



Independent DPHI Compliance Audit

SSI-8609189 – Upper South Creek Water Recycling Centre

Trigalana Environmental Pty Ltd
4 June 2026

Independent Environmental Audit 6

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

**Trigalana Environmental Pty Ltd
Audit Date: 9 April 2026**

Independent Environmental Audit Report 6

SSI-8609189 – Upper South Creek Advanced Water Recycling Centre

Prepared By:

Richard Peterson

Trigalana Environment Pty Ltd

ABN: 67 638 805 848

Version Control

Revision	Date	Comment
A	27 May 2026	Draft for SWC Review
0	4 June 2026	Final

Table of Contents

Executive Summary	3
IAPAR Compliance Table	5
1 Introduction	7
1.1 Project overview	7
1.2 Project Approval	7
1.3 Supplementary Approvals and Licences.....	8
1.4 Construction Activities	8
1.5 Audit Team.....	10
1.6 Audit Objectives	10
1.7 Audit Scope and Period.....	10
2 Audit Methodology	11
2.1 Scope Development.....	11
2.2 Stakeholder Consultation – Key Issues	11
2.3 Summary of Audit Processes	11
2.4 Opening and Closing Meetings.....	11
2.5 Site Inspection.....	11
2.6 Document Review	12
2.7 Compliance Descriptors	12
3 Audit Findings	14
3.1 Compliance Performance	14
3.2 Summary of Agency Notices, Orders, Penalty Notices and Prosecutions.....	17
3.3 Community Complaints	17
3.4 Environmental Events.....	17
3.5 Actions from previous audits.....	17
3.6 Adequacy of Environmental Management Plans	20
3.7 Stakeholder Consultation Outcomes	20
3.8 Assessment of Compliance with Predictions in the Environmental Impact Statement (Key Environmental Risks).....	22
3.9 Assessment of Compliance with Predictions in the Environmental Impact Statement (Project Boundary)	25
3.10 Key Strengths.....	25
Appendix A DPHI Auditor Approval	35
Appendix B Independent Audit Table	36
Appendix C Stakeholder Consultation Records	59
Appendix D Site Photographs	69
Appendix E Auditor Declaration	74

Executive Summary

Trigalana Environmental Pty Ltd has been engaged by Sydney Water Corporation (SWC) (the Proponent) to undertake the 6th 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 6th IEA (IEA6) and covers the period from the site inspection for the 5th IEA on 27 October 2026 to the date of the site inspection for this 6th IEA on 9th of April 2026. 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 completion activities at the AWRC site (such as landscaping and finishing works). 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 well advanced 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
- One complaint has been received during the Audit period. Appropriate actions have been taken in response to the complaint

- Three recommendations are made by this audit, in relation to the rehabilitation of RBM 12 lands, project signage and the management of risks associated with the transition from construction to the operational phase
- 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 5th IEA on 27 October 2025 to the date of the site inspection for this 6th IEA on 9 March 2026. 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.

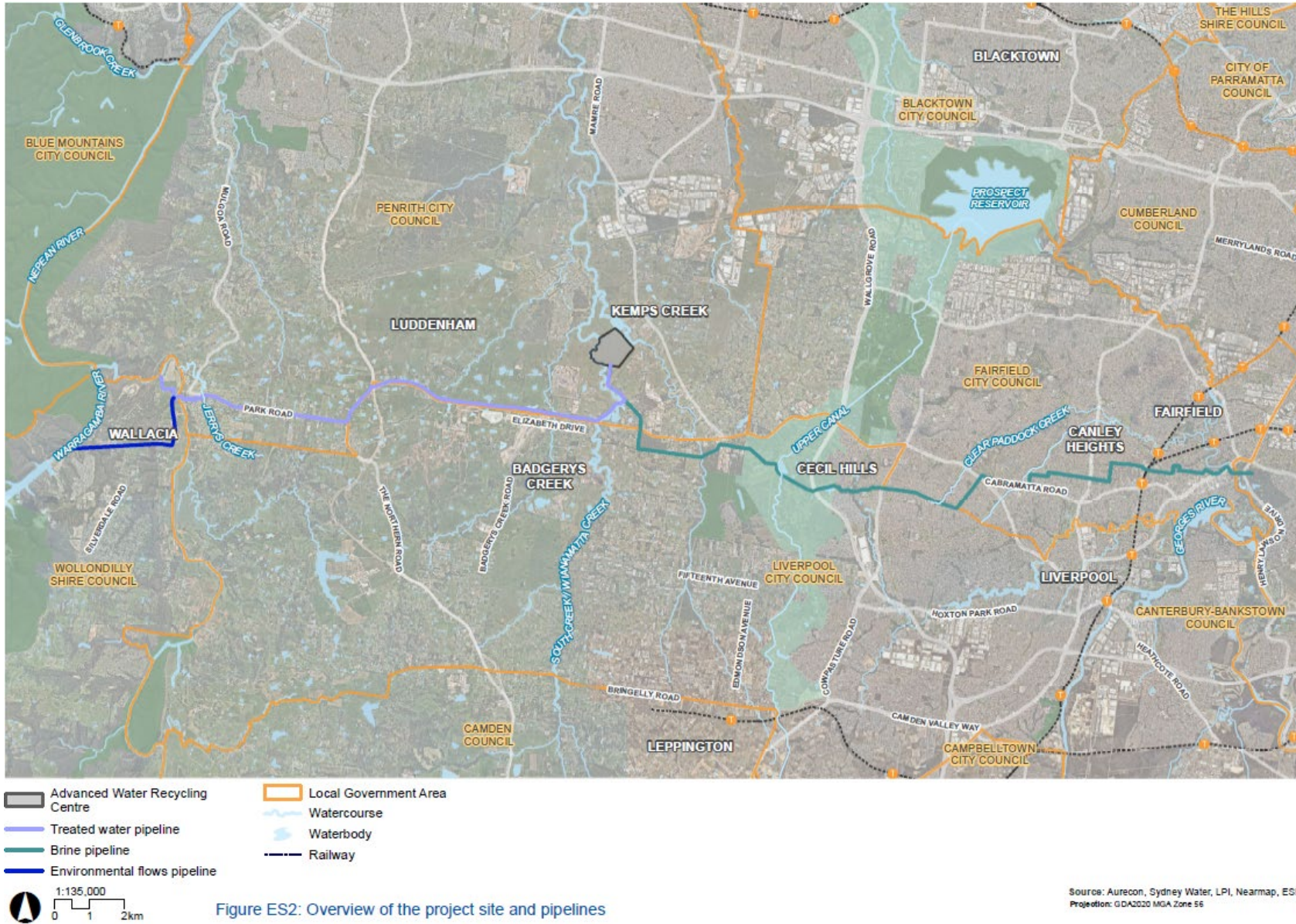


Figure ES2: Overview of the project site and pipelines

Figure 1: Project Location as described in the EIS

1.5 Audit Team

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

Table 3: Audit Team

Name and Role	Qualifications	Key Experience
Richard Peterson – Lead Auditor	B. E Civil M. Environmental Management Management Systems Auditing Leading Management Systems Audit teams Exemplar Global Lead Auditor	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 • HumeLink • M7/M12 Interchange • 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 6th 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 5 th IEA on 27 October 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 20 June 2025
- 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 Thursday 9th April 2026 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
- Ella McQue, Environmental Graduate, Sydney Water
- 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 Thursday 9th April 2026. The weather was generally fine. At the time of the inspection, pipeline had been completed and remaining works at the AWRC site were focussed on landscaping, rehabilitation, finishing works and commissioning.

Active works being undertaken at the time of the inspection included:

- Importation and management of topsoil, tree planting and turfing
- Final conversion of temporary construction sediment basins to operational water management ponds
- Maintenance of the riparian area at the Vegetation Management Plan Zone (adjacent to the AWRC site)
- Watering of permanent landscaping
- 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.

The Audit inspection did not include the RBM12 site location due to an event (external to the project) being held at the time of the Audit that utilised the land.

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

Auditor Observations
Advanced Water Recycling Centre (AWRC)
<ul style="list-style-type: none"> • Construction of digesters, sludge thickening, polymer storage, brine tanks, maintenance sheds, and the membrane bioreactor was complete • Administration building was substantially complete with internal fitout underway • Permanent internal roads and drainage were substantially complete • Asset protection zone (perimeter road) was substantially complete • Heritage interpretation artwork has been installed within landscape features • A water cart was in operation to suppress dust on active haul roads. A street sweeper was in operation to remove accumulated sediment from internal roads. Dust and mud tracking was not noticeable issue at the time of the site inspection • The High Efficiency Structure (HES) utilised for construction water management has been converted to an operational basin • The AWRC outlet channel has been completed with scour protection in the form of a rock lined and shaped grassed channel and a water quality boom with silt curtain attachment within South Creek. • Permanent drainage including culverts with rock scour protection have been installed • Minimal chemicals were stored on site, mobile bunds were utilised for short term spill protection at work fronts • Carparking areas had 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 • Rehabilitation and stabilisation of exposed surfaces was underway • Stockpiles and formation batters have been stabilised to minimise dust generation and erosion. • Permanent landscaping is nearing completion, irrigation systems were provided to promote ground cover growth • Appropriate waste and recycling facilities were provided on site

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	102	0	35
Total	218	170	0	48

Table 8: Non-compliances, Observations and Recommendations

Condition No.	Details of Condition	Auditor Observations	Recommendation for Improvement	Finding
Non-compliances identified by the Auditor				
N/A	N/A	No non- compliances were identified by the Auditor.	N/A	N/A
Non compliances identified by SWC/JHG				
N/A	N/A	No non- compliances were identified by Sydney Water or John Holland Group during the audit period	N/A	N/A
Observations and recommendations made by the Auditor				
A2	Stage 1 of the CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	<p>The Auditor notes that the project is reaching its final stages of construction with commissioning and operational activities to commence thereafter. The change in project stage will:</p> <ul style="list-style-type: none"> necessitate a shift in the projects risk profile from construction to operational related risks result in a likely change in project personnel and organisational responsibility for managing environmental and compliance outcomes 	<p>Based on the Auditors experience, the following recommendations are made:</p> <ul style="list-style-type: none"> Review approval conditions, the CEMP and specialist subplans, and close out any construction related obligations. Keep a register of closeout items Review and retire any construction related environmental management plans and communicate this to DPHI prior to the commencement of operations. Remove retired management plans from the Project website. Induct any new personnel/organisations into the compliance obligations 	Observation

Condition No.	Details of Condition	Auditor Observations	Recommendation for Improvement	Finding
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>	<p>On the day of the inspection, the signage was not in place. It was noted that the fence that the sign was attached to had been removed temporarily by the landscaping contractor.</p> <p>As noted in previous Audits, the sign was previously installed on ATF fencing prior to the commencement of construction and was observed to be in place during previous Audit inspections.</p>	<p>The project is still in construction and it is recommended that the sign is re-instated for the remainder of the project to ensure stakeholders are aware of project and contact details</p>	<p>Recommendation</p>
E19	<p>The Proponent must prepare a Rehabilitation Management Plan to revegetate and restore impacted RBM 12 red-hatched lands at Kemps Creek, mapped within the amended impact assessment area at Appendix B. Rehabilitation must occur as soon as practical after construction of the brine pipeline mapped at Appendix B, or as otherwise agreed with relevant landowner(s) or EHG.</p>	<p>As noted during the previous Audit, CPHR have expressed concerns to SWC regarding rehabilitation works and the RBM12 site. During the Audit period, CPHR have met with DPPI twice to work through their concerns. Constraints to meeting CPHR expectations include land ownership and property owner activities that impact the success of rehabilitation. SWC appear to be taking reasonable steps to resolve the issue, including investigating alternatives that may be acceptable to DPPI and CPHR. At the time of the Audit the issue had not been resolved, however SWC appear to have committed to working collaboratively with CPHR and DPPI to progress a practical and compliant resolution. This may include a further project modification. In the meantime, JHG are continuing to maintain the existing established plants in accordance with the RBM12 RMP, noting the landowner constraints.</p>	<p>Continue to work with CPHR and DPPI to reach a practical solution that all parties are satisfied with.</p>	<p>Observation</p>

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

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

3.3 Community Complaints

One complaint received during the Audit period. The complaint related to damage caused to an irrigation line. The complainant arranged for repair of the irrigation line and JHG paid for the plumber. Overall the complaints management system appears to be effective.

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 fifth Audit 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
Observations and recommendations made by the Auditor during the previous audit period			
E20	<p>Section 6.4 of the RMP required under Condition E19 notes the following: <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: 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>	<p>Undertake an internal audit of the RMP during the next Audit period and provide findings of the Audit to CPHR with the initial 6 monthly report</p>	<p>The first six monthly rehabilitation summary progress report for RBM 12 lands has been prepared for the period ending December 2025.</p> <p>The progress report includes the following information:</p> <ul style="list-style-type: none"> • Maintenance activities covering Watering, Weeding and Plant replacement for each month from July- December 2025 • Details of inspections undertaken by the landscaping contractor (B&K) • Photographic records of observations made during site inspections • Monitoring activities undertaken by an ecologist and botanist • Discussion regarding contingency for unsuccessful rehabilitation relating to issues such as predation, grazing threats and landowners use of the land <p>At the time of the Audit, the draft report had been prepared but not submitted to DPHI or BCS (now) CPHR.</p> <p>A specific Audit or Annual review of the RMP had not been undertaken, however, SWC/ DPHI acknowledge elements of the RMP have not been implemented due to landowner issues. SWC are working with DPHI and CPHR to develop pathway to resolve the matter.</p> <p>Status - Open</p>

Condition No.	Summary of Non-Compliance/Observation	Previous Recommendation	Evidence of implementation / Status
E117	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>	<p>Photographic evidence was provided to the Auditor demonstrating the redundant structures have been removed.</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 11](#) 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>The Department does not require any additional matters to be included within the scope of the audit beyond those already captured by the Approval and the Department's Independent Audit Post Approval Requirements (2020).</p> <p>Please consult with the stakeholders mentioned in your previous consultation email dated 3/10/2025 as part of the audit.</p>	Noted. Additional stakeholders have been consulted with, refer below for further details.
Liverpool Council	No response received	N/A
Penrith Council	No response received	N/A
Wollondilly Council	No response received	N/A
Heritage NSW (Heritage Council)	<p>Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed.</p> <p>It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.</p>	Noted. Conditions relating to heritage have been addressed by the Audit. Please refer to the Audit Schedule (Appendix B)
NSW EPA	No response received	N/A
Transport for NSW (M12)	No issues raised	Noted

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

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

Table 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 was converted to an operational basin Water quality boom installed at the project outlet (Upper South Creek) Waterway crossings completed using HDD methods 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 was 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 Clearing activities are now complete with no reported incidents of clearing beyond the project boundary or exceeding the conditional clearing limits 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 is complete 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"> The AWRC site is located in an industrial setting with substantial buffering to sensitive receivers 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 and National Heritage	<ul style="list-style-type: none"> The Project is not located within the boundary of any World or National heritage-listed items so will not have any direct impacts on any listed items. 	<ul style="list-style-type: none"> No impacts to World and National Heritage areas were reported during the audit period It may be reasonably concluded that impacts to World or National heritage listed items are within the predictions documented in the EIS.

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

The original Environmental Impact Statement and modifications (MOD1, determined 26/05/23 , 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 for the audit period.

Appendix A DPHI Auditor Approval

Our ref: SSI-8609189-PA-36

Your ref: Sydney Water

via Major Projects Portal

21 July 2023

Attention: Ms Cheryl Cahill, Environment Lead, Sydney Water

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

Dear Cheryl

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

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

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

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

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

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

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

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

Yours sincerely,



Alex McGuirk

A/Team Leader Compliance – Government Projects
NSW Planning

As nominee of the Planning Secretary

Appendix B Independent Audit Table

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
A1	<p>The Proponent must carry out Stage 1 of the CSSI in accordance with the terms of this approval and generally in accordance with the:</p> <p>(a) Upper South Creek Advanced Water Recycling Centre Environmental Impact Statement, dated September 2021; (b) Upper South Creek Advanced Water Recycling Centre Submissions Report, dated March 2022; (c) Upper South Creek Advanced Water Recycling Centre Amendment Report, dated March 2022 (d) Upper South Creek Advanced Water Recycling Centre Submissions Report – Project Amendments, dated April 2022; (e) Response to DPHI RFI 1, regarding responses to advice received on the Response to Submissions Report (dated, 1 June 2022, 1 July 2022, and 11 July 2022); (f) Response to DPHI RFI 2, regarding additional information on Flood Impact Assessment (dated, 11 July 2022). (g) in accordance with modification application SSI-8609189-Mod 1 and supporting documentation (h) in accordance with modification application SSI-8609189-Mod 2 and supporting documentation (i) in accordance with modification application SSI-8609189-Mod 3 and supporting documentation</p>	<ul style="list-style-type: none"> USC (Enviro and Approvals) Obligations and Compliance Tracking Register_MASTER.xls JHG/SWC Audit Interview 9/4/26 SSI-8609189 MOD 1 dated 26/5/23 SSI-8609189 MOD 2 dated 9/10/23 SSI-8609189 MOD 3 dated 20/6/25 CA 047 - Amendments to Southern Drainage Swale, SWC dated 6/3/25 SWC CA Register Site Inspection 9/4/26 	<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 (CA) are undertaken to ensure consistency with project approvals (and documents listed) and a register is maintained.</p> <p>Three modifications have been approved to date as follows: - MOD 1 - to remove pipeline and release structure from Warragamba River (26/5/23) - MOD 2 - Pipeline Realignments (10/10/23) - MOD 3 - Changes to operational water discharge limits (20/6/25)</p> <p>There have been no modifications during the Audit period. The most recent consistency assessment (CA 047) was for amendments to the Southern Drainage Swale and was approved by SWC on 6/3/25 (prior to this Audit period)</p>	Compliant
A2	<p>Stage 1 of the CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.</p>	<ul style="list-style-type: none"> Documents reviewed as noted in this audit report USC (Enviro and Approvals) Obligations and Compliance Tracking Register_MASTER3.xls JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<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. There have been no incidents during the Audit period that would result in a breach of the conditions of Consent.</p> <p>Observation The Auditor notes that the project is reaching its final stages of construction with commissioning and operational activities to commence thereafter. The change in project stage will: - necessitate a shift in the project's risk profile from construction to operational related risks - result in a likely change in project personnel and organisational responsibility for managing environmental and compliance outcomes</p> <p>Recommendation Based on the Auditors experience, the following recommendations are made: - Review approval conditions, the CEMP and specialist subplans, and close out any construction related obligations. Keep a register of closure items - Review and retire any construction related environmental management plans and communicate this to DPHI prior to the commencement of operations. - Remove retired management plans from the Project website. - Induct any new personnel/organisations into the compliance obligations</p>	Compliant
A3	<p>In the event of an inconsistency between:</p> <p>(a) the terms of this approval and any document listed in Condition A1 inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in Condition A1 inclusive, the most recent document will prevail to the extent of the inconsistency.</p> <p>Note: For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>As noted above and in previous audits, consistency assessments are undertaken to ensure all activities are consistent with the terms of approval. No consistency assessments were prepared during the IAG Audit period. No inconsistencies are known to have been identified to date.</p>	Compliant
A4	<p>The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to:</p> <p>(a) the environmental performance of Stage 1 of the CSSI; (b) any document or correspondence in relation to Stage 1 of the CSSI; (c) any notification given to the Planning Secretary under the terms of this approval; (d) any audit of the construction or operation of Stage 1 of the CSSI; (e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); (f) the carrying out of any additional monitoring or mitigation measures; and (g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>Observed evidence throughout the audit concludes the Proponent has complied with the various written requirements and directions issued by DPHI during the audit period.</p>	Compliant
A5	<p>This approval lapses five years after the date on which it is granted, unless Work has physically commenced on or before that date.</p>	<ul style="list-style-type: none"> SSI 8609189 Planning Approval as modified, dated 10/10/23 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>The project was approved on 28/11/22. Work commenced on 20/2/23, within 5 years of the project approval date.</p>	Compliant
A6	<p>The maximum capacity of the AWRC must not exceed an average dry weather flow (ADWF) of 50 megalitres per day (ML/day) under Stage 1.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<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	<p>References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of this approval, unless otherwise approved by the Planning Secretary.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>Noted</p>	Compliant
A8	<p>Any document that must be submitted or action taken within a timeframe specified in or under the terms of this approval may be submitted or undertaken within a later timeframe agreed in writing with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident or a non-compliance.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 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 - 8609189-PA-117) - Conditions E 63, E64 and E65 - Approval of revised Urban Design and Landscape Plan" dated 20/11/24 Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (AWRC and Pipelines Project (SSI-8609189): Request for extension of time for the development of the Aboriginal Cultural Heritage Excavation Report [Condition E31]" 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 	<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> <p>During the IAG Audit period, an extension was also requested and granted on 20/11/25 for the submission of the Cultural Heritage Excavation Report under Condition E31.</p>	Compliant
A9	<p>Where the terms of this approval require consultation to be undertaken, evidence of the consultation undertaken must be submitted to the Planning Secretary and ER (as relevant) with the corresponding documentation. The evidence must include:</p> <p>(a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval; (b) a log of the dates of engagement or attempted engagement with the identified party; (c) documentation of the follow-up with the identified party where engagement has not occurred to confirm that they do not wish to engage or have not attempted to engage after repeated invitations; (d) outline of the issues raised by the identified party and how they have been addressed; and (e) a description of the outstanding issues raised by the identified party and the reasons why they have not been addressed.</p>	<ul style="list-style-type: none"> Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI-8609189) - Approval of Construction Environmental Management Plan, Sub-plans monitoring programs and Out of Hours Work Protocol, dated 8/8/23 Upper South Creek, Advanced Water Recycling Centre and Pipelines CoA9 Consultation Summary Report - Air Quality Plan, dated 26/5/23 Upper South Creek, Advanced Water Recycling Centre and Pipelines, CoA9 Consultation Summary Report - Works in South Creek Rev01, dated 14/6/24 Upper South CoA E19 and E20 Creek Rehabilitation Management Plan, RMB12 Lands - Kemps Creek, Rev05, dated 23/5/24 DPHI Letter to SWC RE: Approval of Rehabilitation Management Plan, dated 30/5/24 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 22/4/24 CoA ESS A9 - Consultation Summary Report, Upper South Creek OOWH April 2026 CoA ESS A9 - Consultation Summary Report, Upper South Creek OOWH March 2026 CoA ESS A9 - Consultation Summary Report, Upper South Creek OOWH February 2026 Upper South Creek, Advanced Water Recycling Centre and Pipelines, CoA9 Consultation Summary Report - Wildlife Management Plan, JHG dated 14/1/26 Upper South Creek Advanced Water Recycling Centre, Green Space Master Plan Engagement, Outcomes Report, Sydney Water Upper South Creek, Advanced Water Recycling Centre and Pipelines, CoA A9 Consultation Summary Report, CoA E24 AWRC Flood Management in Design" Revision 1 dated 14/1/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - ESS Consultation Report March 2026, dated 3/3/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - E19 Wildlife Management Plan" dated 3/2/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - ESS Consultation Report Feb. 2026, dated 5/2/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - ESS Consultation Report April 2026, dated 8/4/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - ESS Consultation Report Dec 25", dated 1/12/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received (SSI-8609189-PA-154) dated 30/1/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received (SSI-8609189-PA-204) dated 2/4/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received (SSI-8609189-PA-176) dated 27/1/26 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<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, DPI 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 (IAG), consultation reports have been prepared for the following - Community Consultation on Respite for OOH Works - Wildlife Management Plan - Greenspace Master Plan - AWRC Flood Management in Design Copies of A9 and ESS Consultation reports were provided to the Auditor as evidence of consultation. Evidence of submission was also provided.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
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, only 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 	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. 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.	Compliant
A11	The Staging Report must: (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. 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.	<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 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	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: - 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. There have been no changes to the Staging Report during the audit period.	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 9/4/26 Site Inspection 9/4/26 	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 9/4/26 Site Inspection 9/4/26 	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 9/4/26 Site Inspection 9/4/26 	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. 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. Nothing in this condition prevents the preparation of either separate or combined strategies, plans or programs required under this approval. Notes: 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 9/4/26 Site Inspection 9/4/26 	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: (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, C7 and C12 SWC Functional Inspection Action List, dated 16/6/24 SWC Functional Inspection Action List, dated 13/5/24 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	At the time of the Audit site inspection all construction ancillary facilities have been demolished. No non-compliances with the requirements of this condition were identified by this Audit (A16) 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: (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: (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. Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each construction ancillary facility. 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.	<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 9/4/26 Site Inspection 9/4/26 	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 9/4/26 	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
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: (a) are located within or immediately adjacent to the construction boundary; and (b) have been assessed by the ER to have - (i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guidelines (IDCC, 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 9/4/26 Site Inspection 9/4/26 	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

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
A20	Boundary screening must be erected between construction ancillary facilities (including 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 9/4/26 Site Inspection 9/4/26 	As noted in previous audits, appropriate screening was installed at the CID site compound between the adjacent residents and the compound. The CID compound has now demolished and has been returned to SWC for other projects.	Compliant
A21	All Independent Appointments required by the terms of this approval must have regard to Seeking approval from the Department for the appointment of independent experts (DPIE, 2020). All Independent Appointments must hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Acoustics Advisors" dated 16/12/22 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives" dated 16/12/22 Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre - Agreement to independent auditor, dated 21/07/22 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	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 9/4/26 Site Inspection 9/4/26 	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 9/4/26 Site Inspection 9/4/26 	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 9/4/26 Site Inspection 9/4/26 	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 9/4/26 Site Inspection 9/4/26 	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 9/4/26 Site Inspection 9/4/26 	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 9/4/26 Site Inspection 9/4/26 	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); (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) - Revised Noise and Vibration CEMP Sub-plan, Revision E" dated 20/11/25 Letter from BB Enviro to SWC titled "Environmental Representative (ER) - Review and Approval - Community and Stakeholder Engagement Plan (CSEP) Rev F, dated 4/12/25 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Endorsement of the Waste and Resource Use CEMP Sub-plan, Revision D" dated 30/10/25 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision C" dated 20/11/25 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Air Quality CEMP Sub-plan, Revision C" dated 24/12/25 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Community and Stakeholder Engagement Plan (CSEP) Rev F" dated 4/12/25 Email from BB Enviro to JHG titled "Revised ADSCMP (Rev C) for Review" dated 12/11/25 Email from BB Enviro to JHG titled "USC Noise and Vibration Monitoring Report (March 2025 - August 2025) (Rev 1) for review dated 30/10/25 Email from BB Enviro to JHG titled "Surface Water Construction Monitoring Report - (Mar- Aug 2025) - for review " dated 30/10/25 Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for December 2025 Project: SSI-8609189- Upper South Creek Advanced Water Recycling Centre" dated 26/12/25 Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for January 2026 Project: SSI-8609189- Upper South Creek Advanced Water Recycling Centre" dated 6/2/26 Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for February 2026 Project: SSI-8609189- Upper South Creek Advanced Water Recycling Centre" dated 7/3/26 Letter from BB Enviro to DPHI titled "Environmental Representative Monthly Report for March 2026 Project: SSI-8609189- Upper South Creek Advanced Water Recycling Centre" dated 7/4/26 Environmental Representative (ER) Site Inspection report - date of inspection 01/12/25 Environmental Representative (ER) Site Inspection report - date of inspection 2/2/26 Environmental Representative (ER) Site Inspection report - date of inspection 2/3/26 Environmental Representative (ER) Site Inspection report - date of inspection 16/3/26 Environmental Representative (ER) Site Inspection report - date of inspection 30/3/26 Environmental Representative (ER) Site Inspection report - date of inspection 9/4/26 TEJ0374-REP-001 Badu Mura Grove Detailed Design RSA Report_BSWC_ER.pdf USC Surface Water Monitoring Report (March 2025 to August 2025)(Rev 1)_clean_SW_ER.docx USCP-JHG-MPL-ENV-0008 Upper South Creek CEMP (Rev C) - track changes_SWC_ER.doc USCP-JHG-PUN-ENV-001 USC AWWC Pipelines Water Reuse Strategy (Rev C)_SWW_ER.doc DPHI Post Approval Forms (various) ER Audit Interview 24/04/26 	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
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 complaint 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 9/4/26 Site Inspection 9/4/26 ER Audit Interview 24/4/26 Email from JHG to BB Enviro titled "Weekly Copy of USC Complaints Register" dated 6/01/26 Email from JHG to BB Enviro titled "Weekly Copy of USC Complaints Register" dated 13/02/26 Email from JHG to BB Enviro titled "Weekly Copy of USC Complaints Register" dated 27/3/26 	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 9/4/26 Site Inspection 9/4/26 	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 	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 9/4/26 Site Inspection 9/4/26 AA Interview, 21/5/26 Email from JHG to Acoustic Studio titled "Weekly Copy of USC Complaints Register" dated 6/01/26 Email from JHG to Acoustic Studio titled "Weekly Copy of USC Complaints Register" dated 13/02/26 Email from JHG to Acoustic Studio titled "Weekly Copy of USC Complaints Register" dated 27/3/26 	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 focussed at the AWRAC site which is located away from sensitive receivers.	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 9/4/26 	Three alternatives to the Lead AA have been approved by DPHI.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
A34	<p>The approved AA must:</p> <p>(a) receive and respond to communication from the Planning Secretary in relation to the performance of Stage 1 of the CSSI in relation to noise and vibration;</p> <p>(b) consider and inform the Planning Secretary on matters specified in the terms of this approval relating to noise and vibration;</p> <p>(c) consider and recommend to the Proponent, improvements that may be made to avoid or minimise adverse noise and vibration impacts;</p> <p>(d) review proposed night-time Works to determine if sleep disturbance would occur and recommend measures to avoid sleep disturbance or appropriate additional alternative mitigation measures.</p> <p>(e) review noise and vibration documents required to be prepared under the terms of this approval, and should they be consistent with the terms of this approval, endorse them before submission to the Planning Secretary (or if required to be submitted to the Planning Secretary) or before implementation (if not required to be submitted to the Planning Secretary);</p> <p>(f) regularly monitor the implementation of all noise and vibration documents required to be prepared under the terms of this approval to ensure implementation is in accordance with what is stated in the documents) and the terms of this approval;</p> <p>(g) notify the Planning Secretary of noise and vibration incidents in accordance with Conditions A43 and A45 of this approval;</p> <p>(h) in conjunction with the ER, the AA must:</p> <p>(i) as may be requested by the Planning Secretary, help plan, attend or undertake audits of noise and vibration management of Stage 1 of the CSSI including briefings, and site visits;</p> <p>(j) in the event that conflict arises between the Proponent and the community in relation to the noise and vibration performance of Stage 1 of the CSSI, follow the procedure in the Community Communication Strategy approved under Condition B2 to attempt to resolve the conflict, and if it cannot be resolved, notify the Planning Secretary.</p> <p>(k) consider relevant minor amendments made to the Site Establishment Management Plan, CEMP, relevant sub-plans and noise and vibration monitoring programs that require updating or are of an administrative nature, and are consistent with the terms of this approval and the management plans and monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, endorse the amendment. (this does not include any modifications to the terms of this approval).</p> <p>(l) review the noise impacts of minor construction ancillary facilities, and</p> <p>(m) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, a Monthly Noise and Vibration Report detailing the AA's actions and decisions on matters for which the AA was responsible in the preceding month. The frequency of this report can be changed if agreed by the Planning Secretary. The Monthly Noise and Vibration Report must be submitted within seven days following the end of each month for the duration of the AA's engagement for Stage 1 of the CSSI, or as otherwise agreed by the Planning Secretary.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 27/10/25 AA Interview, 21/5/26 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project (December 25), dated 15/1/26 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project (January 26), dated 7/2/26 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project (February 26), dated 7/3/26 Acoustics Advisor Monthly Report - Sydney Water Upper South Creek Project (March 26), dated 7/4/26 Email from DPHI to Acoustic Studios titled "Upper South Creek Advanced Water Recycling Centre - A34 AA Report February 2026" dated 8/3/26 Email from DPHI to Acoustic Studios titled "Upper South Creek Advanced Water Recycling Centre - A34 AA Report March 2026" dated 8/4/26 Email from DPHI to Acoustic Studios titled "Upper South Creek Advanced Water Recycling Centre - A34 AA Report January 2026" dated 9/2/26 Email from DPHI to Acoustic Studios titled "Upper South Creek Advanced Water Recycling Centre - A34 AA Report Dec 25" dated 13/1/26 Letter from DPHI to Acoustic Studios titled "Upper South Creek Advanced Water Recycling Centre - Extension Request for AA Report" dated 21/2/23 DPHI Post Approval Record 5075628 DPHI Post Approval Record 7015628 DPHI Post Approval Record 7094139 DPHI Post Approval Record 7092713 Acoustic Advisor Endorsement - Sydney Water Upper South Creek Project - Noise and Vibration CEMP Subplan" dated 20/11/25 Acoustic Advisor Endorsement - Sydney Water Upper South Creek Project - Noise and Vibration Monitoring Report" dated 17/2/26 Email from Acoustic Studio to JHG titled "Revised NVCSF (Rev E) for Review" dated 30/10/25 Email from Acoustic Studio to JHG titled "Revised NVCSF (Rev E) for Review" dated 30/10/25 Email from JHG to Acoustic Studio titled "Revised NVCSF (Rev E) for Review" dated 7/11/25 Upper South Creek Advanced Water Recycling Centre and Pipelines Noise and Vibration CEMP Subplan Rev E Track changes (AA Review) 	<p>The AA is performing their role in accordance with the requirements of this condition and is provided with the information and access to the site in order for them to perform the role. Key activities the AA is involved with are:</p> <ul style="list-style-type: none"> - Preparation of a monthly report issued to DPHI - 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 GCH permits (for information) - Endorsement of updates to the CNMMP <p>The AA noted that no requests from the Planning Secretary have been made to undertake any targeted acoustic audits. The AA noted that 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 AWRK site is located in sparsely populated with a reasonable buffer between the construction activities and the sensitive receivers. Given the low acoustic risk and lack of noise complaints, the AA has ceased undertaking inspections</p>	Compliant
A35	The Department must be notified in writing of the dates of commencement of Works, construction and operation at least one month before those dates.	<ul style="list-style-type: none"> Various Letters from SWC to DPHI: Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Notification of commencement of works in accordance with Condition A35, dated 9/12/22, 19/5/23, 24/8/23 Letter from SWC to DPHI RE: Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Amended Notification of commencement of works in accordance with Condition A35, dated 17/2/23 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>DPHI were notified at least one month prior to the commencement of work and the commencement of Construction.</p> <p>When changes to the commencement dates occurred due to delays in obtaining CEMP and Commonweath approval, subsequent notifications were issued to DPHI advising them of the revised date. SWC noted the operation of the SWRC is due to commence in late 2026 and are planning on issuing a further notification later in the year.</p>	Compliant
A36	If the construction or operation of Stage 1 of the CSSI is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of the commencement of that stage.	<ul style="list-style-type: none"> Various Letters from SWC to DPHI RE: Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Notification of commencement of works in accordance with Condition A35, dated 9/12/22, 19/5/23, 24/8/23 Letter from SWC to DPHI RE: Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Amended Notification of commencement of works in accordance with Condition A35, dated 17/2/23 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	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).	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 IAS was conducted on 27/10/25 and the site inspection for IAR 6 on 9/4/26 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 E305.	<ul style="list-style-type: none"> Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Agreement of Independent Auditor" dated 21/7/23 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	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"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	The Planning Secretary has not requested the initial and subsequent audits to be undertaken at different times.	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"> Email from DPHI to Sydney Water titled "Upper South Creek Advanced Water Recycling Centre - Independent Audit No 5" dated 6/2/26 Email from DPHI to SWC titled "Water Recycling Centre - (SSI-8609189-PA-193) dated 16/1/26 Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (AWRC and Pipelines Project) (CSSI 8609189): Provision of 5th Independent Audit report and submission of response to audit findings in accordance with conditions A40 and A41" dated 16/1/26 Letter from DPHI to SWC titled "Water Recycling Centre Independent Environmental Audit Report #5" dated 6/2/26 JHG/SWC Audit Interview 9/4/26 	The 5th Independent Audit Report and response was available on the SWC website as required by this condition. As noted in condition A41 below, the Audit report and response to Audit findings was submitted to DPHI within the required timeframe.	Compliant
A41	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (DPIE, 2020).	<ul style="list-style-type: none"> 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 16/1/26 https://www.sydwater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/upper-southcreek-advanced-water-recycling-centre.html JHG/SWC Audit Interview 9/4/26 	The 5th Independent Audit Report and response was provided to DPHI on 16/1/26 and was available on the SWC website as required by this condition. The site inspection for IAS was conducted on 27/10/25, so submission was within the 3 month timeframe required by Conditions A41 was complied with (Note: an extension of time was granted by DPHI to submit audit reports within 3 months of the site inspection for Audits undertaken over the Xmas period - refer to condition A39 for further information. On 6/2/26, DPHI confirmed the IEA report to generally satisfy the reporting requirements of the approval and the NSW Planning Independent Audit Post Approval Requirements (2020).	Compliant
A42	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (DPIE, 2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	JHG/SWC Audit Interview 9/4/26	Operational requirement	Not triggered
A43	The Planning Secretary must be notified via the Major Projects Website as soon as possible and no later than 12 hours after the Proponent becomes aware of an incident. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the location and nature of the incident.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Environmental Report Action Register dated 14/4/2026 Report Action_RA15628 Report Action_RA18286 Report Action_RA18975 Report Action_RA19086 	The Auditor was provided with a copy of the incident register for the Audit period. The incidents were relatively minor in nature and did not trigger the requirement to notify DPHI or other agencies as required by the conditions of this consent.	Not triggered
A44	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A of this approval.	JHG/SWC Audit Interview 9/4/26	As above. There were no reportable incidents raised during the audit period.	Not triggered
A45	The Planning Secretary must be notified via the Major Projects Website within seven days after the Proponent becomes aware of any non-compliance. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one), identify the condition/s against which the CSSI is non-compliant, the nature of the non-compliance; the reason for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	JHG/SWC Audit Interview 9/4/26	As noted in the Audit interview, there have been no non-compliances reported during the Audit period.	Not triggered
A46	A non-compliance which has been notified as an incident under Condition A43 does not need to be notified as a non-compliance.	JHG/SWC Audit Interview 9/4/26	Noted	Not Triggered
A47	Heavy vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and CSSI application number to enable immediate identification by a person viewing the heavy vehicle. No more than one set of project markings can be displayed on a heavy vehicle at any one point of time.	<ul style="list-style-type: none"> Photographs showing the name and CSSI number John Inghill Data and Digitalisation, SpoilTrak User Manual JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	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 IAR6, all spoil haulage activities have been completed.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
A48	The CSSI name, application number, telephone number, postal address and email address required under Condition B8 of this approval must be made available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also be provided on the website required under Condition B12 of this approval.	https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/upper-south-creek-advanced-water-recycling-centre.html#ref=5WT1D7&projectId=Upper%20South%20Creek%20Advanced%20Water%20Recycling%20Centre&cc=dxBwZUzb3V0a6NyZWY1QHNSZG5iEKhdsGVYmNv65ShdQz= <ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	Observation On the day of the inspection, the signage was not in place. It was noted that the fence that the sign was attached to had been removed temporarily by the landscaping contractor. As noted in previous Audits, the sign was previously installed on ATF fencing prior to the commencement of construction and was observed to be in place during previous Audit inspections. Recommendation The project is still in construction and it is recommended that the sign is re-instated for the remainder of the project to ensure stakeholders are aware of project and contact details.	Compliant
B1	A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication about construction and operation of Stage 1 of the CSSI with: (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.	<ul style="list-style-type: none"> Community & Stakeholder Engagement Plan (CSEP) Upper South Creek Advanced Water Recycling Centre and Pipelines, dated August 2023 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-85)" dated 20/1/23 Letter from BB Enviro to SWC titled "Environmental Representative (ER) Review and approval - Community and Stakeholder Engagement Plan (CSEP) Rev D, SSI 8609189 - Upper South Creek Advanced Water Recycling Centre" dated 2/2/24 241101_L_USC_CESP Rev E_ER Approval Letter, dated 1/11/24 FW_FOR REVIEW_USC_AWRK & Pipelines CSEP Rev E, dated 17/10/24 JHG/SWC Audit Interview 9/4/26 Community & Stakeholder Engagement Plan (CSEP) Upper South Creek Advanced Water Recycling Centre and Pipelines, Rev F dated November 2025 Letter from BB Enviro to SWC titled "Environmental Representative (ER) Review and approval - Community and Stakeholder Engagement Plan (CSEP) Rev F, SSI 8609189 - Upper South Creek Advanced Water Recycling Centre" dated 4/12/25 	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. During the IA6 Audit period, further minor changes were made to the plan and endorsed by the ER on 4/12/25	Compliant
B2	The Community Communication Strategy must: (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 Cabrawale 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: (i) through which the community can discuss or provide feedback to the Proponent; (ii) through which the Proponent will respond to enquiries or feedback from the community; and (k) to resolve any issues and mediate any disputes that may arise in relation to the environmental management and delivery of Stage 1 of the CSSI, including disputes regarding rectification or compensation; (l) address who will engage with the community, relevant councils and agencies.	<ul style="list-style-type: none"> Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines 4/10/23 USCP-JHG-MPL-CSR-0002 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-85)" dated 20/1/23 241101_L_USC_CESP Rev E_ER Approval Letter, dated 1/11/24 FW_FOR REVIEW_USC_AWRK & Pipelines CSEP Rev E, dated 17/10/24 JHG/SWC Audit Interview 9/4/26 	The Community Communication Strategy (CCS) includes the relevant information as required by this condition and was approved by DPHI on 20/1/23.	Compliant
B3	The Community Communication Strategy must be submitted to the Planning Secretary and be approved prior to the commencement of any Work.	<ul style="list-style-type: none"> Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines 4/10/23 USCP-JHG-MPL-CSR-0002 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-85)" dated 20/1/23 JHG/SWC Audit Interview 9/4/26 	The Community Communication Strategy was approved by DPHI on 20/1/23 prior to Work commencing on the 20/2/23.	Compliant
B4	Work for the purposes of Stage 1 of the CSSI must not commence until the Community Communication Strategy has been approved by the Planning Secretary.	<ul style="list-style-type: none"> Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines 4/10/23 USCP-JHG-MPL-CSR-0002 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-85)" dated 20/1/23 JHG/SWC Audit Interview 9/4/26 	The Community Communication Strategy was approved by DPHI on 20/1/23 prior to Work commencing on the 20/2/23.	Compliant
B5	The Community Communication Strategy as approved by the Planning Secretary, including any minor amendments approved by the ER, must be implemented for the duration of the Work and for 12 months following the completion of construction.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 One month lookahead notification December 2025 One month lookahead notification November 2025 One month lookahead notification January 2026 One month lookahead notification March 2026 One month lookahead notification April 2026 USC Complaints Register https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/upper-south-creek-advanced-water-recycling-centre.html#ref=5WT1D7&projectId=Upper%20South%20Creek%20Advanced%20Water%20Recycling%20Centre&cc=dxBwZUzb3V0a6NyZWY1QHNSZG5iEKhdsGVYmNv65ShdQz=NE2N80N4z%20HG/SWC%20Audit%20Interview%2027%2010%25%E2%80%9A2%20Site%20Inspection%2027%2010%25 	Substantial evidence was reviewed by the Auditor to demonstrate the effective implementation of the Community Communications Strategy throughout the audit period.	Compliant
B6	A Public Liaison Officer must be appointed to assist the public with questions and complaints they may have at any time during Work. The Public Liaison Officer must be available at all times that Work is occurring.	JHG/SWC Audit Interview 9/4/26	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	A Complaints Management System must be prepared and implemented before the commencement of any Work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of Stage 1 of the CSSI. The Complaints Management System must be consistent with Sydney Water's Complaint Policy (Document number: 735107, version 4, dated 27 October 2021). 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.	<ul style="list-style-type: none"> Flyer dated 5 August 2023 "Start of work and how you can talk to us - Upper South Creek Advanced Water Recycling Centre" Complaints Policy, Appendix B Noise and Vibration CEMP Sub-plan Complaints Policy, Appendix J Community and Stakeholder Engagement Plan JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Automatic email response (example) USC Complaints Register up to date as of 26/3/25 	Consultation Manager is the complaints system and has been implemented for the duration of the project. Supporting information regarding the complaints system and SWC Policy is provided on the project website.	Compliant
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 9/4/26 https://www.sydneywater.com.au/water-the-environment/what-we-are-doing/projects-in-your-area/upper-south-creek-advanced-water-recycling-centre.html#ref=5WT1D7&projectId=Upper%20South%20Creek%20Advanced%20Water%20Recycling%20Centre&cc=dxBwZUzb3V0a6NyZWY1QHNSZG5iEKhdsGVYmNv65ShdQz= 	The website includes the following details: <ul style="list-style-type: none"> - Complaints and enquiries line (1800 064 127) - Email uppersouthcreek@sydneywater.com.au - Post PO Box 160 Kemps Creek NSW 2178 - Complaints system that is linked to the latest version of the SWC complaints policy The SWC information including an interpreter service covering ten different languages.	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.	Complaints Register up to date as of 16/4/26	"Consultation Manager" has been established to record, monitor and close out complaints. In addition an excel spreadsheet is produced to track and monitor complaints. The Consultation Manager/excel spreadsheet includes all of the information as required by this condition. One complaint was received during the Audit relating to damaged irrigation system. The complaints register documents corrective actions implemented with the complaint resolved.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
C6	The Surface Water and Groundwater CEMP Sub-Plan must be prepared by a suitably qualified expert and include, but not limited to: (a) measures to achieve compliance with the NSW Government Wianamatta South Creek waterway health objectives and construction phase stormwater management targets, in accordance with the Wianamatta MUSIC modelling toolkit and Technical Guidance for Achieving Wianamatta South Creek Stormwater Management Targets (DPH, 2022); (b) detail erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'; (c) detail all off-site flows from the AWRC site; (d) the Dewatering Procedure and Drilling Fluid Management Procedure as committed to in the documents listed in Condition A1.	<ul style="list-style-type: none"> Surface Water & Groundwater CEMP Sub-plan (USCP-JHG-MPL-ENV-0001) JHG/SWC Audit Interview 9/4/26 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 previous Audit period (IA45) with no further changes made during the IA 86 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 9/4/26 	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 (IEnvP[S/C]) 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): (a) details of construction activities and their locations which have the potential to expose areas known to contain, or potentially contain, contaminated soils and/or other contaminated materials; (b) measures for the handling, treatment and management of hazardous and contaminated soils and materials, including measures to manage and/or minimise worker and public health and safety risks with regard to exposure to contamination; (c) a description of how the effectiveness of the actions and measures for managing contamination impacts would be monitored during the proposed works, clearly indicating how often this monitoring would be undertaken, the locations where monitoring would take place, and how the results of the monitoring would be recorded and reported; (d) measures to identify contamination during Works; (e) measures to manage acid sulfate soils; (f) measures to manage asbestos finds; and (g) measures to detail unexpected finds consistent with the Unexpected Finds Procedure for Contamination required under Condition E88. The procedure must include details of who will be responsible for implementing the Unexpected Finds Procedure for Contamination and the roles and responsibilities of all parties involved. The Soils and Contamination CEMP Sub-Plan must be reviewed by the Site Auditor engaged under Condition E74. The Site Auditor must issue interim audit advice or a relevant site audit statement stating whether they consider the Soils and Contamination CEMP Sub-Plan to be adequate. Once reviewed by the Site Auditor and approved by the Planning Secretary, the Soils and Contamination CEMP Sub-Plan must be implemented throughout the duration of construction.	<ul style="list-style-type: none"> Soils & Contamination CEMP Sub-plan (USCP-JHG-MPL-ENV-0003) Rev C dated 7/7/25 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 JHG/SWC Audit Interview 9/4/26 	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 Soils and Contamination CEMP subplan was made during the previous (IA45 Audit period) with no changes made during this IA86 Audit period.	Compliant
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 CSS; 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;	<ul style="list-style-type: none"> Biodiversity CEMP sub-plan (USCP-JHG-MPL-ENV-0004) JHG/SWC Audit Interview 9/4/26 	The Biodiversity CEMP Sub-plan was prepared by a suitably qualified expert and contains the relevant information as required by this condition. 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 CSS; (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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision D, dated 26/11/24 Letter from BB Enviro to SWC titled "Environmental Representative (ER) review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision C" dated 20/11/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan, Revision E dated 7/7/25 	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 audit period and were endorsed by the ER.	Compliant
C11	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary.	<ul style="list-style-type: none"> DPH Approval dated 08/08/2023 ref:SS1-8609189 JHG/SWC Audit Interview 9/4/26 	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 CSS.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Letter from BB Enviro to SWC titled "Environmental Representative (ER) - Endorsement of the Waste and Reuse CEMP Subplan Revision D, dated 20/10/25 Letter from BB Enviro to SWC titled "Environmental Representative (ER) - Endorsement of the Revised Noise and Vibration CEMP Sub-Plan, Revision E dated 20/11/25 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 Construction Noise and Vibration and 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 CSS 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, EH, DPH Water, DPI Fisheries, WaterNSW and relevant council(s) (b) Groundwater EPA, DPH Water (c) Noise and vibration EPA, WaterNSW and relevant council(s)	<ul style="list-style-type: none"> Surface Water Quality Monitoring Program - CEMP Appendix B1 - Surface Water and Groundwater Management Sub Plan Groundwater Monitoring Program CEMP Appendix B1 - Surface Water and Groundwater Management Sub Plan Letter from BB Enviro to SWC RE: ER Review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision B, dated 17/6/24 Letter from BB Enviro to SWC RE: ER Review and approval - Revised Noise and Vibration CEMP Sub-plan, Revision C, dated 17/9/24 Noise and Vibration Monitoring Program CEMP Appendix B5 - Noise and Vibration Management Sub Plan Noise & Vibration CEMP Sub-plan (USCP-JHG-MPL-ENV-0007) Upper South Creek Advanced Water Recycling Centre and Pipelines, Noise and Vibration Subplan, Rev C dated 15/8/24 Upper South Creek Advanced Water Recycling Centre and Pipelines, Noise and Vibration Subplan, Rev D dated 26/11/24 Acoustic Advisor Endorsement - Upper South Creek Project - review of Noise and Vibration CEMP Subplan dated 17/9/24 Upper South Creek Advanced Water Recycling Centre and Pipelines NVSCP Appendix E Noise and Vibration Monitoring Program Rev C dated "15/8/24 JHG/SWC Audit Interview 9/4/26 	The Construction Monitoring Programs are included in the relevant CEMP Sub-plans and were prepared in consultation with relevant agencies as noted above. Following IA82, the Noise and Vibration Monitoring Plan was amended to address the non compliance with reporting timelines (as noted in IA82) 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.	<ul style="list-style-type: none"> Surface Water Quality Monitoring Program - CEMP Appendix B1 - Surface Water and Groundwater Management Sub Plan Groundwater Monitoring Program CEMP Appendix B1 - Surface Water and Groundwater Management Sub Plan Noise and Vibration Monitoring Program CEMP Appendix B5 - Noise and Vibration Management Sub Plan JHG/SWC Audit Interview 9/4/26 	The Construction Monitoring Programs include the relevant information as required by this condition, and were endorsed by the ER and approved by DPH.	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.	<ul style="list-style-type: none"> ER recommendation letter 25/08/2023 from BBEnviro to SWC DPH Approval dated 08/08/2023 their ref:SS1-8609189 JHG/SWC Audit Interview 9/4/26 	Monitoring programs were endorsed by the ER and submitted to DPH progressively in April/May 2023. The monitoring programs were approved by DPH 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 DPH.	Compliant
C16	Construction must not commence until the relevant CMP(s) have been approved by the Planning Secretary and all relevant baseline data for the specific construction activity has been collected.	<ul style="list-style-type: none"> DPH Approval dated 08/08/2023 their ref:SS1-8609189 7837350dd0bc3d3e54f9bb23cb65c71_Approval_Letter_USC_AWRC_CEMP_signed_8_August_2023.pdf JHG/SWC Audit Interview 9/4/26 	Monitoring programs were endorsed by the ER and submitted to DPH 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 DPH.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
C17	The CMP(s), as approved, including any minor amendments approved by the ER, must be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary, whichever is the greater.	<ul style="list-style-type: none"> Noise and Vibration Monitoring Program CEMP Appendix BC 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 USC Advanced Water Recycling Centre and Pipelines, Groundwater Monitoring Report, Rev 03 dated 15/01/26 USC Advanced Water Recycling Centre and Pipelines, Surface Water Monitoring Report Rev 1 dated 25/11/24 USC Advanced Water Recycling Centre and Pipelines, Surface Water Monitoring Report Rev 2 dated 12/8/25 Email from JHG to SWC titled "USC Surface and Groundwater Construction Monitoring Reports - September 2024 to February 2025" dated 12/8/25 Email from JHG to SWC titled "Noise and Vibration Construction Monitoring Report - August 2024 to February 2025" dated 12/8/25" dated 12/8/25 Email from JHG to SWC titled "Noise and Vibration Construction Monitoring Report - (Mar-Aug 2025) for review" dated 12/8/25 Acoustics Advisor Endorsement, Noise and Vibration Monitoring Report, September 2024 to February 2025, 12 August 2025, dated 12/8/25 	Construction Monitoring Programs for Noise and Vibration, Groundwater and Surface Water continue to be implemented, as evidenced in corresponding monitoring reports for the September 2025 to February 2026 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.	<ul style="list-style-type: none"> Email from JHG to Fairfield Council titled "USC Noise and Vibration Monitoring Report (March 2025-August 2025) (Rev 2) dated 24/2/26 Email from JHG to Fairfield Council titled "USC Noise and Vibration Monitoring Report (March 2025-August 2025) (Rev 2) dated 24/2/26 Email from JHG to Canterbury Council titled "USC Noise and Vibration Monitoring Report (March 2025 to August 2025) (Rev 2) dated 24/2/26 Email from JHG to BCS titled "USC Groundwater Monitoring Report, (March 2025 to August 2025) (Rev 3), USC Surface Water Monitoring Report (March 2025 to August 2025) (Rev 2) dated 24/2/26 Email from JHG to DPIE Water Assessments titled "USC Water Monitoring Report (March 2025-August 2025) (Rev 2) USC Groundwater Monitoring Report (March 2025-August 2025) (Rev 2) dated 24/2/26 Email from JHG to EPA titled "USC Groundwater Monitoring Report (March 2025-August 2025) (Rev 2)", "USC Noise and Vibration Monitoring Report (March 2025-August 2025) (Rev 2) USC Surface Water Monitoring Report (March 2025-August 2025) (Rev 2) dated 24/2/26 Email from JHG to Liverpool Council titled "USC Noise and Vibration Monitoring Report (March 2025-August 2025) USC Surface Water Monitoring Report (March 2025-August 2025) dated 24/2/26 Email from JHG to DPIE AHC Central titled "USC Surface Water Monitoring Report (March 2025-August 2025) USC Groundwater Monitoring Report (March 2025-August 2025) dated 24/2/26 Email from JHG to Penrith Council titled "USC Noise and Vibration Monitoring Report (March 2025-August 2025) USC Surface Water Monitoring Report (March 2025-August 2025), USC Groundwater Monitoring Report (March 2025 to August 2025) dated 24/2/26 USC Groundwater Monitoring Report (March 2025 to August 2025) Rev 2_SW_ER Email from DPIH to SWC titled "Upper South Creek Advanced Water Recycling Centre - C18 Groundwater Monitoring Report- Jan 26" dated 4/3/26 Email from DPIH to SWC titled "Upper South Creek Advanced Water Recycling Centre - C18 Noise and VIB Monitoring Report- Oct 25" dated 4/3/26 Email from DPIH to SWC titled "Upper South Creek Advanced Water Recycling Centre - C18 Surface Water Monitoring Report - Nov 25" dated 4/3/26 Email from DPIH to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-197) dated 24/2/26 Email from DPIH to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-198) dated 24/2/26 Email from DPIH to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-199) dated 24/2/26 	Construction Monitoring Reports for Noise and Vibration, Groundwater and Surface Water continue to be implemented with reporting undertaken 6 monthly. Evidence was provided to the Auditor demonstrating the relevant reports have been submitted to the relevant agencies as required by this condition including EPA, local councils, WaterNSW, DPIE Water, DPI (Fisheries) and ENG. Monitoring reports are provided to the ER, although this is not a specific requirement of this condition.	Compliant
D1	An Operational Environmental Management Plan (OEMP) must be prepared having regard to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). The OEMP must detail how the performance outcomes, commitments and mitigation measures made and identified in the documents listed in Condition A1 will be implemented and achieved during operation. Condition D1 does not apply if Condition D2 of this approval applies.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Operational Environmental Management Plan, Operations and Maintenance, Badu Yarragal Water Resource Recovery Facility, Trilley, Rev D dated 14/11/25 Emergency and Pollution Incident Response Management Plan (EPIRMP), Trilley, Rev D dated 27/10/25 Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). SWC Comments Register dated 14/11/25 	At the time of the Audit, a draft Operational Environmental Management Plan (OEMP) was prepared and was undergoing review by SWC. Section 9 of the OEMP addresses regulatory compliance requirements noting the OEMP has been prepared in accordance with the following key requirements: <ul style="list-style-type: none"> - Trilley ISO 14001: 2015 accredited Environmental Management System - The Environmental Management Plan Guideline for Infrastructure Projects, (DPIE, 2020) - Ministers Conditions of Approval for the Project (MCA) for the project (SSI-8609189) - Sydney Waters Environmental Management System (SWEMS0026)- 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 21800). In addition to the above, the OEMP includes the following: <ul style="list-style-type: none"> - 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) At the time of IEA 86, the OEMP was yet to be submitted to DPIH.	Compliant
D2	An OEMP is not required for Stage 1 of the CSSI if the Proponent has a certified Environmental Management System (EMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that through the certified EMS or equivalent: <p>(a) the performance outcomes, commitments and mitigation measures, made and identified in the documents listed in Condition A1, and specified relevant terms of this approval can be achieved;</p> <p>(b) issues identified through ongoing risk analysis can be managed; and</p> <p>(c) procedures are in place for rectifying any non-compliance with this approval identified during compliance auditing, incident management or any other time during operation.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Operational Environmental Management Plan, Operations and Maintenance, Badu Yarragal Water Resource Recovery Facility, Trilley, Rev D dated 14/11/25 Emergency and Pollution Incident Response Management Plan (EPIRMP), Trilley, Rev D dated 27/10/25 SWC Comments Register dated 28/11/25 	As noted in condition D1, an OEMP has been prepared for the operation of the facility. Preparation of the OEMP as well as the Emergency and Pollution Incident Response Management Plan (PIRMP) has progressed throughout the Audit period with further revisions undertaken to address comments by SWC.	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 9/4/26 Operational Environmental Management Plan, Operations and Maintenance, Badu Yarragal Water Resource Recovery Facility, Trilley, Rev D dated 14/11/25 Emergency and Pollution Incident Response Management Plan (EPIRMP), Trilley, Rev D dated 27/10/25 SWC Comments Register dated 28/11/25 	At this stage the draft OEMP has been prepared and is currently under review by SWC. It is planned to be submitted to DPIH upon final preparation of the OEMP as well as the Emergency and Pollution Incident Response Management Plan (PIRMP) has progressed throughout the Audit period with further revisions undertaken to address comments by SWC. The OEMP will be submitted to DPIH prior to the commencement of 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 9/4/26 Operational Environmental Management Plan, Operations and Maintenance, Badu Yarragal Water Resource Recovery Facility, Trilley, Rev D dated 14/11/25 Emergency and Pollution Incident Response Management Plan (EPIRMP), Trilley, Rev D dated 27/10/25 SWC Comments Register dated 28/11/25 	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 10/9/24 Site Inspection 9/4/26 	Section 8 of the Air Quality CEMP subplan describes measures to be implemented to minimise air quality impacts <p>As observed during the Audit site inspection, construction of the pipelines and rehabilitation of exposed areas is now complete, thereby eliminating the risk of a dust related incident in these areas. Dust management practices at the AWRC site included a sealed carpark, speed limit restrictions, water carts and a street sweeper. Exposed surfaces were being progressively stabilised to reduce dust. At the time of IEA86, the landscaping works were substantially complete.</p> <p>No odour issues identified during the construction phase. No air quality or odour related complaints have been received during the audit period.</p>	Compliant
E2	The final design of the discharge stacks of each co-generation engine must include a sampling plane compliant with Australian Standard AS4323.1 Stationary source emissions – Selection of sampling positions (2021).	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 	No co-generation for the project.	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E3	The Waste Gas Burner must be designed to comply with relevant provisions of Division 4 of Part 5 of the Protection of the Environment Operations (Clean Air) Regulation 2021.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Upper South Creek Design Report, Revision 5, GHD Jacobs dated 24/1/25 Sydney Water Technical Specification – Waste Gas Burner Installations (D0001871) A19833-DS-001-1-Waste Gas Burners (Data Sheet, 6/2/23) AWRC-SKH-P-401-0001 [01] Digester-gas-system-sketch-pack-P8-I0 	<p>A copy of the AWRC Design Report was provided to demonstrate compliance with Condition E3. The report has now been finalised and the latest revision (Rev 5) is dated 24/1/25</p> <p>Section 15 of the AWRC Design Report addresses Anaerobic Digestion and Biogas Handling and confirms that two waste gas burners (duty/standby) are provided to allow any excess gas to be safely flared. Figure 23 in the report is a model extract showing its approximate location near-to the digestors (gas flare).</p> <p>Table 54 of the AWRC Design Report provides a list of the relevant reference drawings (suite P4011), including the Waste Gas Burner #1 and #2.</p> <p>The data sheet for the burner was provided as evidence and states that the burner is compliant with Sydney Water Technical Specification – Waste Gas Burner Installations (D0001871). The specification states that all waste gas burner installations must meet the relevant requirements of the POEO Act 1997 and its Clean Air Regulation (refer section 1.4).</p> <p>A copy of the Sydney Water specification was also provided as evidence.</p> <p>At the time of IA #6 the waste burner had been installed however had not been commissioned.</p>	Compliant
E4	All plant and equipment installed and used for the project must be: (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 9/4/26 Site Inspection 9/4/26 Equipment maintenance records – Bobcat/Skid Steer Loader(9/2/26), Liebherr Unit 671 Mobile Crane – SWL *1DLTLMALT (2023), ISUZU Water Cart - Road FSR (2023) dated 16/2/26 	<p>Equipment was observed to be operating effectively with no visible exhaust plumes or excessive noise identified.</p> <p>Equipment maintenance records were provided to the Auditor as evidence of compliance</p>	Compliant
E5	Prior to the commencement of operation, the Proponent must prepare, implement and maintain an Odour Management Plan (OMP) for the AWRC. The OMP must be prepared by a suitably qualified and experienced person(s) in consultation with the EPA and submitted to the Planning Secretary for information.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Odour Management Plan, Rev 5 dated 2/9/25 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA162) Conditions E5 and E6 Odour Management Plan" dated 5/9/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA 162) dated 31/8/25 SWC Comments Register dated 4/7/25 	<p>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.</p>	Compliant
E6	The OMP must describe measures to minimise odour impacts associated with operation and include, but not necessarily limited to: (a) objectives and targets; (b) key performance indicators; (c) identification of all sources of odour associated with the operation; (d) a detailed description of odour mitigation methods and management practices; (e) a detailed description of the methods used for monitoring the effectiveness of the odour mitigation methods and management practices; (f) location, frequency and duration of monitoring; (g) details of proposed contingency measures should odour impacts occur; (h) a communications strategy for handling potential odour complaints that includes recording, investigation, reporting and actioning; and (i) system and performance review for continuous improvements.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Odour Management Plan, Rev 5 dated 2/9/25 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 	<p>The Auditor reviewed the Odour Management Plan and notes the following:</p> <ul style="list-style-type: none"> Section 2 describes the objectives, targets and key performance indicators Section 4 describes the sources of odour Section 5 describes odour mitigation measures and management practices Section 6 describes the odour monitoring program Section 7 describes the contingency measures Section 8 describes the processes for communications and complaints management Section 9 describes processes for continual review and improvement. <p>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.</p>	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 9/4/26	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 9/4/26	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 9/4/26	No co-generation for the project.	Not triggered
E10	A minimum of two rounds of sampling must be undertaken to provide a suitable characterisation of emissions. Sampling must be undertaken when plant/process conditions are representative of emissions during representative periods of normal operation.	JHG/SWC Audit Interview 9/4/26	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 emission limits and requirements for ongoing monitoring.	JHG/SWC Audit Interview 9/4/26	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.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 USC Vegetation Clearing Tracker dated 6_1_26 Upper South Creek Advanced Water Recycling Centre and Pipelines Project, Pre-Clearance Assessment Report, Biosis, Revision 5 dated 19/10/23 Upper South Creek Project - Clearing Permit Number AWRC - Clearing 013 dated 03/04/25 	<p>At the time of IA # 6, all clearing activities had been completed. As noted in previous audits, to minimise flora and fauna impacts:</p> <ul style="list-style-type: none"> A two stage process was implemented and 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

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
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 9/4/26 EIS Appendix J- Biodiversity Assessment Part 1 SEARS compliance table, Aquatic and Riparian Biodiversity Ecology Section. Email from Habitat Innovation to JHG dated 21/5/24 CPESC INSPECTION Prior to works, dated 1/8/24 CPESC INSPECTION Completion of Works, dated 18/9/24 	As noted in previous audits, open trenching works were previously undertaken in Congroo Creek. South Creek open trenching commenced in early August and was completed about 3 weeks, outside the late April to early June avoidance timeframe pursuant to Condition E22. CPESC inspections prior to commencement and at completion of works were provided as evidence demonstrating the works at South Creek started in early August and were finished by 28/8/2024.	Compliant
E23	Stage 1 of the CSSI must maximise the reuse of native vegetation and other habitat features that have been approved for removal. Where reuse by the CSSI is not possible, relevant council(s), NSW National Parks & Wildlife Service, Western Sydney Parklands Trust, Greater Sydney Local Land Services, local Landcare groups, DPI Fisheries and any additional relevant government agencies must be consulted prior to the removal of vegetation and other habitat to determine if: <p>(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</p> <p>(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.</p>	<ul style="list-style-type: none"> CoA E19 and E20 Rehabilitation Management Plan, RBM 12 Lands - Kemps Creek Revision 04, dated 30/4/24 Letter from Biocys to JHG RE: Pre-Clearance Survey for the Upper South Creek Advanced Water Recycling Centre, dated 31/7/24 AWRC tree removal sketch, dated 19/7/23 Internal JHG Email, dated 29/7/24 Upper South Creek Rolling Tree Register Upper South Creek Advanced Water Recycling Centre- online Workshop Photographic evidence - timber stockpiles EPA Waste Form, dated 11/4/23 Email from Featherdale Wildlife Park to JHG, dated 1/4/24 	<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. Opportunities to reuse such features within the final project landscaping and rehabilitation works have been identified with timber and hollow bearing features. 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 9/4/26 Upper South Creek Design Report, Revision 2, dated 13/8/24 (DRAFT) - excerpt only as at 31/10/24 (Section 6.4 Flooding Assessment & Appendix D) An excerpt of section 6.4 and Appendix D of the AWRC Design Report IFC drawing ST0079 D501-1 has been included App D - AWRC-DIV-MEM-CW-0501-0004(A) Flood Modelling Assessment.pdf ST0079_D501-10(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 "CSSI-8609189 USC AWRC memo re condition of approval E24- flood management in design" dated 17/6/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - E24 Measures to not worsen flood characteristics" dated 22/7/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre Post Approval Document Received (SSI-9609189-PA-183)" dated 15/1/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre Flood in Design Memo-Response from NSW DCCCEW CPHR" dated 11/12/25 Technical Memorandum from Forward Hydro to JHG titled "CSSI-8609189 USC AWRC Memo re condition of Approval E24- flood management in design" dated 24/10/26 Upper South Creek Advanced Water Recycling Centre and Pipelines, CoA A9 Consultation Summary Report, CoA E24 AWRC Flood Management in Design, Rev 01, JHG, dated 14/1/26 Letter from DCCCEW (CPHR) to SWC titled "CPHR post approval advice - Upper South Creek Advanced Water Recycling Centre Stage 1 (SSI-8609189-PA183)" dated 11/12/25 BCS Portal Submission/Consultation Record dated 17/11/25 Email from JHG to SWC titled "E24 Flood in Design Memo" dated 7/11/25 	<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>"Based on the comprehensive review of relevant documentation and comparison between reference and detailed designs, it is generally confirmed that AWRC Stage 1 detailed design complies with CoA E24. The design:</p> <ul style="list-style-type: none"> Incorporates all measures identified to avoid worsening flood characteristics when compared to the reference design; Ensures AWRC operational facilities are located outside flood-prone areas; Uses earthworks and stormwater infrastructure to mitigate flood risks; Complies with all relevant water quality and flow objectives; Addresses potential future impacts through planned assessments and adaptive design strategies." <p>During the IEA6 Audit period, the flood design memo was issued to Penrith City Council and DCCCEW (CPHR) for consultation. A copy of the A9 consultation report was provided to the Auditor. PCC did not respond or raise any issues. CPHR wrote to SWC on 11/12/25 noting the following:</p> <p>"CPHR has reviewed the Technical Memorandum (Forward Hydro, 24 October 2025) and considers that the Stage 1 detailed design flood management measures comply with CoA E24 and that no further information is required"</p> <p>The flooding memo was issued to DPHI who confirmed on 27/1/26 that the Department "has no comments on the document at this time"</p>	Compliant
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. <p>Where the requirements set out in the amended FIA (July 2022) listed in Condition A1 cannot be met alternative flood levels or mitigation measures may be agreed to with the affected landowner.</p> <p>In the event that the Proponent and the affected landowner cannot agree on the measures to mitigate the impact as described in the amended FIA (July 2022) listed in Condition A1, the Proponent must engage a suitably qualified and experienced independent person to advise and assist in determining the impact and relevant mitigation measures.</p>	<ul style="list-style-type: none"> DPHI Post Approval Form 20240430083154 JHG/SWC Audit Interview 9/4/26 Upper South Creek Design Report, Revision 5, GHD Jacobs dated 24/1/25 IFC drawing ST0079 D501-1 has been included App D - AWRC-DIV-MEM-CW-0501-0004(A) Flood Modelling Assessment.pdf ST0079_D501-10(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>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>"Based on the comprehensive review of relevant documentation and comparison between reference and detailed designs, it is generally confirmed that AWRC Stage 1 detailed design complies with CoA E24. The design:</p> <ul style="list-style-type: none"> Incorporates all measures identified to avoid worsening flood characteristics when compared to the reference design; Ensures AWRC operational facilities are located outside flood-prone areas; Uses earthworks and stormwater infrastructure to mitigate flood risks; Complies with all relevant water quality and flow objectives; Addresses potential future impacts through planned assessments and adaptive design strategies." <p>During the IEA6 Audit period, the flood design memo was issued to Penrith City Council and DCCCEW (CPHR) for consultation. A copy of the A9 consultation report was provided to the Auditor. PCC did not respond or raise any issues. CPHR wrote to SWC on 11/12/25 noting the following:</p> <p>"CPHR has reviewed the Technical Memorandum (Forward Hydro, 24 October 2025) and considers that the Stage 1 detailed design flood management measures comply with CoA E24 and that no further information is required"</p> <p>The flooding memo was issued to DPHI who confirmed on 27/1/26 that the Department "has no comments on the document at this time"</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 9/4/26 LM 23208 - Discharge Structure Batter Sections, dated 12/11/24 Kemps Creek Sewage Network, T2W0M - Discharge Facility Earthworks Contour Plan - As Constructed dated 02/12/24 Site Inspection 9/4/26 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 	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. The complaint finding therefore relates to the pipelines and the Nepean River Discharge, with further assessments required during future Audits regarding the AWRC works	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. <p>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.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	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 9/4/26 Site Inspection 9/4/26 	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 (LUSP-JHG-MPL-ENV-0006) Letter from Kelleher Knightingale to SWC titled "Completion of Archaeological Fieldwork, Upper South Creek Advanced Water Recycling Centre State Significant Infrastructure Approval (SSI 8609189) dated 12/9/23 Letter from Kelleher Knightingale to SWC titled "Completion of Archaeological Fieldwork, Upper South Creek Advanced Water Recycling Centre State Significant Infrastructure Approval (SSI 8609189) dated 30/4/24 Unexpected Finds and Human Remains Procedure JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<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 Wallace Weir (AFT 3) - parish". SWC/JHG noted that since the issue of the Kelleher report (12/9/23) that the fieldwork for Wallace 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. At the time of IEA6, all ground disturbance works had been completed and the likelihood of an unexpected find is negligible.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E30	<p>The Registered Aboriginal Parties (RAPs) must be kept regularly informed about Stage 1 of the CSSI. The RAPs must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of Stage 1 of the CSSI.</p> <p>The Proponent must allow the RAPs an opportunity to undertake cultural salvage at each Aboriginal archaeological site identified for salvage in the Aboriginal Cultural Heritage Assessment Report (ACHAR) (June 2021) listed in Condition A1.</p> <p>Note: Details regarding ongoing engagement with RAPs must be provided in the Communication Strategy required under Condition B1.</p>	<ul style="list-style-type: none"> Upper South Creek Project - Advanced Water Recycling Centre and Pipelines - Co-AB 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 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Upper South Creek, Advanced Water Recycling Centre, Green Space Master Plan Engagement Outcomes Report, Sydney Water Badhu Yarragal WTC Final Email from Hope Cockatoo Collins to SWC titled "Community Profile - Aunty Leanne" dated 2/3/26 Email from Hope Cockatoo Collins to SWC titled "Cultural Burn - Co-ordination with new supplier" dated 30/3/26 Draft Interpretative panels content for review by Leanne Watson, Artefact Heritage Videos for AWRAC Administration Building, SWC - First Nations Video Prompts dated 22/2/26 Email from Hope Cockatoo Collins to SWC titled "Vector Files" dated 5/3/26 Badu Yarragal Water Resource Recovery Facility, Heritage Interpretation Framework, Artefact Heritage, dated 12/2/26 Power Point Presentation titled "Presentation to Representatives of the Aboriginal Stakeholder Advisory Group: Confirming Satisfaction and Ongoing Considerations for Heritage Initiatives" Email from Hope Cockatoo Collins to SWC titled "Sydney Water heritage interpretation initiatives for the Upper South Creek Project at Fleurs" dated 18/3/26 Email from Hope Cockatoo Collins to SWC titled "Welcome to Country and Dharug Translation" dated 26/2/26 Email from Hope Cockatoo Collins to SWC titled "New date for filming" dated 13/4/26 Hope Speaking Notes - Outcomes for Country, SWC 	<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 AWRAC and along pipelines (engaged by KMC under SWC direction).</p> <p>The Auditor was provided with several examples where local Aboriginal stakeholders have been engaged with including:</p> <ul style="list-style-type: none"> the Greenspace Master Plan Engagement Outcomes Report, which provides details of workshops and engagement activities with Aboriginal groups. Presentation to representatives of the Aboriginal Stakeholder Advisory Group confirming satisfaction and ongoing consideration to heritage initiatives Various emails and documents demonstrating Aboriginal Stakeholder involvement in the development of welcome to Country Statements, heritage interpretation, videos and aboriginal artwork initiatives <p>The access road to the site was renamed from Paper Road to Badu Muri Grove, as discussed and agreed during online workshops with traditional custodians and RAPs.</p>	Compliant
E31	<p>At the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s) must be prepared by a suitably qualified person. The Aboriginal Cultural Heritage Excavation Report(s), must:</p> <p>(a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, DEW 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and</p> <p>(b) document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds).</p> <p>The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant council(s), LALC, the RAPs and local libraries within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).</p>	<ul style="list-style-type: none"> Letter from Kelleher Knightingle 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 9/4/26 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 Site Inspection 9/4/26 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 SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (AWRC and Pipelines Project (CSSI 8609189): Request for extension of time for the development of the Aboriginal Cultural Heritage Excavation Report (Condition E31)" 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 	<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 Knightingle has been appointed to undertake this work.</p> <p>During the IAEG Audit period, DPHI approved an extension request to complete the report and submit to DPHI by 30/7/26</p>	Not triggered
E32	<p>Where previously unidentified Aboriginal objects or places of cultural significance are discovered, all Work must immediately stop in the vicinity of the affected area. Works potentially affecting the previously unidentified objects and places must not recommence until Heritage NSW has been informed. The measures to consider and manage this process must be specified in the Unexpected Heritage Finds and Human Remains Procedure required by Condition E37 and include registration in the Aboriginal Heritage Information Management System (AHIMS).</p>	<ul style="list-style-type: none"> John Holland - Environmental Induction Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) JHG/SWC Audit Interview 9/4/26 	<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
E33	<p>Archival photographic digital recording must be undertaken as proposed in the documents listed in Condition A1 for all listed heritage items which will be affected by Stage 1 of the CSSI. The recording must be undertaken prior to the commencement of Work which may impact the items and sites. The Archival recording must be undertaken by a suitably qualified heritage specialist and prepared in accordance with NSW Heritage Office's How to Prepare Archival Records of Heritage Items (1998) and Photographic Recording of Heritage Items Using Film or Digital Capture (2006). A copy must be provided to Heritage NSW and the relevant council(s) and submitted as part of the Heritage Report required by Condition E35.</p>	<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 5, Artefact September 2023 Letter from Artefact to SWC titled "Archaeological Monitoring Excavation Results: Blandans Crossing PAS 3" dated 21/12/24 Letter from Artefact to SWC titled "Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS7) Salvage Area 1" dated 21/12/24 Letter from Artefact to SWC titled "Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS7) Salvage Area 1" dated 31/1/23 Upper South Creek, Fleurs Radio Telescope Site, Photographic Archival Recording, Report to Sydney Water, Artefact, Rev2 dated 14/8/25 Email from Artefact to Fairfield City Council titled "Photographic Archival Recording of Upper South Creek Fleurs Radio Telescope" dated 18/1/25 Email from Artefact to Sydney University titled "Photographic Archival Recording of Upper South Creek Fleurs Radio Telescope" dated 18/1/25 SWC internal email dated 25/11/22 Upper South Creek, Fleurs 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 9/4/26 	<p>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 report was submitted to the relevant Council(s) in addition to CSIRO, Heritage NSW, CSIRO and the University of Sydney.</p>	Compliant
E34	<p>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.</p>	<ul style="list-style-type: none"> Archaeological Monitoring Excavation Results: Blandans Crossing (PAS 3), Artefact, December 2023 Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS 7) - Salvage Area 1, Artefact, December 2023 Upper South Creek AWRAC 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 5, 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 AWRAC PAS 7 - Salvage Area 2" dated 2/5/25 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 Archaeological Monitoring Excavation Results: Blandans Crossing (PAS 3), Artefact, December 2023 Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS 7) - Salvage Area 1, Artefact, December 2023 Upper South Creek AWRAC 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 5, Artefact November 2023 Email from Artefact to SWC dated 21/11/23 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>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</p>	Compliant
E35	<p>Following completion of archaeological excavation programs a Heritage Report must be prepared that includes:</p> <p>(a) the details of any archival recording;</p> <p>(b) further historical research undertaken;</p> <p>(c) results of archaeological excavations (including artefact analysis and identification of a final repository for finds); and</p> <p>(d) details of any significant artefacts recovered, where they were located, and details of their ongoing conservation and protection in perpetuity.</p> <p>The report must be prepared in accordance with guidelines and standards required by Heritage NSW.</p>	<ul style="list-style-type: none"> Archaeological Monitoring Excavation Results: Blandans Crossing (PAS 3), Artefact, December 2023 Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS 7) - Salvage Area 1, Artefact, December 2023 Upper South Creek AWRAC 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 5, 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 AWRAC PAS 7 - Salvage Area 2" dated 2/5/25 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 Archaeological Monitoring Excavation Results: Blandans Crossing (PAS 3), Artefact, December 2023 Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS 7) - Salvage Area 1, Artefact, December 2023 Upper South Creek AWRAC 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 5, Artefact November 2023 Email from Artefact to SWC dated 21/11/23 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>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.</p>	Compliant
E36	<p>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.</p>	<ul style="list-style-type: none"> Archaeological Monitoring Excavation Results: Blandans Crossing (PAS 3), Artefact, December 2023 Archaeological Monitoring Excavation Results: Fleurs Radio Telescope (PAS 7) - Salvage Area 1, Artefact, December 2023 Upper South Creek AWRAC 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 5, Artefact November 2023 Email from Artefact to SWC dated 21/11/23 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>The Heritage Report has been submitted to DPHI, Heritage Council, relevant councils as well as CSIRO, Sydney University and Penrith Historical Archaeology Group.</p>	Compliant
E37	<p>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.</p>	<ul style="list-style-type: none"> Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 14/7/23 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>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.</p>	Compliant
E38	<p>The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of Work.</p> <p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Unexpected Heritage Finds and Human Remains Procedure (included in site induction) Site Induction register (Environment) dated 9/4/25 	<p>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.</p>	Compliant
E39	<p>A detailed land use survey must be undertaken to confirm sensitive land uses (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.</p>	<ul style="list-style-type: none"> Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 	<p>The detailed land use survey is included in the Construction Noise and Vibration Management subplan with details incorporated into the Gateway noise models.</p>	Compliant
E40	<p>Work must be undertaken during the following hours:</p> <p>(a) 7:00am to 6:00pm Mondays to Fridays, inclusive;</p> <p>(b) 8:00am to 1:00pm Saturdays; and</p> <p>(c) at no time on Sundays or public holidays.</p>	<ul style="list-style-type: none"> OOH work register Site Environmental Plan (SEP)- AWRAC USC AWRAC Environmental Management Booklet USC Working Environmental Induction OOH Works Permit, AWRAC Family Day dated 30/10/25 OOH Works Permit AWRAC Extended Hours, Community Agreement, JHG dated 7/11/25 Notice of Licence Variation No 21800, EPA dated 31/10/25 Site Induction Records 	<p>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.</p> <p>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. The process for assessing and approving OOH works has been followed with evidence of implementation provided to the Auditor.</p>	Compliant
E41	<p>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:</p> <p>(a) between the hours of 8:00 am to 6:00 pm Monday to Friday;</p> <p>(b) between the hours of 8:00 am to 1:00 pm Saturday; and</p> <p>(c) if continuously, then not exceeding three hours, with a minimum cessation of Work of not less than one hour.</p> <p>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.</p>	<ul style="list-style-type: none"> Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 Site Environmental Plan (SEP)- AWRAC USC AWRAC Environmental Management Booklet USC Working Environmental Induction Site Hive Noise Monitoring Data - December 25 Site Hive Noise Monitoring Data - January 26 Site Hive Noise Monitoring Data - November 25 Site Hive Noise Monitoring Data - March 26 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	<p>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.</p> <p>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 and the need to undertake highly intensive works such as rockblasting in residential areas has been eliminated. There were no noise intensive activities being undertaken at the AWRAC site as observed during the Audit site inspection.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
442	<p>Notwithstanding Conditions E40 and E41 Work may be undertaken outside the hours specified in the following circumstances (a, b, or c):</p> <p>(a) Safety and Emergencies, including:</p> <p>(i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or</p> <p>(ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm.</p> <p>On becoming aware of the need for emergency work in accordance with Condition E40(a), the AA, the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. Best endeavours must be used to notify all noise and/or vibration affected residents and owners/occupiers of properties identified sensitive land use(s) of the likely impact and duration of those works; or</p> <p>(b) Work that meets all of the following criteria:</p> <p>(i) construction that causes LAeq(15 minute) noise levels:</p> <ul style="list-style-type: none"> - no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and - no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land use(s); or <p>(ii) construction that causes:</p> <ul style="list-style-type: none"> - continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or - intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006). <p>(c) By Approval, including:</p> <p>(i) where different construction hours are permitted or required under an EPL in force in respect of the CSS; or</p> <p>(ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E43; or</p> <p>(iii) negotiated agreements with directly affected residents and sensitive land use(s).</p>	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 9/4/26 • Site Inspection 9/4/26 • 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
443	<p>An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of Work which is outside the hours defined in Conditions E40, and that are not subject to an EPL. The Protocol must be submitted to and approved by the Planning Secretary before commencement of the out-of-hours work. The Protocol must be prepared in consultation with the ER, AA and EPA. The Protocol must include:</p> <p>(a) identification of low and high risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where:</p> <p>(i) the ER and AA review all proposed out-of-hours activities and confirm their risk levels,</p> <p>(ii) low risk activities can be approved by the ER in consultation with the AA, and</p> <p>(iii) high risk activities that are approved by the Planning Secretary;</p> <p>(b) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria;</p> <p>(c) a process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of Condition E55. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land use(s) would be exposed to, including the number of noise awakening events;</p> <p>(d) procedures to facilitate the coordination of out-of-hours work including those approved by an ER, or undertaken by a third party, to ensure appropriate respite is provided; and</p> <p>(e) notification arrangements for affected receivers for approved out-of-hours work and notification to the Planning Secretary of approved low risk out-of-hours works.</p> <p>This condition does not apply if the requirements of Condition E42(a) or (b) are met.</p> <p>Note: If the Work is subject to an EPL and the EPA does not endorse extended hours as part of the EPL, the extended hours can not be considered under this Protocol.</p>	<ul style="list-style-type: none"> • DPHI Approval dated 08/08/2023 their ref:SSI-8609189 • Environment Protection Licence EPL No 21800 • JHG/SWC Audit Interview 9/4/26 • Site Inspection 9/4/26 	<p>The project has obtained an Environment Protection Licence (EPL 21800). OOH work is undertaken in accordance with the EPL, not under the OOHV Protocol.</p>	Not triggered
444	<p>Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration objectives:</p> <p>(a) construction 'Noise affected' NMLs established using the Interim Construction Noise Guideline (DECC, 2009);</p> <p>(b) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure);</p> <p>(c) Australian Standard AS 2187.2 - 2006 'Explosives - Storage and Use - Use of Explosives';</p> <p>(d) BS 7385 Part 2-1993 'Evaluation and measurement for vibration in buildings Part 2' as they are 'applicable to Australian conditions'; and</p> <p>(e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage).</p> <p>Work that exceeds the noise management levels and/or vibration criteria must be managed in accordance with the Noise and Vibration CEMP Sub-plan required by Condition C4, as applicable.</p> <p>Note: The ICNG identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction NML.</p>	<ul style="list-style-type: none"> • Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Sub-plan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 • JHG Pre-start toolbox record, dated 24/10/25 • JHG Start Card dated 24/10/26 • JHG Site Inspection form INS-0107476, 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
445	<p>Mitigation measures must be applied when the following residential ground-borne noise levels are exceeded:</p> <p>(a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and</p> <p>(b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A).</p> <p>The mitigation measures must be outlined in the Noise and Vibration CEMP Sub-plan, including in any Out-of-Hours Work Protocol, required by Condition E43.</p>	<ul style="list-style-type: none"> • Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Sub-plan - 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
446	<p>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.</p>	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 9/4/26 • Site Inspection 9/4/26 	<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
447	<p>At no time can noise generated by construction exceed the National Standard for exposure to noise in the occupational environment of an eight-hour (8hr) equivalent continuous A-weighted sound pressure level of LAeq,8h of 85 dB(A) for any employee working at a location near the CSSi.</p>	<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 85dBa threshold.</p>	Compliant
448	<p>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.</p>	<ul style="list-style-type: none"> • Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Sub-plan - 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 Tomlin and Associates, dated 21/6/23 • Upper South Creek - Advanced Water Recycling Centre, Construction Noise and Vibration Impact Statement - Pipelines, Renzo Tomlin and Associates, dated 5/9/23 • USC Advanced Water Recycling Centre and Pipelines, Noise and Vibration Construction Monitoring Report, Rev A dated 15/5/24 	<p>Renzo Tomlin 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>Out of Hours works have been undertaken during the Audit period. OOH Permits detail proposed measures to be implemented.</p> <p>The Planning Secretary has not requested a copy of the CNVIS during the audit period.</p>	Compliant
449	<p>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.</p>	<ul style="list-style-type: none"> • JHG/SWC Audit Interview 9/4/26 • Site Inspection 9/4/26 	<p>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.</p>	Not triggered
450	<p>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:</p> <p>(a) use of regularly serviced low sound power equipment;</p> <p>(b) early occupation and later release of road carriageways and construction sites;</p> <p>(c) scheduling of noisiest Works before 11.00 pm Sunday to Thursday and before 12 midnight Friday and Saturday;</p> <p>(d) temporary noise barriers (including the arrangement of plant and equipment) around noisy equipment and activities such as rock hammering and concrete cutting; and</p> <p>(e) use of alternative construction and demolition techniques.</p>	<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 9/4/26 • Site Inspection 9/4/26 	<p>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.</p> <p>Out of Hours works have been undertaken during the Audit period. OOH Permits detail proposed measures to be implemented.</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

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
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 9/4/26 Site Inspection 9/4/26 Email from Artefact dated 24/11/23 Upper South Creek - Upper Canal Vibration Monitoring Report dated 30/11/23 Technical Memorandum titled "Upper South Creek Advanced Water Recycling and Pipelines, Horizontal Directional Drilling - Upper Canal Crossing - Vibration Monitoring Plan, ERM 14/9/23 	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. The advice was also reviewed by Artefact (prior to the IAH6 Audit period)	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 9/4/26 Site Inspection 9/4/26 	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: (a) rescheduling Work to provide respite to impacted noise sensitive land use(s) so that the respite is achieved in accordance with Condition ESS; 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 9/4/26 Site Inspection 9/4/26 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 (Paper 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. During the IAH 6 Audit period, minimal coordination has been required for the use of the AWRC access road, however these activities are relatively low impact considering the limited number of sensitive receivers in the general vicinity.	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: (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 of 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 9/4/26 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Consultation Summary Report - CoA ESS Community Consultation on Respite, November 2025 dated 31/10/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Consultation Summary Report - CoA ESS Community Consultation on Respite, December 2025, dated 28/11/25 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Consultation Summary Report - CoA ESS Community Consultation on Respite, January 2026 dated 2026, dated 30/1/26 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Consultation Summary Report - CoA ESS Community Consultation on Respite, February 2026 dated 2026, dated 30/1/26 Upper South Creek, Advanced Water Recycling Centre and Pipelines, Consultation Summary Report - CoA ESS Community Consultation on Respite, March 2026 dated 2026, dated 27/2/26 Email from JHG to EPA titled "CoA ESS A9_Consultation Summary Report Upper South Creek OOHV April 2026.pdf" dated 1/4/26 Email from EPA to JHG titled "CoA ESS A9_Consultation Summary Report Upper South Creek OOHV December 2025.pdf" dated 2/12/25 Email from EPA to JHG titled "CoA ESS A9_Consultation Summary Report March 2026.pdf" dated 2/12/25 Email from JHG to EPA titled "CoA ESS A9_Consultation Summary Report Upper South Creek OOHV December 2025.pdf" dated 1/12/25 Email from JHG to EPA titled "CoA ESS A9_Consultation Summary Report Upper South Creek OOHV February 2026.pdf" dated 30/1/25 Email from SWC to EPA titled "CoA ESS A9_Consultation Summary Report Upper South Creek OOHV January 2026.pdf" dated 19/12/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - ESS Consultation Summary Report - Dec 25" dated 1/12/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - ESS Consultation Summary Report - March 26" dated 3/2/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - ESS Consultation Summary Report - Jan 26 30" dated 23/12/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - ESS Consultation Summary Report - April 26" dated 8/4/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - ESS Consultation Summary Report - February 26" dated 5/2/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - Post Approval Document Received - (SS-8609189-PA-204)" dated 2/4/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - Post Approval Document Received - (SS-8609189-PA-180)" dated 1/12/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - Post Approval Document Received - (SS-8609189-PA-194)" dated 30/1/26 	The Auditor was provided with copies of the ESS Consultation Summary Reports for the period from November 2025 to March 2026 and which included details of: - 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 ESS.	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: (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 predictions based on the Final design. Confirmation must be based on an appropriately calibrated model(s) which has incorporated noise monitoring, and concurrent traffic counting, where necessary for calibration purposes). The assessment must specifically include verification of noise levels at all fitted 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: (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 9/4/26 Site Inspection 9/4/26 USC Project - Acoustic Advisor Review - Operational Noise and Vibration Review Rev 5 dated 4/12/24 Email from JHG to AA/ER titled "ES6 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 - ES6 - Operational Noise Review" Dated 4/7/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water recycling Centre - Post Approval Document Received - (SS-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 ES6 Operational Noise Review - Acoustic Advisor Verification" dated 6/6/25 Email from DPHI to SWC titled "Upper South Creek - ES6 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 ES6.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	Operational requirement	Not triggered
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 9/4/26 Site Inspection 9/4/26 Badu Yarragui, Greenspace Masterplan, 28 Badu Muru Grove, Kemps Creek, DRAFT, Rev 1, SWC dated 29/8/25 	The main construction site compound is located in an area with low visual sensitivity. Pipeline works have been completed and compounds demobilised, effectively eliminating visual impacts in visually sensitive residential areas. Rehabilitation activities, particularly along waterways has created a natural visual appearance, an improvement when compared to the pre-construction condition (particularly at creek crossings, riparian zones and RBM12 lands). Carpark lights at the AWRC compound are oriented in a downward direction to avoid spillage. The Environmental Inspection Form includes lighting as an issue to be assessed during site inspections. No complaints have been received regarding visual impacts during the audit period.	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/NZS 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. Additionally, mitigation measures must be provided to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners. Note: The outcomes of this condition must be demonstrated in the Urban Design and Landscape Plan.	<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 9/4/26 Site Inspection 9/4/26 Letter from DPHI to SWC titled "Upper South Creek, Advanced Water Recycling Centre (SS-8609189-pa-52) Site Inspection form INS 0039287 	The main construction site compound is located in an area with low visual sensitivity. Pipeline works have been completed and compounds demobilised, effectively eliminating visual impacts in visually sensitive residential areas. Rehabilitation activities, particularly along waterways has created a natural visual appearance at some locations, an improvement when compared to the pre-construction condition. 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. The Environmental Inspection Form includes lighting as an issue to be assessed during site inspections. No complaints have been received regarding visual impacts.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E60	<p>Temporary and permanent active transport facilities along the pipeline alignment must be designed, constructed and/or rectified in accordance with:</p> <p>(a) the process set out in the Movement and Place Framework (NSW Government) including: (i) the Walking Space Guide: Toward Pedestrian Comfort and Safety (ITNSW, 2020); and (ii) the Cyclingway Design Toolkit: Designing for Cycling and Micromobility (ITNSW, 2020); (b) the Guide to Road Design Part 6A: Paths for Walking and Cycling (Austroads 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> <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 9/4/26 Site inspection 9/4/26 	<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	<p>The place making, design and landscape outcomes for the AWRC Site of Stage 1 of the CSSI must be:</p> <p>(a) informed by and be consistent with the Upper South Creek Advanced Water Recycling Centre Urban Design Report, dated July 2021 (provided as Attachment A to RFI 1, dated 1 June 2022) and identified in the documents listed in Condition A1, including but not limited to the objectives and design principles, requirements, and opportunities; and (b) prepared in consultation with the community (including the affected landowners and businesses or a representative of the businesses), LALCs, RAs and relevant council(s).</p>	<ul style="list-style-type: none"> Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI-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-UDLP - timeframe for additional components, dated 29/8/24 Revised UDLP Revision 8, dated 4/10/24 External_Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-117), dated 4/10/24 DPHI Letter to Sydney Water RE: SSI-8609189-PA-117 - Condition E63 - Revised UDLP - Request for Additional Information, dated 30/10/24 Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (AWRC and Pipelines Project (CSSI 8609189): Response to RFI for Revised Urban Design and Landscaping Plan (UDLP) SSI-8609189-PA-117) dated 12/11/24 Upper South Creek Advanced Water Recycling Centre and Pipelines Urban Design and Landscape Plan, Revision 8 dated 4/10/24 Badu Yarragul, Greenspace Masterplan, 28 Badu Muru Grove, Kemp's Creek, DRAFT_Rev 1, SWC dated 29/8/25 JHG/SWC Audit Interview 9/4/26 	<p>The Stage 1 Urban Design and Landscape Plan (UDLP) was approved by DPHI on 29/11/23. The UDLP was subsequently revised to include the Landscape Management Plan (LMP) and Vegetation Management Plan (VMP) as appendices. The revised UDLP including LMP and VMP was submitted to DPHI for approval on 4/10/24.</p> <p>The submission date for the revised UDLP, including LMP and VMP was requested to be extended to 4/10/24 after the initial submission date of 1/6/24 was missed. Emails between Sydney Water and DPHI discussing the need for an extension, dated 29/8/24 were provided as evidence.</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 UDLP (1/6/24) had passed. DPHI agreed that the missed timeframe would not be considered a non-compliance and Sydney Water confirmed no vegetation or landscaping works had commenced associated with the UDLP.</p> <p>NB: On 30/10/24 DPHI issued a letter requesting additional information in relation to the revised UDLP, LMP and VMP. The project will need to provide further information to DPHI to support compliance with Condition E63(a) and E65(a).</p> <p>NB: on 20/11/24, DPHI approved the revised UDLP noting the UDLP has been revised to include the Vegetation Management Plan (VMP) and Landscape Management Plan (LMP) required by the Departments Approval Letter (dated 29/11/23), to inform vegetation and landscaping requirements on the AWRC site and adjacent to the South Creek corridor.</p> <p>At the time of IEA #6, the Greenspace Masterplan was approved by DPHI with evidence of stakeholder consultation and the DPHI letter of approval provided to the Auditor. The UDLP has been updated with the Greenspace Masterplan and is provided on the SWC website.</p>	Compliant
E62	<p>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.</p>	<ul style="list-style-type: none"> Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRC-TRA-PLN-DES-0001 Rev 5, dated 13/11/23 JHG/SWC Audit Interview 9/4/26 	<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	<p>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 UDLP must be:</p> <p>(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) and 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 UDLP applies; and (d) implemented during construction and operation of Stage 1 of the CSSI.</p> <p>Note: The UDLP may be developed and considered in stages to facilitate design progression and construction. Any such staging and associated approval would need to facilitate a cohesive final design and not limit final design outcomes.</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, E66 Urban Design and Landscape Plan, dated 26/7/23 Letter from SWC to DPHI RE: Upper South Creek Advanced Water Recycling Centre (SSI 8609189): Notification of proposed staging of the Urban Design Plan and Landscape Plan (UDLP) (Condition E63-E65) in accordance with the Staging Report (Condition A10), dated 29/9/24 Revised UDLP Revision 8, dated 4/10/24 External_Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-117), dated 4/10/24 DPHI Letter to Sydney Water RE: SSI-8609189-PA-117 - Condition E63 - Revised UDLP - Request for Additional Information, dated 30/10/24 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI - 8609189-PA-117) - Conditions E 63, E64 and E65 - Approval of revised Urban Design and Landscape Plan" dated 20/11/24 Badu Yarragul, Greenspace Masterplan, 28 Badu Muru Grove, Kemp's Creek, DRAFT_Rev 1, SWC dated 29/8/25 JHG/SWC Audit Interview 9/4/26 	<p>As noted in IEA #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 UDLP noting that the works undertaken are core structural elements. External finishes and landscaping works were yet to commence at the time of the audit.</p> <p>On 29/9/23 DPHI approved the construction of structural concrete works prior to the UDLP as follows: - Oxidation ditches - MBR - Inlet works - Digesters</p> <p>The revised UDLP including LMP and VMP addresses the requirements of Condition E63 and was submitted to DPHI for approval on 4/10/24 with DPHI approval issued on 20/11/24.</p> <p>The DPHI letter of approval was for works outlined in the revised UDLP (revision 08, dated 04/10/24) and excludes any components to be captured as part of the Greenspace Masterplan.</p> <p>At the time of IEA #6, the Greenspace Masterplan was approved by DPHI with evidence of stakeholder consultation and the DPHI letter of approval provided to the Auditor. The UDLP has been updated with the Greenspace Masterplan and is provided on the SWC website.</p>	Compliant
E64	<p>The UDLP must document how the following matters have been considered in the design and landscaping of the project:</p> <p>(a) the requirements of Conditions E61 to E62; (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, DPI 2012), draft Western Sydney Aerotropolis Riparian Revegetation Strategy, and the tree planting provisions in the draft Western Sydney Aerotropolis Development Control Plan – Phase 2 (October 2021); (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.</p>	<ul style="list-style-type: none"> Sydney Water - Upper South Creek Advanced Water Recycling Centre, Urban Design and Landscape Plan Stage 1, Tract, Rev 5, dated 13/11/23 Revised UDLP Revision 8, dated 4/10/24 External_Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-117), dated 4/10/24 DPHI Letter to Sydney Water RE: SSI-8609189-PA-117 - Condition E63 - Revised UDLP - Request for Additional Information, dated 30/10/24 Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI - 8609189-PA-117) - Conditions E 63, E64 and E65 - Approval of revised Urban Design and Landscape Plan" dated 20/11/24 Badu Yarragul, Greenspace Masterplan, 28 Badu Muru Grove, Kemp's Creek, DRAFT_Rev 1, SWC dated 29/8/25 Upper South Creek, Badu Yarragul Water Recovery Facility, Wildlife Management Plan, JHG, Rev 4 dated 10/8/25 JHG/SWC Audit Interview 9/4/26 	<p>The UDLP is comprehensive and addresses the requirements of this condition.</p> <p>DPHI approved the UDLP Stage 1 on 29/11/23 (Revision 5, dated 13/11/23), which excluded any vegetation and landscaping requirements under Conditions E64 and E65. The UDLP addresses the requirements of this condition.</p> <p>The revised UDLP including LMP and VMP was submitted to DPHI for approval on 4/10/24 and subsequently approved on 20/11/24.</p> <p>At the time of IEA #6, the Greenspace Masterplan was approved by DPHI with evidence of stakeholder consultation and the DPHI letter of approval provided to the Auditor. The UDLP has been updated with the Greenspace Masterplan and is provided on the SWC website.</p>	Compliant
E65	<p>The UDLP must include descriptions and visualisations (as appropriate) of:</p> <p>(a) the design of the permanent built elements for the 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 Work (including adequate watering of plants following planting depending on forecast weather conditions and weed management) to ensure the success of the design and landscape outcomes.</p> <p>Unless otherwise agreed with the Planning Secretary, construction of permanent built work or landscaping that are the subject of the UDLP must not be commenced (in the area to which the UDLP applies) until the UDLP has been approved by the Planning Secretary.</p>	<ul style="list-style-type: none"> Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number 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 29/9/23 Letter from DPHI to SWC RE: Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-39) - Condition E63, E64 E65 Approval of the Urban Design and Landscape Plan, dated 29/11/23 Revised UDLP Revision 8, dated 4/10/24 External_Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-117), dated 4/10/24 DPHI Letter to Sydney Water RE: SSI-8609189-PA-117 - Condition E63 - Revised UDLP - Request for Additional Information, dated 30/10/24 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI - 8609189-PA-117) - Conditions E 63, E64 and E65 - Approval of revised Urban Design and Landscape Plan" dated 20/11/24 JHG/SWC Audit Interview 9/4/26 Badu Yarragul, Greenspace Masterplan, 28 Badu Muru Grove, Kemp's Creek, DRAFT_Rev 1, SWC dated 29/8/25 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - E63 Greenspace Masterplan" dated 4/2/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - SSI-8609189-PA-191) dated 15/1/26 Upper South Creek Advanced Water Recycling Centre, Green Space Master Plan Engagement, Outcomes Report, Sydney Water Badu Yarragul Greenspace Master Plan, 28 Badu Muru Grove, Kemp's Creek, Sydney Water Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189)-Greenspace Master Plan, dated 4/2/26 	<p>On 29/9/23 DPHI approved the construction of structural concrete works prior to the UDLP submission as follows: - Oxidation ditches - MBR - Inlet works - Digesters</p> <p>DPHI approved the UDLP Stage 1 on 29/11/23 (Revision 5, dated 13/11/23), which excluded any vegetation and landscaping requirements under Conditions E64 and E65. The UDLP addresses the requirements of this condition.</p> <p>The revised UDLP including LMP and VMP was submitted to DPHI for approval on 4/10/24.</p> <p>NB: On 30/10/24 DPHI issued a letter requesting additional information in relation to the revised UDLP, LMP and VMP. The project will need to provide further information to DPHI to support compliance with Condition E63(a) and E65(a).</p> <p>NB: on 20/11/24, DPHI approved the revised UDLP noting the UDLP has been revised to include the Vegetation Management Plan (VMP) and Landscape Management Plan (LMP) required by the Departments Approval Letter (dated 29/11/23), to inform vegetation and landscaping requirements on the AWRC 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 IEA #6, the Greenspace Masterplan was approved by DPHI with evidence of stakeholder consultation and the DPHI letter of approval provided to the Auditor. The UDLP has been updated with the Greenspace Masterplan and is provided on the SWC website.</p>	Compliant
E66	<p>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 Proprietor'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 Proprietor must maintain items and work to at least the design standards established in the UDLP, required by Condition E65.</p> <p>The Planning Secretary must be advised of the date of transfer of the asset(s) to the relevant authority.</p>	<ul style="list-style-type: none"> Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number 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 JHG/SWC Audit Interview 9/4/26 Site inspection 9/4/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - E63 Greenspace Masterplan" dated 4/2/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - SSI-8609189-PA-191) dated 15/1/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-191) dated 15/1/26 Upper South Creek Advanced Water Recycling Centre, Green Space Master Plan Engagement, Outcomes Report, Sydney Water 	<p>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.</p> <p>At the time of IEA #6, the Greenspace Masterplan was approved by DPHI with evidence of stakeholder consultation and the DPHI letter of approval provided to the Auditor. The UDLP has been updated with the Greenspace Masterplan and is provided on the SWC website.</p> <p>Evidence of maintenance activities for landscaping were observed during the Audit site inspection with landscaping maintenance records provided to the Auditor.</p>	Not triggered

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
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 9/4/26 Site Inspection 9/4/26 Infrastructure Approval SSI-8609189, Appendix B Upper South CoA E19 and E20 Creek Rehabilitation Management Plan, RMB12 Lands - Kemps Creek, Rev05, dated 23/5/24 DPH Letter to SWC RE: Approval of Rehabilitation Management Plan, dated 30/5/24 Vegetation Maintenance Records, B&K Group Australia dated 29/11/25 Vegetation Maintenance Records, B&K Group Australia dated 10/2/26 	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 (with records of maintenance activities, including landscaping construction diaries)	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 9/4/26 Site Inspection 9/4/26 	As noted in previous audits, work activity planning includes the identification of inground services through a number of processes including Dial Began, 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. There were no impacts to External services during the Audit period.	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 9/4/26 Site Inspection 9/4/26 Audit/Slaps - Geotagged Pre-Construction Survey OPT (Upper Canal South Creek), 24 July 2023 230710 Property Condition Survey Letter 1 dated 12/7/23 230710 Property Condition Survey Letter 3 dated 14/8/23 230710 Property Condition Survey Letter 2 dated 23/2/24 Audit/Slaps - 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. There were no property impacts identified during the IA#6 Audit period.	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 9/4/26 Site Inspection 9/4/26 Master AWRC - Treated Post Construction Property Survey Schedule-rev1, as at 1/11/24 Audit/Slaps OPT-38835 USC AWRC Post-Construction Condition Survey, 22 Park Road Wallacia, dated 8/10/24 Audit/Slaps's OPT-38835 USC AWRC Post-Construction Condition Survey, 24 Greendale Road Wallacia, dated 11/10/24 Audit/Slaps - OPT-38835 USC AWRC - Kemps Creek NSW, Post-Construction Geotagged Condition Survey, dated 15/10/24 Audit/Slaps's OPT-38835 USC AWRC Post-Construction Condition Survey, Sports Bar, 1 Bartley Street Canly Vale NSW 2166, 15/10/25 Letter from SWC to Cabralve Diggers titled "Upper South Creek Advanced Water Recycling Centre - Post Construction Property Condition Survey" dated 25/9/24 	Post-construction surveys undertaken during the (IEA #4) Audit period were for the following properties: <ul style="list-style-type: none"> Sports Bar, 1 Bartley Street, Canly Vale Council Assets, 1 Bartley Street, Canly Vale 24 Greendale Road, Wallacia 600-602 Cabramatta Road West. The surveys were undertaken by Audit/Slaps, 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#6) 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 9/4/26 Site Inspection 9/4/26 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 (6th 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 Guide for Achieving Wianamatta South Creek Stormwater Management Targets (DPH, 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 Progressive Erosion and Sediment Control Plan, Kemps Creek Sewerage Network, Water Resource Recovery Facility General Arrangement dated 12/8/25 Farm Dam Entry ESCP dated 19/3/23 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 6/2/25 Soil Conservationist Site Inspection Report 26/3/25 Progressive Erosion and Sediment Control Plan, Kemps Creek Sewerage Network, Water Resource Recovery Facility, ERSED, dated 12/8/25 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	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 ERSED controls observed during the audit were generally a high standard with a High Efficiency Sediment Basin installed at the AWRC site which had been 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 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	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): (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 9/4/26 Site Inspection 9/4/26 	A NSW EPA accredited Site Auditor has been engaged. Evidence was provided of their involvement throughout the project to date, including the issue of Interim Advice letters. Assessments were ongoing and the project was not yet up to a stage where a Site Audit Report or Site Audit Statement could be issued. Refer to Condition E75 for more detail.	Compliant
E75	Evidence that the NSW EPA accredited Site Auditor has reviewed each of the plans and reports listed in Condition E74, and has issued an interim audit advice or a relevant Site Audit Statement regarding the appropriateness of those plans or reports, must be provided when the plan or report is submitted to the Planning Secretary for information. Where the NSW EPA accredited Site Auditor confirms that no further investigations are warranted, Conditions E76 to E82 do not apply.	<ul style="list-style-type: none"> Letter from 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 12/9/23 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 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 JBSG 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 - Pipeline" 5/9/25 DPH Post Approval Form - 20230901061601 DPH Post Approval Form - 20230901061601 JHG/SWC Audit Interview 9/4/26 Email from JSBG to JHG titled "CSSI 8609199 Upper South Creek AWRC - Site Validation Report (Pipelines) Site Auditor Comments" dated 6/11/25 Email from JSBG to JHG titled "CSSI 8609199 Upper South Creek AWRC - Site Validation Report (Pipelines) Site Auditor Comments" dated 6/11/25 Email from JSBG to JHG titled "CSSI 8609199 Upper South Creek AWRC - Site Validation Report (Pipelines) Site Auditor Comments" dated 6/11/25 Email from JSBG to JHG titled "USC Soils and Contamination CEMP Subplan (Rev C) for review" dated 29/10/25 	At the time of this Audit (IA#6), a total of 12 Interim Advice letters have been issued by the EPA Accredited Site Auditor to date. Interim Advice letters state the following documents were reviewed: <ul style="list-style-type: none"> - Soils and Contaminated Land Impact Assessment - Preliminary Site Investigation - Options assessment/Preliminary Site Investigation - Detailed Site Investigation - Memorandum re Hazardous Materials Survey - Soils and Construction Environmental Management Plan - Unexpected Finds procedure for contamination - Updated remedial action plan for pipelines alignment. - DSI for pipelines Post Approval forms were provided as evidence and confirm submission of the Interim Advice letters to the Department as required. During the previous Audit (IEA#5) period, IA 12 was issued for the review of detailed site investigations, pipelines. At the time of this Audit (IEA#6), the site validation reports were progressing (working through minor imported materials issues) in readiness for submission to the EPA Auditor.	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 - Pipelines" dated 16 May 2023 JHG/SWC Audit Interview 9/4/26 	Risk Reviews were undertaken in accordance with Condition E76 with Interim Advice issued by the EPA accredited Site Auditor. Refer to Condition E75 for more detail.	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: (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 (CEInvPSC) 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, 6/6/23 Letter from JBSG 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 JBSG 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 9/4/26 Site Inspection 9/4/26 	Sampling and Analysis Quality Plans (SAQPs) were prepared for both the AWRC site and pipelines. The SAQPs were both reviewed by the EPA accredited Site Auditor with Interim Advice provided.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E78	<p>For medium to high-risk AECs as confirmed by the NSW EPA accredited Site Auditor, Detailed Site Investigation(s) must be conducted to determine the full nature and extent of the contamination at project areas identified in the SAOP(s). The Detailed Site Investigation(s) must:</p> <p>(a) be prepared (or reviewed and approved) by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnPSC) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme</p> <p>(b) be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the CLM Act; and</p> <p>(c) state if the land within the project footprint is suitable for the proposed use or if the land requires remediation to be made suitable for the proposed use.</p>	<ul style="list-style-type: none"> Letter from JB&G to SWC titled "L09 Interim Audit Advice (0503-2307-09) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Plant Site 6/9/23 Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16/8/23 USC AWRIC Pipeline Spoil Characterisation Report, ERM 19/12/23 USC AWRIC Pipeline Spoil Characterisation Report, ERM 8/4/24 Comments Register, 0677 Pipelines DSI Aud Comms, 24.7.25 Detailed Site Investigations - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Draft Rev 1 ERM dated 26/6/25 Detailed Site Investigations - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Rev 2 ERM dated 24/7/25 Letter from JB&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 9/4/26 Site Inspection 9/4/26 	<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 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>"Based on a review of the information provided and subject to the limitations in Attachment 1, the following audit opinions are presented:</p> <ul style="list-style-type: none"> The auditor considers that the DSI (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
E79	<p>A Detailed Site Investigation Report must be submitted to the Planning Secretary upon request following the completion of the Detailed Site Investigation(s) required by Condition E78.</p> <p>The Detailed Site Investigation Report must be prepared in accordance with:</p> <p>(a) the land use criteria applicable to the final land use at the opening of Stage 1 of the CSSI. Where the final land use is unknown the most stringent criteria for the land use assumed in the documents listed in Condition A11 is to be applied; and</p> <p>(b) relevant guidelines made or approved by the EPA under section 105 of the CLM Act including Consultants Reporting on Contaminated Land: Contaminated Land Guidelines (NSW EPA 2020).</p> <p>The report must be prepared by a Contaminated Land Consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnPSC) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.</p> <p>Notes:</p> <p>1. Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports for separate contaminated sites.</p> <p>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.</p>	<ul style="list-style-type: none"> Letter from JB&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 DSI Aud Comms, 24.7.25 Detailed Site Investigations - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Draft Rev 1 ERM dated 26/6/25 Detailed Site Investigations - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Rev 2 ERM dated 24/7/25 Letter from JB&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 DSI for the AWRIC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09. During the IAS Audit period 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> <ul style="list-style-type: none"> 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 Lovelle of ERM, certified under Environment Institute of Australia and New Zealand's (EIANZ) Certified Environmental Practitioner (Site Contamination) scheme (CEnPSC). The auditor considers that the DSI (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" <p>The Planning Secretary has not made any request for submission of a Detailed Site Investigation Report during the Audit period.</p>	Compliant
E80	<p>The Detailed Site Investigation Report must provide details on:</p> <p>(a) primary sources of contamination, for example potentially contaminating activities, infrastructure (such as underground storage tanks, fuel line, sumps or sewer lines) or site practices;</p> <p>(b) contaminant dispersal in air, hazardous ground gases, surface water, groundwater, soil vapour, separate phase contaminants, sediments, infrastructure (e.g. concrete, biota, soil and dust);</p> <p>(c) contaminant characterisation and behaviour (volatility, leachability, speciation, degradation products and physical and chemical conditions on-site which may affect how contaminants behave);</p> <p>(d) potential effects of contaminants on human health, including the health of occupants of built structures (for example arising from risks to service lines from hydrocarbons in groundwater, or risks to concrete from acid sulphate soils) and the environment;</p> <p>(e) potential and actual contaminant migration routes including potential preferential pathways;</p> <p>(f) the adequacy and completeness of all information available for use in the assessment of risk and for making decisions on management requirements, including an assessment of uncertainty;</p> <p>(g) the review and update of the conceptual site model from the preliminary and detailed site investigations;</p> <p>(h) nature and extent of any existing remediation (such as impervious surface cappings); and</p> <p>(i) whether the land is suitable (for the intended final land use) or can be made suitable through remediation.</p>	<ul style="list-style-type: none"> Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16/8/23 JHG/SWC Audit Interview 9/4/26 Letter from JB&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 DSI for the AWRIC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09. During the IAS Audit period 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> <ul style="list-style-type: none"> 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 Lovelle of ERM, certified under Environment Institute of Australia and New Zealand's (EIANZ) Certified Environmental Practitioner (Site Contamination) scheme (CEnPSC). The auditor considers that the DSI (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
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> <p>Notes:</p> <p>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.</p> <p>2. This condition does not prevent disturbance required to complete the Detailed Site Investigation(s).</p> <p>3. This condition does not prevent other activities that do not disturb the land where the ER has reviewed the appropriateness of these activities in accordance with Condition A28(b).</p>	<ul style="list-style-type: none"> Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16/8/23 JHG/SWC Audit Interview 9/4/26 Letter from JB&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 DSI for the AWRIC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09. Refer to the Auditors response to Condition E79 (above) regarding the DSI for the pipelines component of the project.</p> <p>During the IEA #5 Audit period 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> <ul style="list-style-type: none"> 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 Lovelle of ERM, certified under Environment Institute of Australia and New Zealand's (EIANZ) Certified Environmental Practitioner (Site Contamination) scheme (CEnPSC). The auditor considers that the DSI (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	<p>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.</p>	<ul style="list-style-type: none"> Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16/8/23 Comments Register, 0677 Pipelines DSI Aud Comms, 24.7.25 Detailed Site Investigations - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Draft Rev 1 ERM dated 26/6/25 Detailed Site Investigations - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Rev 2 ERM dated 24/7/25 Letter from JB&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 9/4/26 	<p>As noted in previous Audits, the DSI for the AWRIC site has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Audit Statement L09. During this Audit, the DSI 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 DSI 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 areas 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 DSI report, therefore ERM considers E82 does not apply"</p>	Compliant
E83	<p>Where remediation is required to make land suitable for the final intended land use, a Remedial Action Plan must be prepared and/or reviewed and approved by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnPSC) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.</p> <p>The Remedial Action Plan must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the CLM Act and must include measures to remediate the contamination at the site to ensure the site will be made suitable for the final intended land use.</p> <p>Note: Nothing in this condition prevents the Proponent from preparing individual Remedial Action Plan(s) for separate contaminated sites.</p>	<ul style="list-style-type: none"> Remediation Action Plan, Upper South Creek Advanced Water Recycling Centre, John Holland, 29/8/23 Remediation Action Plan, Upper South Creek Advanced Water Recycling Centre - Pipelines, John Holland, 6/3/24 Letter from SWC to DPH Titled "Upper South Creek Advanced Water Recycling Centre: Provision of Remedial Action Plan (RAP) in accordance with Condition E84 Letter from JB&G 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 JB&G 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 JB&G 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 DPH to SWC titled "Upper South Creek Advanced Water Recycling Centre (SS-8609189) Remediation Action Plan - Pipelines JHG/SWC Audit Interview 9/4/26 	<p>A Remedial Action Plan (RAP) has been prepared for the AWRIC site and submitted to the Department with the EPA Site Auditor's Interim Audit Advice. An additional RAP was prepared for the pipelines and approved by DPH on 21/3/24 following review and endorsement by the EPA Site Auditor. The DPH approved the RAP had been reviewed by the EPA Site Auditor with corresponding Interim Audit Advice provided. Stockpiles on AWRIC classified in accordance with the NEPM. As observed during the site inspection, stockpiles have been maintained within the AWRIC project boundary for future re-use potential.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
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 DPHI to SWC Titled "Upper South Creek Advanced Water Recycling Centre: Provision of Remedial Action Plan (RAP) in accordance with Condition E84 Letter from JB5G 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 - Plan 1" dated 30/9/23 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189) Remediation Action Plan - Pipelines Letter from DPHI to SWC titled "Asbestos Clearance Certificate - Upper South Creek Advanced Water Recycling Centre, Lennox Reserve Construction Support Compound, Canley Vale NSW, dated 6/2/25 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 9/4/26 	<p>As noted in previous Audits, a Remedial Action Plan (RAP) has been prepared for the AWRK site and submitted to the Department with the EPA Site Auditor's Interim Audit advice.</p> <p>An additional RAP was prepared for the pipelines and approved by DPHI on 21/3/24 following review and endorsement by the EPA Site Auditor. The DPHI approval noted the RAP had been reviewed by the EPA Site Auditor with corresponding Interim Audit Advice provided.</p> <p>During the IA#8 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 AWRK site to manage ACM spoil from around structures that were in place on the AWRK site. The encapsulation cell will be managed in accordance with an LTEMP/CLMP to be developed as part of the AWRK validation report prior to operation.</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 CSSI. Note: Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Email from JB5G to JHG titled "CSSI 8609189 Upper South Creek AWRK - 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 # 6 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> <p>At the time of IA#6, the validation report for the AWRK site was being drafted.</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 9/4/26 Email from JB5G to JHG titled "CSSI 8609189 Upper South Creek AWRK - 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 	The Audit statement is not required until the completion of construction.	Not triggered
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 JB5G to SWC RE: I04 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 9/4/26 Detailed Site Investigations - Pipelines, Upper South Creek Advanced Water Recycling Centre, Final Rev 2, ERM dated 24/7/25 Letter from JB5G 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 (I04) 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 DSI for the pipelines has been completed and reviewed by the EPA Accredited Auditor as evidenced in Interim Advice Statement L12.</p> <p>Section 10 of the Pipelines DSI 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 within 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 DSI report, therefore ERM considers E82 does not apply"</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. Note: Nothing in this condition prevents the Unexpected Finds Procedure for Contamination required under Condition E88 to be submitted for approval as part of the Soils and Contamination CEMP Sub-Plan under Condition 08.	<ul style="list-style-type: none"> Appendix C Soils and Contamination CEMP Sub-plan Enviro Consulting - Asbestos inspection report - Monash Place and Hebblewate Place Bonnyrigg, dated 28/2/24 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 D 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> <p>No unexpected finds were encountered during the IEA#6 Audit period.</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 20221103061008 John Holland Case Study - Sand to Glass and Back Again: A Circular Tale of Sustainable Construction Rev00, dated 6/2/2024 JHG Sustainability CSF Tracker - Snapshot, as at 1/11/24 ERM and JHG Sustainability Dashboard Interim 2025 	<p>The sustainability strategy commits to a "Gold" Rating.</p> <p>Examples of sustainability initiatives include a recycled pipe bedding sand alternative, utilising blended glass sand and the replacement of recycled gyprock in the place of gypsum.</p> <p>In the IA #6, Audit, Infrastructure Sustainability Council (ISC) certification was complete with a Platinum IS v2.1 Design Rating Achieved. This is higher than the original target of Gold Rating.</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 9/4/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre E90 - ISC Design Rating" dated 20/3/26 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA 203) dated 13/3/26 Letter from SWC to DPHI titled "Upper South Creek Advanced Water Recycling Centre (IA#6)" and Biallone, Brian (JHG) 8609189 - Revision of Infrastructure Sustainability Council (ISC) Design Rating 	<p>In the IA #6, Audit period, Infrastructure Sustainability Council (ISC) certification was complete with a Platinum IS v2.1 Design Rating Achieved. This is higher than the original target of Gold Rating. A copy of the ISC certificate was provided to DPHI with no comments received.</p>	Compliant
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: B 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 9/4/26 	<p>The sustainability strategy commits to a "Gold" Rating.</p> <p>Examples of sustainability initiatives include a recycled pipe bedding sand alternative, utilising blended glass sand and the replacement of recycled gyprock in the place of gypsum.</p> <p>In the IA #4, Audit, Infrastructure Sustainability CSF Tracker was reviewed and indicated the DRI Submission Completion Rate was at 100% with 79.22 points ready for submission as of April 2025.</p> <p>In the IA #6, Audit period, Infrastructure Sustainability Council (ISC) certification was complete with a Platinum IS v2.1 Design Rating Achieved. This is higher than the original target of Gold Rating. A copy of the ISC certificate was provided to DPHI with no comments received.</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: (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: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational phases of the CSSI.	<ul style="list-style-type: none"> Upper South Creek Advanced Water Recycling Centre and Pipelines CoA E92 Construction Water Reuse Strategy Rev D, dated 6/02/26 Water Reuse Dashboard - screenshot as at 1/11/24 Email from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Received - (SSI-8609189-PA-207) dated 21/4/26 DPHI Post Approval Form 20220421043738 	<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>The Water Reuse Strategy (latest version is Rev D dated 6/2/26) has been revised to consider the water re-use applications for both the construction and operational phases and was submitted to DPHI on 21/4/26</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 9/4/26 Site Inspection 9/4/26 	At the time of the Audit (IA # 6), all works on the pipelines had completed. There were no property access issues identified by the Audit.	Compliant
E94	Any property access physically affected by Stage 1 of the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Pre-construction customer agreement - working with property owners dated 10/3/24 Pre-construction customer agreement - working with property owners dated 10/3/24 	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-installation of driveways. There were no properties affected during the IA#6 Audit period, noting that all pipeline activities are now complete.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
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 9/4/26 Letter from DPHI to SWC titled "Approval of the Traffic and Transport CEMP Sub-plan, Local Roads Approval, and Construction Parking and Access Strategy" dated 24/11/23 	There have been no incidents or non-compliances related to local road use reported during the audit period. DPHI approved the use of local roads on 24/11/23. No new local road approvals have been required during the audit period.	Compliant
E96	All requests to the Planning Secretary under Condition E95 must include the following: (a) a swept path analysis; (b) demonstration that the use of local roads by heavy vehicles for the Stage 1 of the CSSI will not compromise the safety of pedestrians and cyclists or the safety of two-way traffic flow on two-way roadways; (c) provide details as to the date of completion of the road dilapidation surveys for the subject local roads; (d) measures that will be implemented to avoid where practicable the use of roads past schools, aged care facilities and child care facilities during their peak operation times; and (e) written advice from an appropriately qualified professional on the suitability of the proposed heavy vehicle route which takes into consideration items (a), (b), (c), and (d) of this condition.	<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 Revised - (SS-8609189-PA-123), dated 15/3/24 Letter from DPHI to SWC titled "Upper South Creek Advanced Water Recycling Centre - Condition E95 and E96 - Approval of revised Local Roads Approval for use of Edith Street" dated 22/11/24 Memoandum - Upper South Creek Advanced Water Recycling Centre and Pipelines Project - Local Roads Approval Rev B" dated 13/11/24 DPHI Post Approval Form 5061030 Upper South Creek Advanced Water Recycling Centre and Pipelines, Traffic and Transport CEMP Subplan, Rev D dated 29/11/24 	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 IA95 Audit period, a minor amendment to the Local Road Approval for Edith was endorsed by the ER on the 11/11/24 and approved by DPHI on the 22/11/24. DPHI requested the updated Local Roads Approval to be appended to the updated version of the Traffic and Transport CEMP subplan. This was subsequently updated and endorsed by the ER on 11/12/24	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 9/4/26 Site Inspection 9/4/26 Spoiltrack Dashboard (Screenshot as at 1/11/24) Spoiltrack - user manual 	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 Dump 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.	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 - AUSDIOLAPS Document Transmittal Ref JH-TRANSMIT-00063 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 9/4/26 Site Inspection 9/4/26 Consistency Assessment for road repairs of roads noted within the EIS and the LRA dated 21/12/23 Fairfield City Council Tax Invoice - FCC Permanent Restoration Scope; Asphalt Work, dated 31/12/24 John Holland Remittance Advice dated 9/1/25 Letter from Fairfield City Council to JHG titled "Council Assets Restoration for Upper South Creek AWRC - Pipeline Works" dated 12/12/24 	As noted in IEA2 and IEA3, some damage to local roads had occurred, 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 IE99 Audit period.	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 9/4/26 Site Inspection 9/4/26 Upper South Creek, Transport and Traffic Management Plan, dated 4/2/23 	At the time of the IEA 86 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 9/4/26 Site Inspection 9/4/26 Upper South Creek, Traffic and Transport CEMP Sub-plan RevC, dated 15/8/24 	At the time of the IEA 86 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. Spoil haulage activities have now been completed with none undertaken during the Audit period.	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 Cabramatta 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 of 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 22/11/24 Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Parking and Access Strategy CEMP Sub-plan Document No: USCP-JHG-MPL-ENV-0013 Revision G DPHI Post Approval Form 20230907042209 Letter from DPHI to SWC titled "Approval of the Traffic and Transport CEMP Sub-plan Local Roads Approval, and Construction Parking and Access Strategy, dated 24/11/23 	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.	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 9/4/26 Site Inspection 9/4/26 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 	At the time of the IEA 86 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.	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 9/4/26 Site Inspection 9/4/26 	No new or permanently modified local road, parking, permanent infrastructure etc. observed.	Not triggered
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 9/4/26 Road Safety Audit, Upper South Creek AWRC - Badu Muru Grove Detailed Design, Turnbull, Rev B 28/11/25 Site Inspection 9/4/26 	A road safety Audit was undertaken by specialist consultant Turnbull Consulting. The road safety Audit was undertaken for the IFC Detailed design for the AWRC Badu Mura Grove and included a review of the supplied material for approximately 100m. At the time of IA96 the Road Safety Audit report was in draft form.	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E106	<p>The Proponent must assess whether detailed design of the project would result in any increase to operational traffic movements identified in the documents listed in Condition A1 for the 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 TINSW. The Plan must be prepared to address the following:</p> <p>(a) an updated analysis, including modelling of traffic impacts to the adjoining road network, as a consequence of Stage 1 of the CSSI; (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.</p> <p>If a Road Network Performance Plan is triggered under this condition, it must be submitted to the Planning Secretary, relevant council(s) and TINSW for information six months prior to the operation of Stage 1 of the CSSI. The mitigation measures in the Plan must be implemented by the Proponent before the operation of Stage 1 of the CSSI.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 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 has undertaken an assessment of the operational traffic impacts of the AWRC against 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	<p>A Utilities Management Strategy must be prepared and implemented for all utility Work undertaken as a result of Stage 1 of the CSSI. The Strategy must identify how utility Work will be defined and managed. The Utilities Management Strategy must include:</p> <p>(a) The functions of the Utility Coordination Manager as required by Condition E109; (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.</p> <p>The Utilities Management Strategy must be submitted to the Planning Secretary for information at least one month before the commencement of utility Work.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 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 9/4/26 Site Inspection 9/4/26 	There have not been any utility works undertaken as part of the project to date that are not required for the construction of the SS, and have not been included under another approval.	Not triggered
E109	<p>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:</p> <p>(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).</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Upper South Creek Advanced Water Recycling Centre and Pipelines CEMP Rev A, 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. There were no impacts to utilities observed during the Audit Inspection.	Compliant
E110	<p>Waste generated during construction and operation must be dealt with in accordance with the following priorities:</p> <p>(a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; (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.</p>	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 AWRC Waste Tracking Register OCT 25-APR 26 JHG Waste and Recycling Summaries (Various) Monthly Waste Reports (Various) 	<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 EPL details <p>Evidence of communications to the site team regarding waste management and the use of office waste bins was provided to the Auditor in response to recommendations from the previous audit.</p> <p>Routine site inspections cover a range of issues relating to waste management including:</p> <ul style="list-style-type: none"> Planning and permitting for waste management Induction and training Waste segregation Transport and disposal Reporting 	Compliant
E111	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the EPL in force for Stage 1 of the CSSI, or be done in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, as the case may be.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Power BI Waste Dashboard - October 2025 Waste and Recycling Summary - Upper South Creek Advanced Water Recycling Centre (AWRC) and Pipelines dated 16/6/25 Glascoot 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 "JHG/OS242 - John Holland Kemps Creek" dated 13/5/25 Terra WTP Spoil - 0032- WTP Tunnelling Spoil 	<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. JHG provided written certification to the landscaping contractor that the "Mulch and Compost complies with the NSW EPA Resource Recovery Order - the Pasturised Garden organics order 2016"</p>	Compliant
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 9/4/26 Site Inspection 9/4/26 AWRC Waste Tracking Register OCT 25-APR 26 USC AWRC Pipeline Spoil Characterisation Report, ERM 19/12/23 USC AWRC Pipeline Spoil Characterisation Report, ERM 8/4/24 Bingo Industries Tip Dockets - Various 	A Waste Tracking Register has been prepared and is maintained. The register includes details of the materials and their destination, including the docket number and the EPL reference of the receiving site.	Compliant
E113	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	<ul style="list-style-type: none"> Bingo Industries Waste Delivery Docket # 12898 dated 19/10/23 5143 Certificate - Defence Establishment Orchard Hills dated 9/10/23 Resource Reporting Tracking Schedule USC Waste and Resource Use Subplan Document USCP-JHG-AMR-EMV-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 9/4/26 Site Inspection 9/4/26 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 IEAR6, 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 9/4/26 Site Inspection 9/4/26 EWMS Working in Waterways, Treated Water Pipeline and Brine Pipeline Alignment_signed Progressive Erosion and Sediment Control Plan (PESCP), Nepean River Works - Construction of piling pad and creek stabilisation, dated 28/4/24 PESCP South Creek Discussion Rev7, amendment 30/6/24 	The following experts were involved in the development of the construction EWMS and PESCPs:	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
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 9/4/26 Site Inspection 9/4/26 EWMS Working in Waterways, Treated Water Pipeline and Brine Pipeline Alignment_signed Progressive Erosion and Sediment Control Plan (PESCP), Nepean River Works - Construction of piling pad and creek stabilisation, dated 28/4/24 PESCP South Creek Diversion Rev D, approved 30/6/24 CoA A9 Consultation Summary Report Works in South Creek Rev01, dated 14/6/24 Email from CPESC RE: South Creek diversion PESCP - Rev D, dated 11/7/24 Email from Ecologist RE: Supervision of infilling and aquatic fauna relocation of South Creek, dated 5/8/24 South Creek, Rock Chute Typical Details, Detailed Design (As constructed), rev C dated 18/10/24 Soil Conservationists Site Report dated 14/1/25 Letter from Habitat Innovation and Management to JHG dated 23/1/25 Nepean River Map - Vegetation Reduction Plan 	<p>Temporary waterway crossings were designed and supervised by appropriate experts taking into consideration relevant guidelines and standards. Rehabilitation of waterway crossings is now complete. An assessment was undertaken by a specialist ecologist and botanist on 14 January, 2025 to evaluate the restoration works undertaken.</p> <p>Highlights of the assessment are as follows: Oakly Creek and Cogroves Creek The rehabilitation works have restored both Oakly and Cogroves 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 These rehabilitation works have restored South Creek to an improved state by mitigating the erosion and reducing further erosion from the removal of the culvert, backfilling the scour hole, battering and re-shaping the creek bank and installing the submerged dam wall and coir logs. Aquatic and riparian habitat has been enhanced from the introduction of habitat rocks, and a rock batter chute which will re-instate a fish passage, and the revegetation of a riparian zone, which will reduce potential erosions and create habitat for native aquatic and riparian fauna.</p> <p>Nepean River 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 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 CSSI must be commenced within three months of the completion of the watercourse Work and any other Work required in the riparian corridor.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Photographic records (various) 	<p>At the time of this IA86, all works within creeks have been completed and rehabilitated completed. Refer Auditors response to E116 for further details.</p> <p>As observed during the IA85 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>As recommended by the previous Audit, redundant structures have been 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 License(s) (WAL) to account for the maximum predicted take for each water source prior to the take occurring.	<ul style="list-style-type: none"> Water Access Licence - Reference WAL 44922 dated 28/9/23 JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	A Water Access Licence (WAL) has been obtained. Underboring activities that may have resulted in impacts to groundwater are now complete.	Compliant
E119	The Proponent must develop and implement an ongoing Water Quality Monitoring Program (WQMP) to assess the impacts of the AWRC effluent discharges on water quality. The WQMP must include: (a) monitoring of treated effluent from the AWRC under different release streams; (b) monitoring of waterways that may be impacted by AWRC discharges (including comparison with baseline and upstream conditions). (c) details of the sampling frequency, analysis, and locations used in the program; (d) reporting requirements for the program to the EPA, including consideration of any expanded Beachwatch monitoring program in the Hawkesbury Nepean catchment.	<ul style="list-style-type: none"> Appendix E Upper South Creek Advanced Water Recycling Centre and Pipelines Surface Water & Groundwater CEMP Sub-Plan Revision A SWC Internal Email titled "draft WQMP to support EPL" dated 17/2/25 Operational Water Quality Monitoring Plan, Bady Yarragul Water Resource Recovery Facility (WRRRF) 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 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 9/4/26 	<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 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 WQMP (not implementation), further assessment will be required in the operational audit to assess compliance regarding implementation</p>	Compliant
E120	The WQMP required under Condition E119 must be submitted to the EPA for review at least 18 months prior to the commencement of operation of Stage 1 of the CSSI, and submitted to the Planning Secretary for information at least one year prior to the commencement of operation of Stage 1 of the CSSI.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 SWC Internal Email titled "draft WQMP to support EPL" dated 17/2/25 Operational Water Quality Monitoring Plan, Bady Yarragul Water Resource Recovery Facility (WRRRF) Sydney Water 	During the IA85 Audit period, Condition E120 was modified by MOD 3 to remove the requirement for the WQMP to be approved by EPA. As noted in condition E119, the WQMP has been submitted to EPA for review and submitted to DPHI for information.	Compliant
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 9/4/26 Wet Weather Infiltration Monitoring Program, for the sewer network connected to the Bady Yarragul Water Resource Recovery Facility (WRRRF), 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-B of Schedule 2 of this approval provides additional water quality assessment and monitoring requirements that must be met. 2. The WQMP and monitoring program to assess wet weather infiltration into the sewer network must be provided to the Planning Secretary and/or the EPA upon request. 3. The WQMP and monitoring program to assess wet weather infiltration into the sewer network are required to be updated on an ongoing basis throughout operation of Stage 1 of the CSSI.	JHG/SWC Audit Interview 9/4/26	During the IA85 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.	Compliant
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 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 9/4/26 Upper South Creek Design Report, Revision 5, GHJ/Jacobs, dated 24/1/25 Surface Water & Groundwater CEMP Sub-plan, Section 2.2 & 7.5 	<p>Stormwater drainage and treatment is addressed in the 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. The AWRC Design Report was provided as evidence during the audit.</p> <p>The Upper South Creek Design Report has now been finalised.</p> <p>Auditor Note: The scope of this Audit does not include verification of design.</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 9/4/26 	<p>A Water Pollution Impact Assessment (WPIA) has been prepared and issued to the EPA in accordance with the EPL.</p> <p>An additional assessment was undertaken in relation to proposed hydrostatic testing along the brine and treated water pipelines that would result in discharges of water into the environment.</p>	Compliant

Refer	Condition	Evidence	Auditor Conclusion	Audit Finding
E125	The Proponent must undertake further hydrological and hydraulic modelling for the AWRIC 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 9/4/26 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 AWRIC 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 Upper South Creek Design Report provides a summary of the AWRIC 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 Upper South Creek Design Report provides a summary of the AWRIC effluent outfall channel which carries plant discharge from the water treatment process to South Creek.</p> <p>Auditor Note: The scope of this Audit does not include verification of design.</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: <ul style="list-style-type: none"> (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 9/4/26 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 AWRIC 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 Upper South Creek Design Report provides a summary of the AWRIC 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 Upper South Creek Design Report provides a summary of the AWRIC effluent outfall channel which carries plant discharge from the water treatment process to South Creek.</p> <p>Auditor Note: The scope of this Audit does not include verification of design.</p>	Not triggered
E127	All new or modified drainage systems associated with Stage 1 of the CSSI must be designed to: <ul style="list-style-type: none"> (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 9/4/26 Site Inspection 9/4/26 	<p>This condition is not applicable as the AWRIC 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 Upper South Creek Design Report provides a summary of the AWRIC 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 AWRIC effluent outfall channel which carries plant discharge from the water treatment process to South Creek.</p> <p>Auditor Note: The scope of this Audit does not include verification of design.</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 AWRIC.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	Operational requirement.	Not triggered
E129	The Proponent must consider the provisions of the Airports (Protection of Airspace) Regulation 1996 for any intrusions into prescribed airspace, including: <ul style="list-style-type: none"> (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 Airports Act 1996 and the Airports (Protection of Airspace) Regulation 1996.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Aviation Risk Assessment, Upper South Creek Advanced Water Recycling Centre, GHD/Jacobs dated 28/1/25 	<p>An aviation risk assessment has been undertaken in to assess the risks of the AWRIC as they relate to the new Western Sydney Airport which is being constructed nearby. The Risk Assessment covered the following risks:</p> <ul style="list-style-type: none"> Wildlife Strikes Distractions to pilots Intrusions into the protected airspace of Airports. <p>The Risk Assessment noted that the proposed height of all fixed structures on the AWRIC do not penetrate into the OLS (protected airspace), therefore it may be reasonably concluded that an approval in accordance with the Airports Act is not required.</p>	Compliant
E130	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: <ul style="list-style-type: none"> (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 9/4/26 Letter from DPIH to SWC titled "Badu Yarragall Water Resource Recovery Facility - Wildlife Management Plan (WMP)" dated 20/10/25 Upper South Creek, Badu Yarragall Water Recovery Facility, Wildlife Management Plan, JHG, Rev 6 dated 14/1/26 Upper South Creek, Advanced Water Recycling Centre and Pipelines, CoA A9 Consultation Summary Report - Wildlife Management Plan, Rev 1, JHG dated 14/1/26 Site Inspection 9/4/26 Email from DPIH to SWC titled "Upper South Creek Advanced Water Recycling Centre - E130- Wildlife Management Plan" dated 3/2/26 Email from DPIH to SWC titled "Upper South Creek Advanced Water Recycling Centre - Post Approval Document Reviewed - (SSI-8609189-PA-176) dated 27/1/26 Email from DPIH to SWC titled "Upper South Creek Advanced Water Recycling Centre - Response from DPI Agriculture, dated 24/10/25 Letter from DPIH to SWC titled "Badu Yarragall Water Resource Recovery Facility - Wildlife Management Plan" dated 20/10/25 DPIH Post Approval form 20260127053833 	<p>The Wildlife Management Plan has now been prepared. An A9 Consultation Summary Report" was provided to the Auditor with details of consultation undertaken with relevant agencies including DPI (agriculture) and Western Sydney Airport (WSA). The Consultation Summary Report provides details of issues raised by each stakeholder along with responses to issues raised including amendments to the Wildlife Management Plan.</p>	Compliant
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: <ul style="list-style-type: none"> (a) baseline and post-commissioning monitoring of representative attributes that: <ul style="list-style-type: none"> (i) contribute to the Outstanding Universal Value (OUV) of the Greater Blue Mountains Area; and (ii) are identified in the documents listed in Condition A1 as potentially impacted during Stage 1 of the CSSI; (b) relevant water quality monitoring data; and (c) photos at each monitoring point. 	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 Letter from Stream Ecology to SWC titled Nepean River World Heritage Area - Development and Implementation of a Monitoring Program" dated 3/3/26 Letter from Stream Ecology to SWC titled Nepean River World Heritage Area - Development and Implementation of a Monitoring Program" dated 3/3/26 Stream Ecology Job Safety Analysis Worksheet - for field visit commencing 8/4/26 Stream Ecology Fieldwork Trip Plan dated 7/4/26 	<p>No impacts to World Heritage Areas at the time of the audit.</p> <p>Has commenced, baseline monitoring being undertaken, Streamology</p>	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: <ul style="list-style-type: none"> (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 9/4/26 Site Inspection 9/4/26 	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 National Parks and Wildlife Act 1974 (NPW Act) or the National Parks and Wildlife Regulation 2019.	<ul style="list-style-type: none"> JHG/SWC Audit Interview 9/4/26 Site Inspection 9/4/26 	No work is known to have been undertaken within the Blue Mountains National Park. The boundary of the Blue Mountains National Park is the Centreline of the Nepean River.	Not triggered

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

Appendix C Stakeholder Consultation Records

Appendix C-1 Correspondence Issued

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Monday, 30 March 2026 10:39 AM
To: DPE PSVC Compliance Mailbox
Subject: SSI 8609189 - Upper South Creek Advanced Water Recycling Centre - Independent Environmental Audit # 6 - Consultation

To whom it may concern,

The sixth (fifth ongoing) Environmental Audit is planned to commence on the 9th of April with the Audit report to be submitted to the Department by

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 previous 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](mailto:richard.peterson-trigalana@outlook.com)

6th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

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

Date Mon 30/03/2026 10:40 AM

To Richard Peterson <richard.peterson-trigalana@outlook.com>; mail@fairfieldcity.nsw.gov.au <mail@fairfieldcity.nsw.gov.au>; lcc@liverpool.nsw.gov.au <lcc@liverpool.nsw.gov.au>; Canterbury Bankstown Council <council@cbc.city.nsw.gov.au>; Penrith City Council - RECORDS <council@penrith.city>; Wollondilly Shire Council <council@wollondilly.nsw.gov.au>

To whom it may concern

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

I have now been appointed to undertake the sixth 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 15th of April 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](mailto:richard.peterson-trigalana@outlook.com)

Please consider the environment before printing this e-mail

This email (including any attachments) is confidential. If you are not the intended recipient you must not copy, use, disclose, distribute or rely on the information contained in it. If you have received this email in error, please notify the sender immediately by reply email and delete the email from your system. Confidentiality and legal privilege attached to this communication are not waived or lost by reason of mistaken delivery to you. Trigalana Environmental does not guarantee that this email or the attachment(s) are unaffected by computer virus, corruption or other defects.

richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Monday, 30 March 2026 10:43 AM
To: Richard Peterson; info@epa.nsw.gov.au
Subject: 6th 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 \(nsw.gov.au\)](#)

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

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

In this regard, a response by 15th of April would be greatly appreciated.

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

Many thanks

richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Monday, 30 March 2026 10:45 AM
To: Richard Peterson; OEH HD Heritage Mailbox
Subject: 6th 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 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 15th of April would be greatly appreciated.

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

Many thanks

6th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

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

Date Mon 30/03/2026 10:47 AM

To Richard Peterson <richard.peterson-trigalana@outlook.com>; Daniel Saunders <daniel.saunders@transport.nsw.gov.au>

Cc 'Suzette Graham' <suzette.graham@transport.nsw.gov.au>

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 sixth 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 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 15th of April 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](mailto:richard.peterson-trigalana@outlook.com)

Please consider the environment before printing this e-mail

This email (including any attachments) is confidential. If you are not the intended recipient you must not copy, use, disclose, distribute or rely on the information contained in it. If you have received this email in error, please notify the sender immediately by reply email and delete the email from your system. Confidentiality

Appendix C-2 Correspondence Received

richard.peterson-trigalana@outlook.com

From: Divyansh Kumar <divyansh.kumar@dpie.nsw.gov.au> on behalf of DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Sent: Monday, 30 March 2026 4:37 PM
To: Richard Peterson
Subject: Re: SSI 8609189 - Upper South Creek Advanced Water Recycling Centre - Independent Environmental Audit # 6 - Consultation

Dear Richard,

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

The Department does not require any additional matters to be included within the scope of the audit beyond those already captured by the Approval and the Department's Independent Audit Post Approval Requirements (2020).

Please consult with the stakeholders mentioned in your previous consultation email dated 3/10/2025 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.

If you have any questions or wish to discuss any aspect of the above, please feel free to contact me.

Regards,

Divyansh Kumar

Planning Compliance Officer

Department of Planning, Housing and Infrastructure

T 02 9274 6308 | E Divyansh.kumar@dpie.nsw.gov.au

dphi.nsw.gov.au

Locked Bag 5022 | 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2124

Working days Monday to Friday, 9:00am - 5:00pm



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

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

Sent: Monday, March 30, 2026 10:38 AM

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

richard.peterson-trigalana@outlook.com

From: Alison Lamond <alison.lamond@dcceew.nsw.gov.au>
Sent: Monday, 30 March 2026 4:32 PM
To: Richard Peterson
Subject: RE: 6th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

Hello Richard,

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for your project. Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed. It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.

If you have any questions regarding these comments, please contact heritagemailbox@environment.nsw.gov.au.

Kind regards,

Alison Lamond *BSci, BA (Hons), (she/her)*
Strategic Manager – Major Projects
Heritage NSW
**Department of Climate Change,
Energy, the Environment and Water**

M 0419 762 918 **E** alison.lamond@dcceew.nsw.gov.au

dcceew.nsw.gov.au

Level 3, 6 Stewart Ave
Newcastle West NSW 2303

Locked Bag 1002, Dangar NSW 2309

Working days Monday to Friday, 9:00am - 5:00pm



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Monday, 30 March 2026 10:45 AM
To: Richard Peterson <richard.peterson-trigalana@outlook.com>; OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>
Subject: 6th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre



Outlook

RE: 6th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

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

Date Mon 30/03/2026 4:04 PM

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

Cc Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>; Tracey Austin <Tracey.AUSTIN@transport.nsw.gov.au>

Hi Richard

Our construction activity was completed in November, and we are now operational. We have not had any interface with this Sydney Water site for some time and no further interaction is anticipated going forward either. Thanks for reaching out and good luck in finalising your project.

Regards

Daniel Saunders

OFFICIAL

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

Sent: Monday, 30 March 2026 10:47 AM

To: Richard Peterson <richard.peterson-trigalana@outlook.com>; Daniel Saunders <Daniel.Saunders@transport.nsw.gov.au>

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

Subject: 6th Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

CAUTION: This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

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 sixth 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 TfNSW so if there are any issues TfNSW would like me to consider during the audit, they may be included in the audit schedule.

Appendix D Site Photographs

Advanced Water Recycling Centre (AWRC) Main Construction Site



Photo 1: Digesters



Photo 2: Odour control facility



Photo 3: Brine tanks



Photo 4: AWRC Outlet, Administration building and brine tanks

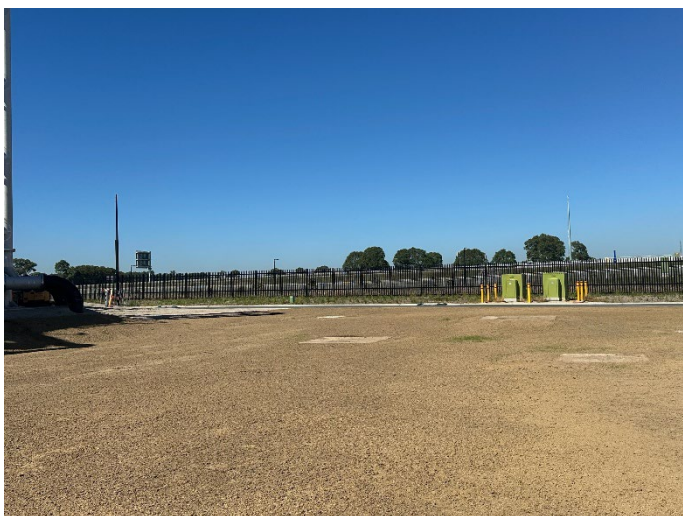


Photo 5: Solar Farm

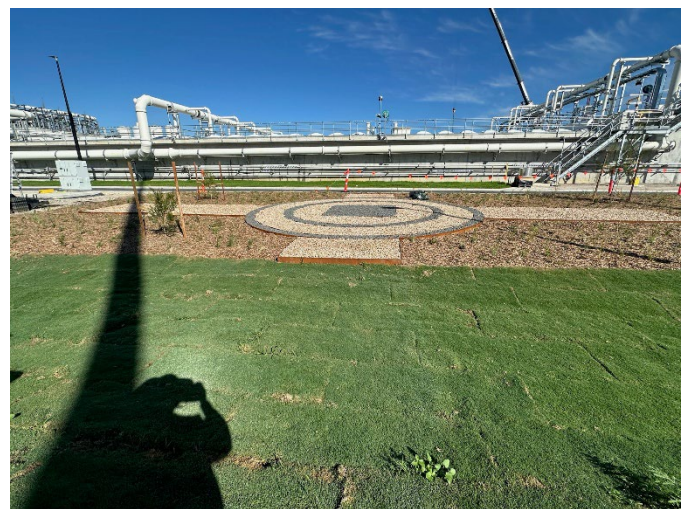


Photo 6: Heritage interpretation and final landscaping



Photo 7: Heritage interpretation and final landscaping



Photo 8: Silt boom within South Ck, downstream of emergency overflow channel



Photo 7: Operational bioretention basin



Photo 8: Permanent drainage and culvert adjacent to the Solar Farm



Photo 9: Water quality control pond, AWRC Outlet



Photo 10: Completed internal roadway



Photo 11: Permanent fencing and stabilised batter with irrigation system in place



Photo 12: Permanent fencing, turf and sediment control



Photo 13: Topsoil stockpile for permanent landscaping



Photo 14: APZ/Fire trail and rehabilitation



Photo 15: Streetsweeper



Photo 16: Streetsweeper Water Cart utilised for dust suppression



Photo 17: Bunded generator



Photo 18: Chemicals stored in mobile bund

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	4 June 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

