMP Sub-plans and were prepared in consultation with relevant agencies as noted above. Following IA#2, the Noise and Vibration Monitoring Plan was amended to address the non compliance with reporting timelines (as noted in IA#2) There were no changes to the monitoring programs during the Audit period.	Compliant
C14 Each Construction Monitoring Program (CMP) must have consideration of SMART principles and provide: (a) details of baseline data available; (b) details of baseline data to be obtained and when; (c) details of all monitoring of the project to be undertaken; (d) the parameters of the project to be monitored; (e) the frequency of monitoring to be undertaken; (f) the location of monitoring; (g) the reporting of monitoring results and analysis results against relevant criteria; (h) details of the methods that will be used to analyse the monitoring data; (i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicate unacceptable project impacts; and (j) any consultation to be undertaken in relation to the monitoring programs.	• 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 • JHG/SWC Audit Interview 27/10/25	The Construction Monitoring Programs include the relevant information as required by this condition, and were endorsed by the ER and approved by DPHI.	Compliant
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.	• ER recommendation letter 25/08/2023 from BBEnviro to SWC • DPHI Approval dated 08/08/2023 their ref:SSI-8609189 • JHG/SWC Audit Interview 27/10/25	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.	• DPHI Approval dated 08/08/2023 their ref:SSI-8609189 7837350db0e03d5e549fb23cb65c7f_Approval_Letter_USC_AWRC_CEMP_Signed_8_August_2023.pdf • JHG/SWC Audit Interview 27/10/25	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.	• 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 Monitoring Report, Rev 2 dated 12/8/25 • USC Advanced Water Recycling Centre and Pipelines, Noise and Vibration Monitoring Report, Rev 2 dated 24/10/25	Construction Monitoring Programs for Noise and Vibration, Groundwater and Surface Water continue to be implemented, as evidenced in corresponding monitoring reports for the September 2024 to February 2025 period.	Compliant
C18 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. Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.	• Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre -C18 Ground Water Monitoring Report, August 25", dated 15/8/25 • Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre -C18 Noise Monitoring Report, August 25", dated 15/8/25 • Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre -C18 Surface Water Monitoring Report, August 25" dated 15/8/25 • Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre -Post Approval Document Received (SSI-8609189-Pa)" dated 13/10/25 • JHG/SWC Audit Interview 27/10/25	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, DPHI 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.	• Operational Environmental Management Plan, Operations and Maintenance, Badu Yarragul Water Resource Recovery Facility, Rev B dated 13/10/25 • Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). • SWC Comments Register dated 4/7/25	At the time of the Audit, a draft Operational Environmental Management plan (OEMP) was prepared and was undergoing review by SWC. Section 3 of the OEMP addresses regulatory compliance requirements noting the OEMP has been prepared in accordance with the following key requirements: - Trilitys ISO 14001: 2015 accredited Environmental Management System - The Environmental Management Plan Guideline for Infrastructure Projects, (DPIE 2020) - Ministers Conditions of Approval for the Project (MCoA) for the project (SSI-8609189) - Sydney Waters Environmental Management System (SWEMS002)- Preparation of Environmental Management Plan Procedure - The Upper South Creek Advanced Water Recycling Centre, Environmental Impact Statement (EIS) Volume 4 Environmental Management and Synthesis -Environment Protection Licence (EPL) 21300. In addition to the above, the OEMP includes the following: - Operational Environmental Objectives (section 4) - Roles and Responsibilities (section 5) - Training and competence (section 6) - Incident management and emergencies (section 7) - Implementation (section 8) - Communication and consultation (section 9) - Monitoring and measurement (section 10) - Review (section 11)	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
D2 An OEMP is not required for Stage 1 of the CSS 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: <ul style="list-style-type: none"> (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; (b) issues identified through ongoing risk analysis can be managed; and (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. 	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Operational Environmental Management Plan, Operations and Maintenance, Badu Yarragul Water Resource Recovery Facility, Rev B dated 13/10/25 • SWC Comments Register dated 4/7/25 	As noted in condition D1, an OEMP has been prepared for the operation of the facility	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"> • JHG/SWC Audit Interview 27/10/25 • Operational Environmental Management Plan, Operations and Maintenance, Badu Yarragul Water Resource Recovery Facility, Rev B dated 13/10/25 • SWC Comments Register dated 4/7/25 	At this stage the draft OEMP has been prepared and is currently under review by SWC. It is planned to be submitted to DPHI upon finalisation and prior to operation.	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"> • JHG/SWC Audit Interview 27/10/25 • Operational Environmental Management Plan, Operations and Maintenance, Badu Yarragul Water Resource Recovery Facility, Rev B dated 13/10/25 • SWC Comments Register dated 4/7/25 	Operational requirement, not triggered	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 27/10/25 	Section 8 of the Air Quality CEMP subplan describes measures to be implemented to minimise air quality impacts. 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. Sand being placed in the operational basin was wet to avoid dust generation. No odour issues identified during the construction phase. No air quality or odour related complaints have been received during the audit period.	Compliant
E2 The final design of the discharge stacks of each co-generation engine must include a sampling plane compliant with Australian Standard AS4232.1 Stationary source emissions – Selection of sampling positions (2021).	• JHG/SWC Audit Interview 27/10/25	No co-generation for the project.	Not triggered
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"> • JHG/SWC Audit Interview 27/10/25 • Site inspection 27/10/25 • 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 (00001871) • A19833-05-001-1-Waste Gas Burners Data Sheet, 6/2/23 • AWRC-SKH-P-4011-0001 [01] Digester-gas-system-sketch-pack-P&ID 	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. 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'). 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). 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 (00001871). The specification states that all waste gas burner installations must meet the relevant requirements of the <i>POEO Act 1997</i> and its Clean Air Regulation (refer section 1.4). A copy of the Sydney Water specification was also provided as evidence. At the time of IA#5, the waste burner had been installed however had not been commissioned.	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) • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • Equipment maintenance records - Glascoot Bobcat (3DS), Grader (3DS), Kerb miller asphalteter 3DS 	Equipment was observed to be operating effectively with no visible exhaust plumes or excessive noise identified. Equipment maintenance records were provided to the Auditor as evidence of compliance	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"> • JHG/SWC Audit Interview 27/10/25 • Upper South Creek, Advanced Water Recycling Centre and Pipelines, Odour Management Plan, Rev 5 dated 2/9/25 • Operational Environmental Management Plan, Operations and Maintenance, Badu Yarragul Water Resource Recovery Facility, Rev B dated 13/10/25 	The Odour Management Plan has been completed and approved by DPHI on the 5/9/25. Appendix A of the OMP provides details of consultation undertaken with EPA. No issues were raised by the EPA.	Compliant
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 and actioning; and (i) system and performance review for continuous improvements. 	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Upper South Creek, Advanced Water Recycling Centre and Pipelines, Odour Management Plan, Rev 2 dated 27/5/25 • Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PQ-162) - Conditions E5 and E6 Odour Management Plan" dated 5/9/25 	The Auditor reviewed the Odour Management Plan and notes the following: <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. DPHI approved Revision 5 of the Odour Management Plan on the 5/9/25 noting the OMP generally meets the requirements of Conditions E5 and E6 of SSI-8609189 for Stage 1.	Compliant
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.	• JHG/SWC Audit Interview 27/10/25	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.	• JHG/SWC Audit Interview 27/10/25	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.	• JHG/SWC Audit Interview 27/10/25	No co-generation for the project.	Not triggered

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
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.	• JHG/SWC Audit Interview 27/10/25	No co-generation for the project.	Not triggered
E11 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: (a) a description of the process operating conditions at the time of sampling, including fuel usage rates and electricity generation (kWh); (b) a detailed description of the sampling location, including engineering drawings, schematics or photographs to support the description; (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; (d) comparison of measured emissions against the concentrations listed in Table 4: Table 4: Emission concentration standards Pollutant: Units of measure 100 percentile concentration standard Reference conditions Oxygen 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 (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. Notes: 1. Supporting evidence must be included which confirms that the plant/process was operating under normal, representative conditions at the time of sampling. 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.	• JHG/SWC Audit Interview 27/10/25	No co-generation for the project.	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.	• JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • 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	At the time of IA # 5, all clearing activities had been completed. As noted in previous audits, to minimise flora and fauna impacts: • A two stage process was implemented and is supervised by an experienced ecologist • Clearing permits were implemented which includes signoff by the project ecologist • A vegetation clearing tracker was 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. It was noted in the Audit interview that there was no clearing undertaken during the Audit period.	Compliant
E13 Impacts to plant community types and species credit species must not exceed those identified in Table 5 and Table 6.	• JHG/SWC Audit Interview 27/10/25 • USC Vegetation Clearing Tracker dated 06/01/25	At the time of the Audit, clearing had been completed with no clearing undertaken during the Audit period. 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.	Compliant
E14 Prior to impacts on the biodiversity values of Stage 1 of the CSSI, the number and classes of ecosystem credits and species credits (like-for-like) as set out in Table 5 and Table 6, must be retired. The retirement of the credits must be carried out in accordance with the Biodiversity Conservation Act 2016, and can be achieved by: (a) acquiring and retiring "biodiversity credits" within the meaning of the BC Act; and / or (b) making a payment into the Biodiversity Conservation Fund of an amount equivalent to the class and number of ecosystem and species credits, as calculated by the Biodiversity Offsets Payment Calculator; and/or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. Table 5: Ecosystem Credits to be Retired Table 6: Species Credits to be Retired Note: Excludes certified areas.	• 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 • JHG/SWC Audit Interview 27/10/25	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. No reduction in clearing credits was sought during the audit period.	Compliant
E15 Where evidence of compliance with the Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits (OEH, 2017) for the purpose of applying the variation rules has been provided to the Planning Secretary, variation rules may be applied to retire the relevant ecosystem credits and species credits as set out in the BAM Biodiversity Credit Biodiversity Report (Variation). The variation rule does not apply to biodiversity credits for threatened species or threatened ecological communities that are listed as critically endangered under the Biodiversity Conservation Act 2016 or listed in any capacity under the Environment Protection and Biodiversity Conservation Act 1999. 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.	• JHG/SWC Audit Interview 27/10/25	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.	• 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" • JHG/SWC Audit Interview 27/10/25	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 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: (a) be prepared in consultation with EHG and submitted to the Planning Secretary for approval prior to the commencement of construction; (b) be prepared in accordance with the Order; (c) detail how the Proponent proposes to meet the requirements specified under Relevant Biodiversity Measure (RBM) 8 of the Order; and (d) include the location of the offsets and the proposed measures to ensure the long-term protection of the offsets. 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.	• JHG/SWC Audit Interview 27/10/25 • 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.	• JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25	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 been undertaken	Compliant

Ref ID: Condition	Evidence	Auditor Conclusion	Audit Finding
E19 The Proponent must prepare a Rehabilitation Management Plan to revegetate and restore impacted RMB 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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines CoA9 Consultation Summary Report - Works in South Creek Rev01, dated 14/6/24 Upper South CoA19 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 RMB12-RMP for issue to DPHI, dated 23/5/24 DPHI Post Approval form 20240430083154 (submission to DPHI, dated 30/4/24) 	<p>Preparation of the RMB12 Rehabilitation Management Plan has been completed in consultation with DPI Fisheries, BCS, DCCEEW, and Penrith City Council. Consultation with DCCEEW for the RMB12 Rehabilitation Management Plan was sighted as evidence. DCCEEW responded to the consultation issued in a letter dated 12/4/24.</p> <p>Approval of the Rehabilitation Management Plan was issued by DPHI in a letter dated 30/5/24.</p> <p>At the time of the Audit and as observed during the site inspection, rehabilitation of the RMB 12 lands has been undertaken.</p>	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 RMB 12 red-hatched lands. The plan must include: <ul style="list-style-type: none"> (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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines CoA9 Consultation Summary Report - Works in South Creek Rev01, dated 14/6/24 Upper South CoA19 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 RMB12-RMP for issue to DPHI, dated 23/5/24 DPHI Post Approval form 20240430083154 (submission to DPHI, dated 30/4/24) Email from CB City Council titled 'Upper South Creek, Acceptance of Restoration, Dated 5/8/25 Rehabilitation Management Plan, Lansdowne Reserve, NGRS, Lansdowne Reserve, dated 23/1/25 	<p>Preparation of the RMB12 Rehabilitation Management Plan has been completed in consultation with DPI Fisheries, BCS, DCCEEW, and Penrith City Council. Consultation with DCCEEW for the RMB12 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.</p> <p>At the time of the Audit and as observed during the site inspection, rehabilitation of the RMB 12 lands has been undertaken.</p> <p>Section 6.4 of the RMP required under Condition E19 notes the following:</p> <p><i>Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this RMP and other relevant approvals, licences and guidelines. An annual review of this plan will be undertaken and documented by a SOP to reflect any feedback from monitoring activities and any changes to management responses. Audit requirements are detailed in Section 3.9 of the CEMP.</i></p> <p>At this stage, an internal audit of the RMP has not been undertaken.</p> <p>Section 6.5 of the RMP notes the following:</p> <p><i>Six monthly reports are required to provide documentation of the progress of the rehabilitation in the RMB12 impacted corridor. This is in accordance with CoA E20 (i), which requires six-monthly summary progress reports over the maintenance period to be submitted to BCS for comment until BCS is satisfied that vegetation is sufficiently established at which time the maintenance period will end.</i></p> <p>The first six monthly report to EHG (now CPHR) is due to be submitted. A meeting with CPHR has occurred to discuss the rehabilitation of the RMB 12 activities during the Audit period. It was noted that CPHR raised some issues to SWC/JHG regarding the scope of the rehabilitation activities undertaken.</p> <p>Recommendation</p> <p>Undertake an internal audit of the RMP is undertaken of the RMP during the next Audit period and provide the findings of the Audit are provided to CPHR with the initial 6 monthly report</p>	Compliant
E21 The Proponent must minimise impacts to Key Fish Habitat (KHF) as defined in Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update).	<ul style="list-style-type: none"> Site Inspection 27/10/25 Progressive Erosion and Sediment Control Plan (PESCP), Nepean River Works - Construction of piling pad and creek stabilisation, dated 28/4/24 PESCP South Creek Revision Rev0, 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 	<p>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:</p> <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 HDO 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. <p>An A9 Consultation Report was also prepared for creek crossings, with evidence of consultation for the South Creek works examined during the audit.</p>	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 27/10/25 EIS Appendix 1 - Biodiversity Assessment Part 1 SEARS compliance table, Aquatic and Riparian Biodiversity Ecology Section. Email from habitat innovation to JHG dated 23/5/24 CPESC INSPECTION Report to works, dated 1/6/24 	<p>As noted in previous audits, open trenching works were previously undertaken in Cosgrove Creek.</p> <p>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.</p>	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: <ul style="list-style-type: none"> (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, RMB 12 Lands - Kemps Creek Revision 04, dated 30/4/24 Letter from Biopsys 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 stockpile EPA Waste Form, dated 11/4/23 Email from Featherdale Wildlife Park to JHG, dated 1/4/24 	<p>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.</p> <p>Opportunities to re-use such features within the final project landscaping and rehabilitation works have been identified with timber and hollow bearing features.</p> <p>Some timber has been mulched and reused for erosion control.</p> <p>Reasonable efforts have been made throughout the project 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.</p> <p>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, some take up from Western Sydney Parklands has occurred.</p>	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 JHG/SWC Audit Interview 27/10/25 Upper South Creek Design Report, Revision 2, dated 13/8/24 (DRAFT) - exempt 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 IFP 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 CV - Kyle Thompson, Forward Hydro CPHR Portal Consultation Records 7/11/25 Email from SWC to JHG titled "E24- Flood in Design Memo" dated 7/11/25 Memo from JHG to SWC titled "C51-8609189 USC AWRC memo re condition of approval E24- flood management in design" dated 17/6/25 	<p>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.</p> <p>Flooding is addressed in the 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.</p> <p>An independent flooding specialist has been appointed to review potential flooding impacts and compliance with condition E24 a copy of the CV of the specialist was provided to the Auditor.</p> <p>The flooding consultant concluded:</p> <p><i>"Based on the above, measures identified in the documents listed in Co A1 to not worsen flood characteristics during operation or other measures that achieve the same outcomes, have been incorporated into the AWRC site detailed design of Stage 1 of the CSSI. The incorporation of these measures into detailed design has been reviewed and endorsed by a suitably qualified flood consultant, who is independent of the Project's design and construction, which is provided in Attachment 1."</i></p>	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
E25 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. 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. 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.	<ul style="list-style-type: none"> • DPHI Post Approval form 20240430083154 • JHG/SWC Audit Interview 27/10/25 • Upper South Creek Design Report, Revision 5, GHD Jacobs dated 24/1/25 • 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] 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 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.</p> <p>As noted above, the independent flooding specialist was appointed to review potential flooding impacts and compliance with condition E24 a copy of the CV of the specialist was provided to the Auditor.</p> <p>The flooding consultant concluded:</p> <p><i>"Based on the above, measures identified in the documents listed in CoA A1 to not worsen flood characteristics during operation or other measures that achieve the same outcomes, have been incorporated into the AWRC site detailed design of Stage 1 of the CSSI. The incorporation of these measures into detailed design has been reviewed and endorsed by a suitably qualified flood consultant, who is independent of the Project's design and construction, which is provided in Attachment 1."</i></p>	Compliant
E26 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.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • LN 23208 - Discharge Structure Batter Sections, dated 12/11/24 • Kems Creek Sewage Network, TWDM - Discharge Facility Earthworks Contour Plan - As Constructed dated 02/12/24 • Site Inspection 27/10/25 • Email from BCS to JHG titled "Upper South Creek (SSI 8906189) CoA E26 - flooding information for AWRC pipelines" dated 19/12/24 • Email from JHG to NSW SES titled "Upper South Creek (SSI 8906189) CoA E26 - flooding information for AWRC pipelines" dated 21/1/25 • Email from JHG to Wollondilly Shire Council titled "Upper South Creek (SSI 8906189) CoA E26 - flooding information for AWRC pipelines" dated 19/12/24 • Email from JHG to EHG titled "Upper South Creek (SSI 8906189) CoA E26 - flooding information for AWRC 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. Evidence was provided to the Auditor to demonstrate the relevant flooding information has been submitted to the relevant stakeholders including Wollondilly Council, SES, and EHG.</p> <p>The compliant finding therefore relates to the pipelines and the Nepean River Discharge, with further assessments required during future Audits regarding the AWRC works</p>	Compliant
E27 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. Note: Condition E27 excludes construction of elements required for effective operation and management of operational components of the AWRC plant. This includes release infrastructure to South Creek, fences around the AWRC operational area and fire trail around the AWRC operational area.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	Construction activities had not commenced in the green space at the time of the audit.	Not triggered
E28 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).	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	Construction activities had not commenced in the green space at the time of the audit.	Not triggered
E29 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.	<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 <p>Unexpected Finds and Human Remains Procedure</p> <ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	<p>As noted in previous audits, aboriginal artefacts were salvaged from the AWRC 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>The Heritage CEMP includes mitigation measures to be implemented during Construction. There have been no unexpected finds or impacts on Aboriginal heritage reported during the audit period.</p> <p>The JHG Site Induction includes unexpected finds and stop work procedures in the event an item of heritage significance is discovered.</p>	Compliant
E30 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. 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. Note: Details regarding ongoing engagement with RAPs must be provided in the Communication Strategy required under Condition B1.	<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 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	<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 AWRC 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. Aboriginal stakeholders have also been consulted on the greenspace master plan.</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 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: (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 (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). 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).	<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 • JHG/SWC Audit Interview 27/10/25 • Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-185) dated 18/11/25 • Letter from DPHI to SWC titled Extension Request for submission of Aboriginal Cultural Heritage Excavation Report under Condition E31" dated 20/11/25 • Site Inspection 27/10/25 	<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 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 commence 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).	<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) • JHG/SWC Audit Interview 27/10/25 	<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

Ref ID	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 CSSL. 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: Fleur's Radio Telescope (PAS7) Salvage Area 1" dated 21/12/24 • Letter from Artefact to SWC titled "Archaeological Monitoring Excavation Results: Fleur's Radio Telescope (PAS7) Salvage Area 1" dated 3/11/23 • Letter from Artefact to SWC titled "Archaeological Monitoring Excavation Results: Fleur's Radio Telescope (PAS7) Salvage Area 1" dated 14/8/25 • Email from Artefact to Fairfield City Council titled "Photographic Archival Recording of Upper South Creek Fleur Radio 	Artefact is engaged as the Heritage Consultant. Archival recording has been undertaken and the Photographic Archival Recording Report has been completed. The recording was undertaken by Artefact, a suitably qualified and experienced heritage consultant. Section 1.4 of the archival recordings report demonstrates how the archival recording has been undertaken in accordance the 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)" Evidence was provided to the Auditor demonstrating the the report was submitted to the relevant Councils in addition to CSIRO, Heritage NSW, CSIRO and the University of Sydney.	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 • Upper South Creek, Fleur's Radio Telescope Site, Photographic Archival Recording, Report to Sydney Water, Artefact, Rev2 dated 14/8/25 • 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 • JHG/SWC Audit Interview 27/10/25 	Artefact Heritage are an experienced Heritage Consultant and have nominated three Archaeological Directors for the project. The Archival recording report required by Condition E33 and the Heritage Report required by Condition E35, documents the involvement of the Archaeological Directors throughout the project	Compliant
E35	Following completion of archaeological excavation programs a Heritage Report must be prepared that includes: <ul style="list-style-type: none"> (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: Fleur's 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 2 dated 27/6/25 • Email from DPHI to SWC titled "Upper South Creek, Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-172) dated 15/8/25 • Email from Artefact to SWC titled "Upper South Creek AWRC Final Excavation Reports - Copies of Emails for Compliance" dated 4/8/25 • Email from Artefact to SWC titled "Clarification on suggestion for change to USC Fleur's Radio Telescope Site Photographic Archival Recording" dated 15/8/25 	The Heritage Report has now been completed. Table 2 of the report summarises where the requirements of this condition have been met within the report.	Compliant
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: Fleur's 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 	The Heritage Report has been submitted to DPHI, Heritage Council, relevant councils as well as CSIRO, Sydney University and Penrith Historical Archaeology Group.	Compliant
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 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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 UFP 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. 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.	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • 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.	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.	• 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: <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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 • Upper South Creek, Advanced Water Recycling Centre and Pipelines, Community Agreement - AWRC Extended Working Hours, from 06 August 2025 for 3 Months, EPL 21800, Rev E • JHG Pre-start record dated 03/10/25 • JHG Pre-start record dated 24/10/25 • OOH Works Permit, JHG dated 21/5/25 • OOH Works Permit AWRC Extended Hours, Community Agreement, JHG dated 2/9/25 • JH Start Card - Brine Pipeline, 24/10/25 • JHG Noise Verification Register dated 19/9/25 	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 Notwithstanding Conditions E40 and E41 Work may be undertaken outside the hours specified in the following circumstances (a, b, or c): (a) Safety and Emergencies, including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (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. 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 (b) Work that meets all of the following criteria: (i) construction that causes L _{Aeq} (15 minute) noise levels: - 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 (ii) construction that causes: - 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). (c) By Approval, including: (i) where different construction hours are permitted or required under an EPL in force in respect of the CSS; or (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 (iii) negotiated agreements with directly affected residents and sensitive land use(s).	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Community Agreement - AWRC Extended Working Hours, from 06 August 2025 for 3 Months, EPL 21800, Rev E JHG Pre-start record dated 03/10/25 JHG Pre-start record dated 24/10/25 OOH Works Permit, JHG dated 21/5/25 OOH Works Permit AWRC Extended Hours, Community Agreement, JHG dated 2/9/25 JH Start Card - Brine Pipeline, 24/10/25 JHG Noise Verification Register dated 19/9/25 	<p>Out of Hours works undertaken during the Audit period in accordance with this condition include:</p> <ul style="list-style-type: none"> Extended working hours at the AWRC site, undertaken under community agreement consisting of general construction, asphalt works and/or mechanical and electrical fitout. Commissioning works along the pipeline alignment undertaken under an OOH works permit Noise monitoring was undertaken for OOH works with a copy of the results provided to the Auditor as a record. <p>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.</p>	Compliant
E43 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: (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: (i) the ER and AA review all proposed out-of-hours activities and confirm their risk levels, (ii) low risk activities can be approved by the ER in consultation with the AA, and (iii) high risk activities that are approved by the Planning Secretary; (b) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria; (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; (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 (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. This condition does not apply if the requirements of Condition E42(a) or (b) are met. 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.	<ul style="list-style-type: none"> DPHI Approval dated 08/08/2023 their ref:SSI-8609189 Environment Protection Licence EPL No 21800 JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	<p>The project has obtained an Environment Protection Licence (EPL 21800), OOH work is undertaken in accordance with the EPL, not under the OOHW Protocol.</p>	Not triggered
E44 Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration objectives: (a) construction 'Noise affected' NMLs established using the Interim Construction Noise Guideline (DEC, 2009); (b) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); (c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives"; (d) BS 7835 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and (e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage). 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. 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.	<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 JHG Pre- Start Record, Brine Pipeline dated 24/10/25 JHG Inspections:INS-0107476 dated 24/10/25 JHG Start Card, Brine Pipeline, dated 24/10/25 	<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>Site inspections undertaken by JHG include a "Noise and Vibration Management Checklist". Prestart forms include a requirement to comply with the requirements of any OOH permits and "Start Cards" include a hazard and risk assessment assessment noting potential community complaints from excessive noise and ensuring an environmental coordinator is present to perform noise monitoring and confirm works align with predicted noise model generated for OOH works permits.</p>	Compliant
E45 Mitigation measures must be applied when the following residential ground-borne noise levels are exceeded: (a) evening (6:00 pm to 10:00 pm) — internal L _{Aeq} (15 minute): 40 dB(A); and (b) night (10:00 pm to 7:00 am) — internal L _{Aeq} (15 minute): 35 dB(A). 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.	<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 	<p>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.</p>	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 timetabled 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 	<p>At the time of the Audit, all works along the pipelines have been completed. Construction works are being undertaken at the main AWRC site. There are no sensitive receivers that would be impacted by the works in accordance with this condition.</p>	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 L _{Aeq,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 Register 	<p>Noise monitoring undertaken demonstrates compliance with this condition. The recorded noise levels are below the 85dB(A threshold.</p>	Compliant
E48 Construction Noise and Vibration Impact Statements (CNVIS) must be prepared for Work that may exceed the noise management levels, vibration criteria and/or ground-borne noise levels specified in Condition E44 and Condition E45 at any residence outside construction hours identified in Condition E40, or where receivers will be highly noise affected. The CNVIS must include specific mitigation measures identified through consultation with affected sensitive land use(s) and the mitigation measures must be implemented for the duration of the Works. A copy of the CNVIS must be provided to the AA and ER prior to the commencement of the associated Works. The Planning Secretary may request a copy/ies of CNVIS.	<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 Upper South Creek - Advanced Water Recycling Centre, Construction Noise and Vibration Impact Statement - AWRC, Renzo Tonin and Associates, dated 21/6/23 Upper South Creek - Advanced Water Recycling Centre, Construction Noise and Vibration Impact Statement - Pipelines, Renzo Tonin and Associates, dated 5/9/23 USC Advanced Water Recycling Centre and Pipelines, Noise and Vibration Construction Monitoring Report, Rev A dated 	<p>Renzo Tonin have prepared CNVIS for the project in accordance with this condition.</p> <p>Section 9.2 of the CNVIS describes the consultation undertaken with affected residents, Section 9.4 includes additional management measures to be employed. The CNVIS has been provided to both the ER and the AA for their review</p> <p>The Planning Secretary has not requested a copy of the CNVIS during the audit period.</p>	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
E49 Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before Work that generates vibration commences in the vicinity of those properties. If the potential exceedance is to occur more than once or extend over a period of 24 hours, owners and occupiers are to be provided a schedule of potential exceedances on a monthly basis for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Noise and Vibration CEMP Sub-plan required by Condition C4 and the Community Communication Strategy required by Condition B1.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	No activities were observed being undertaken near or adjacent to properties that would exceed the screening criteria for cosmetic damage. Pipeline works have been completed.	Not triggered
E50 Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise levels are minimised. Practices must include, but are not limited to: <ul style="list-style-type: none"> (a) use of regularly serviced low sound power equipment; (b) early occupation and later release of road carriageways and construction sites; (c) scheduling of noisiest Works before 11:00 pm Sunday to Thursday and before 12 midnight Friday and Saturday; (d) temporary noise barriers (including the arrangement of plant and equipment) around noisy equipment and activities such as rock hammering and concrete cutting; and (e) use of alternative construction and demolition techniques. 	<ul style="list-style-type: none"> Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Sub-plan Rev 9, dated 28/6/23 JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	As observed during the Audit site inspection, the works on the pipelines have been completed, thereby significantly reducing the noise and vibration risks. Construction activities at the AWRC site are being undertaken in an industrial/rural setting with any noise and vibration sensitive receptors located a substantial distance from the site activities. All equipment observed during the site inspection appeared to be properly maintained with no excessive noise or air emissions generated. Appropriate maintenance records were provided to the Auditor. Out of Hours works have been undertaken during the Audit period. OOH Permits detail proposed measures to be implemented. Site inspections undertaken by JHG include a "Noise and Vibration Management Checklist", Prestart forms include a requirement to comply with the requirements of any OOH permits and "Start Cards" include a hazard and risk assessment assessing potential community complaints from excessive noise and ensuring an environmental coordinator is present to perform noise monitoring and confirm works align with predicted noise model generated for OOH works permits.	Compliant
E51 The Proponent must conduct vibration testing before and during vibration generating activities that have the potential to impact on heritage items to identify minimum working distances to prevent cosmetic damage. In the event that the vibration testing and attended monitoring shows that the preferred values for vibration are likely to be exceeded, the construction methodology must be reviewed and, if necessary, additional mitigation measures implemented.	<ul style="list-style-type: none"> Vibration testing monitoring results 30/10/23 - 6/11/23 JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Email from Artefact dated 24/11/23 Upper South Creek - Upper Canal Vibration Monitoring Report dated 30/11/23 	There were no vibration generating activities identified with the potential to impact on heritage items during the audit period. Earlier in the project Renzo Tonin was engaged to undertake vibration monitoring of the WaterNSW Upper Canal. The results of the vibration monitoring were below the 3mm/s criteria and no damage is known to have occurred. There were no activities undertaken in close proximity to the upper canal during the audit period that would require vibration monitoring	Compliant
E52 Advice from a heritage specialist must be sought on methods and locations for installing equipment used for vibration, movement and noise monitoring at heritage-listed structures. Note: The installation of noise and vibration equipment must not impact on the heritage values of the Heritage items.	Technical Memorandum from ERM to JHG titled "Upper South Creek Advanced Water Recycling Centre and Pipelines Horizontal Directional Drilling - Upper Canal Crossing Vibration Monitoring Plan dated 14/9/23	ERM were appointed as the heritage specialist and provided the advice in accordance with this condition.	Compliant
E53 Before conducting at-property treatment at any heritage item identified in the documents listed in Condition A1, the advice of a suitably qualified and experienced built heritage expert must be obtained and implemented to ensure any such Work does not have an adverse impact on the heritage significance of the item.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	Not triggered as no need to do at property treatments due to the short term nature of works in residential areas. There were no noise impacts to residential receivers during the Audit period noting the pipeline component of the works were complete.	Not triggered
E54 All work undertaken for the construction of Stage 1 of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided. This must include: <ul style="list-style-type: none"> (a) rescheduling Work to provide respite to impacted noise sensitive land use(s) so that the respite is achieved in accordance with Condition E55; or (b) the provision of alternative respite or mitigation to impacted noise sensitive land use(s); and (c) the provision of documentary evidence to the AA in support of any decision made in relation to respite or mitigation. The consideration of respite must also include all other CSSI, SSI and SSD projects which may cause cumulative and/or consecutive impacts at receivers affected by the delivery of Stage 1 of the CSSI.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Email trail between JHG and Sydney Water regarding the minimisation of cumulative impacts and the rolling community agreement, dated 12/8/24-16/8/24 	As noted in previous Audits, Project coordination meetings with other projects and noise modelling / permits for proposed OOH works are reviewed by the AA to help ensure appropriate coordination and respite is provided. SWC/JHG demonstrated an awareness of other project activities planned that may require coordination, e.g. the Kemps Creek pressure main. Evidence of correspondence with third parties to coordinate works was reviewed during the audit. Email correspondence was provided between JHG and other SWC projects (Papew Road) demonstrating active management of cumulative impacts. A Rolling Community Agreement is in place for pipeline works, which are generally low impact in nature and of short duration. As observed during this Audit, pipeline activities have now been completed and there is little or no requirement to co-ordinate project activities with third parties for future works.	Compliant
E55 In order to undertake out-of-hours work outside the hours specified under Condition E40, the appropriate respite periods must be identified for the out-of-hours work in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with: <ul style="list-style-type: none"> (a) a progressive schedule for periods of likely out-of-hours work; (b) a description of the potential work, location and duration of the out-of-hours work; (c) the noise characteristics and likely noise levels of the work, and (d) likely mitigation and management measures which aim to achieve the relevant noise management levels and vibration criteria under Condition E44 (including the circumstances when respite or relocation offers will be available and details about how the affected community can access these offers). The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the AA, ER, EPA and the Planning Secretary for information prior to undertaking the Work scheduled for the subject period. Note: Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the rating background noise level at any residence.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Consultation Summary Report - CoA E55 Community Consultation on Respite, May 2025 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Consultation Summary Report - CoA E55 Community Consultation on Respite, June 2025 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Consultation Summary Report - CoA E55 Community Consultation on Respite, September 2025 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Consultation Summary Report - CoA E55 Community Consultation on Respite, October 2025 Email from JHG to EPA titled "CoA E55 A9_Consultation Summary Report Upper South Creek OOHW June 2025.pdf" dated 2/6/25 Email from JHG to SWC titled "CoA E55 A9_Consultation Summary Report Upper South Creek OOHW June 2025.pdf" dated 2/6/25 Email from JHG to SWC titled "CoA E55 A9_Consultation Summary Report Upper South Creek OOHW September 2025.pdf" dated 1/9/25 Email from JHG to EPA titled "CoA E55 A9_Consultation Summary Report Upper South Creek OOHW September 2025.pdf" dated 1/9/25 Email from JHG to ER/AA titled "E55 Consultation Report" dated 29/11/24 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - E55 Consultation Summary Report" dated 4/7/25 	The Auditor was provided with copies of the E55 Consultation Summary Reports for the period from May to September 2025 and which included details of: <ul style="list-style-type: none"> the out of hours works schedule consultation process details of community notification details of work locations and activities - outside standard hours details of letter distribution area details of project survey undertaken regarding out of hours works Appropriate notifications were issued to the community regarding the out of hours works and were submitted to the Department and other stakeholders in accordance Condition E55.	Compliant
E56 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: <ul style="list-style-type: none"> (a) confirm the appropriate operational noise and vibration objectives and levels for surrounding development, including existing sensitive land use(s); (b) confirm the operational noise prediction 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; (c) identify all noise and vibration mitigation measures including location, type and timing of mitigation measures, with a focus on: <ul style="list-style-type: none"> (i) source control and design; and (ii) 'best practice' achievable noise and vibration outcome for each activity; (d) include a consultation strategy to seek feedback from directly affected landowners on the noise measures; and (e) procedures for the management of operational noise complaints, including investigation and monitoring (subject to complainant agreement). 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. The identified noise measures must be implemented and the ONR must be made publicly available.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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 Upper South Creek Advanced Water Recycling Centre - Operational Noise Review, Renzo Tonin, dated 22/5/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - E56 - Operational Noise Review" Dated 4/7/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - Post Approval Document Received - (SSI-8609189 - PA-156)" dated 10/6/25 Letter from Acoustic Studio to DPHI titled "Upper South Creek Advanced Water Recycling Centre - Concept and Stage 1, Condition of Approval E56 Operational Noise Review - Acoustic Advisor Verification" dated 6/6/25 Email from DPHI to SWC titled "Upper South Creek - E56 Operational Noise Review" dated 4/8/25 	An Operational Noise Review (ONR) has been prepared by Renzo Tonin, and has been issued to relevant stakeholders (EPA and Council) for comments. The ONR was also reviewed and verified by the AA with a copy of the AA verification letter provided to the Auditor as evidence. The ONR was issued to DPHI on 10/6/25. On 4/8/25, DPHI wrote to SWC acknowledging receipt of the ONR and confirming they do not have any comments on the document at this time.	Compliant
E57 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	Operational requirement	Not triggered

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
E58 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Badu Yarragul, Greenspace Masterplan, 28 Badu Muru Grove, Kems Creek, DRAFT, Rev 1, SWC dated 29/8/25 	<p>The main construction site compound is located in an area with low visual sensitivity. Pipeline works have been completed and compounds demolished, 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 (particularly at creek crossings, riparian zones and RBTM12 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 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.	<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 JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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 demolished, 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 during the audit period.</p>	Compliant
E60 Temporary and permanent active transport facilities along the pipeline alignment must be designed, constructed and/or rectified in accordance with: <ul style="list-style-type: none"> (a) the process set out in the Movement and Place Framework (NSW Government) including: <ul style="list-style-type: none"> (i) the Walking Space Guide: Toward Pedestrian Comfort and Safety (TNSW, 2020); and (ii) the Cycleway Design Toolbox: Designing for Cycling and Micromobility (TNSW, 2020). (b) the Guide to Road Design Part 6A: Paths for Walking and Cycling (Ausroads 2017) where not otherwise covered by (a); (c) relevant Australian Standards (AS) such as 1428.1-2009 Design for access and mobility; and (d) relevant Crime Prevention Through Environmental Design (CPTED) principles. <p>Note: In the event of an inconsistency, the latest guidance document prevails to the extent of the inconsistency.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	<p>There have been no impacts to Active Transport Links (ATLs) at this stage in the project. Temporary or permanent ATLs are not proposed.</p>	Not triggered
E61 The place making, design and landscape outcomes for the AWRC site of Stage 1 of the CSSI must be: <ul style="list-style-type: none"> (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 (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). 	<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-8609189-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 - UDL - timeframe for additional components, dated 29/8/24 Revised UDL 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 UDL - Request for Additional Information, dated 30/10/24 Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (AWRC and Pipelines Project (SSI-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 Badu Yarragul, Greenspace Masterplan, 28 Badu Muru Grove, Kems Creek, DRAFT, Rev 1, SWC dated 29/8/25 JHG/SWC Audit Interview 27/10/25 	<p>The Stage 1 Urban Design and Landscape Plan (UDLP) was approved by DPHI on 29/11/23. The UDL was subsequently revised to include the Landscape Management Plan (LMP) and Vegetation Management Plan (VMP) as appendices. The revised UDL including LMP and VMP was submitted to DPHI for approval on 4/10/24.</p> <p>The submission date for the revised UDL, including LMP and VMP was requested to be extended to 4/10/24 after the initial submission date of 1/6/24 was missed.</p> <p>Emails between Sydney Water and DPHI discussing the need for an extension, dated 29/8/24 were provided as evidence.</p> <p>NB: It is noted that discussion for a need for extension was initiated by Sydney Water after the timeframe for submission of the UDL (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 UDL.</p> <p>NB: On 30/10/24 DPHI issued a letter requesting additional information in relation to the revised UDL, 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 UDL noting the UDL 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 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> <p>At the time of IA # 5, the greenspace masterplan was being drafted with a copy provided to the Auditor as evidence.</p>	Compliant
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 AWRC-TRA-PLN-DES-0001 Rev 5, dated 13/11/23 JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	<p>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.</p>	Not triggered
E63 An Urban Design and Landscape Plan (UDLP) must be prepared for the AWRC 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 UDL must be: <ul style="list-style-type: none"> (a) prepared by a suitably qualified and experienced person(s) in place, urban and landscape design and bush regeneration; (b) prepared in consultation with relevant council(s) or the community, including affected landowners and businesses; (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 UDL applies; and (d) implemented during construction and operation of Stage 1 of the CSSI. <p>Note: The UDL 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.</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 AWRC 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 UDL 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 UDL - Request for Additional Information, dated 30/10/24 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI - 86091980-PA-117)" - Conditions E63, E64 and E65 - Approval of revised Urban Design and Landscape Plan" dated 20/11/24 Badu Yarragul, Greenspace Masterplan, 28 Badu Muru Grove, Kems Creek, DRAFT, Rev 1, SWC dated 29/8/25 JHG/SWC Audit Interview 27/10/25 	<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. SWC wrote to DPHI requesting approval to adopt a staged approach to the delivery of the UDL 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 UDL as follows: <ul style="list-style-type: none"> Oxidation ditches MBR Inlet works Digestors </p> <p>The revised UDL 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 UDL (revision 08, dated 04/10/24) and excludes any components to be captured as part of the Greenspace Masterplan. At the time of IA # 5, the greenspace masterplan was being drafted with a copy provided to the Auditor as evidence.</p>	Compliant
E64 The UDL must document how the following matters have been considered in the design and landscaping of the project: <ul style="list-style-type: none"> (a) the requirements of Conditions E61 to E62; (b) the requirements of the Wildlife Management Plan under Condition E130; (c) demonstrated integration of Crime Prevention Through Environmental Design (CPTED) principles; (d) Designing with Country and the principles and objectives of the draft Connecting with Country Framework; (e) the finalised version of the draft guideline 'Recognise Country – Draft Guidelines for development in the Aerotropolis'; (f) constraints associated with bushfire, flooding and airport safeguarding; (g) vegetation management that considers the principles of Guidelines for Vegetation Management Plans on Waterfront Land (NSW Office of Water, DPHI 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); (h) architectural design to soften the industrial aesthetic; (i) integrating heritage character of the site with treatment and finishes of the new design; and (j) inputs from relevant experts in architecture, landscape architecture, bushfire management, heritage, revegetation, ecology, wildlife hazard management and flooding. 	<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 UDL 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 UDL - Request for Additional Information, dated 30/10/24 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI - 86091980-PA-117)" - Conditions E63, E64 and E65 - Approval of revised Urban Design and Landscape Plan" dated 20/11/24 Badu Yarragul, Greenspace Masterplan, 28 Badu Muru Grove, Kems Creek, DRAFT, Rev 1, SWC dated 29/8/25 Upper South Creek, Badu Yarragul Water Recovery Facility, Wildlife Management Plan, JHG, Rev 4 dated 18/8/25 JHG/SWC Audit Interview 27/10/25 	<p>The UDL is comprehensive and addresses the requirements of this condition.</p> <p>DPHI approved the UDL 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 UDL addresses the requirements of this condition.</p> <p>The revised UDL including LMP and VMP was submitted to DPHI for approval on 4/10/24 and subsequently approved on 20/11/24.</p> <p>At the time of IA # 5, the greenspace masterplan was being drafted with a copy provided to the Auditor as evidence.</p>	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
E65 The UDLP must include descriptions and visualisations (as appropriate) of: <ul style="list-style-type: none"> (a) the design of the permanent built elements for the AWRC site including their form, materials and detail; (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; (c) the design of the project landform and landscaping elements; (d) the type and design of public and open space; (e) details of strategies to rehabilitate, regenerate or revegetate disturbed areas with local native species; and (f) management and routine maintenance standards and regimes for design elements and landscaping (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. 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.	<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 AWRC-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 20/9/23 • 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 - 86091980-PA-117) - Conditions E63, E64 and E65 - Approval of revised Urban Design and Landscape Plan" dated 20/11/24 • JHG/SWC Audit Interview 27/10/25 • Badu Yarragul, Greenspace Masterplan, 28 Badu Muru Grove, Kemps Creek, DRAFT, Rev 1, SWC dated 29/8/25 	On 29/9/23 DPHI approved the construction of structural concrete works prior to the UDLP submission as follows: <ul style="list-style-type: none"> - Oxidation ditches - MBR - inlet works - digestors 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. The revised UDLP including LMP and VMP was submitted to DPHI for approval on 4/10/24. 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 Conditions E61(a) and E65(a). 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 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. At the time of IA # 5, the greenspace masterplan was being drafted with a copy provided to the Auditor as evidence.	Compliant
E66 The ongoing maintenance and operation costs of urban design, open space, landscaping and recreational items and work implemented for the AWRC 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. The Planning Secretary must be advised of the date of transfer of the asset(s) to the relevant authority.	<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 AWRC-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 	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. At the time of IA # 5, the greenspace masterplan was being drafted with a copy provided to the Auditor as evidence.	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"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • Infrastructure Approval SSI-8609189, Appendix B • Upper South CoA19 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 • Landscape Construction Diary: Upper South Creek - Pipeline, B&K, dated 8/8/25 • Landscape Construction Diary: Upper South Creek - Pipeline, B&K, dated 25/6/25 	Evidence of plant watering observed during the Audit site inspection included the establishment of irrigation systems in the Vegetation Management Zone. 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 maintenance activities, including landscaping construction diaries and photographs of maintenance activities	Compliant
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 CSSI 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 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	As noted in previous audits, work activity planning includes the identification of inground services through a number of processes including Dial Before 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"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • 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 Letter2 dated 23/2/24 • AusDilaps - Geotagged Pre-Construction Survey OPT 6 Curtain Street, Cabramatta, 12/8/23 	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"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • 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 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 OPT-33835 USC AWRC Post-Construction Condition Survey, Sports Bar, 1 Bartley Street Canley Vale NSW 2166, 15/10/25 	Post-construction surveys undertaken during the previous (IA #4) 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. There were no surveys undertaken during this (IA#5) Audit period	Compliant
E71 Where damage has been determined to occur as a result of Stage 1 of the CSSI, 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"> • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 • Email from ERM to JBSG 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. This is consistent with observations made by the Auditor noting that all construction activities undertaken on the pipelines in the vicinity of properties has been completed.	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 • Progressive Erosion and Sediment Control Plan, Kemps Creek Sewerage Network, Water Resource Recovery Facility, ESED, dated 12/8/25 • JHG/SWC Audit Interview 27/10/25 	Erosion and Sediment Control Plans (ESCPs) have been prepared and implemented for work sites. An experienced 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 ESED controls observed during the audit were generally a high standard with a High Efficiency Sediment Basin installed at the AWRC site which , at the time of the site inspection was being converted to an operational basin. 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. The project CPESC continues to undertake regular inspections	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 11/7/25 • Soil Conservationist Site Inspection Report 26/3/25 • JHG/SWC Audit Interview 27/10/25 	A CPESC has been appointed and is consulted during preparation of the ESCPs. The CPESC undertakes routine inspections every 2-3 weeks to review compliance.	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): <ul style="list-style-type: none"> (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 • JHG/SWC Audit Interview 27/10/25 • Site Inspection 27/10/25 	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

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
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 JBSG 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 JBSG 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 JBSG 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 JBSG 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 Letter from JBS&G to SWC titled "L12 Interim Audit Advice (0503-2307-12) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Pipelines" 5/9/25 DPHI Post Approval Form - 20230901061601 DPHI Post Approval Form - 20230901061601 JHG/SWC Audit Interview 27/10/25 	<p>At the time of this Audit (IA#5), a total of 12 Interim Advice letters have been issued by the EPA Accredited Site Auditor to date.</p> <p>Interim Advice letters state the following documents were reviewed:</p> <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. DSI for pipelines <p>Post Approval forms were provided as evidence and confirm submission of the Interim Advice letters to the Department as required.</p> <p>During the Audit period, IA 12 was issued for the review of detailed site investigations, pipelines.</p>	Compliant
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" dated 17/3/23 	<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: <ul style="list-style-type: none"> (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 (b) be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (CLM Act). 	<ul style="list-style-type: none"> Sampling and Analysis Quality Plan: Upper South Creek Advanced Water Recycling Centre ERM, 6/2/23 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 JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	<p>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.</p>	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: <ul style="list-style-type: none"> (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 (b) be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the CLM Act; and (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. 	<ul style="list-style-type: none"> Letter from JBS&G to SWC titled "L00 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 Spill Characterisation Report, ERM 19/12/23 USC AWRC Pipeline Spill Characterisation Report, ERM 8/4/24 Comments Register, 0677 Pipelines DS1 Aud Comms_24.7.25 Detailed Site Investigators - Pipelines, Upper South Creek Advanced Water Recycling Centre,Final Draft Rev 1 ERM dated 26/6/25 Detailed Site Investigators - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Rev 2, ERM dated 24/7 25 Letter from JBS&G to SWC titled "L12 Interim Audit Advice (0503-2307-12) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Pipelines" 5/9/25 JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	<p>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.</p> <p>JHG maintain a register of DSIs so they can be tracked and updated.</p> <p>During the Audit period the DSIs for the pipelines was completed. The DSIs were reviewed by the EPA accredited auditor and an interim advice issued on 5/9/25. Section 5 of the interim audit advice notes the following:</p> <p><i>"Based on a review of the information provided and subject to the limitations in Attachment 1, the following audit opinions are presented:</i></p> <ul style="list-style-type: none"> <i>• The auditor notes that the DSIs (ERM 2025) is appropriate for the purposes of assessing the nature and extent of contamination, and to identify what, if any, remediation/management is required for the proposed land uses.</i> <i>• The auditor is of the opinion that the site can be made suitable for the proposed land uses if the Pipelines RAP (ERM 2024) previously assessed by the auditor (L11, Table 1) is implemented successfully"</i> 	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. The Detailed Site Investigation Report must be prepared in accordance with: (a) the land use criteria applicable to the final land use at the opening of Stage 1 of the CSI. 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 (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). 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. Notes: 1. Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports for separate contaminated sites. 2. 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.	<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 Comments Register, 0677 Pipelines DS1 Aud Comms_24.7.25 Detailed Site Investigators - Pipelines, Upper South Creek Advanced Water Recycling Centre,Final Draft Rev 1 ERM dated 26/6/25 Detailed Site Investigators - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Rev 2, ERM dated 24/7 25 Letter from JBS&G to SWC titled "L12 Interim Audit Advice (0503-2307-12) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Pipelines" 5/9/25 	<p>The DSIs for the AWRC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09. During the Audit period the DSIs for the pipelines was completed. The DSIs were reviewed by the EPA accredited auditor and an interim advice issued on 5/9/25. Section 5 of the interim audit advice notes the following:</p> <ul style="list-style-type: none"> <i>• The auditor notes that the DSIs (ERM, 2025) complies with the requirement that it be prepared/reviewed by a Certified Contaminated Land Consultant under consent condition E78. The report has been reviewed by Mr Peter Lavelle of ERM, certified under Environment Institute of Australia and New Zealand's (EIANZ) Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)).</i> <i>• The auditor considers that the DSIs (ERM 2025) is appropriate for the purposes of assessing the nature and extent of contamination, and to identify what, if any, remediation/management is required for the proposed land uses.</i> <i>• The auditor is of the opinion that the site can be made suitable for the proposed land uses if the Pipelines RAP (ERM 2024) previously assessed by the auditor (L11, Table 1) is implemented successfully"</i> 	Compliant
E80 The Detailed Site Investigation Report must provide details on: (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; (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; (c) contaminant characterisation and behaviour (volatility, leachability, speciation, degradation products and physical and chemical conditions on-site which may affect how contaminants behave); (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 groundwater, or risks to concrete from acid sulphate soils) and the environment; (e) potential and actual contaminant migration routes including potential preferential pathways; (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; (g) the review and update of the conceptual site model from the preliminary and detailed site investigations; (h) nature and extent of any existing remediation (such as impervious surface capping); and (i) whether the land is suitable (for the intended final land use) or can be made suitable through remediation.	<ul style="list-style-type: none"> Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 JHG/SWC Audit Interview 27/10/25 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 	<p>The DSIs for the AWRC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09. During the Audit period the DSIs for the pipelines was completed. The DSIs were reviewed by the EPA accredited auditor and an interim advice issued on 5/9/25. Section 5 of the interim audit advice notes the following:</p> <ul style="list-style-type: none"> <i>• The auditor notes that the DSIs (ERM, 2025) complies with the requirement that it be prepared/reviewed by a Certified Contaminated Land Consultant under consent condition E78. The report has been reviewed by Mr Peter Lavelle of ERM, certified under Environment Institute of Australia and New Zealand's (EIANZ) Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)).</i> <i>• The auditor considers that the DSIs (ERM 2025) is appropriate for the purposes of assessing the nature and extent of contamination, and to identify what, if any, remediation/management is required for the proposed land uses.</i> <i>• The auditor is of the opinion that the site can be made suitable for the proposed land uses if the Pipelines RAP (ERM 2024) previously assessed by the auditor (L11, Table 1) is implemented successfully"</i> 	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
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.	<ul style="list-style-type: none"> Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16/8/23 JHG/SWC Audit Interview 27/10/25 Letter from JBS&G to SWC RE-109 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 <p>Notes: 1. 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. 2. This condition does not prevent disturbance required to complete the Detailed Site Investigation(s). 3. 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(j).</p>	<p>The DS1 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 DS1 for the pipelines component of the project.</p> <p>During the Audit period the DS1 for the pipelines was completed. The DS1 was reviewed by the EPA accredited auditor and an interim advice issued on 5/9/25. Section 5 of the interim audit advice notes the following:</p> <ul style="list-style-type: none"> The auditor notes that the DS1 (ERM, 2025) complies with the requirement that it be prepared/reviewed by a Certified Contaminated Land Consultant under consent condition E78. The report has been reviewed by Mr Peter Lavelle of ERM, certified under Environment Institute of Australia and New Zealand's (EIANZ) Certified Environmental Practitioner (Site Contamination) scheme (CEnvPSC). The auditor considers that the DS1 (ERM 2025) is appropriate for the purposes of assessing the nature and extent of contamination, and to identify what, if any, remediation/management is required for the proposed land uses. The auditor is of the opinion that the site can be made suitable for the proposed land uses if the Pipelines RAP (ERM 2024) previously assessed by the auditor (L11, Table 1) is implemented successfully" 	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 Comments Register, 0677 Pipelines DS1 Aud Comms_24.7.25 Detailed Site Investigators - Pipelines, Upper South Creek Advanced Water Recycling Centre,Final Draft Rev 1 ERM dated 26/6/25 Detailed Site Investigators - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Rev 2, ERM dated 24/7/25 Letter from JBS&G to SWC titled "L12 Interim Audit Advice (0503-2307-12) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Pipelines" 5/9/25 JHG/SWC Audit Interview 27/10/25 	<p>As noted in previous Audits, the DS1 for the AWRC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09. During this Audit, the DS1 for the pipelines has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L12.</p> <p>Section 10 of the Pipelines DS1 notes the following:</p> <p>"A summary of investigation results was discussed with the NSW EPA site Auditor prior to construction and during preparation of the Pipelines RAP, confirming that no contamination issues had been identified within the AEC's which would require adjustments to the agreed management/remediation methodology established within the pipelines RAP. Recommendations made by the NSW EPA accredited Site Auditor were implemented via the pipelines RAP before commencement of work that could result in any disturbance of land confirmed as moderate to high risk area of potential concern in accordance with Condition E81.</p> <p>No recommendations for changes to management measures in the Construction Environmental Management Plan (CEMP) Subplans have been made within this DS1 report, therefore ERM considers E82 does not apply"</p>	Compliant
E83 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 (CEnvPSC) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.	<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 	<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 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.	<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 JHG/SWC Audit Interview 27/10/25 	<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>Duriung 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>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 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 CSI.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Email from JBS&G to JHG titled "CSI 8609189 Upper South Creek AWRC - Site Validation Report (Pipelines) - Site Auditor Comments" dated 6/11/25 Validation Report - Pipelines, Upper South Creek Advanced Water Recycling Centre, Rev 01, ERM dated 3/10/25 Pipelines SVR_SWC comment register.xlsx 	<p>At the time of IA # 5 the validation report for pipelines was prepared and had been reviewed by SWC. Initial review of the draft report has been undertaken by the EPA Site Auditor, who has accepted the discussions and conclusions presented in the report. At this stage the site audit statement hasn't been prepared and as noted by this condition is required to be submitted to the Planning Secretary and relevant councils within one month of the commencement of operation.</p>	Not triggered
E86 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Email from JBS&G to JHG titled "CSI 8609189 Upper South Creek AWRC - Site Validation Report (Pipelines) - Site Auditor Comments" dated 6/11/25 Validation Report - Pipelines, Upper South Creek Advanced Water Recycling Centre, Rev 01, ERM dated 3/10/25 Pipelines SVR_SWC comment register.xlsx 	<p>The Audit statement is not required until the completion of construction.</p>	Not triggered

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
E87 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.	<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 12/5/23 JHG/SWC Audit Interview 27/10/25 Detailed Site Investigators - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Rev 2, ERM dated 24/7/25 Letter from JBS&G to SWC titled "L12 Interim Audit Advice (0503-2307-12) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Pipelines" 5/9/25 	<p>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.</p> <p>As noted in condition E82, the DS1 for the pipelines has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L12.</p> <p>Secton 10 of the Pipelines DS1 notes the following:</p> <p><i>"A summary of investigation results was discussed with the NSW EPA site Auditor prior to construction and during preparation of the Pipelines RAP, confirming that no contamination issues had been identified within the AEC's which would require adjustments to the agreed management/remediation methodology established within the pipelines RAP. Recommendations made by the NSW EPA accredited Site Auditor were implemented via the pipelines RAP before commencement of work that could result in any disturbance of land confirmed as moderate to high risk area of potential concern in accordance with Condition E81.</i></p> <p><i>No recommendations for changes to to management measures in the Construction Environmental Management Plan (CEMP) Subplans have been made within this DS1 report, therefore ERM considers E82 does not apply"</i></p>	Compliant
E88 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.	<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 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 previous audit periods, several unexpected asbestos finds were encountered. Adequate evidence was provided to demonstrate the implementation of the Unexpected Finds Procedure.</p>	Compliant
E89 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.	<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 at 1/11/24 E89 and 91 Sustainability Dashboard (April 2025) E89 and 91 Sustainability Dashboard (January 2025) Upper South Creek Project, Monthly Report - September 2025 JHG/SWC Audit Interview 27/10/25 	<p>The sustainability strategy commits to a "Gold" Rating". Examples of sustainability initiatives include a recycled pipe bedding sand alternative, utilising blended glass sand and the replacement of recycled gypsum in the place of gypsum.</p> <p>In the IA #4, Audit, 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. As of IAR5, Design round #1 has now been resubmitted to ISC and their independent verifiers. The current score is around 89 points. Progress on achieving the sustainability targets is reported monthly.</p>	Compliant
E90 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 	<p>Not required to be undertaken prior to the completion of the project and the attainment of the final rating.</p>	Not triggered
E91 The Sustainability Strategy must be implemented throughout design, construction and operation, and be submitted to the Planning Secretary for information.	<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 JHG/SWC Audit Interview 27/10/25 	<p>The sustainability strategy commits to a "Gold" Rating". Examples of sustainability initiatives include a recycled pipe bedding sand alternative, utilising blended glass sand and the replacement of recycled gypsum in the place of gypsum.</p> <p>In the IA #4, Audit, 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. As of IAR5, Design round #1 has now been resubmitted to ISC and their independent verifiers. The current score is around 89 points. Progress on achieving the sustainability targets is reported monthly with the September 2025 report provided to the Auditor as evidence.</p>	Compliant
E92 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: <ul style="list-style-type: none"> (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). 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. Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail before the commencement of construction. 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. Note: <i>Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational phases of the CSSI.</i>	<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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	<p>At the time of the Audit (IA # 5), all works on the pipelines had completed. There were no property access issues identified by the Audit.</p>	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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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 	<p>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. There were no properties affected during the IA#5 Audit period, noting that all pipeline activities are now complete.</p>	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 JHG/SWC Audit Interview 27/10/25 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 	<p>There have been no incidents or non-compliances related to local road use reported during the audit period.</p> <p>DPHI approved the use of local roads on 24/11/23.</p> <p>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).</p>	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
E96 All requests to the Planning Secretary under Condition E95 must include the following: (a) a sweep 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.	<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 B" dated 13/11/24 DPHI Post Approval Form 5051030 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. During the Audit period, a minor amendment to the Local Road Approval for Edith was endorsed by the ER on 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 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. Note: Refer to Condition A47 in relation to vehicle identification.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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. 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. There have been no known requests from EPA or DPHI for monitoring data or information. All spoil haulage activities have now been completed and monitoring activities have ceased.</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 - AUDILAPS 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 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): (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).	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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 	<p>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. No damage has occurred to local roads during this Audit period.</p>	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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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
E101 Vehicles (including light and heavy vehicles) associated with Stage 1 of the CSSI must be managed to: (a) minimise parking on public roads; (b) minimise idling and queuing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive land user(s); (d) not block or disrupt access across pedestrian or shared user paths at any time; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the Traffic and Transport Management CEMP Sub-plan.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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 AWRC 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 now been completed.</p>	Compliant
E102 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: (a) achieving the requirements of Condition E101; (b) confirmation and timing of the removal of on- and off-street parking associated with construction of Stage 1 of the CSSI; (c) parking surveys of all parking spaces to be removed or occupied by the CSSI workforce in the vicinity of the tunnelling compounds at Cabaralee 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; (d) consultation with affected stakeholders utilising existing on- and off-street parking stock which will be impacted as a result of construction; (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; (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; (g) mechanisms for monitoring, over appropriate intervals, to determine the effectiveness of implemented mitigation measures; (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; (i) provision of contingency measures should the results of mitigation or monitoring indicate implemented measures are ineffective; and (j) provision of reporting or monitoring results to the Planning Secretary and relevant council(s) at three monthly intervals. 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.	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines Traffic & Transport CEMP Sub-plan Revision B, dated 23/11/24 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. The CPAS was approved on 24/11/23. The overarching TTCSF has been updated to incorporate the CPAS. The Local Roads Approval (LRA) and CPAS were included in the TTCSF.</p>	Compliant
E103 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	No new or permanently modified local road, parking, permanent infrastructure etc. observed.	Not triggered

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
E105 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. 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). 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	No new or permanently modified local road, parking, permanent infrastructure etc. observed.	Not triggered
E106 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 AWRC 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 TNSW. The Plan must be prepared to address the following: (a) an updated analysis, including modelling of traffic impacts to the adjoining road network, as a consequence of Stage 1 of the CSSI; (b) an assessment of the performance of the road network, inclusive of the Clifton Avenue / Elizabeth Drive intersection; and (c) mitigation measures to manage any predicted traffic performance impacts. If a Road Network Performance Plan is triggered under this condition, it must be submitted to the Planning Secretary, relevant council(s) and TNSW 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-158)" dated 27/6/25. Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Condition E106 - Operational traffic movements" 22/7/25 Memo from JHG to SEC titled "CSSI-8609189 USC AWRC memo re condition of approval E106 - operational traffic movements" dated 27/6/25 	<p>JHG have undertaken an assessment of the operational traffic impacts of the AWRC againsts the predictions made in the EIS. The assessment concludes "the operation of the AWRC is not expected to result in any increase in operational traffic movements identified in the EIS and therefore a Road Network Performance Plan, as stated in CoA E106 is not required.</p> <p>The memo has been issued to DPHI who have acknowledged receipt and noted they do not have any comments on the document at this time.</p>	Compliant
E107 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: (a) The functions of the Utility Coordination Manager as required by Condition E109; (b) A description of all utility Work to be undertaken; and (c) Management measures to be implemented to manage dust, noise, traffic, access, lighting and other relevant impacts associated with utility Work. The Utilities Management Strategy must be submitted to the Planning Secretary for information at least one month before the commencement of utility Work.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Rev A, dated 22/08/2023 	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.	Compliant
E108 Nothing in this approval permits the carrying out of any utility Work not required for the purpose of the Stage 1 of the CSSI.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	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.	Not triggered
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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 AWRC Waste Tracking Register Waste and Recycling Summary - Upper South Creek Advanced Water Recycling Centre (AWRC) and Pipelines dated 16/6/25 Waste and Recycling Summary - Upper South Creek Advanced Water Recycling Centre (AWRC) and Pipelines dated 8/7/25 Waste and Recycling Summary - Upper South Creek Advanced Water Recycling Centre (AWRC) and Pipelines dated 11/7/25 Waste and Recycling Summary - Upper South Creek Advanced Water Recycling Centre (AWRC) and Pipelines dated 4/9/25 	<p>Appropriate waste and recycling bins have been provided on site.</p> <p>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 EPI 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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Power BI Waste Dashboard - October 2025 Waste and Recycling Summary - Upper South Creek Advanced Water Recycling Centre (AWRC) and Pipelines dated 16/6/25 Glascoft Compost - Importation Records (Various) Import Material Register as of 22/10/25 Email from ERM to JHG titled "Imported Material Review - WTP Tunnelling Spoil" dated 8/7/25 Email from ERM to JHG titled "SS002 - Compost Rev 1, Imported Materials Review" dated 28/7/25 Email from ERM to JHG titled "I0705242 - John Holland Kemps Creek" dated 13/5/25 Terra WTP Spoil - 0032 - WTP Tunnelling Spoil Quality Plan Summary, Standard Operating Procedures, for the processing of garden organics vegetation to finished composts and mulches, ANL dated 11/3/24 Certificate of Registration - ISO 14001:2015, Australian Native Landscapes Pty Ltd, SAI Global dated 6/9/24 Certificate of Registration - ISO 45001:201, Australian Native Landscapes Pty Ltd, SAI Global dated 6/9/24 Standards Mark License, Australian Native Landscapes, Pty Ltd, SAI Global dated 7/6/25 Environmental Analysis Report, Soil Certificate of Analysis E25-00-5327 Letter from ANL to Glascoft Landscape and Civil titled "Supply of Greenlife Mulch and Compost to the Advanced Water Recycling Project - Kemps Creek" dated 18/6/25 Letter from NSW EPA to ANL titled "Advisory Letter - Australian Native Landscapes Pty Ltd" dated 13/6/25 	<p>There is no waste imported to the site, materials imported include tunnel spoil from the Western Tunnelling Project at Rosehill (Virgin Excavated Natural Material) and composting materials for landscaping provided by Australian Native Landscapes.</p> <p>JHG's contamination consultant (ERM) provide technical oversight of importation processes and have approved the importation of these materials. Independent Certificates and operating procedures were provided for ANL. Test results for organic garden mix were negative and compliant with soil criteria for commercial/industrial use as noted by ERM in their email dated 13/5/25. ANL are also subject to inspections and corrective actions from the EPA and have been independently certified as ISO14001 and ISO45001 compliant. ANL provided written certification to the landscaping contractor that the "Mulch and Compost complies with the NSW EPA Resource Recovery Order - the Pasteurised Garden organics order 2016"</p>	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
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 Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 AWRC Waste Tracking Register USC AWRC Pipeline Spill Characterisation Report, ERM 19/12/23 USC AWRC Pipeline Spill 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 docket 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 8 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 Letter from ERM to JHG titled "Waste Classification Report - Asbestos Stockpile AW Upper South Creek, AWRC Site, Kemps Creek NSW" dated 7/8/25 	<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> <p>During the Audit period, a waste classification report was prepared for the Asbestos stockpile by ERM</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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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 IA4, 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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 EWMS Working in Waterways, Treated Water Pipeline and Brine Pipeline Alignment,_signed Progressive Erosion and Sediment Control Plan (PESC), Nepean River Works - Construction of piling pad and creek stabilisation, dated 28/4/24 	<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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 EWMS Working in Waterways, Treated Water Pipeline and Brine Pipeline Alignment,_signed Progressive Erosion and Sediment Control Plan (PESC), Nepean River Works - Construction of piling pad and creek stabilisation, dated 28/4/24 PESC South Creek Diversion RevD, approved 30/6/24 CoA9 Consultation Summary Report Works in South Creek Rev01, dated 14/6/24 Email from CPESC RE: South Creek diversion PESC - 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 erosion 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
E117 Rehabilitation and revegetation of the riparian corridor and banks of watercourses impacted by Stage 1 of the CSI 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"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	<p>At the time of this IA5, all works within creeks have been completed and rehabilitated completed. Refer Auditors response to E116 for further details.</p> <p>Observation</p> <p>As observed during the Audit site inspection, rehabilitation works at South Creek have been completed however some of the plantings and their protective structures have been displaced. It was noted during the site inspection that this was due to farm animals and that the team were working through this issue with the farm owner. Replacement trees have been periodically installed.</p> <p>Recommendation</p> <p>It is noted that this is an issue that will require ongoing management to ensure long term rehabilitation outcomes are achieved. In addition to the ongoing management actions planned by JHG, it is recommended redundant structures are removed to avoid them from being washed into South Creek</p>	Compliant
E118 The Proponent must ensure sufficient water entitlement is held in a Water Access Licence(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 JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	<p>A Water Access Licence (WAL) has been obtained. Underboaring activities that may have resulted in impacts to groundwater are now complete.</p>	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: <ul style="list-style-type: none"> (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 GEMP 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, Rev 2 dated 15/9/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI - 8609189-PA-164) dated 4/8/25 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189)- Request for Information - Operational Water Quality Monitoring Program and Monitoring Program to assess wet weather infiltration into the new sewer network" dated 29/9/25 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189)- Conditions E119 and E1120" dated 29/9/25 JHG/SWC Audit Interview 27/10/25 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 	<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>On 29/8/25, DPHI wrote to SWC requesting additional information. SWC provided a response on 15/9/25 with a copy of the revised WQMP. On 22/9/25, DPHI wrote to SWC acknowledging SWCs receipt of the revised WQMP and response to the Departments request for further information. The Department noted they have no further comments.</p> <p>Auditor Note: The compliant findings relate 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 CSI, and submitted to the Planning Secretary for information at least one year prior to the commencement of operation of Stage 1 of the CSI.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 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 	<p>During the Audit period, Condition E120 was modified by MOD 3 to remove the requirement for the WQMP to be approved by EPA. A note in condition E119, the WQMP has been submitted to EPA for review and submitted to DPHI for information.</p>	Compliant

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
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"> JHG/SWC Audit Interview 27/10/25 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 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-165) Conditions E121 and E122 Wet Weather Infiltration Monitoring Program" dated 22/9/25 	<p>SWC has prepared a wet weather infiltration monitoring program (WWIMP) 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>During the Audit period the WWIMP was issued to DPHI On the 5/9/25. On 29/8/25, DPHI wrote to SWC noting requesting further information. On 29/8/25, DPHI wrote to SWC requesting additional information. SWC provided a response on 15/9/25 with a copy of the revised WQMP. On 22/9/25, DPHI wrote to SWC acknowledging SWC's receipt of the revised WQMP and response to the Departments request for further information. The Department noted they have no further comments.</p> <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 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 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"> JHG/SWC Audit Interview 27/10/25 	<p>During the Audit period, Condition E122 was modified by MOD 3 to remove the requirement for the wet weather infiltration monitoring program to be approved by EPA.</p>	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"> JHG/SWC Audit Interview 27/10/25 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 IAS.</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 JHG/SWC Audit Interview 27/10/25 	<p>A Water Pollution Impact Assessment (WPJA) 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"> JHG/SWC Audit Interview 27/10/25 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
E126 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: (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; (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 (c) set out a clear time frame for the implementation of mitigation measures. 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 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 All new or modified drainage systems associated with Stage 1 of the CSSI must be designed to: (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); (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 (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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	<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 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	Operational requirement.	Not triggered

Ref: Condition	Evidence	Auditor Conclusion	Audit Finding
E129 The Proponent must consider the provisions of the <i>Airports (Protection of Airspace) Regulation 1996</i> for any intrusions into prescribed airspace, including: (a) constructing permanent structures, such as buildings, into the protected airspace; (b) temporary structures such as cranes protruding into the protected airspace; or (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. 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> .	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 Aviation Risk Assessment, Upper South Creek Advanced Water Recycling Centre, GHD/Jacobs dated 28/1/25 	An aviation risk assessment has been undertaken 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: <ul style="list-style-type: none"> Wildlife Strikes Distractions to pilots Intrusions into the protected airspace of Airports. 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.	Compliant
E130 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: (a) wildlife monitoring surveys and regular wildlife hazard assessments; (b) wildlife awareness and management training for operational staff; (c) implementation of activities to reduce hazardous bird populations; (d) adoption of wildlife deterrent technologies to reduce hazardous bird populations; (e) performance indicators to evaluate implementation and compliance; (f) a review process to regularly assess implementation against performance indicators, identify gaps, and ensure currency; and (g) roles and responsibilities for plan implementation and review. 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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre Wildlife Management Plan - Response from DPI Agriculture" dated 20/20/25 Letter from DPHI to SWC titled "Badu Yarragul Water Resource Recovery Facility - Wildlife Management Plan (WMP)" dated 20/10/25 Upper South Creek, Badu Yarragul Water Recovery Facility, Wildlife Management Plan, JHG, Rev 4 dated 18/8/25 Site Inspection 27/10/25 	Although this is an operational requirement, it was noted that the preparation of the Wildlife Management Plan (WMP) has commenced and is still under development with review comments being closed out.	Not triggered
E131 Condition Deleted		Condition Deleted by MOD 1	N/A
E132 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: (a) baseline and post-commissioning monitoring of representative attributes that: (i) contribute to the Outstanding Universal Value (OUV) of the Greater Blue Mountains Area; and (ii) are identified in the documents listed in Condition A1 as potentially impacted during Stage 1 of the CSSI; (b) relevant water quality monitoring data; and (c) photos at each monitoring point.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	No impacts to World Heritage Areas at the time of the audit.	Not triggered
E133 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: (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; (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; (c) effectiveness of mitigation measures implemented, and any necessary additional mitigation measures; and (d) any corrective actions that may be required and/or have been employed. The World Heritage monitoring report must be provided to EHG for information within one month of completion of each annual report.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	Operational requirement.	Not triggered
E134 No work within Blue Mountains National Park (part of the Greater Blue Mountains Area) is to occur as part of Stage 1 of the CSSI (such as for investigations, monitoring or temporary construction compounds), unless authorisation is granted by the NSW National Parks and Wildlife Service under the <i>National Parks and Wildlife Act 1974</i> (NPW Act) or the <i>National Parks and Wildlife Regulation 2019</i> .	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 	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
E135 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. (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: (i) include a final site layout including dangerous goods storage locations; (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: - flammable dangerous goods (Class 3); and - corrosive liquids (Class 8). The verification should be focused on key elements such as separation distances described in the relevant standard and critical controls. (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.	<ul style="list-style-type: none"> Memo from JHG to SWC titled "CSS18609189 - 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 JHG/SWC Audit Interview 27/10/25 Site Inspection 27/10/25 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 	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. 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. Section 1.2 of the Final Hazard Analysis confirms the Scope of the FHA includes: <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 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	Compliant

Refer: Condition	Evidence	Auditor Conclusion	Audit Finding
<p>E136 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'.</p> <p>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"> • JHG/SWC Audit Interview 27/10/25 • 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
<p>E137 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"> • JHG/SWC Audit Interview 27/10/25 	<p>Operational requirement.</p>	Not triggered

Appendix C Stakeholder Consultation Records

richard.peterson-trigalana@outlook.com

From: Katie Purdy <katherine.purdy@dpie.nsw.gov.au>
Sent: Tuesday, 7 October 2025 11:33 AM
To: richard.peterson-trigalana@outlook.com
Subject: SSI 8609189 - Upper South Creek Advanced Water Recycling Centre - Independent Environmental Audit #5 - Consultation

Dear Richard,

Thank you for your email regarding consultation for the fifth Environmental Audit for the Upper South Creek Advanced Water Recycling Centre.

NSW Planning Compliance would like the following to be considered in more detail as part of the upcoming audit:

- Storage of dangerous goods
- Erosion and sediment controls and onsite water management

Please consult with the stakeholders mentioned in your previous email as part of the audit.

Please also include this email and any responses received from other stakeholders as evidence of consultation in the final audit report.

Kind regards,
Katie.

Katie Purdy

Senior Compliance Officer – Government Projects
Development Assessment & Sustainability
Department of Planning, Housing and Infrastructure

P (02) 9585 6093 | **E** katherine.purdy@dpie.nsw.gov.au
4 PSQ, 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.

richard.peterson-trigalana@outlook.com

From: Neil Ramsay <RamsayN@liverpool.nsw.gov.au>
Sent: Monday, 13 October 2025 1:28 PM
To: Richard Peterson
Subject: RE: 5th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

Dear Richard,

Thank you for your email correspondence dated 10th October 2025 regarding the fifth 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, I recommend that you also 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 environmental performance of the development must be assessed with consideration for the Environmental Impact Statement to verify 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-A46); community communication strategy and complaints management system (Condition B1-B11).

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) and related key issue conditions listed in Part E of the Approval.

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

Your help in relation to this matter is greatly appreciated. Have a nice day.

Regards,

Neil Ramsay
Senior Environmental Health Officer

LIVERPOOL
CITY
COUNCIL 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.

This email (including any attachments) may contain confidential and/or legally privileged information. If you are not the intended recipient please delete this email and notify us prohibited.

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

Sent: Friday, 10 October 2025 7:50 AM

To: Richard Peterson <richard.peterson-trigalana@outlook.com>; mail@fairfieldcity.nsw.gov.au; LCC <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>

Subject: 5th 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 fifth independent environmental 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 26th of October 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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SSI 8609189 - Upper South Creek Advanced Water Recycling Centre - Independent Environmental Audit # 5 - Consultation

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

Date Fri 3/10/2025 11:51 AM

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

To whom it may concern,

The fifth (fourth ongoing) Environmental Audit is planned to commence on the 27th of October 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 20th of October 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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richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Friday, 10 October 2025 7:50 AM
To: Richard Peterson; mail@fairfieldcity.nsw.gov.au; lcc@liverpool.nsw.gov.au; Canterbury Bankstown Council; Penrith City Council - RECORDS; Wollondilly Shire Council
Subject: 5th 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 fifth independent environmental audit

Details of the project can be found here [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning Housing and Infrastructure \(nsw.gov.au\)](https://www.planning.nsw.gov.au/upper-south-creek-advanced-water-recycling-centre)

The audit will be undertaken in accordance with the [Independent Audit – Post Approval Requirements – Requirement 2 – May 2020 \(nsw.gov.au\)](https://www.planning.nsw.gov.au/audit-independent-audit-post-approval-requirements-requirement-2-may-2020)

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 26th of October 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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richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Friday, 10 October 2025 7:56 AM
To: info@epa.nsw.gov.au
Subject: 5th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

Hi EPA,

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

I have now been appointed to undertake the fifth independent environmental audit

Details of the project can be found here [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning Housing and Infrastructure \(nsw.gov.au\)](https://www.planning.nsw.gov.au/upper-south-creek-advanced-water-recycling-centre)

The audit will be undertaken in accordance with the [Independent Audit – Post Approval Requirements – Requirement 2 – May 2020 \(nsw.gov.au\)](https://www.planning.nsw.gov.au/audit-independent-audit-post-approval-requirements-requirement-2-may-2020)

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 26th of October 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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richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Friday, 10 October 2025 8:04 AM
To: OEH HD Heritage Mailbox
Subject: 5th 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 fifth independent environmental audit

Details of the project can be found here [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning Housing and Infrastructure \(nsw.gov.au\)](https://www.planning.nsw.gov.au/upper-south-creek-advanced-water-recycling-centre)

The audit will be undertaken in accordance with the [Independent Audit – Post Approval Requirements – Requirement 2 – May 2020 \(nsw.gov.au\)](https://www.planning.nsw.gov.au/audit-independent-audit-post-approval-requirements-requirement-2-may-2020)

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

In this regard, a response by 26th of October 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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richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Friday, 10 October 2025 8:14 AM
To: Daniel Saunders
Cc: 'Suzette Graham'
Subject: 5th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

Hi Dan

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

I have now been appointed to undertake the fifth independent environmental audit

Details of the project can be found here [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning Housing and Infrastructure \(nsw.gov.au\)](https://www.planning.nsw.gov.au/upper-south-creek-advanced-water-recycling-centre)

The audit will be undertaken in accordance with the [Independent Audit – Post Approval Requirements – Requirement 2 – May 2020 \(nsw.gov.au\)](https://www.planning.nsw.gov.au/audit-independent-audit-post-approval-requirements-requirement-2-may-2020)

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

In this regard, a response by 26th of October 2025 would be greatly appreciated.

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

Many thanks

Appendix D Site Photographs

Advanced Water Recycling Centre (AWRC) Main Construction Site



Photo 1: Digesters



Photo 2: General Construction



Photo 3: Digesters and Landscape Watering System



Photo 4: Active Stockpile



Photo 5: Perimeter Buffer Zone



Photo 6: Internal road construction and landscaping



Photo 7: Internal road construction and landscaping



Photo 8: Administration Building



Photo 9: Landscaped and Stabilised Batter



Photo 10: Construction and water management



Photo 11: Permanent Road Construction

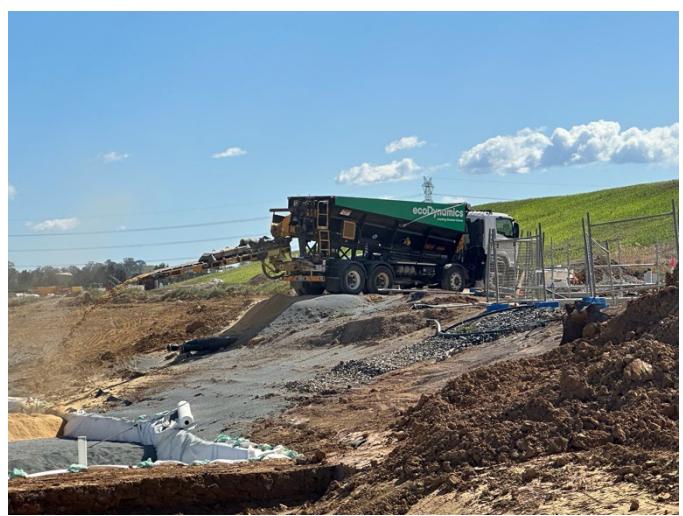


Photo 12: Sand Placement Activities



Photo 13: Sediment Basin



Photo 14: Operational Basin Conversion



Photo 15: Bunded Generator



Photo 16: Bunded Chemicals



Photo 17: Chemical Storage



Photo 18: Scrap Metal Recycling Bin



Photo 19: Solar farm rehabilitation watering



Photo 20: Treated weeds



Photo 21: Speed restriction Signage



Photo 22: Site signage

AWRC Site – Vegetation Management Plan Zone (VMPZ)



Photo 23: Permanent Rock scour protection



Photo 24: Permanent Vegetation Watering



Photo 25: Retained Habitat Feature



Photo 26: Retained Habitat Feature



Photo 27: Landscape watering system



Photo 28: Creek rehabilitation

RMB 12 Site



Photo 29: Access road and landscape plantings



Photo 30: Creek crossing – scour protection



Photo 31: Plant protection systems



Photo 32: Permanent landscaping works and rehabilitation

South Creek Restoration Works



Photo 33: South creek rehabilitation works



Photo 34: South creek rock 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	10 January 2026

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

