Upper South Creek

Advanced Water Recycling Centre and Pipelines

Annual Sustainability Report

April 2023 – April 2024

JOHN HOLLAND

Contents

Acknowledgement of Country

John Holland respectfully acknowledges Aboriginal people as the traditional custodians of Sydney, Illawarra and the Blue Mountains where we work, live and learn.

Their lore, traditions and customs nurtured and continue to nurture the waters (bulingang or saltwater and muulii ngadyuung or sweetwater) in our operating area, creating well-being for all.

We pay our deepest respect to Elders, past and present. We acknowledge their deep connections to land and waters. In the spirit of reconciliation, we remain committed to working in partnership with local Traditional Owners to ensure their ongoing contribution to the future of the water management landscape, learning from traditional and contemporary approaches, while maintaining and respecting their cultural and spiritual connections.

Dharug Country

The Dharug people are the Traditional Custodians of Country in the project area. As Traditional Custodians, the Dharug people have had a continual connection to Country since time immemorial, and strong custodial obligations and responsibilities to care for Country in this area.

Wianamatta

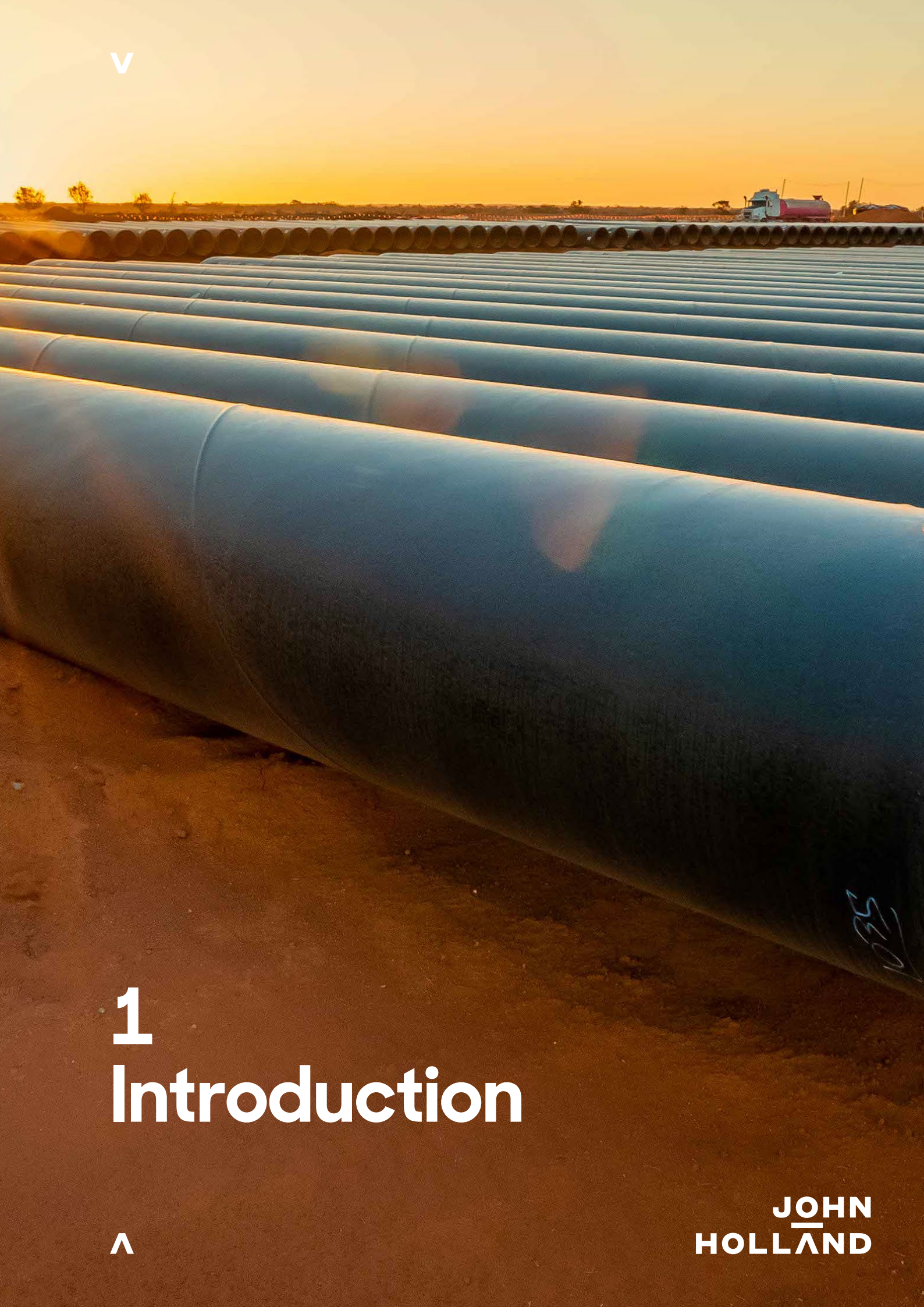
Wianamatta, meaning "Mothers place" in Dharug language, or otherwise known as 'South Creek', is a creek that runs from Dharawal Country in the south to Dharug Country in the north, and Eastern Creek, flowing into the Hawkesbury, and Prospect Creek draining into the Georges River. Wianamatta connects with a large and complex network of tributaries including creeks and streams and borders the Upper South Creek Advanced Water Recycling Centre site.

Aboriginal People have nurtured Wianamatta for thousands of years, and in return Country has provided everything needed to live. Wianamatta is important to Dharug People and the health of water must be maintained and protected. Evidence suggests that the junction of Kemps Creek, the Georges River and Wianamatta was traditionally used as a gathering area.

The Cumberland Plain

The Cumberland Plain consists of hills, valleys and ridges which encompass Wianamatta and create a complex system of passing water. The Cumberland Plain stretches from Windsor in the north to Picton in the south, and from the Nepean River in the west across to the inner west of metropolitan Sydney.

The Cumberland Plain is characterised by grassy woodlands of eucalypts, gums and ironbarks with an undergrowth of many grass variations and a variety of wildlife. There are many culturally significant areas on Dharug Country such as viewpoints, scar trees, resource rich areas, and gathering places. Salt Pan Creek is an example of an important historical gathering place located along the north shore of the Georges River on the traditional Country of Pemulwuy, an Aboriginal Resistance Leader and important historical figure.



1 Introduction

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1.1
Project Background

The Upper South Creek Advanced Water Recycling Centre and Pipelines project (the project) Annual Sustainability Report (2023/2024) showcases the sustainability targets, initiatives and processes that have been established and implemented throughout the Project. The report focuses on the project's key sustainability areas and highlights the progress made.

The Project Sustainability commitments, objectives and associated targets have been informed by the Infrastructure Sustainability Council's "Materiality Assessment" and align with the United Nations (UN) Sustainable Development Goals (SDGs). The commitments, objectives and targets are consistent with Sydney Water and John Holland's Sustainability Policies, and the Sustainability Management Strategy sets out the pathway to achievement for the Upper South Creek (USC) Advanced Water Recycling Centre (AWRC) and Pipelines Project.

This report follows reporting context principles outlined by the Global Reporting Initiative (GRI). It sets out the Non-Owner Participant (NOP)'s organisational profile, purpose of the report, project details, and showcases the Project's sustainability targets and achievements to date under John Holland's key sustainability pillars.

John Holland has been engaged as the principal contractor by Sydney Water to design and construct Stage 1 of the Project. Specifically, this includes the design and construction of the AWRC and pipelines for treating a daily wastewater flow of up to 35ML/day. John Holland has engaged a design joint venture comprising of GHD and Jacobs to deliver the Project design and provide overall engineering and design services.

Sydney Water has additionally selected a joint venture consisting of Trility and John Holland Group (JHG) that will provide operations and maintenance input during design and construction and will be responsible for operating the AWRC during its first five years.

John Holland notes that the Project is currently in the design and construction phase as many of the Project design packages are in progress. The design phase is expected to be completed by December 2024. The Annual Report includes six (6) case studies from the period, which are listed in the Table of Contents for reference.

2 Project Description

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2.1
Project Description

The Upper South Creek Advanced Water Recycling Centre and Pipelines project will collect wastewater from homes and businesses in the South West Growth Area and Western Sydney Aerotropolis Growth Area. It will treat the wastewater to produce high-quality water suitable for a wide range of non-drinking uses in homes, industry, business, and agriculture.

Additionally, the treated water will be utilised for greening public open spaces and released into local waterways, such as the Nepean River, to sustain and support the health of important river ecosystems. These ecosystems continue to face significant pressure from extreme weather events.

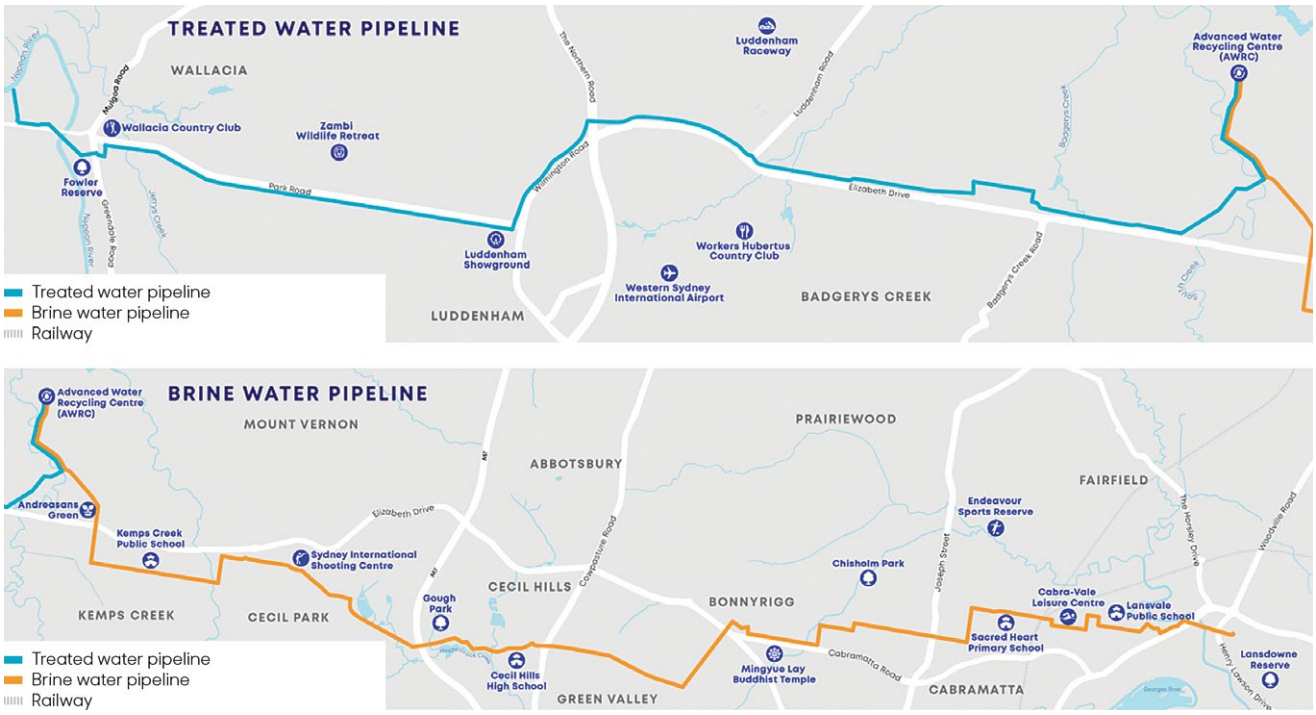
John Holland is constructing:

- A new Advanced Water Recycling Centre in Kemps Creek.
- A 17 kilometre pipeline to release high quality treated water to the Nepean River at Wallacia.
- A 24 kilometre pipeline to take the plant's saline by-product (brine) to the existing North Georges River Submain (NGRS) at Lansdowne.
- Associated ancillary infrastructure.

The AWRC site is about 78 ha in size and is in the suburb of Kemps Creek, NSW, bounded by Wianamatta-South Creek to the west, Kemps Creek to the northeast and the new M12 Motorway to the south. The site will include an operational area and a green space area.

The project has been classified State Significant Infrastructure and will help achieve a range of Commonwealth, NSW, local government and Sydney Water objectives relating to economic development, growth, water resilience and environmental protection:

- Providing efficient and cost-effective wastewater services.
- Producing high-quality, recycled water for a range of potential non-drinking reuses.
- Potential to recycle organic waste to generate electricity.
- Helping to protect local waterways and aquatic ecosystems via environmental flows.
- Producing biosolids for an alternative to chemical fertilisers in agriculture.
- Enhancing biodiversity by greening Western Sydney with recycled water.
- Generating renewable energy within the AWRC.
- Building a centre that can respond to changes in demand as our community grows.
- The treated water will be released into local waterways, such as the Nepean river, to help sustain our important river ecosystems that continue to come under significant pressure from extreme weather events and developments within their catchments.



2.1.1
Current Stage of Works

An overview of the key milestones and activities progressing during the reporting period are detailed below:

Project Component	Key Dates
Contract Award	September 2022
ISC Materiality Verification	19th April 2023
Project Establishment Period Completion	26th April 2023
Initiation of the Procurement Phase	January 2023
Project Design Phase Ongoing	September 2022 – December 2024
Construction Phase - AWRC	Q3 2023 – Q1 2026
Construction Phase - Pipelines	Q3 2023 – Q1 2026
Process Commissioning	Q1 2026 – Q4 2026
Handover to Operations	Q4 2026

2.1.2
Status of Project Infrastructure Sustainability (IS) Certification

The project is currently progressing towards its design round 1 submission and resubmission of its Base Case Proposal and Business as Usual (BAU) Assumptions in response to verifier comments for verification in November 2024. The project's materiality assessment has been verified, and the sustainability Management Plan has been approved and implemented.

The Project's Base Case Approach will be resubmitted for review by the IS Council and ISC verifiers for independent verification. As a result, estimate reductions are based on the current assumptions available for energy, material, and water targets for this reporting period, as detailed in sections 6, 7, and 13.

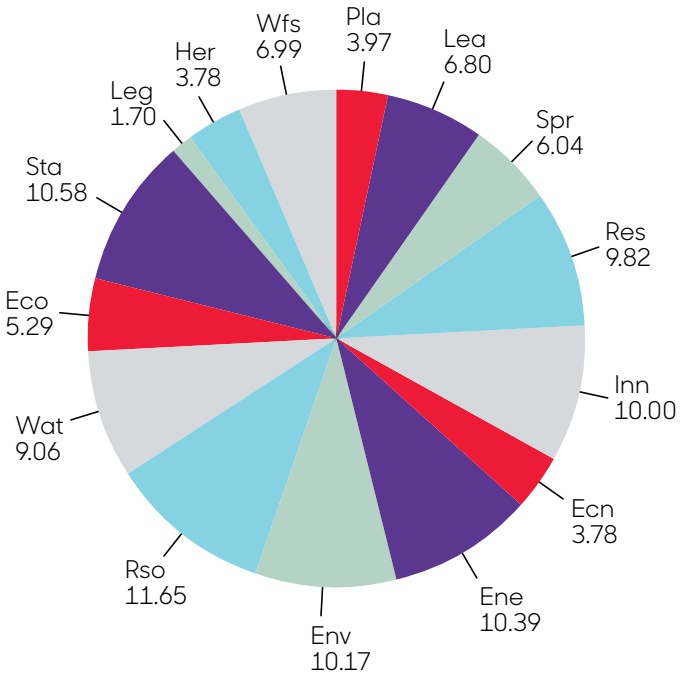
IS Deliverable	Key Dates
Infrastructure Sustainability Council (ISC) Materiality Verification	19th April 2023
Approved Sustainability Management Plan	21st April 2023
Project Establishment Period Completion	26th April 2023
Base Case Proposal & Business as Usual (BAU) Assumptions submitted for verification	26th April 2023
Base Case Proposal & Business as Usual (BAU) Assumptions verified	November 2024
Design Round 1 submitted for verification	November 2024
Design Round 2 submitted for verification	February 2025
As Built Round 1 submitted for verification	October 2025
As Built Round 2 submitted for verification	December 2025

2.2
Key Sustainability Impacts

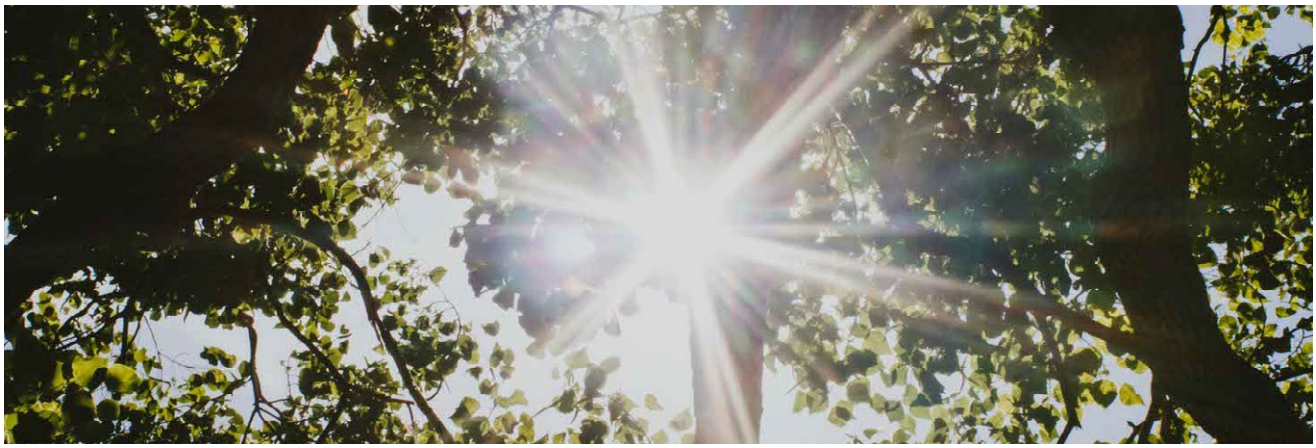
JHG undertook a materiality assessment in November 2022 as part of the Infrastructure Sustainability rating process for certification. The materiality assessment requires projects to identify 'material' or priority sustainability aspects for consideration within the project context.

The assessment was completed with a broad representation of internal (senior discipline leads) and relevant external stakeholders through the facilitation of a series of workshops. The assessment was then submitted to the I ISC with evidence and verified as representing sustainability materiality for the Project.

Final Category Points Distribution



Her – Heritage
Wfs – Workforce Sustainability
Pla – Place
Lea – Leadership
Spr – Sustainable Procurement
Res – Resilience
Inn – Innovation
Ecn – Economic
Ene – Energy
Env – Environmental
Rso – Resources
Wat – Water
Eco – Ecology
Sta – Stakeholder
Leg – Legacy



The materiality assessment is a key step in establishing the sustainability strategy for the project as it identifies The Project's potential to impact on the economy, environment, and people. These impacts include negative and positive impacts, short-term and long-term impacts, intended and unintended impacts, and reversible and irreversible impacts. From this assessment, the project's Sustainability Management Strategy was derived.

2.3 Key Project Delivery Risks

Key risks identified for the Upper South Creek Project include:

- Community disruption through the construction phase of the development.
- Skills shortage in roles required to construct the Project.
- Vulnerability to natural hazards and the longer-term impact of climate change.
- Unapproved negative impact to Flora and Fauna protected by the Environment Protection and Biodiversity Conservation (EPBC) Act and/or Biodiversity Conservation (BC) Act.
- The development sites are situated near residential and commercial dwellings sensitive to construction impacts such as noise and vibration.
- Risk of impacting water resources through surface water pollution due to construction impacts.
- Controlling the quality and compliance of materials bought to site.

These risks inform the material issues identified for the Project.

2.4 Key Sustainability Opportunities and Project Benefits

As outlined in section 2.1 , the AWRC will produce high-quality water. This recycled water is suitable for a wide range of non-drinking uses in homes, for various industrial uses, in businesses, in agriculture and for watering of public open spaces. This saves valuable drinking water and provides increased resilience to Sydney's water supplies.

Given the high-quality nature of the water once treated, it can be released to the Nepean River to help sustain an important river ecosystem that continues to come under significant pressure from climatic changes and developments within its catchment.

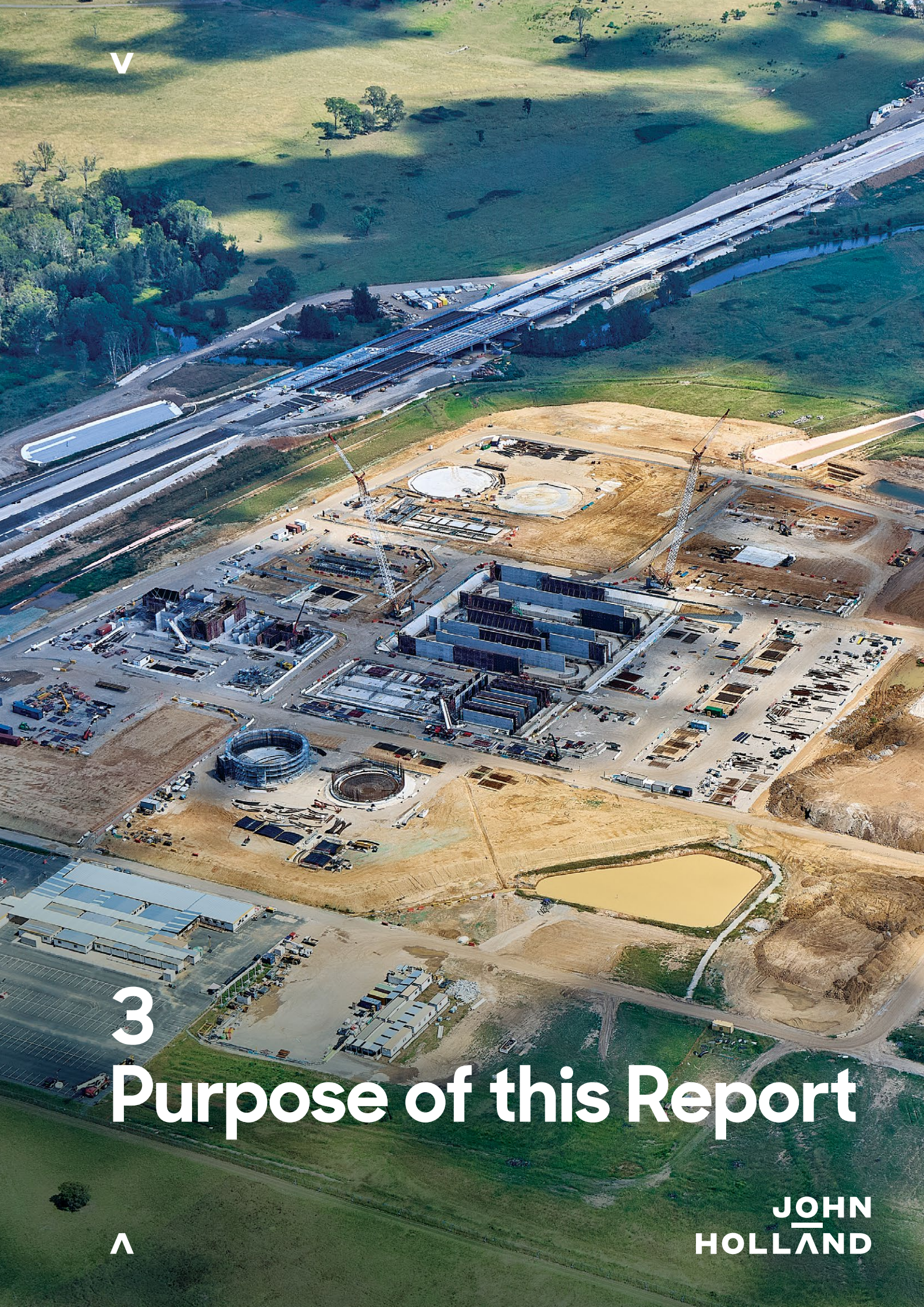
Additional positive impacts identified for the Upper South Creek Project include the following operation benefits:

- Providing efficient and cost-effective wastewater services.
- Producing high-quality, recycled water for a range of potential non-drinking reuses.
- Potential to recycle organic waste to generate electricity.
- Producing biosolids for an alternative to chemical fertilisers in agriculture.
- Enhancing biodiversity by greening Western Sydney with recycled water.
- Generating renewable energy within the AWRC
- Building a centre that can respond to changes in demand as our community grows.
- Delivering a landscape-led design to seamlessly connect the AWRC to the wider precinct.

And construction phase benefit:

- Sustainability has been a core principle of the design, to achieve an ISC 2.1 Gold Rating in support of Sydney Water's net zero ambitions.

Further information on these opportunities, actions and mitigation is contained within subsequent sections of this report.



3 Purpose of this Report

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The intent of this report is to fulfil project-specific annual reporting requirements for:

- Delivery in alignment with the Sustainability Management Strategy.
- Sustainability target tracking.
- Showcasing Sustainability achievements of the Project.
- ISC Annual reporting.
- Tracking IS v2.1 Rating progress.

This publicly available report is available on Sydney Water's Upper South Creek Project webpage and details the sustainability related project achievements against the Project's Sustainability Objectives & Targets for the period between 26 April 2023 to 26 April 2024.

In addition, this report details how the Project contributes to the United Nations Sustainable Development Goals and has been prepared in reference with Global Reporting Initiative (GRI) principles. Material topics reported have been determined through USC's Sustainability Strategic Framework themes and objectives.

4 Organisational Profile

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4.1 Organisation Details

Project	Upper South Creek AWRC and Pipelines
Name of Organisation	Upper South Creek Project is being delivered by John Holland Pty Ltd for the client Sydney Water
ABN	11 004 282 268
Project Office Address	Level 3, 65 Pirrama Rd, Pyrmont NSW 2009, Australia
JHG Corporate Headquarters Address	Level 9, 180 Flinders Street, Melbourne VIC 3000, Australia
Principle Project Director	Richard Ioffrida
Contact Details	Mark Trethewy (Sustainability Manager) mark.trethewy@jhg.com.au Richard Ioffrida (Project Director) richard.ioffrida@jhg.com.au
Reporting Period	26 April 2023 – 26 April 2024
Type and Stage of Works	Design and construction of water infrastructure The project is currently in the design and construction phase. Construction has begun, but the peak workforce has not been reached yet. The pouring and installation of structures have commenced, and the pipelines have installed 63% of the total pipework required. For more details, please refer to Section 2.1.1.

4.2 Governance Structure

The JHG Management Committee provides oversight and governance for the Project. It comprises the two (2) members from John Holland Group, one (1) member from Trility and one (1) member from the design partner GHD.

The responsibilities of the Management Committee members are to:

- Ensure Sydney Water specifications, Engineering and Construction Contract (ECC) and the Operation and Maintenance (O&M) Contract conditions are met.
- Ensure the intent of the JV Agreement is upheld and the interface between Design and Construction (D&C) and O&M effectively managed.
- Monitor the progress of the Project – contract program, budget, safety, quality, environment and operability .
- Monitor client satisfaction and the health of the relationship with Sydney Water and stakeholders.
- Empower the Project Director and Operation and Maintenance Manager to deliver all aspects of the Project
- Hold the Project Director accountable for all aspects of Project performance.
- Continuously review risks associated with this Project and recommend mitigation strategies.
- Resolve issues that are escalated by the Project Director or Operation and Maintenance Manager or wider stakeholders.
- Influence the culture of the project team.
- Keep the respective Joint Venture Partners informed of the project performance.

The Project has adopted John Holland's best practice corporate governance procedures on the Project. The organisational chart contained in Appendix B: details the senior leadership structure within the Project.

4.3 Stakeholder and Community Engagement

4.3.1 Identifying and Selecting Stakeholders

The Project conducted a Stakeholder Analysis prior to the commencement of the Project. This included a social and demographic assessment and assessment of proposed and existing Sydney Water projects in the region.

Key social and demographic information indicates:

- A smaller (and just slightly older) population compared to those living near other major construction projects in Sydney.
- Fewer First Nations peoples compared to the NSW average.
- The top languages other than English spoken at home.
- Limited print and social media opportunities, with Luddenham being a more online community than Kemps Creek and Badgerys Creek.
- People are much more likely to drive to work, meaning any traffic congestion will be a key concern.

4.3.2 List of Stakeholder Groups

The key stakeholders (grouped for the purposes of this report) are listed below, further detail can be found within the publicly available Project Construction Stakeholder Engagement Plan (CSEP)

- First Nation groups.
- Project specific expression of interest (advisory) Groups.
- Local Government Authorities (Canterbury-Bankstown, Fairfield, Liverpool, Penrith, Wollondilly).
- Known businesses nearby.
- Culturally and Linguistically Diverse (CALD) communities.
- Directly impacted landowners.
- Indirectly impacted communities.
- Local community interest groups.
- Schools and childcare centres.
- Commonwealth Government.
- State Government members and agencies.
- Utility providers.
- Property developers.

4.3.3
Approach to Stakeholder Engagement

The engagement approach for the design and construction of the AWRC and Pipelines has been influenced by:

- Sydney Water's planning phase Community and Stakeholder Engagement Plan.
- USC Environmental Impact Statement (EIS) and NSW Department of Planning's Conditions of Approval.
- Sydney Water's Policy and Guidelines for Community and Stakeholder Engagement.
- Sydney Water's community and stakeholder risk assessment tool.
- NSW Department of Planning and Environment's Undertaking Engagement Guidelines for State Significant Projects.
- International Association for Public Participation's (IAP2's) core values and code of ethics.
- Recognise Country – Guidelines for development in the Aerotropolis.
- Infrastructure Sustainability Council's v2.1 rating tool requirements.
- Engagement outcomes from the project EIS and Submissions Report.
- Information from the Australian Bureau of Statistics' 2021 census data and community engagement strategies from local councils.
- Feedback from stakeholders throughout detailed design and project delivery.

The overall approach to engagement is based on understanding stakeholder expectations up front, providing relevant and timely updates on project progress and working closely with the project team and stakeholders to minimise project impacts wherever possible.

Stakeholder expectations and areas of interest have been documented in the stakeholder analysis tables in the Community and Stakeholder Engagement Plan (CSEP) based on past engagement outcomes, including from the EIS and Submissions Report.

Priority issues for stakeholders were identified and formally documented during the initial site investigations and detailed design stage of the project. The project team will continue to address these issues through design and construction planning and will seek to understand and address any changes in priority issues during construction. The community engagement team will regularly update stakeholders on progress.

Given the nature and location of the work, the level of likely public interest and the potential impacts, the engagement approach has ranged from 'inform' to 'involve' on the IAP2 Public Participation Spectrum. For most stakeholders we engage at the 'consult' level of the spectrum.

By engaging at the 'consult' level, our team will continue to work with the community and stakeholders to ensure that concerns and aspirations are listened to, acknowledged and addressed, and will provide feedback on how stakeholder input influenced the project. Opportunities to move beyond 'consult' and 'involve' approaches, including in relation to the future use and management of the Green Space, are being explored.

Our approach to managing enquiries and complaints is in accordance with Sydney Water's Complaint Policy. It includes information about how enquiries and complaints can be made, complaint management procedures, response times, reporting and escalation procedures.

4.3.4 Key Topics and Concerned Raised

The main issues identified by the AWRC risk assessment, stakeholder research and other analysis detailed within the Project CSEP include:

- Design preferences from identified key stakeholders.
- Construction impacts for properties near the AWRC and properties along major transport routes (particularly on Clifton Avenue and Elizabeth Drive) – these may include noise, dust, visual, vibration, business impacts, traffic congestion, public safety, spreading of weeds, parking and access impacts.
- Potential impacts to Aboriginal cultural heritage including undiscovered artefacts, impacts to waterways and future use and management of the Green Space.
- Operational impacts of an AWRC including perceived impacts to property values, concerns about operational odour and noise, wildlife management, visual impacts, glint and glare for pilots, light spill, the co-generation gas flare, urban heat, transport of chemicals and increased traffic.
- Concern or interest in any stated or perceived development restrictions near the AWRC.
- The time needed to meaningfully and sensitively engage with Aboriginal stakeholders about Caring for Country practices and how these can be incorporated into design, delivery and operation.
- Potential impacts to other heritage items including remnants of the Fleurs radio telescope arrays.
- Desire from stakeholders to implement an education hub, detailed heritage interpretation, public recreational space or other aspects of the facility that may no longer be feasible or continued as described in the EIS.
- Construction and consultation fatigue from this and other projects including Western Sydney Airport, Sydney Metro, M12 and the Elizabeth Drive upgrade.
- Coordinating with major projects nearby.
- Construction near services and environmentally sensitive sites.

Strategies and actions to address these issues have been identified and addressed within the Project's CSEP.

4.4
Sustainability Framework and Approach

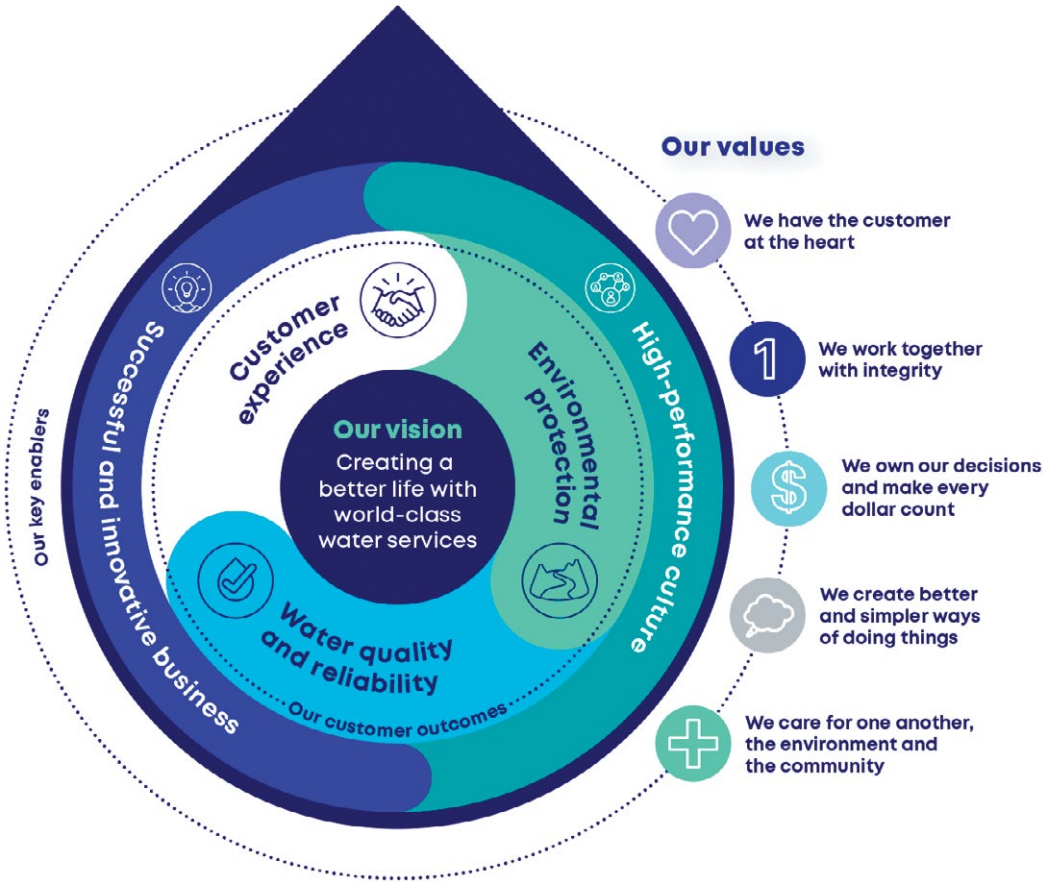
4.4.1
Sydney Water Sustainability Context

Sydney Water is committed to protect, restore and enhance the environment for our customers and communities. We create a better life through world-class water services, including essential and sustainable water and wastewater products and services to our city.

Key Policy commitments include:

- Reducing wastewater pollution to support clean and safe waterways.
- Having no net environmental impact from our discharges to the air, waterways, or land.
- Maximising resource value and supporting a circular economy by responsibly managing energy, water and materials, and minimising waste creation.
- Achieving net zero carbon in our operations by 2030 and supply chain by 2040.
- Supporting entire integrated water cycle management.
- Protecting, restoring, and enhancing our natural and heritage assets.
- Social responsibility by having regard for the interests of the community.

Additionally, Sydney Water's Our Strategy 2020-2030 provides an overview for delivering the vision: Creating a better life with world-class water services and includes the direction for creating thriving, liveable and sustainable cities.



Sydney Water Strategy 2020-2030 - Strategy Architecture.

Sydney Water's Environmental Policy and Our Strategy 2020-2030 documents can be found at johnholland.com.au/how-we-care/sustainability

4.4.2
John Holland Sustainability Context

JHG Sustainability Framework (Figure 2-1) governs the way we work through 4 key pillars (Leadership and Strategy, Our Community and Partners, Built and Natural Environment; and Our People) and 12 Sustainability Elements. These 12 Sustainability Elements focus on the key interactions with our supply chain, customers, communities and the environment, throughout the project lifecycle.

The Framework is designed to leverage our people and diverse expertise by encouraging a thoughtful, collaborative, interconnected approach to decision making. Each component of our framework is interconnected, each of the 4 pillars and their 12 elements define our inclusive and thoughtful approach to decision-making that we see as a 'whole of business' challenge – that is one we are all working towards together.

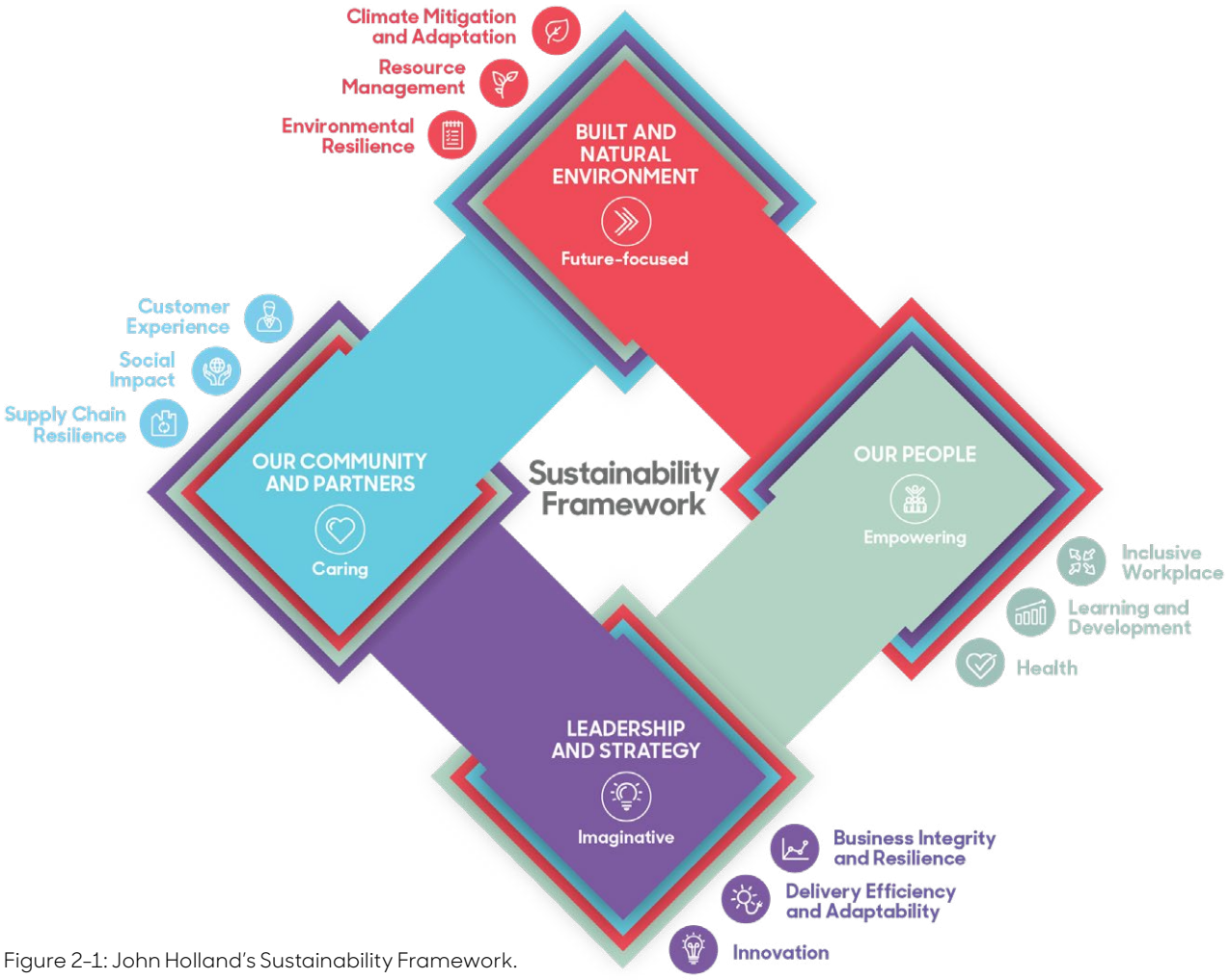


Figure 2-1: John Holland's Sustainability Framework.

John Holland's 4 Key Sustainability Pillars

Further details on John Holland's Sustainability Framework can be found at johnholland.com.au/how-we-care/sustainability

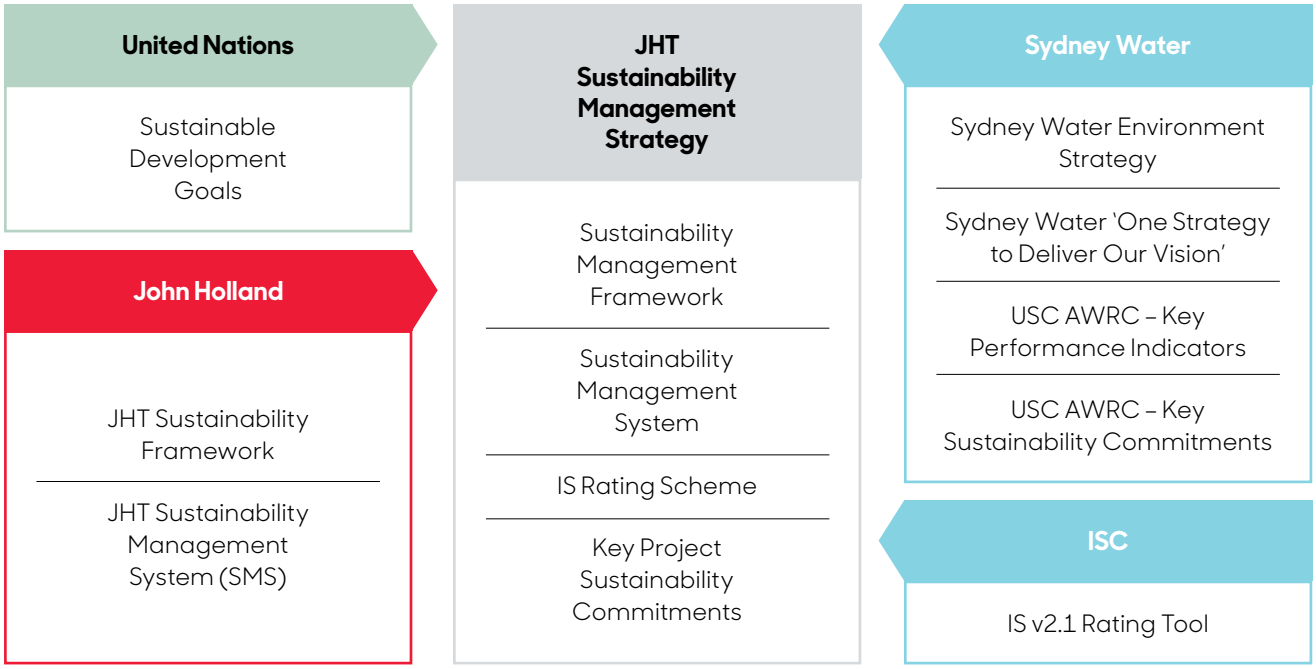
John Holland's Sustainability Policy details how we're committed to sustainability through "integrating economic growth, environmental resilience, and social progress as priorities into decision-making at every level, with the ambition to create long-term value."

Commitments include:

- Create a sense of place for communities, by making a positive and meaningful difference to the community by genuinely engaging with the community and stakeholders.
- Work closely with our customers to achieve optimal and resilient outcomes for users and society.
- Decision-making to integrate economic, social, environmental and governance aspects, and seek to achieve positive outcomes in each.
- Minimise whole of life asset impact by future proofing our assets and responding to climate change.
- Address environmental considerations in a manner that is sensitive to the needs of our stakeholders and the environmental outcomes wherever practical.
- Be recognised as an industry leader in making our workplaces safer through innovation, collaboration and effective planning and management of risks.
- Enhance workforce health and wellbeing and inclusion and diversity, through employee empowerment to deliver sustainable outcomes.
- Source sustainably and ethically, including prioritising local industry participation, social procurement initiatives and a commitment to avoiding modern slavery.
- Encourage innovation amongst our delivery teams and supply chain to achieve sustainable outcomes.
- Manage all activities ethically, managing and reporting the sustainability performance of the project.
- Govern for sustainability by implementing project systems and processes to ensure the effective and efficient delivery and operation of the project.
- Support the UN Sustainable Development Goals.

4.4.3 Project Sustainability Approach

The Sustainability Management Strategy sets out how sustainability will be developed across the project and how the team will strive to exceed its sustainability requirements. The Project Sustainability Management Strategy was developed using information, guidance and structure from Sydney Water, the United Nations, the Infrastructure Sustainability Council and John Holland (Figure below).



Upper South Creek Sustainability Management Strategy Development.

The Project's Sustainability Management Strategy will apply the approach set out by the JHG Sustainability Management Framework (SMF), using the tools and structure in the SMF to embed and exceed the projects sustainability requirements. The strategy also enables the project to work towards the UN Sustainable Development Goals.

This strategy aligns with Sydney Water's Environment and Sustainability Policy in particular, each component of the strategy is interconnected with each of the four pillars, John Holland's 12 elements and Sydney Waters strategic outcomes define an inclusive and considered approach.

The figure (below) demonstrates the synergy between the JHG Sustainability Framework elements and the broader Sydney Water 2030 Strategy and Vision of "Creating a better life with world-class water services."

The Project strives to work with Sydney Water to build resilience in the Sydney network, for Sydney Water and its customers, and for JHG's people and supply chain.

Building Resilience

4.4.4
Project Sustainability Objectives and Targets

The Project material issues were developed using information, guidance and structure from Sydney Water, the United Nations, the Infrastructure Sustainability Council and John Holland Group detailed above which has then informed the issues identified by the Project. Responding to Project Key Risks & Opportunities (Section 2.3 & 2.4) and Stakeholder Concerns (Section 4.3.4) also framed the development of material issues.

Following the verification of the IS Weighting Assessment for the Project the Sustainability and senior leadership teams confirmed and formalised Project-specific themes, objectives and "SMART" targets relevant to the most material sustainability aspects. These targets are reported on monthly to the Senior Leadership Team and reviewed quarterly for accuracy and relevance.

Material Sustainability Themes and Objectives for the Project.

Environmental Health	Natural and Heritage Assets	Energy and Carbon	Circular Economy
Have no net impact on environmental health through discharges to water, air and land.	Protect, restore and enhance natural and heritage assets.	■ Responsibly manage energy by applying best practice design and energy efficiency approaches. ■ Minimise residual GHG emissions by pursuing renewable energy and low-carbon solutions.	Pursue circular economy approaches to material sources. (including reuse) and effective waste management.

Water Use Management	Resilience	Society and Community	Governance
■ Supply recycled water for non-drinking purposes for use in homes and businesses, for agriculture purposes or irrigation of public spaces. ■ Minimise water use and choose appropriate water sources.	Adopt a resilience approach when considering climate change risks, climate change impacts and implement adaptation solutions.	■ Be a leader in social responsibility by having the well-being of the community and stakeholders at the forefront of delivery. ■ Create green and vibrant spaces through landscape-led urban design and landscaping.	Value-for-money decision-making which integrates economic, social, environmental aspects.

Project risk, opportunities and stakeholder concerns are mapped to Project Material Themes and Objectives

Material Theme/ Objective	Type	Detail
Resilience	Project Risk	Vulnerability to natural hazards and the longer-term impact of climate change
Society & Community	Project Risk & Stakeholder Concern	Community disruption through the construction phase of the development
Society & Community & Environmental Health	Project Risk & Stakeholder Concern	The development sites are situated near residential and commercial dwellings sensitive to construction impacts such as noise and vibration
Environmental Health	Project Risk	Unapproved negative impact to Flora and Fauna protected by the EPBC Act and/or BC Act
Environmental Health	Project Risk & Stakeholder Concern	Risk of impacting water resources through surface water pollution due to construction impacts
Circular Economy	Project Risk	Controlling the quality and compliance of materials bought to site
Natural & Heritage Assets	Stakeholder Concern	The time needed to meaningfully and sensitively engage with Aboriginal stakeholders about Caring for Country practices and how these can be incorporated into design, delivery & operation
Natural & Heritage Assets	Stakeholder Concern	Desire from stakeholders to implement an education hub, detailed heritage interpretation, public recreational space or other aspects of the facility that may no longer be feasible or continued as described in the EIS
Environmental Health	Stakeholder Concern	Operational impacts of an AWRC including perceived impacts to property values, concerns about operational odour and noise, wildlife management, visual impacts, glint and glare for pilots, light spill, the co-generation gas flare, urban heat, transport of chemicals and increased traffic
Governance	Project Opportunity	Providing efficient and cost-effective wastewater services
Water Use Management	Project Opportunity	Producing high-quality, recycled water for a range of potential non-drinking reuses
Energy & Carbon	Project Opportunity	Potential to recycle organic waste to generate electricity
Energy & Carbon	Project Opportunity	Producing biosolids for an alternative to chemical fertilisers in agriculture
Natural & Heritage Assets	Project Opportunity	Enhancing biodiversity by greening Western Sydney with recycled water
Energy & Carbon	Project Opportunity	Generating renewable energy within the AWRC
Natural & Heritage Assets	Project Opportunity	Delivering a landscape-led design to seamlessly connect the AWRC to the wider precinct
Governance	Project Opportunity	Sustainability has been a core principle of the design, to achieve an ISC 2.1 Gold Rating in support of Sydney Water's net zero ambitions

Full details on the targets associated with these Material Themes and Objectives are available in Appendix A and within the Theme specific sections within this Report.

4.4.5
Building a Strong Supply Chain

At John Holland, we recognize the vital role that suppliers play in supporting our business activities, and we understand that our reputation relies on the quality of the services they deliver. For this reason, we work closely with our trading partners to ensure that they share our values and uphold the highest standards of sustainability.

Our supplier relationships are built on collaboration and respect. We have comprehensive and industry-leading requirements for our suppliers to comply with all applicable regulations and legislation regarding working hours, wages, welfare, and human rights. By operating on a category management approach to procurement, particularly for strategic trades, we can develop deeper relationships with key vendors throughout our supply chain. This approach fosters closer collaboration and alignment with our corporate goals and values.

Furthermore, we believe in supporting our suppliers through training and knowledge-sharing. We regularly hold forums to communicate clear expectations and provide opportunities for them to enhance their sustainability practices.

It is with great pride that we acknowledge the pivotal collaborations we have established with the following suppliers and delivery partners.

Through these partnerships, we have been able to implement cutting-edge and sustainable practices that have led to significant achievements for our projects, John Holland, and our valued client, Sydney Water:

- Kypreos Group, State Asphalt Services NSW.
- SAMI Bitumen Technologies.
- Boral.
- Jonishan.
- Kennards Hire.
- Blue Diamond Machinery.
- Re-fuelling Solutions.
- Hanson.
- Mates on the Move.

We are truly grateful for the commitment and efforts of our supply chain partners in driving sustainability and contributing to our success. Together, we are making a positive impact on the environment and communities we serve.

4.4.6
Memberships and Associations

John Holland is a partner and member of the following nationally recognised Sustainability industry organisations:

- Infrastructure Sustainability Council (ISC).
- Green Building Council of Australia (GBCA).
- Materials and Embodied Carbon Leaders' Alliance (MECLA).
- Sustainable Supply Chain School.
- National Association of Women in Construction (NAWIC).

5 UN SDGs Project Target Alignment

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Our targets seek to both minimise our negative impacts and maximise our positive impacts as we procure, design, build and operate the Upper South Creek Advanced Water Recycling Centre.

This diagram demonstrates how key targets address both positive and negative impacts and maps these against the UN Sustainable Development Goals (SDGs). Performance snapshots on the following theme pages show how all the project sustainability targets have sought to maximise positive contributions and minimise negative contributions to key sustainability issues and the UN SDGs, in accordance with the diagram.

Mapping of all targets to UN SDG outcomes is located at Appendix A.

Maximise Positive Contribution

Supply Chain

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

Theme
Governance

Target
- Achieve an ISC rating of 'Gold' under v2.1.
- Achieve 5 innovation points under ISC.

Design

11 SUSTAINABLE CITIES AND COMMUNITIES

Theme
Natural and Heritage Assets

Target
- Identify, maintain, and enhance Aboriginal and non-Aboriginal heritage assets and values within the Project's urban and landscape design by integrating requirements into design documentation by 2026.
- Develop and implement 100% of the urban design landscape themes/ recommendations within the Stage 1a Operational Space Urban Design Landscape Plan.

Construction

6 CLEAN WATER AND SANITATION

Theme
Clean Water and Sanitation

Target
- Regenerate and landscape the riparian area adjacent to Wianamatta-South Creek, including the reconnection of an on-site billabong to support Western Sydney's green spine development.

Operation

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Theme
Responsible Consumption and Production

Target
- 100% re-use of biosolids.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

Theme
Circular Economy

Target
- 50% of materials (by cost) can be easily adapted, re-used or recycled at end-of-life.

Minimise Negative Contribution

Supply Chain

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Theme
Circular Economy

Target
- The Project will target 5% recycled material and/or recycled asphalt pavement use in the asphalt production for permanent works at the plant site.
- ≥ 250 tonnes of pipe bedding sand made from a blend of natural sand and crushed glass collected from curb side waste collection schemes will be used in the Project permanent works.
- 45% reduction in material life cycle impacts from the Base Case scenario.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

Theme
Circular Economy

Target
- 30% of products/ materials (by cost) will have an ISC approved sustainability label.

Design

13 CLIMATE ACTION

Theme
Resilience

Target
- Reduce 100% of extreme and high-priority direct climate and natural hazard risks to an acceptable risk level.

6 CLEAN WATER AND SANITATION

Theme
Water Use Management

Target
- 25% reduction in water demand and total potable water from the Base Case scenario.

Construction

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Theme
Circular Economy

Target
- 95% diversion of clean/inert excavation spoil from entering landfill.
- 80% diversion of other inert resource outputs from entering landfill.
- 70% diversion of office waste from entering landfill.

15 LIFE ON LAND

Theme
Environmental Health

Target
- The project has several targets associated with mitigation of material environmental impacts.

Operation

7 AFFORDABLE AND CLEAN ENERGY

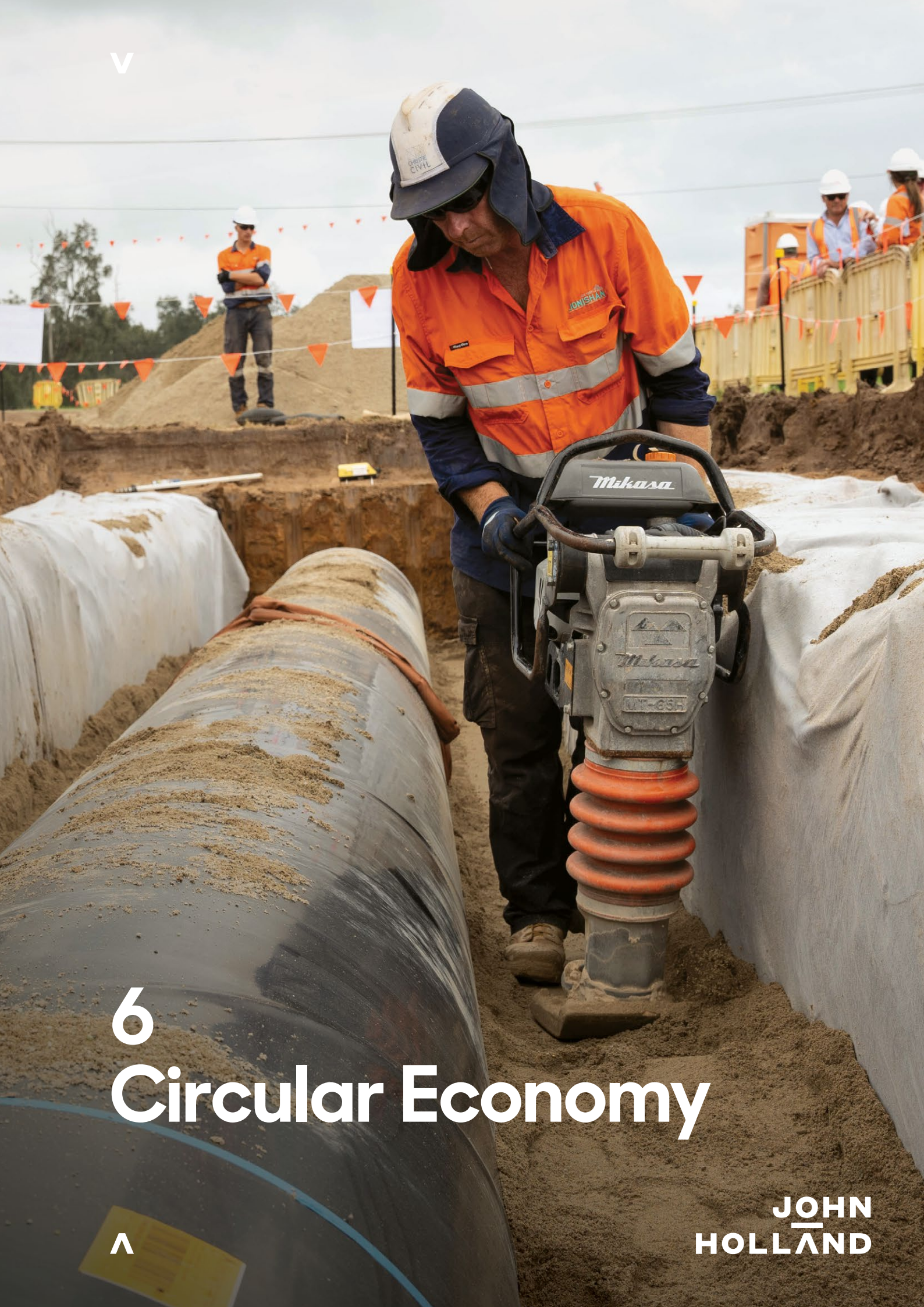
Theme
Energy and Carbon

Target
- 50% increase in operational electricity sourced from renewables from Base Case scenario.
- 30% reduction in energy use/demand from Base Case scenario.

15 LIFE ON LAND

Theme
Environmental Health

Target
- Operational noise, air and water impacts reduced.



6
Circular Economy

JOHN HOLLAND

Legend

- Project target achievement is on track
- Project target achievement is potentially compromised
- Project target achievement is compromised

GRI 301: Materials, GRI 306: Waste

Objective:

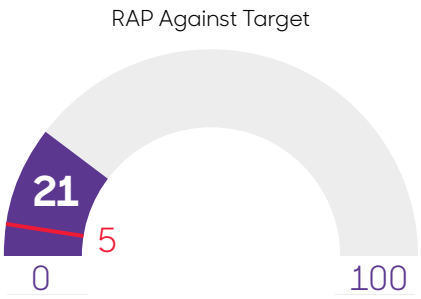
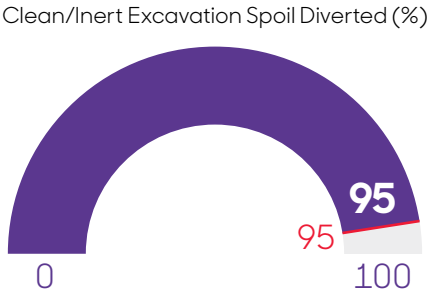
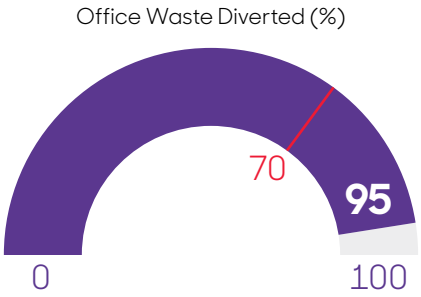
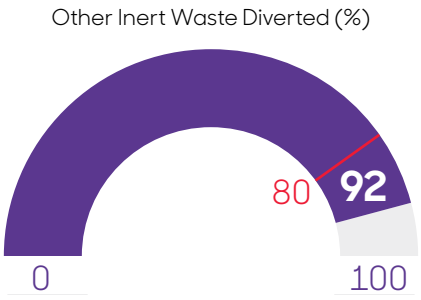
Pursue circular economy approaches to material sources (including reuse) and effective waste management.

Key risks, opportunities and stakeholder concerns met by material issue are detailed in Section 4.4.4.

Targets under this material issue are tracked through the following:

- Monitoring of construction-phase data through reporting by the Project on materials used and waste generated within the Project's data capture platform Project Pack Web.
- Material modelling for ISC purposes, currently under review.
- Inclusions within Design Reports and Issued for Construction documentation.

Target	Target Tracking and Achievement	Progress
45% reduction in material life cycle impacts from a Base Case scenario (T-7)	24.4% Saving of environmental impact (expressed as Green House Gas (GHG) equivalent) of materials used in Reference Design stage however the Project is still awaiting verification of the ISC Base Case document.	
30% of products / materials (by cost) will have an ISC-approved sustainability label (T-8)	As of the current progress, approximately 25.4% of products/materials by cost have been designed, selected, and planned for use on the Project. This achievement is the result of coordination work and contract commitments with our supply chain. The Project is actively collaborating with several awarded suppliers to obtain environmental product declarations for their products. This includes products such as bedding sand and PVC pipework. However, it is important to note that our target is to have 30% of products/ materials (by cost) with an ISC-approved sustainability label (T-8). We are currently at 25.4%, and to ensure we meet our target, key packages such as low voltage services, metal roofing, construction of the administration building, high voltage cable supply, access floor, cable ladders, junction boxes and more will continue to request suitably labelled products throughout the procurement process. This ongoing effort will help us in achieving our sustainability goals.	
100% re-use of biosolids (T-9)	The reuse of biosolids is integrated into the Design and Operational Management of the plant with commitment from support from Sydney Water with a current targeted outcome of 100% re-use.	
50% of materials (by cost) can be easily adapted, re-used or recycled at end-of-life (T-10)	An Adaptability and End of Life Workshop has been held with an associated Adaptability and End of Life Management Plan developed. Project currently tracking to achieve 84.8% of materials (by cost) that can be easily adapted, re-used and/or recycled at end of life.	
≥ 250 tonnes of pipe bedding sand made from a blend of natural sand and crushed glass collected from curb side waste collection schemes will be used in the Project permanent works (T-11)	In February 2024, the project undertook a trial to prove the fit-for-purpose use of recycled glass bedding sand mix as a suitable replacement for virgin bedding sand. The Project supplied successful trial results including compliance with Sydney Water specification around quality assurance, compaction and sieve size, as well as evidence of the glass sand's comparable constructability and safety requirements. On 19th April 2024, Sydney Water conditionally approved the use of the glass sand in the permanent works.	

≥ 2000 white feather honey myrtle seeds will be collected from site, germinated and returned to Project site as tube stock for use in permanent landscaping works to use in the regeneration of the Project riparian corridor (T-12)	In 2023 over 2,000 white feather honey myrtle seeds were collected from trees Muru Mittigar a Dharug Aboriginal Social Enterprise in Western Sydney, who will grow these seeds to tube stock for planting in the riparian corridor adjacent to the AWRC.	
The Project will target 5% recycled material and/or recycled asphalt pavement use in the asphalt production for permanent works at the plant site (T-13)	Consultation with our supply chain has indicated the capacity for the Project to achieve a higher outcome than our target. Currently all asphalt used on the project is tracking to an average of 21% recycled content. Asphalt packages will be let in early 2025. 	
95% diversion of clean/inert excavation spoil from entering landfill (T-29)	Early Construction phase diversion rates are compliant with the identified target currently achieving 95%. 	
70% diversion of office waste from entering landfill (T-30)	Early Construction phase diversion rates are compliant with the identified target currently achieving 95%. 	
80% diversion of other inert resource outputs from entering landfill (T-31)	Early Construction phase diversion rates are compliant with the identified target currently achieving 92%. 	

The Project will utilise ≥ 300 tonnes of salvaged and collected woody debris (logs and root balls) in the Project's riparian corridor rehabilitation and revegetation works (T-32)	Over 300 tonnes of salvaged woody material have been stockpiled on site for future use in the riparian corridor. Detailed use of the material is included in the Project Vegetation Management Plan	
≥ 20 tonnes of sustainable asphalt made from recycled coffee cups and using a bio-bitumen (polymer-modified binder containing biogenic materials) binder will be trialled on-site as part of temporary works during construction to evidence the use/viability and incorporation of problem waste streams in construction materials (T-33)	This trial was undertaken in February 2024 and ran for 75 working days with results currently being analysed by a JHG technical expert. If deemed successful, we will recommend its inclusion in the permanent design of the asset.	

6.1
Circular Economy – Case Study

Initiative Name	Sustainable Asphalt Trial
Target	**T-33** **Over 20 tonnes of sustainable asphalt with the inclusion of recycled coffee cup fibres and using a bio-bitumen (polymer-modified binder containing biogenic materials) binder will be trialled on-site as part of temporary works during construction to evidence the use/viability and incorporation of problem waste streams in construction materials.**
Current Phase	Design and Construction
Status	Well Progressed
Initiative Summary	The Project is trialling the reuse of disposable coffee cups in combination with a biogenic-based polymer modified binder within temporary roads on the Project
Initiative Detail	The Project's sustainability targets provided the team with the framework to explore new opportunities for resource reuse on the project. By requesting suppliers to propose potential new asphalt products and technologies through the sustainable procurement process, the opportunity to use a sustainable asphalt containing fibres, derived from recycled disposable coffee cups, and a bio-bitumen binder, to replace a typical petroleum-based binder, was identified. The use of the coffee cup fibres, called PAKPAVE, and a bio-bitumen binder, called SAMIGreen, was the first time these had been used in combination in Australia. The PAKPAVE fibres are derived from coffee cups collected through Closed Loop's Simply Cups initiative, Australia's largest paper cup recycling program. SAMIGreen is a petroleum-free alternative to bitumen which is made using non-petroleum based renewable raw materials and resulting in energy efficient asphalt with minimised carbon footprint and equivalent engineering performance making it a more sustainable model long term. A trial was undertaken in February 2024 where the pavement was placed at the entrance to the site. Over 75 days, the pavement underwent over 14,600 heavy vehicle movements, equivalent to 10 years of heavy truck vehicles during the operational phase of the Project. The trial's forecasted end date is May 2024, at which time the Project team will collect data for the pavement design team to evaluate for potential utilisation of the sustainable asphalt in the permanent design. With approximately 23,000m2 of paved roads in the permanent works, the trial has the opportunity to drive circular economy outcomes and contribute to the reduction in the project's carbon footprint.
Data Focus	Potential for a 14% embodied carbon reductions, resulting in an 11 tonnes of carbon dioxide emissions (TCO2e) reduced from the permanent pavement. Note that these carbon numbers are unverified and are based off assumed tonnes of carbon equivalent (TCO2e) per square meter (m2) as calculated by State Asphalt Services and with information provided by SAMI Bitumen Technologies. Assumptions include: ■ Business as usual asphalt is an AC14 with C450 binder and 0% RAP laid at 45mm thickness. ■ Sustainable asphalt is a 10mm stone mastic asphalt with PAKPAVE fibres and Biobitumen mix laid at 34mm thickness. ■ Carbon numbers only consider cradle to gate emissions. ■ The Sustainable asphalt has a potential for more carbon savings from cradle to grave, based on less material used per square meter and therefore less material being processed at end-of-life. Additionally, an SMA10 typically has a longer design life compared to an AC14 (15 years vs. 10 years).

Initiative Name	Site Worm Farm
Target	**T-30** **70% diversion of office waste from entering landfill**
Current Phase	Design and Construction
Status	Ongoing Implementation
Initiative Summary	On-site worm farm treating effluent to achieve Project waste targets
Initiative Detail	Due to the location of the site compound, a sewer connection was not available to the site. The business-as-usual scenario is to install large tanks underground and have the sewage pumped out weekly by large trucks and disposed of at an offsite facility. However, the project team investigated alternative solutions to enable the sewage to be treated onsite. Seven farm scale worm farms (to service up to 300 staff personnel) enable all sewage to be disposed of and treated onsite with the by-product used as organic liquid fertiliser. The tanks are buried under the ground to eliminate visual impact and maintain a constant temperature. The worm farm operates like a rainforest floor as it filters water through the organic material and disperses the by-product through the trenches. The use of the worm farm system eliminates the need for truck movements on local roads to remove waste, treats and reuses the waste onsite and is cheaper than the business-as-usual tank and truck option.
Data Focus	497.8 Tonnes – Sewage recycled to date 250 – Truck movements eliminated

Initiative Name	Recovered glass bedding sand mix - Virgin Bedding Sand Alternative
Target	**T-11** **≥ 250 tonnes of pipe bedding sand made from a blend of natural sand and crushed glass collected from curb side waste collection schemes will be used in the Project permanent works.**
Current Phase	Design and Construction
Status	Ongoing Implementation
Initiative Summary	The use of a blended glass bedding sand mix has replaced the use of virgin bedding sand
Initiative Detail	Prior to construction, the project identified that approximately 50,000T of natural virgin bedding sand was required for the Project. John Holland recognised an opportunity to explore alternative solutions. A recycled glass bedding sand mix offers a promising solution to mitigate the adverse impacts associated with sand extraction while promoting environmental, social, and economic benefits. By diverting commercial kerbside collected glass bottles from landfill and transforming it into a valuable construction resource, this innovative approach contributes to sustainability, resource efficiency and circular economy in construction. The recovered glass sand is currently sourced from iQ Renew's facility in Wyong, where glass bottles from kerbside recycling are recovered, double washed and cube cut to achieve an almost spherical shape on the grains. This material is then mixed, at Boral's facility in Emu Plains, with virgin sand to create a blended high grade compaction sand product, alleviating the strain on virgin sand supply. Collaboration with the client, Sydney Water, and supply chain, Jonishan and Boral, was crucial to facilitate acceptance of the alternative product for a trial. Following the success of this trial, the product will be used in the permanent works pending Sydney Water approval.
Data Focus	40% – Embodied carbon reductions per tonne of bedding sand. Note: embodied carbon reductions are based off an unverified Global Warming Potential (GWP) factor for the recovered glass sand portion of the blended material. An Environmental Product Declaration (EPD) is currently being verified by a third party.

Recovered glass bedding sand mix - Implementation Process

Collaboration with Supply Chain

Seek partnership with a subcontractor to undertake an onsite trial of the material to prove its fit-for-purpose use.

Implement on Permanent Works

Trial has successfully proven the material's fit-for-purpose use, deviation is approved and glass sand is implemented as embedment material in permanent works (Pipelines scope).

Seek Approval from Client

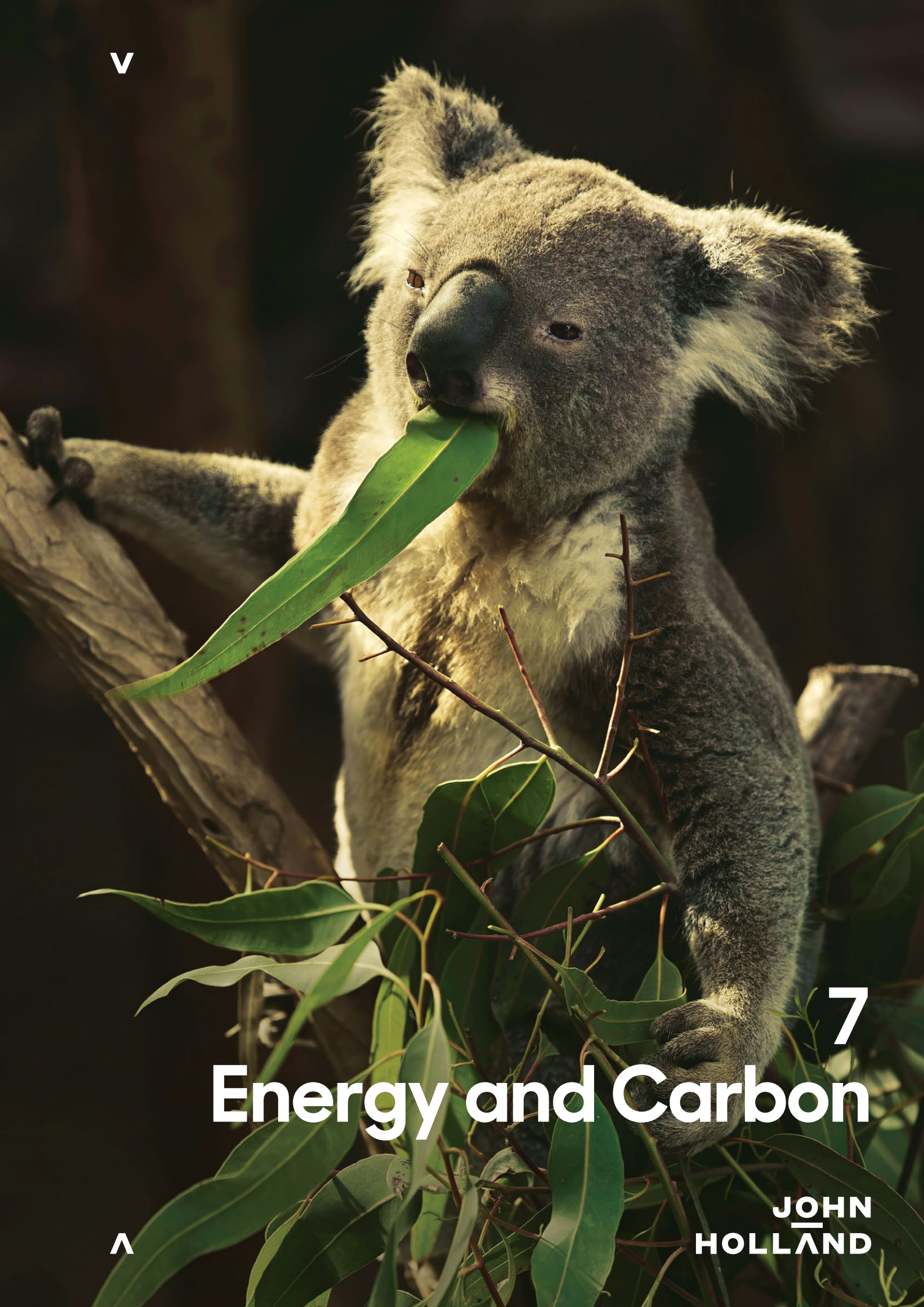
Submit a deviation from standards request to Sydney Water to approve the use of the glass sand on the Pipelines portion of the project.

Undertake a Trial

Trial the blended glass sand on varying pipe types (Mild Steel Cement Lined (MSCL) and an oriented PVC (o-PVC) pipe) to test for compaction and any cosmetic damages to outer pipe coating.

Acceptance and Wider Use of Glass Sand

Acceptance and use of the glass sand across the whole project including AWRC.



7 Energy and Carbon

JOHN HOLLAND

Legend

- Project target achievement is on track
- Project target achievement is potentially compromised
- Project target achievement is compromised

GRI 302: Energy, GRI 305: Emissions

Objectives:

1. Responsibly manage energy by applying best practice design and energy efficiency approaches and
2. Minimise residual GHG emissions by pursuing renewable energy and low-carbon solutions.

Key risks, opportunities and stakeholder concerns met by material issue are detailed in Section 4.4.4.

Targets under this material issue are tracked through the following:

- Monitoring of construction-phase data through reporting by the Project on energy consumed, associated GHG emissions and scope distribution within the Project's data capture platform Project Pack Web
- Energy and carbon modelling by the design team for ISC purposes, currently under review
- Inclusions within Design Reports and Issued for Construction documentation.

Target	Detail	Progress
30% reduction in energy use/ demand from Base Case scenario (T-3) – Design Phase	37% saving of environmental impact (expressed as GHG equivalent) of energy used in Reference Design stage however the Project is still awaiting verification of the ISC Base Case document. Many additional opportunities are yet to be incorporated into the Energy Carbon model through the design phase.	
30% reduction in energy use/demand from Base Case scenario (T-25) – Construction Phase	45% saving of environmental impact (expressed as GHG equivalent) of energy used in Reference Design stage however the Project is still awaiting verification of the ISC Base Case document. Construction phase reduction opportunities will continue to be included within the model as the project completes the design phase.	
50% increase in operational electricity sourced from renewables from Base Case scenario (T-4)	The project includes the installation of a 4 MW photovoltaic system and the use of biogas for heating. This will result in an average increase of 50% in operational energy derived from renewable on-site generation until wastewater flows exceed 30 ML/day in 2033. The average increase in operational energy sourced from renewable for the Stage 1 lifecycle is 38%. The facility has been designed with space for the installation of a cogeneration engine when wastewater flows exceed 35 ML/ day in 2035. This will enable the facility to achieve energy self-sufficiency in excess of 65% during the Stage 1 lifecycle.	
30% increase in electricity sourced from renewables in the Construction Phase (T-26)	The Base Case Approach is yet to be verified and the model component associated with this target is still being reviewed. The Project's Construction and Operational Energy Model is currently being developed and captures initiatives throughout the Construction Phase. Key initiatives during the reporting period include: ■ Main site compound partially powered through onsite solar power. ■ The remainder of the main site compound electricity is 100% Greenpower. ■ Use of Greenpower at temporary pipeline compounds. ■ Use of hybrid generators (solar, battery and diesel) where feasible.	

7.1
Energy and Carbon – Case Study

Initiative Name	Hydrogen Generator Trial
Target	**T-25** **30% reduction in energy use/demand from Base Case scenario**
Current Phase	Construction Phase
Status	Implemented
Initiative Summary	Hydrogen Generator Trial demonstrates site alternatives to diesel generators
Initiative Detail	The initiative trialled by the Project involved a 28-day trial of Blue Diamond and Toyota's innovative GEH2 100 kVA Hydrogen Generator in place of a traditional 100 kVA diesel generator to power the Project's primary construction site. Over the course of the trial the GEH2 unit powered the project's temporary facilities including offices, lunchrooms and ablution blocks, in addition to electric vehicle chargers. This trial marks the first time the GEH2 unit has directly powered a primary construction site in Australia without the need or use of an intermediary battery unit. It also represented the longest-running utilisation of the unit at the point of trial in August 2023. The use of the hydrogen unit in place of a traditional diesel generator reduced emissions by 12.2 T of CO2. Additionally, the unit does not emit CO2 or NO2, only water and filtered air. This water was then used on site for dust suppression. Challenges during the trial included familiarity with the commissioning and installation process and changing of the hydrogen tanks. However, as a direct outcome of the trial and feedback provided by JHG, Blue Diamond and Toyota are currently developing controls to enhance and better manage this process.
Data Focus	12.2 TCO2 (Tonnes of Carbon Dioxide) – Emissions avoided through use of the Hydrogen Generator 15dB(A) – Reduction in decibels with hydrogen unit compared to diesel 146T CO2/year – Predicted emissions avoided for each diesel generator replaced

Blue Diamond and Toyota's innovative GEH2 100 kVA Hydrogen Generator.

Initiative Name	HVO 100% Renewable Diesel Trial
Target	**T-25** **30% reduction in energy use/demand from Base Case scenario**
Current Phase	Construction Phase
Status	Implemented
Initiative Summary	HVO 100% Renewable Diesel Trial demonstrates construction alternatives to diesel
Initiative Detail	Water treatment is one of the most energy-intensive types of infrastructure to build, and as a result the Project invested early in researching alternative diesel/renewable blends during the design phase of the Project. HVO (Hydrotreated Vegetable Oil) is a renewable diesel with minimal emissions compared to mineral diesel. It presents a like for like swap for diesel, with no engine modifications or special maintenance regimes required. It presents a viable alternative to diesel use in the construction sector; however, supply and price have been barriers to adoption to date in Australia. The initiative involved replacing 1,762 litres of business-as-usual diesel with 100% Renewable Diesel or HVO in two generators (70 kVA and 25 kVA) used to power the Project's construction compound. Over the course of the trial, the HVO fuelled generators powered EV chargers and temporary facilities including site sheds and ablution blocks. This trial represented the first time John Holland had used HVO in its own plant and provided valuable lessons and data to the team regarding HVO use. Supply was an issue for the project, experiencing delays in its arrival, however with increasing demand and the establishment of a refinery in Singapore, supply and price challenges are expected to diminish.
Data Focus	5.6 TCO2 – Emissions avoided through use of the HVO 95% – Reduction in emissions achieved through using HVO vs mineral diesel

8 Environmental Health

JOHN HOLLAND

Legend

- Project target achievement is on track
- Project target achievement is potentially compromised
- Project target achievement is compromised

GRI 304: Biodiversity, GRI 306: Effluents and Waste

Objective:

Have no net impact on environmental health through discharges to water, air and land.

Key risks, opportunities and stakeholder concerns met by material issue are detailed in Section 4.4.4.

Targets under this material issue are tracked through the following:

- Reporting by the Project on environmental construction impacts within the Project's data capture platform Project Pack Web.
- Environmental impact modelling as defined within associated Project environmental management plans.
- Inclusions within Design Reports and Issued for Construction documentation.

Target	Target Tracking and Achievement	Progress
The Project will achieve load and concentration limits within Yarramundi 2 subzone and maintain or improve instream water quality and macroinvertebrate diversity attributable to the project's operational waterway releases. These will be achieved by meeting the project-specific water quality objectives (see table 8-8 of USC EIS, September 2021) (T-22)	The Project Issued For Construction design report currently includes details of compliance for tertiary, advanced treated water, and discharge modelling. These compliance criteria align with the requirements listed in table 8-8. To ensure compliance, thorough testing and monitoring will be conducted during the commissioning process. The goal is to gather evidence demonstrating compliance by 2026 as part of Project commissioning.	
Operational noise is within the Project Specific Noise Trigger Levels of 41 dBL at night and 45 dBL day/evening at existing/future residential receivers (T-23)	Noise modelling currently demonstrates compliance within the proposed target for the the final design. The final outcome will be detailed within the Project Operational Noise Review currently in development by the Projects noise and vibration consultant.	
Air quality does not exceed 4 odour units (OU) beyond the boundary of the plant (operational site) (T-24)	Air quality modelling currently demonstrating compliance within the final design. This will be confirmed following the completion of design.	
Number of significant heritage-related incidents per million hours worked is 0 (T-34)	No significant incidents to date.*	
Number of significant water and discharge related incidents per million hours worked is 0 (T-35)	No significant incidents to date.*	

Number of significant noise-related incidents per million hours worked is 0 (T-36)	No significant incidents to date.*	
Number of significant vibration-related incidents per million hours worked is 0 (T-37)	No significant incidents to date.*	
Number of significant fauna/ flora incidents per million hours worked is 0 (T-38)	No significant incidents to date.*	

*A Significant Incident is defined as an environmental incident that has the potential to result in serious or actual threat to the environment.

For more detailed information on the criteria and definition of "significant" environmental incidents related to targets T-34 to T-38, please refer to Appendix A7: Incident Management in the Project Construction Environmental Management Plan (Document Number: USCP-JHG-MPL-ENV-0008). This plan and procedure can be accessed by the public on the Project website at www.sydneywatertalk.com.au/uppersouthcreek

8.1 Environmental Health – Case Study

Initiative Name	Riparian Corridor 7 Waterway Restoration
Target	**T-18 & T-20** **Develop & implement the USC Project Rehabilitation Management Plan.** **&** **The Project will regenerate and landscape the riparian area adjacent Wianamatta-South Creek, including the reconnection of an on-site billabong to support Western Sydney's green spine development before the operational commencement of the plant.**
Current Phase	Design and Construction
Status	Well Progressed
Initiative Summary	Rehabilitation and revegetation of the riparian corridor and banks of watercourses impacted by Project works
Initiative Detail	The project's main objective is to restore and revegetate the riparian corridor and banks of watercourses impacted by construction works and historic land use at South Creek, Cosgrove Creek, Oakey, and Wianamatta-South Creek. The project team has considered factors like rainfall events, discharge events from other projects, and the challenges of construction in waterways with varying bathymetric levels. They have sought advice from experts in geomorphology, aquatic ecology, and relevant agencies to develop a design that best responds to the landscape and restores to natural. To restore the areas, the project has collected seeds from local sources and propagated them for later planting. They have also preserved hollows and tree trunks to be used in the restoration process. The project has been collaborating with authorities to implement a strategy for rehabilitating riparian corridors in key fish habitats at the Neapean River, Cosgrove Creek, and Wianamatta-South Creek in two locations. In relevant locations, the restoration efforts will follow the principles outlined in the Guidelines for Vegetation Management Plans on Waterfront Land (NSW Office of Water, DPI 2012). The focus is on restoring native species and specific Plant Community Types (PCTs) for each area. For example, the project aims to restore the Swamp Oak open forest on river-flats of the Cumberland Plain and Hunter Valley at Wianamatta-South Creek. The rehabilitation works at Wianamatta-South Creek incorporate design elements that aim to protect, maintain, and enhance the ecological values and features of the project site. The Biodiversity Assessment Method (BAM) has been used to assess the presence and condition of native vegetation, threatened flora and fauna species, and their habitats in the riparian corridor. The BAM serves as an ecological tool to ensure a net ecological gain is achieved along Wianamatta-South Creek without any negative impacts on biodiversity. It also ensures that the quantity and diversity of PCTs and plantings result in an enhanced riparian corridor.
Data Focus	Biodiversity Assessment Method (BAM), changes tracked in VI score.

9 Governance

JOHN HOLLAND

Legend

- Project target achievement is on track
- Project target achievement is potentially compromised
- Project target achievement is compromised

GRI: General Disclosures, GRI: Material Topics

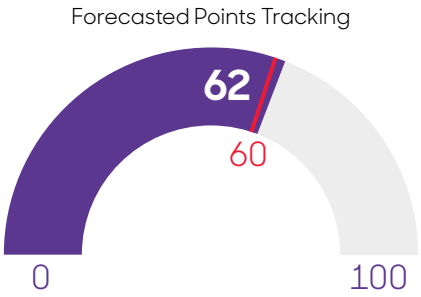
Objective:

Value-for-money decision-making which integrates economic, social, environmental aspects.

Key risks, opportunities and stakeholder concerns met by material issue are detailed in Section 4.4.4.

Targets under this material issue are tracked through the following:

- Management of the IS Pathway tracker.
- Energy and material modelling by the design team for ISC purposes.
- Inclusions within Design Reports and Issued for Construction documentation.
- Extracts from the Project's risk and opportunity register.

Target	Detail	Progress
The Project will target 5% recycled material and/or recycled asphalt pavement use in the asphalt production for permanent works at the plant site (T-13)	Currently the project is on target to achieve their ISC Gold rating target. The figure to the right illustrates the current forecast point outcome for the Project. The Design Round 1 submission is targeted for submission in Q4 2024. 	
Achieve and ISC rating of 'gold' under TM v2.1	The Project is currently targeting 4 Innovations for submission in Design Round 1 worth the maximum achievable 10 IS points. The Project has a further 6 innovations implemented additional to those being submitted for verification.	

10 Natural and Heritage Assets

JOHN HOLLAND

Legend

- Project target achievement is on track
- Project target achievement is potentially compromised
- Project target achievement is compromised

GRI 304: Biodiversity, GRI 413: Local Communities

Objective:

Protect, restore and enhance natural and heritage assets.

Key risks, opportunities and stakeholder concerns met by material issue are detailed in Section 4.4.4.

Targets under this material issue are tracked through the following:

- Inclusions within Design Reports and Issued for Construction documentation.
- Urban Design and Landscape operational management plans.

Target	Detail	Progress
Identify, maintain, and enhance Aboriginal and non-Aboriginal heritage assets and values within the Project's urban and landscape design by integrating requirements into design documentation by 2026 (T-17)	The integration of identified assets and values continues throughout the design phase. Refer to the Natural & Heritage Assets Case Study for a key initiative completed to date.	
Develop and implement the USC Project Rehabilitation Management Plan. (T-18)	Plan continues to be developed throughout the design phase. Further detail will be available for reporting period 24/25.	
The Project will regenerate and landscape the riparian area adjacent (Wianamatta-South Creek), including the reconnection of an on-site billabong to support Western Sydney's green spine development before the operational commencement of the plant (T-20)	The regeneration of the riparian area and commitment to reconnecting the on-site billabong has been incorporated into the Urban Landscape Design.	

10.1
Natural and Heritage Assets – Case Study

Initiative Name	AWRC Site and Access Road Naming
Target	**T-17** **Identify, maintain, and enhance Aboriginal and non-Aboriginal heritage assets and values within the Project's urban and landscape design by integrating requirements into design documentation by 2026.**
Current Phase	Design and Construction
Status	In Progress
Initiative Summary	Project's Aboriginal Participation Plan enables and encourages aboriginal engagement and access road naming in Dharug language
Initiative Detail	The Project's Aboriginal Participation Plan was developed to provide Aboriginal Stakeholders the opportunity to raise and workshop with the Project team any ideas or issues they may have in reference to the urban design, landscaping and construction at the AWRC site. The plan was developed in collaboration with the Project Traditional Custodians to ensure that their needs and goals are taken into account and achieved. Feedback received during the engagement process created an opportunity to facilitate engagement with Dharug Traditional Custodians to develop naming options in Dharug language for the AWRC site, access road and plant meeting rooms. Naming in language was in line with the Recognise Country Guidelines for Development in the Aerotropolis and was noted by Aboriginal stakeholders to be a great opportunity for visitors to the area to learn about Dharug Country, language and culture. Through an engagement process with Dharug Traditional Custodians, themes and suggested names for the access road, project site and meeting rooms were developed. These names were then shortlisted and discussed with other Aboriginal stakeholders who were part of the Project's advisory group. The chosen road name was endorsed by Sydney Wate and has been submitted to the local Council and Geographic Names Board for review and approval with an outcome expected during the following reporting period. This initiative is one of several that is currently being developed because of the Aboriginal Participation Plan workshops.
Data Focus	N/A

10.2
Natural and Heritage Assets – Case Study

Initiative Name	First Nation engagement and incorporation within the Project's Urban & Landscape Design
Target	**T-19 & T-20** **Develop and implement 100% of the urban design landscape themes/recommendations within the Stage 1a Operational Space Urban Design Landscape Plan.** **&** **The Project will regenerate and landscape the riparian area adjacent Wianamatta-South Creek, including the reconnection of an on-site billabong to support Western Sydney's green spine development before the operational commencement of the plant.**
Current Phase	Design
Status	In Progress
Initiative Summary	Inclusion and engagement of First Nation parties within the delivery and design of the Project's physical built environment.
Initiative Detail	The urban design landscaping approach for the Project has sought to enhance the Projects understanding of Dharug Traditional Custodians and the cultural context of Winamatta Creek. During detailed design, the Urban Design Landscape Plan was developed to incorporate the seamless integration of Aboriginal culture and values with the physical built environment. The Project's Aboriginal Stakeholder Advisory Group, inclusive of several Dharug Traditional Custodians were engaged to assist in informing the urban design and landscaping of the Project and ensure the tangible and intangible heritage values of the local Dharug people were incorporated. Specific outcomes and opportunities identified from these workshops include; ■ Retention and protection of a potential Scar tree within the riparian corridor planned for restoration. ■ Consultation on the selection of Plant Community Types (PCTs) and the selection of species to best reestablish their original state. This will enable the regeneration of a diverse range of flora and fauna, including food sources and medicinal plants. ■ The removal of an artificial bund wall, originally installed for agricultural purposes, will enable the rehabilitation and restoration of the billabong to its pre-existing natural state. ■ The project has adapted its construction methodology and landscape design to minimise the construction footprint and mitigate impacts on bank stability and stream morphology. Advice from the ASAG (Aboriginal Stakeholder Advisory Group) has been taken into account, resulting in the incorporation of less invasive, natural methods for stabilising and restoring the riparian corridor. Furthermore, the Project's revised methods and design aim to limit potential disturbance of culturally significant artifacts that may be present within the topsoil. This consideration was raised by the ASAG, drawing from their extensive knowledge of the area.
Data Focus	N/A

11 Resilience

JOHN HOLLAND

Legend

- Project target achievement is on track
- Project target achievement is potentially compromised
- Project target achievement is compromised

GRI 201: Economic Performance, GRI 302: Energy, GRI 305: Emissions

Objective:

Adopt a resilience approach when considering climate change risks, climate change impacts and implement adaptation solutions.

Key risks, opportunities and stakeholder concerns met by material issue are detailed in Section 4.4.4.

Targets under this material issue are tracked through the following:

- Resilience Action Plan developed for the Project.

Target	Detail	Progress
Reduce 100% of extreme and high-priority direct climate and natural hazard risks to an acceptable risk level (T-21)	Climate change workshops were conducted with the Projects deisgn teams, in addition to internal and external stakeholders to develop responses to reduce 100% of extreme and high-priority direct climate and natural hazard risks. The Table below illustrates only 3 high risks identified for the Project at the The table below presents three high risks identified for the Project in the 2070 projection under Representative Concentration Pathways (RCP) 8.5. One of the high risks is associated with extreme storm events, the second with extreme heat events, and the remaining one with extreme rainfall events. To address these risks, a Project Resilience Plan has been developed, which includes implementation approaches for design adaptations specifically targeting these high risks. An update will be provided on specific mitigation outcomes for the 24/25 reporting period.	

Initial risk rating results for RCP 8.5	2030 (RCP 8.5)	2070 (RCP 8.5)	2090 (RCP 8.5)
Low	14	13	5
Medium	13	11	1
High	0	3	0
Extreme	0	0	0
Total	**27**	**27**	**6**

Climate variable	Change in climate variable	Risk Impact	Inherent Risk Rating
Extreme heat events	Increased days >35°C	More hazardous outdoor working conditions due to extreme heat	Heat
Extreme weather events	More frequent and severe storm events	Increase in frequency of damaging storms e.g., hail, extreme wind, affecting exposed equipment	High
Rainfall	Increased precipitation intensity	Increased intensity of peak wet weather flows to ARWC	High

12 Society and Community

JOHN HOLLAND

Legend

- Project target achievement is on track
- Project target achievement is potentially compromised
- Project target achievement is compromised

GRI 413: Local Communities

Objective:

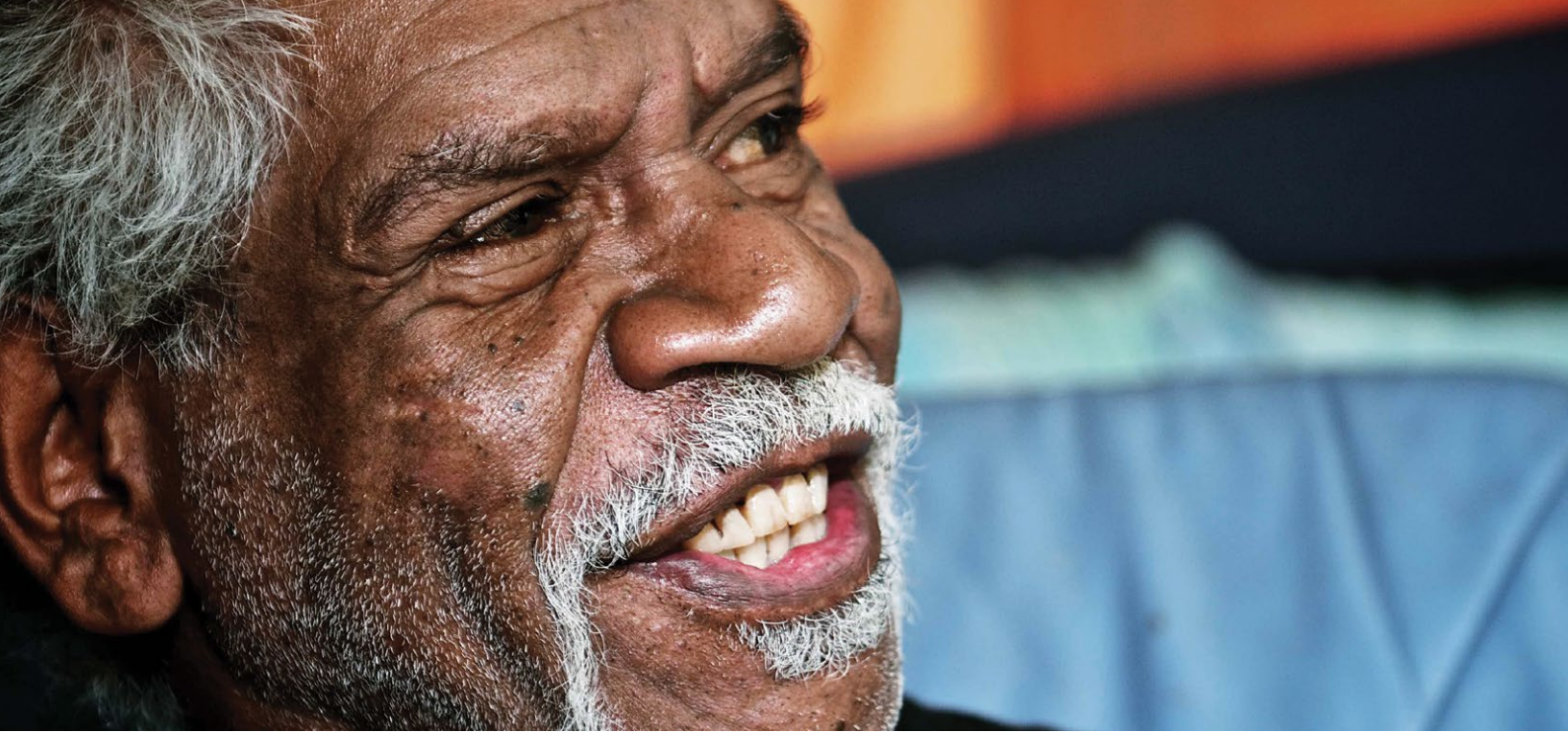
1. Be a leader in social responsibility by having the well-being of the community and stakeholders at the forefront of delivery and 2. Create green and vibrant spaces through landscape-led urban design and landscaping.

Key risks, opportunities and stakeholder concerns met by material issue are detailed in Section 4.4.4.

Targets under this material issue are tracked through the following:

- Inclusions within Design Reports and Issued for Construction documentation
- Urban Design and Landscape operational management plans.

Target	Target Tracking and Achievement	Progress
No greater than 1 horizontal lux level (over the project boundary) (T-14)	Current project lighting design demonstrating compliance with this target.	
No greater than 1% upward light ratio (T-15)	Current project lighting design demonstrating compliance with this target.	
Achieve Level 2 for Urban Design and Landscaping (Pla-2 under ISC v2.1) (T-16)	The Project is on track to achieve Level-2 place 2, pending formal verification. All design requirements for the Place-2 ISC credit have been fulfilled by the Project. Additionally, the as-built requirements have been incorporated into the Project's Urban Design Landscape Plan and associated appendices for construction delivery.	
Develop and implement 100% of the urban design landscape themes/recommendations within the Stage 1a Operational Space Urban Design Landscape Plan (T-19)	The Project has currently integrated 70% of the recommendations to date, with the further 30% planned to be incorporated by the end of Q2, 2024. The Project has identified no inhibitors to incorporating the 100% of the recommendations.	
Community and Stakeholder Engagement Plan (CSEP) inspections are conducted monthly (T-39)	All Required inspections have been completed for the reporting period.	
Avoidable complaints of less than 12 per calendar year for AWRC and less than 24 per calendar year for Pipelines (T-40)	Avoidable complaints have been significantly below the threshold with 0 for the AWRC and 6 for Pipelines.	



First Nations participation

The USC Project remains steadfast in its commitment to expanding opportunities for local First Nations peoples. Our approach to increasing First Nations employment, training and business participation is guided by the objectives outlined in the NSW Government Aboriginal Procurement Policy (APP) 2021. In line with these objectives, we have developed an Aboriginal Participation Plan with specific key targets that include achieving a 3% First Nations employee workforce and a 3% Aboriginal participation (APIC) spend.

To ensure the successful attainment of these targets, the Project is dedicated to fostering collaborative relationships with our suppliers, sub-contractors, and the wider supply chain. Together, we aspire to exceed 3% of APIC spend that can reasonably be directed towards First Nations people and/or businesses. This portion of the spend is referred to as addressable spend. The Project aims to exceed it by May 2024 and double it by Q4 2024.

Through the allocation of addressable spend, we actively promote First Nations employment, engagement of First Nations-owned businesses, education and training, and the engagement or consultation with First Nations organisations and businesses.

The USC Project recognises the significant contributions of our valued business partners, including Supply Nation recognised enterprises such as Muru Mittigar, Borger Crane Hire & Rigging Services, BL Safety and Workwear, and Integrity Health & Safety, among others, in achieving these targets. Their firm commitment and collaboration in advancing First Nations participation has been instrumental in surpassing our goals.

We are proud to celebrate National Reconciliation Week and NAIDOC Week annually as well as include Acknowledgement of Country messaging at all of our major events. Our workforce is inducted in local Aboriginal cultural awareness that has been codeveloped with the Dharug Traditional Custodians.

As we move forward, we remain dedicated to not only meeting but surpassing the First Nations target spend. By leveraging our collective efforts, we aim to create sustainable opportunities that contribute to the long-term prosperity and inclusion of First Nations peoples. The USC Project is proud to play a role in advancing the objectives of the Aboriginal Procurement Policy 2021 and fostering greater First Nations participation in the construction industry.

We look forward to reporting on the progress made in achieving these targets and sharing the positive outcomes of our commitment to First Nations participation in future updates.

12.1
Society and Community – Case Study

Initiative Name	Stakeholder Management – Great Outcomes
Target	**T-40** **Avoidable complaints of less than 12 per calendar year for AWRC and less than 24 per calendar year for Pipelines.**
Current Phase	Design and Construction
Status	In Progress
Initiative Summary	With over 40km of pipeline the Upper South Creek Project had a diverse range of stakeholders
Initiative Detail	The Upper South Creek Project presented the team with a diverse range of stakeholders and communities (including First Nations and CALD) across a long and linear project area. Working closely with Sydney Water and within their Engagement Framework and Approach, the Project's resultant Community and Stakeholder Engagement Plan set-out a detailed approach to community and stakeholder engagement. Through focused engagement activities, including a substantial door knocking effort, community information drop-in sessions (supported by translators in high CALD areas), an Aboriginal Stakeholder Advisory Group, information stands at local markets, information translated into languages other than English, school engagement sessions and community days and site visits for residents closest to project activities, the community was provided with opportunities to learn more about the project, ask questions and provide feedback on how the works would affect them. The emphasis on face-to-face engagement provided many opportunities for feedback to be collected and responded to through adjustments to schedule and methodology, and minimising or eliminating impacts for stakeholders and community members. Additionally, goodwill activities like the Mount Pritchard coffee cart and the Bonnyrigg gelato cart provided the opportunity for informal information sharing about upcoming works and their impacts, relationship building and the chance to thank the community for their ongoing support of the project. These activities have contributed to positive connection with the community, with recent stakeholder surveys demonstrating over 80% of respondents were satisfied that their input influenced project outcomes and avoidable complaints being significantly under the identified target requirement (0 for the AWRC and 6 for Pipelines).
Data Focus	83% – Satisfaction rate of respondents that issues raised during design phase had been addressed.

Community outreach activities throughout the year.

13 Water Use Management

JOHN HOLLAND

Legend

- Project target achievement is on track
- Project target achievement is potentially compromised
- Project target achievement is compromised

GRI 303: Water and Effluents

Objective:

1. Supply recycled water for non-drinking purposes for use in homes and businesses, for agriculture purposes or irrigation of public spaces and 2. Minimise water use and choose appropriate water sources

Key risks, opportunities and stakeholder concerns met by material issue are detailed in Section 4.4.4.

Targets under this material issue are tracked through the following:

- Reporting by the Project on water consumed and used and water source within the Project's data capture platform Project Pack Web
- Operational and construction water modelling by the design team for ISC purposes
- Inclusions within Design Reports and Issued for Construction documentation.

Target	Detail	Progress
25% reduction in water demand from Base Case scenario (T-5) - Design Phase	The Base Case Approach has not been verified yet, and the Water Model is still in the process of being developed. Initiatives will be continually captured and identified during the design and construction phases. Key initiatives include the selection of water treatment chemicals and the widespread utilization of reverse osmosis permeate in plant operations, as well as the implementation of low maintenance and drought-resistant plantings.	
25% reduction in water demand from Base Case scenario (T-27) - Construction Phase	The Base Case Approach has not been verified yet, and the Water Model is still in the process of being developed. Initiatives will continue to be captured and identified throughout the design and construction phases. To date, the following initiatives have been implemented: ■ Reuse of water for horizontal directional drilling fluid. ■ Use of water-efficient dust suppressants and soil binders to prevent repetitive application of potable or non-potable water for dust generation prevention on haul roads, stockpiles, and fill areas. ■ Strategic retention, transfer, and recycling of hydrostatic and wet commissioning water Implementation of water-efficient facilities. ■ Selection of drought tolerant and temporary and permanent grasses, spray grass and plantings that minimal water to establish. ■ Use of water-efficient dust suppressants and soil binders to prevent repetitive application of potable or non-potable water for dust generation prevention on haul roads, stockpiles, and fill areas.	

25% reduction in total potable water from Base Case scenario (T-6)	The Base Case Approach has not been verified yet, and the Water Model is still in the process of being developed. Initiatives will be continually captured and identified during the design and construction phases. Key initiatives include the selection of water treatment chemicals and the widespread utilization of reverse osmosis permeate in plant operations, as well as the implementation of low maintenance and drought-resistant plantings.	
20% reduction in potable water use from Base Case scenario (T-28)	The Base Case Approach has not been verified yet, and the Water Model is still in the process of being developed. Initiatives will continue to be captured and identified throughout the design and construction phases. To date, the following initiatives have been implemented: ■ Reuse of water for horizontal directional drilling fluid. ■ Strategic retention, transfer, and recycling of hydrostatic and wet commissioning water Implementation of water-efficient facilities. ■ Compound setup for rain harvesting and reuse in site ablutions (toilets and urinals), vehicle washdown and general cleaning Retention and storage of water in on-site detention basins for reuse. ■ Strategic planning of exposed site areas and the installation of erosion and sediment control measures to maximise construction water run-off capture from rainfall events for Project reuse.	

Effective planning and management of erosion and sediment control measures have been implemented to maximize the capture and harvesting of construction run-off from rainfall events for project reuse in sediment basins. As a result, over 13 megalitres of stormwater have been successfully captured and reused to date.

14 GRI Content Index

JOHN HOLLAND

Below is the list of GRI disclosures by the project included in the report.

GRI Standard	GRI Disclosure Number (2016)	Disclosure Title	Section	Detail
General Disclosures				
GRI 2: General Disclosures 2021	2-1	Organisational details	4.1	
	2-2	Entities included in the organisation's sustainability reporting	4.1	
	2-3	Reporting period, frequency and contact point	4.1	
	2-5	External Assurance	15	
	2-6	Activities, value chain and other business relationships	4.3.5 and 5.8	
	2-9	Governance structure and composition	4.2	
	2-12	Role of the highest governance body in overseeing the management of impacts	4.2	
	2-22	Statement on sustainable development strategy	4.4	
	2-23	Policy Commitments	4.4	
	2-24	Embedding policy commitments	4.4	
	2-25	Processes to remediate negative impacts	4.3	
	2-26	Mechanisms for seeking advice and raising concerns	4.3	
	2-28	Membership associations	4.3.6	
	2-29	Approach to stakeholder engagement	4.3	
Material Issues				
GRI 3: Material Topics 2021	3-1	Process to determine material topics	4.3 and 4.4	
	3-2	List of Material Topics	4.4 & Appendix A	

<table>
<tr><th colspan="5">Economic Disclosures</th></tr>
<tr><td>GRI 201: Economic Performance 2016</td><td>201-2</td><td>Financial implications and other risks and opportunities due to climate change</td><td>11</td><td></td></tr>
<tr><td>GRI 203: Indirect Economic Impacts 2016</td><td>203-2</td><td>Significant indirect economic impacts</td><td>11</td><td></td></tr>
<tr><th colspan="5">Environmental Disclosures</th></tr>
<tr><td rowspan="2">GRI 301: Materials 2016</td><td>301-1</td><td>Materials used by weight or volume</td><td>6</td><td>
<table>
<tr><th>Material Type</th><th>Material</th><th>Quantity</th><th>Unit</th></tr>
<tr><td rowspan="5">Non-renewable</td><td>Concrete</td><td>13.330</td><td>m3</td></tr>
<tr><td>Steel</td><td>3,850</td><td>Tonnes</td></tr>
<tr><td>Aggregate</td><td>136,160</td><td>Tonnes</td></tr>
<tr><td>Pipe</td><td>29,130</td><td>Tonnes</td></tr>
<tr><td>Asphalt</td><td>2,350</td><td>Tonnes</td></tr>
</table>
</td></tr>
<tr><td>301-2</td><td>Recycled input materials used</td><td>6</td><td>
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<tr><th>Material</th><th>Recycled Quantity</th><th>Unit</th><th>% Recycled</th></tr>
<tr><td>Concrete</td><td>6,864.95</td><td>m2</td><td>51.5</td></tr>
<tr><td>Steel</td><td>2,418.01</td><td>T</td><td>62.8</td></tr>
<tr><td>Aggregate</td><td>80,334.4</td><td>T</td><td>59.0</td></tr>
<tr><td>Asphalt</td><td>517</td><td>T</td><td>22.0</td></tr>
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<tr><td rowspan="2">GRI 302: Energy 2016</td><td>302-1</td><td>Energy consumed within the organisation</td><td>Energy content factors are referenced from NGA Factors 2023, 2024.</td><td>
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<tr><th></th><th>Energy Type</th><th>Total Consumption</th><th>Unit</th><th>Total Energy consumption</th><th>Energy Unit</th></tr>
<tr><td>Non-renewable</td><td>Diesel</td><td>810.2</td><td>kL</td><td>31,107.1</td><td>GJ</td></tr>
<tr><td></td><td>Electricity</td><td>4,067</td><td>kWh</td><td>14.6</td><td>GJ</td></tr>
<tr><td>Total Non-Renewable</td><td></td><td></td><td></td><td>31,121.7</td><td>GJ</td></tr>
<tr><td rowspan="3">Renewable</td><td>Purchased Renewable (Green Power)</td><td>115,755.4</td><td>kWh</td><td>416.7</td><td>GJ</td></tr>
<tr><td>Biodiesel (B5)</td><td>184.9</td><td>kL</td><td>7,099.7</td><td>GJ</td></tr>
<tr><td>Biodiesel (B20)</td><td>13.2</td><td>kL</td><td>487.4</td><td>GJ</td></tr>
<tr><td>Total Renewable</td><td></td><td></td><td></td><td>8,003.8</td><td>GJ</td></tr>
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</td></tr>
<tr><td>302-4</td><td>Reduction of energy consumption</td><td>7</td><td></td></tr>
<tr><td rowspan="2">GRI 303: Water and Effluents 2018</td><td>303-1</td><td>Interactions with water as a shared resource</td><td>13</td><td></td></tr>
<tr><td>303-3</td><td>Water Withdrawal</td><td></td><td>
<table>
<tr><th>Type of Water</th><th>Source of Water</th><th>Quantity Withdrawn (ML)</th></tr>
<tr><td>Non-potable</td><td>Rainwater</td><td>0.6</td></tr>
<tr><td></td><td>Surface Water</td><td>13.1</td></tr>
<tr><td>Total Non-potable</td><td></td><td>13.7</td></tr>
<tr><td>Potable</td><td>Mains Water</td><td>24.3</td></tr>
<tr><td>Total Potable</td><td></td><td>24.3</td></tr>
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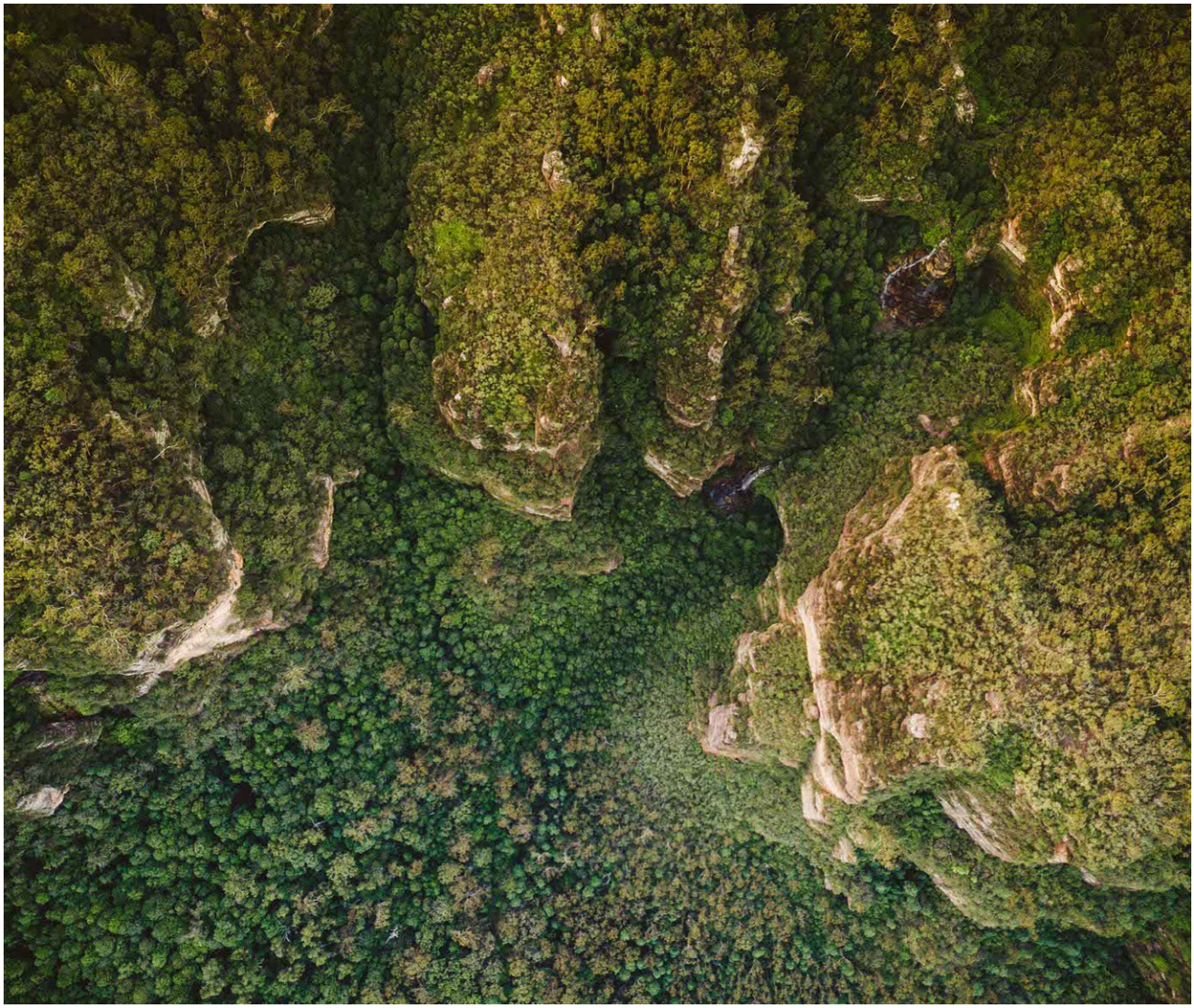
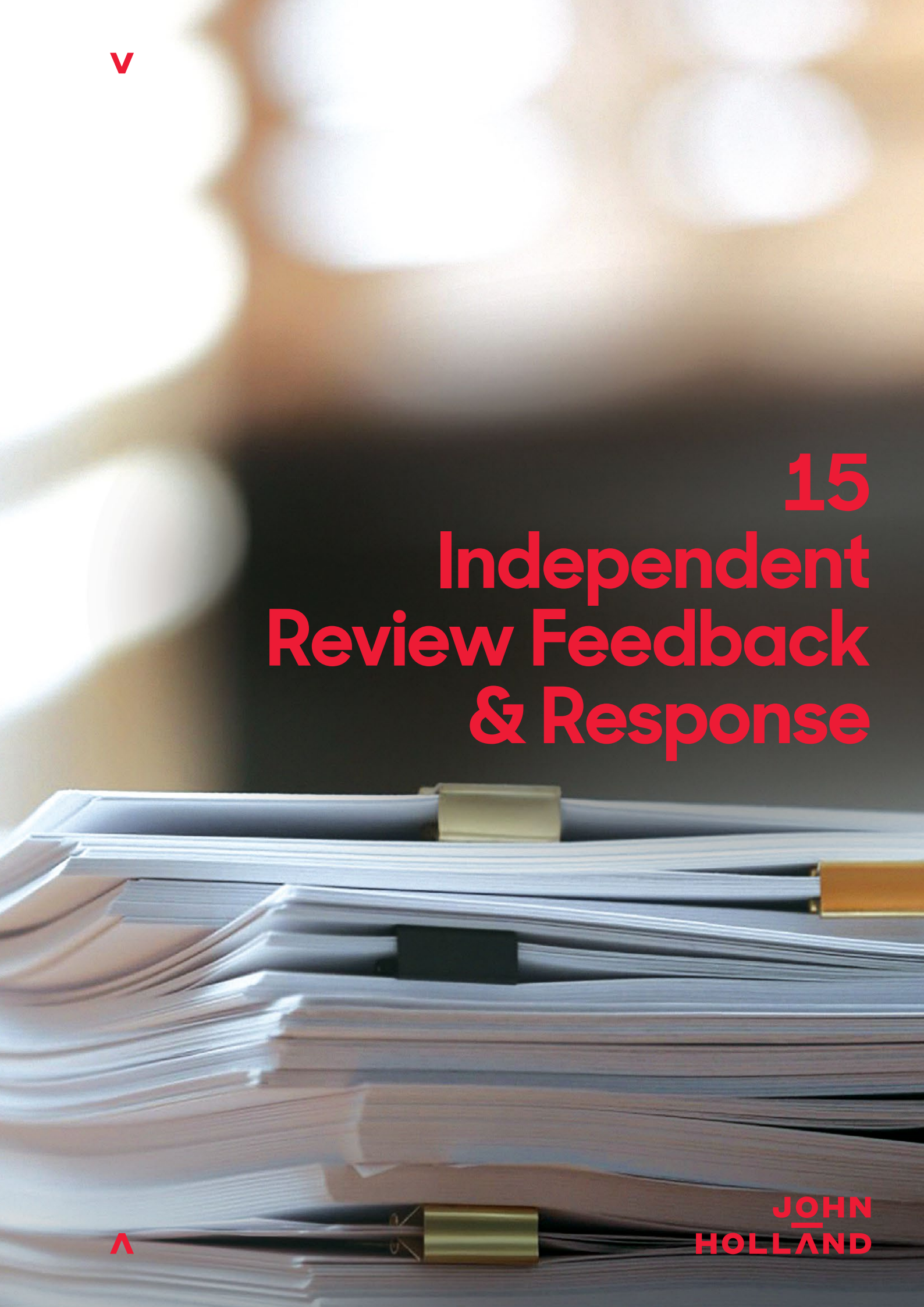
<tr><td rowspan="4">GRI 304: Biodiversity 2016</td><td>304-1</td><td>Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity outside protected areas</td><td>8, 10 and 12</td><td></td></tr>
<tr><td>304-2</td><td>Significant impacts of activities, products, and services on biodiversity</td><td>8, 10 and 12</td><td></td></tr>
<tr><td>304-3</td><td>Habitats protected or resorted</td><td>8, 10 and 12</td><td></td></tr>
<tr><td>304-4</td><td>IUCN Red List species and national conservation list species with habitats in areas affected by operations</td><td>N/A</td><td></td></tr>
<tr><td rowspan="3">GRI 305: Emissions 2016</td><td>305-1</td><td>Direct (Scope 1) GHG emissions</td><td>Conversion Factors referenced from NGA Factors 2023 and 2024.</td><td><table><tr><th>Energy Type</th><th>Total Energy consumption</th><th>Emissions Factor [TCO2e/GJ] (NGA Factors [CO2] 2023, 2024)</th><th>Scope 1 Emissions [TCO2e]</th></tr><tr><td>Diesel</td><td>31,107.1</td><td>0.0699</td><td>2.186</td></tr><tr><td>Biodiesel (B5)</td><td>7,099.7</td><td>Biodiesel component – 0</td><td>0.477</td></tr><tr><td>Biodiesel (B20)</td><td>487.4</td><td>Diesel component – 0.0699</td><td>0.029</td></tr></table></td></tr>
<tr><td>305-2</td><td>Energy indirect (Scope 2) GHG emissions</td><td>Conversion Factors referenced from NGA Factors 2023 and 2024.
The project has purchased 100% Green Power, "Purchased Renewable", for the main site compound and 2 Pipelines compounds.
1 Pipelines compound has purchased 20% Green Power.
Note: Green power is calculated with a 0 TCO2e/GJ emissions factor as all associated emissions are offset by the energy provider.</td><td><table><tr><th>Energy Type</th><th>Total Energy consumption</th><th>Emissions Factor [TCO2e/GJ] (NGA Factors 2023, 2024)</th><th>Scope 2 Emissions [TCO2e]</th></tr><tr><td>Electricity</td><td>14.6</td><td>0.00068</td><td>0</td></tr><tr><td>Purchased Renewable (Green Power)</td><td>416.7</td><td>0</td><td>0</td></tr><tr><td>Biodiesel (B20)</td><td>487.4</td><td>Diesel component – 0.0699</td><td>0.029</td></tr></table></td></tr>
<tr><td>305-3</td><td>Other indirect (Scope 3) GHG emissions</td><td></td><td></td></tr>
<tr><td>GRI 306: Waste 2020</td><td>306-2</td><td>Waste by type and disposal method</td><td>6</td><td><table><tr><th>Waste Category</th><th>Recycled/ Reused (T)</th><th>Disposed at Licensed Landfill (T)</th><th>Total (T)</th></tr><tr><td>Clean/Inert Spoil</td><td>165,619.95</td><td>4,812.98</td><td>170,432.93</td></tr><tr><td>Other Inert Waste</td><td>5,093.68</td><td>235.98</td><td>5,329.66</td></tr><tr><td>Office Waste</td><td>4.70</td><td>17.5</td><td>22.20</td></tr><tr><td>Liquid Waste</td><td>5,858.33</td><td></td><td>5,858.33</td></tr><tr><td>Contaminated Waste</td><td></td><td>113.32</td><td>113.32</td></tr></table></td></tr>
</table>

Community Engagement				
GRI 413: Local Communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	4.3 10, 10.1 12, 12.1	Details of operations with implemented local community engagement, impact assessments: **Environmental Impact Assessments** Information about project impacts and mitigation measures has been made publicly available on the project website: Upper South Creek Advanced Water Recycling Centre | Sydney Water Talk The Project also published an environmental mitigation measures document, and surveyed the community to request feedback on these measures in August 2023. Additionally the Project consulted on the project Construction Access and Parking Strategy – 179 homes and businesses spoken to or contacted via letter. **Public disclosure of results of environmental and social impact assessments** Noise and vibration data, vibration modelling maps, construction noise and vibration impact statements are located on the Project website: Upper South Creek Advanced Water Recycling Centre | Sydney Water Talk **Stakeholder engagement plans based on stakeholder mapping** The CSEP is reviewed annually. The plan includes a comprehensive analysis of the community and stakeholders for both the Pipelines and AWRC, including social and demographic data, and engagement strategies for key stakeholder groups and issues. Formal local grievance processes A Formal complaints process has been developed and can be accessed at the top of the Project's website: Upper South Creek Advanced Water Recycling Centre | Sydney Water Talk





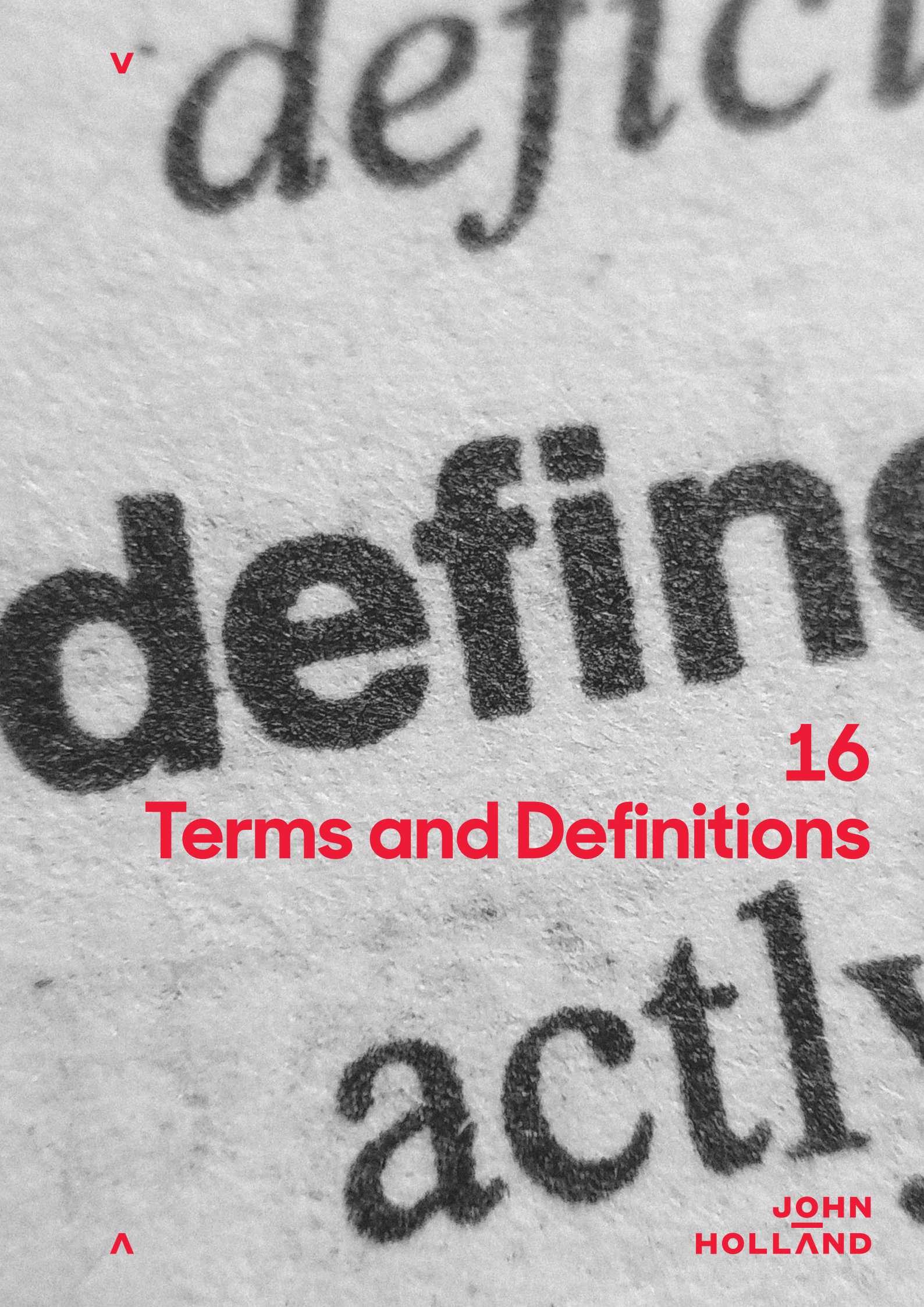
15 Independent Review Feedback & Response

JOHN HOLLAND

Refer to Appendix C & D for the USC Sustainability Report Independent Verifier reviews conducted in August and October 2024. Outstanding actions and recommendations for improvement are detailed below, the Project has addressed all actions and recommendations with the report.

	Reviewed GRI Principle	Independent External Review		Report Response
GRI Report Content	**Stakeholder Inclusiveness** The reporting organisation shall identify its stakeholders and explain how it has responded to their reasonable expectations and interests.	Yes	Refer to Section 3.1 Report Content – ID. AA1	■ GRI 413 disclosure updated (Section 14. GRI Content Index). ■ Section 4.3 updated.
	Sustainability context Present the reporting organisation's performance in the wider context of sustainability	Yes	Refer to Section 3.1 Report Content – ID. AA2	■ Additional context has been added to Section 4.4, to describe the Sustainability Framework and Approach.
	Materiality The organisation's significant economic, environmental, and social impacts	Yes	Refer to Section 3.1 Report Content – ID. AA3	■ Section 4.4.4 updated to clearly connect key risks, opportunities and stakeholder concerns. ■ Section 2.2, 2.3 & 2.4 additionally updated.
	Completeness Includes coverage of material topics and their Boundaries, sufficient to reflect significant economic, environmental, and social impacts, and to enable stakeholders to assess the reporting organisation's performance in the reporting period.	Yes	Refer to Section 3.1 Report Content – ID. AA4	■ Section 3 revised to indicate preparation of the report in reference to the GRI principles. ■ Section 14. GRI Content Index updated to provide appropriate disclosure.

GRI Report Quality	**Accuracy** the reported information shall be sufficiently accurate and detailed for stakeholders to assess the reporting organisation's performance.	Yes	Refer to Section 3.2 Accuracy – ID. A1 to A5	■ A1 - Additional context has been added to the Key Impacts section (Section 2.2 & 2.4) and also within Section 4.4.4. ■ A2 - GRI Content Index updated to provide appropriate disclosure. ■ A3 - Updated detail at the start of each material issue section detailing how the issue is monitored and managed. ■ A4 - Updated status rating approach with associated legend and criteria. ■ A5- Section 6. Circular Economy & Section 14. GRI Content Index updated to reflect recommendation.
	Balance information shall reflect positive and negative aspects of the reporting organisation's performance to enable a reasoned assessment of overall performance.	Yes	Refer to Section 3.3 Balance – ID. B1	■ Summary of highlights detailed within material issue sections, considering all sustainability elements. ■ Section 8 responds to significant incident definition. ■ Potential project risks are identified in Section 2.3.
	Clarity The reporting organisation shall make information available in a manner that is understandable and accessible to stakeholders using that information.	Yes	Refer to Section 3.4 Clarity – ID. C1 to C7	■ C1 - Additional context has been added to the Project Description (Section 2.1) with location figures. Section 4.3 has been added to identify and list relevant stakeholders. ■ C2 - Additional clarification detail has been added to Section 4.1, 4.2 & 4.4. ■ C3 - Additional clarification detail has been added to Section 4.4.1. ■ C4 - Additional graphical content has been added; however, the document is still very wordy. Future reports should review additional graphical content that can improve the reader's experience. ■ C5 - The symbols have changed to Red, Amber and Green with legend provided in Section 5. ■ C6 – Targets have been moved to the Appendices. ■ C7 – Narration has been revised to provide consistency.
	Comparability The reporting organisation shall select, compile, and report information consistently. The reported information shall be presented in a manner that enables stakeholders to analyse changes in the organisation's performance over time, and that could support analysis relative to other organisations	Yes	Refer to Section 3.5 Comparability – ID. D1 to D4	■ D1 - The relevant GRI Standard has been referenced along with the UNSDG to clarify what standards are being reported against.Confirmation of development in reference with GRI Principles. ■ D2 – Refer to C5 response. ■ D3 – Refer to A3 response. ■ D4 – No further action.
	Completeness The reporting organisation shall provide sufficient information to enable an assessment of the organisation's impacts during the reporting period.	Yes	Refer to Section 3.6 Completeness – ID. E1 to E3	■ E1 - Refer to A1 response. ■ E2 – Reduction and quantities have been provided where available. ■ E3 – Refer to C2 response.
	Sustainability context The organization shall report information about its impacts in the wider context of sustainable development.	Yes	Refer to Section 3.7 Sustainability Context – ID. F1 to F3	■ F1 – Project is reporting progress against the approved Targets. ■ F2 – Refer to A2 response. ■ F3 - Additional detail has been provided in Section 4.3.
	Timeliness The reporting organisation shall report on a regular schedule so that information is available in time for stakeholders to make informed decisions	Yes	Refer to Section 3.8 Timeliness – ID. G1	Report to be published no later than the 26th October 2024.
	Verifiability The reporting organisation shall gather, record, compile and analyse information in such a way that the information can be examined to establish its quality.		Refer to Section 3.9 Verifiability – ID. H1 to H4	H1 – Report has been updated to respond to the findings of the independent verifier detailed in Appendix C & D. H2 – Refer to D1 response. H3 – Refer to A2 response. H4 – Refer to A3 response.



16 Terms and Definitions

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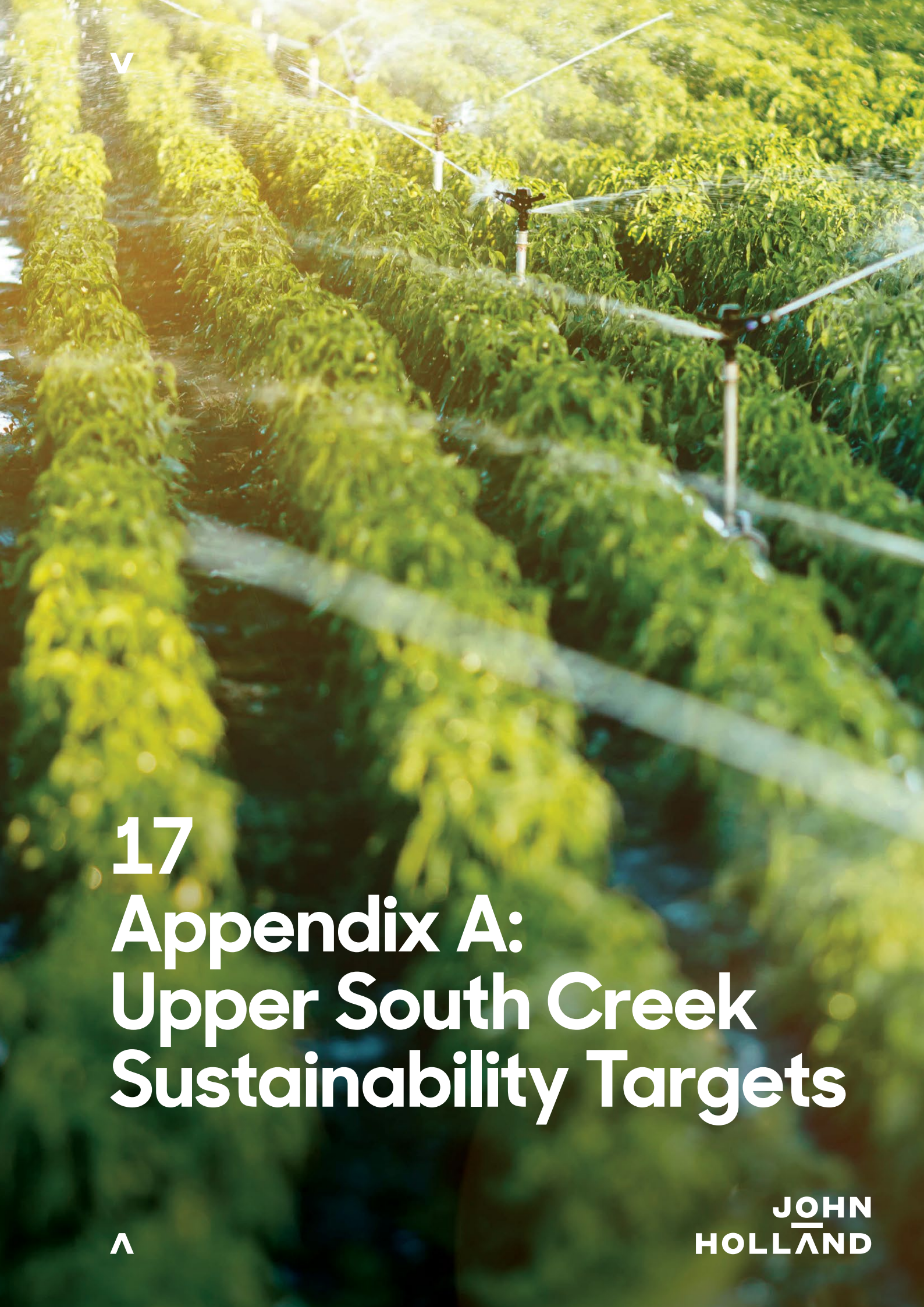
Term	Definition
AWRC	Advanced Water Recycling Centre
CALD	Culturally and Linguistically Diverse
CO2e	Carbon Dioxide Emissions
CSEP	Community and Stakeholder Engagement Plan
D&C	Design and Construction
ECC	Engineering and Construction Contract
EIS	Environmental Impact Statement
EPBC	Environmental Protection and Biodiversity Conservation Act
GBCA	Green Building Council of Australia
GHG	Greenhouse gases
GRI	Global Reporting Initiative
HVO	Hydrotreated Vegetable Oil
IAP	International Association for Public Participation
IS	Infrastructure Sustainability
ISC	Infrastructure Sustainability Council
JHG	John Holland Group
MECLA	Materials and Embodied Carbon Leaders' Alliance
NAWIC	National Association of Women in Construction
O&M	Operations and Maintenance
PV	Photovoltaic
SMART	Specific, Measurable, Achievable, Relevant and Time-bound
UN SDG	United Nations Sustainable Development Goals
USC	Upper South Creek



17 Appendix A: Upper South Creek Sustainability Targets

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Phase	Primary Theme	ID#	"SMART" Target	UN SDG
Project-wide	Governance	T-1	Achieve an ISC rating of 'Gold' under TM v2.1.	All.
		T-2	Achieve 5 innovation points under ISC.	9. Industry, innovation and infrastructure.
Design phase	Energy and Carbon	T-3	30% reduction in energy use/demand from Base Case scenario.	7. Affordable and clean energy. 11. Sustainable cities and communities.
		T-4	50% increase in operational electricity sourced from renewables from Base Case scenario.	7. Affordable and clean energy. 11. Sustainable cities and communities.
		T-5	25% reduction in water demand from Base Case scenario.	6. Clean water and sanitation. 11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-6	25% reduction in total potable water from Base Case scenario.	6. Clean water and sanitation. 11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-7	45% reduction in material life cycle impacts from a Base Case scenario.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-8	30% of products / materials (by cost) will have an ISC-approved sustainability label.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-9	100% re-use of biosolids.	9. Industry, innovation and infrastructure. 12. Responsible consumption and production.
		T-10	50% of materials (by cost) can be easily adapted, re-used or recycled at end-of-life.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-11	≥ 250 tonnes of pipe bedding sand made from a blend of natural sand and crushed glass collected from curb side waste collection schemes will be used in the Project permanent works.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-12	≥ 2000 white feather honey myrtle seeds will be collected from site, germinated and returned to Project site as tube stock for use in permanent landscaping works to use in the regeneration of the Project riparian corridor.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production. 15. Life on land.
		T-13	The Project will target 5% recycled material and/or recycled asphalt pavement use in the asphalt production for permanent works at the plant site.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production.
	Society and Community	T-14	No greater than 1 horizontal lux level (over the project boundary).	11. Sustainable cities and communities .
		T-15	No greater than 1% upward light ratio.	11. Sustainable cities and communities.
		T-16	Achieve Level 2 for Urban Design and Landscaping (Pla-2 under ISC v2.1).	11. Sustainable cities and communities.

Design phase	Natural and Heritage Assets/Society and Community	T-17	Identify, maintain, and enhance Aboriginal and non-Aboriginal heritage assets and values within the Project's urban and landscape design by integrating requirements into design documentation by 2026.	11. Sustainable cities and communities.
		T-18	Develop and implement the USC Project Rehabilitation Management Plan.	14. Life below water. 15. Life on land.
		T-19	Develop and implement 100% of the urban design landscape themes/ recommendations within the Stage 1a Operational Space Urban Design Landscape Plan.	11. Sustainable cities and communities.
		T-20	The Project will regenerate and landscape the riparian area adjacent Wianamatta-South Creek, including the reconnection of an on-site billabong to support Western Sydney's green spine development before the operational commencement of the plant.	11. Sustainable cities and communities. 14. Life below water. 15. Life on land. 13. Climate action.
	Resilience	T-21	Reduce 100% of extreme and high-priority direct climate and natural hazard risks to an acceptable risk level.	13. Climate action.
	Environmental Health – Water	T-22	The Project will achieve load and concentration limits within Yarramundi 2 subzone and maintain or improve instream water quality and macroinvertebrate diversity attributable to the project's operational waterway releases. These will be achieved by meeting the project-specific water quality objectives (see table 8-8 of USC EIS, September 2021).	14. Life below water.
	Environmental Health – Noise	T-23	Operational noise is within the Project Specific Noise Trigger Levels of 41 dBL at night and 45 dBL day/evening at existing/ future residential receivers.	11. Sustainable cities and communities.
	Environmental Health – Air quality	T-24	Air quality does not exceed 4 odour units (OU) beyond the boundary of the plant (operational site).	11. Sustainable cities and communities.
Construction phase	Energy and Carbon	T-25	30% reduction in energy use/demand (Scope 1 and 2) from Base Case scenario.	7. Affordable and clean energy. 11. Sustainable cities and communities.
		T-26	30% increase in electricity sourced from renewables.	7. Affordable and clean energy. 11. Sustainable cities and communities.
	Water Use Management	T-27	25% reduction in water demand from Base Case scenario.	6. Clean water and sanitation. 11. Sustainable cities and communities.
		T-28	20% reduction in potable water use from Base Case scenario.	6. Clean water and sanitation. 11. Sustainable cities and communities. 12. Responsible consumption and production.

Construction phase	Circular Economy	T-29	95% diversion of clean/inert excavation spoil from entering landfill.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-30	70% diversion of office waste from entering landfill.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-31	80% diversion of other inert resource outputs from entering landfill.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-32	The Project will utilise ≥ 300 tonnes of salvaged and collected woody debris (logs and root balls) in the Project's riparian corridor rehabilitation and revegetation works.	11. Sustainable cities and communities. 12. Responsible consumption and production.
		T-33	≥ 20 tonnes of sustainable asphalt made from recycled coffee cups and using a bio-bitumen (polymer-modified binder containing biogenic materials) binder will be trialled on-site as part of temporary works during construction to evidence the use/ viability and incorporation of problem waste streams in construction materials.	9. Industry, innovation and infrastructure. 11. Sustainable cities and communities. 12. Responsible consumption and production.
	Natural and Heritage Assets	T-34	Number of significant heritage-related incidents per million hours worked is 0.	11. Sustainable cities and communities.
	Environmental Health – Water	T-35	Number of significant water and discharge related incidents per million hours worked is 0.	14. Life below water. 15. Life on land.
	Environmental Health – Noise	T-36	Number of significant of noise-related incidents per million hours worked is 0.	11. Sustainable cities and communities.
	Environmental Health – Vibration	T-37	Number of significant vibration-related incidents per million hours worked is 0.	11. Sustainable cities and communities.
	Environmental Health – Biodiversity	T-38	Number of significant fauna / flora incidents per million hours worked is 0.	15. Life on land.
	Society and Community	T-39	Community and Stakeholder Engagement Plan (CSEP) inspections are conducted monthly.	11. Sustainable cities and communities.
		T-40	Avoidable complaints of less than 12 per calendar year for AWRC and less than 24 per calendar year for Pipelines.	11. Sustainable cities and communities.

18 Appendix B: John Holland & Sydney Water Project Organisational Charts

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Upper South Creek AWRC and Pipelines Delivery Team Org Chart

Project Director
Richard Ioffrida

Governance Manager
Donna Zaballero

Plan

Deputy Project Director
Jason Julius

- **Design Manager - EI&C**
  Hossein Afsharmehr
- **Completions & Quality Manager**
  Joseph Hancock
- **Sustainability Manager**
  Mark Trethewy
- **Project Planning Manager**
  Omar Saad
- **Commissioning Manager**
  Per Hoff
- **Senior Commissioning Engineer**
  Takuma Abe

Planning, Environment & Approvals Director
Alyce Harrington

- **Environment Lead**
  Ryan Maxwell
- **Planning & Approvals Lead**
  Simone Kenyon

TRILITY
RENZO TONIN & ASSOCIATES
SAGE Automation
GHD
ERM
J
Tract

Enable

Commercial Director
Brandon Goldworthy

- **Commercial Manager - Upstream**
  Richard Savage
- **Commercial Manager - AWRC**
  Simon Armstrong
- **Commercial Manager - Pipelines**
  Hammad Aslam
- **Finance & Admin Manager**
  Janet Yan
- **Project Controls Manager**
  Kian Borzabadi
- **Senior Contracts Administrator**
  Stuart Holmes

Comms & Stakeholder Director
Sheila Maidment

- **Comms & Stakeholder Engagement Consultant**
  Michael Robertson
- **Senior Comms, Community & Stakeholder Advisor**
  Rawinia Davies

People & Performance Director
Renuka Tandon

- **Workforce Development Manager**
  Sharon Stevenson
- **People Advisor**
  Garima Singh
- **People Coordinator**
  Justin Tan

Deliver

Construction Director
Michael McIlveen

- **Construction Manager - Pipelines**
  Aidan O'Driscoll
- **Construction Manager - AWRC**
  Jeremy Cadzow
- **Health & Safety Manager**
  Triska McKervey
- **Construction Planner**
  Hamid Ekrami
- **Survey & Monitoring Manager**
  Adrian Airinei

Sydney WATER

Upper South Creek AWRC and Pipelines Delivery Team Org Chart

Project Control

- **Head of Major Projects** — Bernard Clancy
- **Head of Procurement** — Xavier Decomps
- **Head of Water Resource Recovery** — Kevin Conna

Project Governance

- **Delivery Systems** — Dave Walmsley; + Quality Lead (vacant)
- **Commercial** — Pouya Razavi; +TBC
- **Operations** — Gavin Landers
- **Commercial Mgmt Systems** — Winvie Mendoza; + Argelia Ochoa Silva
- **Capital Investment** — Mikel Barbara
- **Environment & Sustainability** — Gill Fowler
- **Community Engagement** — Ben Grogan

Project Delivery

Project Director (Acting) — Kris Bradley

PPM AWRC — Dimi Shortland

- **SPM AWRC Civil, Structures, Early Works** — Vacant
  - **APM AWRC, Early Works, Access Road** — Ivy Xie
    - **Const Project Engineer Civil** — Shahilan Arudselvan (Lead); Jordan Jeong (Assist)
      - **Supervisor (Liquid Retaining Structures)** — Haylen Williams
        - **Const Supervisor (Non-Liquid Retaining/Ingrounds)** — Stephen Walker
          - **Engineering Intern** — Justine Kim
- **SPM AWRC M&E** — Marcelo Sales
  - **Const Project Engineer - Mech** — Andy Kwong/ Mohamed Shehad
    - **Construction Project Engineer Electrical** — Mohammed Owais
      - **Construction Project Engineer Process/Commissioning** — Mark Zangouei
        - **Supv AWRC Mech (Preliminary Cutover & Primary Treatment)** — Phil Mahoney
          - **Supv AWRC Mech (Secondary & Tertiary Treatment)** — Geoff King
            - **Supervisor AWRC Electrical** — Andrew Leak

Production Manager — Yasir Shami

- **Safety Lead** — Eric Novak
  - **Quality Officer** — Mohammed Monshi

PPM Pipelines & Interfaces — N/A

- **PM** — Kelvin Chung
  - **APM** — Vrishab Jain
    - **Project Engineer** — Jeremie Hooi
      - **Project Engineer** — Alan Law
        - **Construction Supervisor Brine** — Jon Robinson
          - **Construction Supervisor TW** — Jack Poyntz (demob 26/7)
            - **Engineering Intern** — Simone Sethi

Technical Director — Paul Collins

- **Technical Advisor** — Stantec
  - **Technical Project Engineer Process/Commissioning** — Mark Zangouei
    - **Technical Project Engineer Civil** — Heleen Lindeque
      - **Technical Project Engineer Electrical** — Mohammed Owais

Major Project Contract Manager — Naveen Paladugu

- **Commercial**
  - **Contract Manager AWRC** — Mark Miranda
    - **Contract Manager Pipelines** — Marwa Ibrahim
      - **Contract Manager O&M** — Catherine Ng
        - **Contract Administrator** — Kasun Premaratna
          - **Contract Administrator** — Nikhil Naraharii
- **Controls**
  - **Reporting & Governance Lead** — Anastasia Goda
    - **Risk Lead** — Robbie Breschkin
      - **Document Control** — Neda Lotfi
        - **Cost Manager** — Bryan Li
          - **Cost Controller** — Namrata Sharma
            - **Scheduler** — Ozair Karim
              - **Business Support Administrator** — Giselle Hawkings

Enviro Lead — Cheryl Cahill

- **Senior Sustainability Advisor** — Lawrie Jeavons
  - **Sustainability Officer** — Ted Devine
    - **Enviro Officer** — Nerisha Stanley
      - **Enviro Intern** — Jacob McGregor

Community Lead — Grant Thomas

- **Community Advisor Pipelines** — Elise Clark
  - **Community Advisor AWRC** — Kaitlyn Lawler

Other Key Support

IP-IMO Senior Investment PM — Mikel Barbara	**Senior Environment Scientist** — Samantha Prior	**Senior Property Acqusition Manager** — David Pearce	**SH&W Business Partner** — Andrew Georgiou	**Talent Acqusition Partner** — Jessica Mckay	**Capital Interferenece Manager** — Castor Rajanayagam	**Senior Commercial Manager** — Grant Eyles	**Urban Planner (Greenspace)** — Erin Saunders	**Procurement Services Officer** — Melissa Keddie
IP-IMO Senior PM — Simon Trickett	**Engineering Manager** — Ian Gabriel	**Senior Property Acqusition Manager** — Jessica Ellis	**Manager P&C** — Yvette Schubert	**Ops Leader West (Network)** — David Cantlon	**Program Manager** — Bernard Mitchel	**Manager Science Research Innovation** — Django Seccombe	**Manager Developer Partnerships** — Christian McNally	**Senior Investment Analyst** — Adrian Merlino
IP-IMO Governance Manager — Federico Costa	**Senior Project Engineer** — John Nunes	**Asset & Systems Management Lead** — Alex Robertson	**P&C Specialist** — Lisa McCann	**Lead Networks Ops Engineer** — Ganga Gangatharan	**KPI Support** — Denis Freire Barreto	**SPM Circular Economy** — Sarah Bouhayat	**Commercial Partnerships** — Fernando Ortega	**Head of Investment Governace** — Peter Spence

19
Appendix C: Independent Review Report – August 2024

JOHN HOLLAND

14 August 2024

MARK TRETHEWEY
UPPER SOUTH CREEK – AWRC & PIPELINES
JOHN HOLLAND
CLIFTON AVENUE
KEMPS CREEK NSW 2178

JAMIE LEES
INTI APAC PTY LTD
LEVEL 1, COLLINS ST
MELBOURNE, VIC
EMAIL: JAMIE.LEES@INTIAPAC.COM.AU:

Dear Mark

Independent Review Report - Upper South Creek AWRC&P Sustainability Report 2024

1 Introduction

This report has been prepared to document the findings for the independent review of the draft *Upper South Creek – Advanced Water Recycling Centre and Pipelines (USC)* Sustainability Report for the period, April 2023 to April 2024. The review is to confirm that the reporting principles of the Global Reporting Initiative (GRI) have been considered and that the content and quality of the report are satisfactory, including reporting of contributions to the Sustainable Development Goals (SDGs).

The review was conducted by Jamie Lees (Inti APAC), who is an Infrastructure Sustainability Accredited Professional (ISAP) with over 20 years of experience working in environmental and sustainability disciplines in the resources, energy and infrastructure sectors. Jamie has experience supporting the preparation of Sustainability Reports, including collating and auditing sustainability data and Global Reporting Initiative (GRI) standards. Copies of Jamie's CV, ISAP Certification and Memorandum of Understanding confirming Independence are included in **Attachment 1, 2 and 3.**

For the purposes of Lea-1 credit of the ISv2.1 technical manual, Jamie is independent from the USC project and is deemed a suitably qualified professional (SQP).

1.1 Scope of Work.

In accordance with Lea-1 DL and AB 3.2 of the ISv2.1 technical manual, the scope of works requires the reviewer to consider the GRI Reporting Principles in assessing the USC Sustainability Report.

The review of the Sustainability Report also included cross-checking the GRI Index (Appendix B) against reference documents and confirming the completeness and accuracy of data.

Excluded from this review is any verification of information relating to:

- Activities outside the defined reporting period;
- Sustainability reporting of group activities not relevant to the USC project.

This review should not be relied upon to detect errors, omissions or misstatements that may exist within the report.

1.2 The Upper South Creek AWRC Project

The Upper South Creek AWRC is a water management system that collects wastewater from homes and businesses across Western Sydney and treats it to produce high-quality water suitable for a wide range of non-drinking uses in homes, industrial and business use, agriculture and for greening public open spaces. Given its high quality, the water can also be released to local waterways such as the Nepean and Warragamba Rivers to help sustain important river ecosystems that continue to come under significant pressure from extreme weather events.

The facility will support the predicted population and economic growth in Western Sydney.

The project is currently in the construction phase with some design packages still under development.

2 Finding Summary

The 2024 USC Sustainability Report is the project's inaugural sustainability report.

For the purposes of this report, the draft versions of the Sustainability Report, titled "*USC - JHG - Sust Annual Report - 23_24 - Draft 1 - For Issue1*" and "*USC - JHG - Sust Annual Report - 23_24 - Draft 2 – with GRI revision were* reviewed. Incremental changes were made to Draft 2, to address initial GRI reporting principles comments relating to the *Issue 1* version.

The sustainability report has been developed to focus on reporting progress against the project's sustainability targets, which address the project's material issues and contractual obligations. The UNSDGs are mapped against the various targets, with a statement describing how the target will have a positive contribution or minimise a negative contribution.

A review of the quantitative data confirmed that USC's data management system and processes to ensure data capture completeness appear comprehensive. The data QA/QC monthly and quarterly processes implemented by both USC and JHG ensure data accuracy.

Key issues identified in "*USC - JHG - Sust Annual Report - 23_24 - Draft 1 - For Issue", included:*

- The Sustainability Report provided limited contextual information about the project for a reader with limited knowledge of it. This included information on project management, challenges, relevant stakeholders, material risks and opportunities and the projects approach to sustainability.
- There was a general reliance on John Holland Group public ESG reporting which was not project specific.
- The USC Sustainability Report references several management plans to support GRI Topic disclosures. Some of these management plans are not publicly available, and no additional detail has been provided to support the disclosure.
- Due to the early draft of the document, there was limited graphical content, which did not allow the reviewer to confirm that the information would be presented in an accessible and understandable way.
- Reporting "in reference" to the Global Reporting Initiative (GRI) and confirming relevant standards (topic areas) to be reported against was not well integrated into the report. There is insufficient detail regarding the standards that are being used to meet the relevant disclosure requirements.

- Additional clarification on the Energy and Emission factors is required to ensure that the most current factors are being used. This includes the emissions factors being used on purchased Renewable Energy.
- The criteria used to report progress against each of the targets was unclear and could cause confusion among readers.

The "USC—JHG—Sust Annual Report—23_24—Draft 2—with GRI revision" was updated to address the initial observations made by the reviewer of the draft version (Issue 1). The updated version of the report has resulted in positive changes to ensure that the GRI reporting principles have been conserved.

Section 3 of this report details these changes and provides additional recommendations.

3 GRI Reporting Principles Review

The following tables and recommendations have been prepared to consider the GRI Reporting Principles and should be read in conjunction with the sustainability report version *"USC—JHG—Sust Annual Report—23_24—Draft 2—with GRI revision (referred to as Rev 2)*. This table also includes the initial findings and recommendations made from the review of *""USC - JHG - Sust Annual Report - 23_24 - Draft 1 - For Issue1*, (referred to as Rev 1) and a comment to indicate if the recommendation has been adequately addressed.

3.1 Report Content

ID	*Review finding*	*Recommendation*
Stakeholder Inclusiveness *The reporting organisation shall identify its stakeholders and explain how it has responded to their reasonable expectations and interests.*		
AA1	**Rev 1** - The Sustainability Report provides limited detail on stakeholders relevant to the project and does not describe how they are impacted or engaged/consulted. There is limited detail on the processes the project has in place to respond to stakeholders' reasonable expectations and interests, however, a case study has been provided to describe stakeholder engagement practices to avoid complaints,	**Rev 1** - USC should consider providing additional context on how the project manages stakeholder expectations and interests, including complaints and grievances.
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made. Additional stakeholder information has been included in Section 4.3.	Rev 2 – Review disclosure requirements in GRI 413 and update the report or GRI Index accordingly.
Sustainability Context *Present the reporting organisation's performance in the wider context of sustainability*		

ID	Review finding	Recommendation
AA2	**Rev 1 -**The approach to sustainability provides limited detail on the project's sustainability context. However, Section 1.2.1 describes some of the project's benefits. There is limited information about the wider context of sustainability.	**Rev 1 -** USC should update the report to provide further sustainability context for the project and how it integrates into the strategic initiatives for the Sydney Water Catchment.
	Rev 2 – The Rev 1 recommendation has generally been addressed. • Additional context has been added to Section 4.4, to describe the Sustainability Framework and Approach	
Materiality *The organisation's significant economic, environmental, and social impacts*		
AA3	**Rev 1** – Section 1.4 detailed the material issues for the project but provided limited information to understand why these were selected based on significant economic, environmental, and social impacts	**Rev 1** - USC should update the report to provide further details on how the material topics were identified and why.
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made. Section 2.2 has been updated to include additional detail on project risks and the materiality assessment, however, it is unclear how the key risks described in section 2.3 relate to the material issues detailed in section 6.	**Rev 2**—Update the report to clearly align the key risks (section 2.3), key opportunities (section 2.4) and stakeholder concerns (section 4.3.4) with the material issues in section 6.
Completeness *This includes coverage of material topics and their Boundaries, sufficient to reflect significant economic, environmental, and social impacts, and to enable stakeholders to assess the reporting organisation's performance in the reporting period.*		
AA4	**Rev 1 –** USC has adapted its reporting approach to GRI and established a GR Index as an appendix to the Sustainability Report. It is unclear which GRI	**Rev 1 -** USC should confirm its approach to reporting in alignment with GRI and either update either the

ID	Review finding	Recommendation
	standards the project will use and whether all disclosure requirements will be reported. The sustainability report has been developed to report progress against the project's sustainability targets, to address the project's material issues and contractual obligations. The management disclosures are limited and incomplete, limiting stakeholders' ability to understand and assess USC's performance in the reporting period. It is noted that this is the first Sustainability Report, so comparing year-on-year trends is not possible.	Sustainability Report or GRI Index to include the required disclosures.
	Rev 2 - The Rev 1 recommendation has generally been addressed, but further improvements could be made. A review of the quantitative data confirmed that USC's data management system and processes to ensure data capture completeness appear comprehensive. The data QA/QC monthly and quarterly processes implemented by both USC and JHG ensure data accuracy.	**Rev 2 –** USC should review all relevant disclosure requirements in the GRI standards and update the Sustainability Report or GRI Index accordingly.

3.2 Accuracy

The organisation shall report information that is correct and sufficiently detailed to allow an assessment of the organisation's impacts.

ID	Review finding	Recommendation
A1	**Rev 1** - The Sustainability Report provides limited project context and an explanation for how the material issues were identified (Sections 1.2 and 1.4) without referring to the USC Sustainability Management Plan	**Rev 1** - USC should consider providing additional context around the material issues and how they were determined (including stakeholder involvement).
	Rev 2 – The Rev 1 recommendation has generally been addressed. Additional context has been added to sections 2.2 and 4.4.4.	
A2	**Rev 1 -** Key metrics for Water, Energy, and Emissions have been reported in reference to GRI, but this data has not been reviewed for accuracy, and the required disclosures are incomplete. .	**Rev 1** - USC should arrange a data review session with the independent reviewer.
	Rev 2: • A review of the quantitative data confirmed that USC's data management system and processes to ensure data capture completeness appear comprehensive. The data QA/QC monthly and quarterly processes implemented by both USC and JHG ensure data accuracy. Limited testing of key data sets confirmed data accuracy.	**Rev 2:** • Update the Report or the GRI index table to include the required disclosures and breakdown of quantitative data e.g. Material Used (GRI 301), energy consumption sources (GRI302), water take sources and volumes and water discharge location and volume (GRI303-3 & 4), Waste Categories and volumes • Review the use of Water Consumption (GRI303-5), as USC's methodology is inconsistent with GRI. • Confirm that all energy and emissions factors being used are current and provide evidence.

ID	Review finding	Recommendation
	• Topic disclosure requirements should align with GRI Topic standards.	• Confirm that the Emissions Factor (0 for purchased renewable energy of 0 tCO2e) is correct, considering the power bills report GHG emissions, e.g., Jan 2024 = 14.44 Tonnes.
A3	**Rev 1** - The Sustainability Report and GRI Index do not include the required GRI disclosures regarding the "basis of preparation" for the data.	**Rev 1** - USC should confirm its approach to reporting in alignment with GRI and either update the Sustainability Report or GRI Index accordingly to include the required disclosures.
	Rev 2 – The Rev 1 recommendation has not been addressed.	**Rev 2 –** Consider providing overarching disclosure information at the start of each material issue section (above the target table). This section could provide information to address the general GRI topic management disclosures that satisfy Disclosure 3-3 in *GRI 3: Material Topics 2021* and detail how USC manages these issues to address the risks and Target requirements.
A4	**Rev 1** - The use of the current status ratings could be misleading as there are Targets that have been assigned "Well Progressed" as a result of a model or a design confirming that the project will achieve the required Target, e.g., T22, T23, T24, T 14, T15. However, no monitoring has been completed to confirm that the target will be achieved.	**Rev 1:** • See "clarity" findings **C5**. • Review all Targets based on revised status indicators and criteria to ensure the indicator accurately reflects progress.
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2**—The symbols have changed to Red, Amber and Green. However, there are no criteria. A legend and criteria could improve this.
A5	**Rev 1 –** The details provided against each target are mostly qualitative. A few Targets have limited detail due to "The Base Case Approach is yet to be verified; hence, no figure is provided."	**Rev 2 -** USC should consider reporting key milestones or achievements to provide more accurate progress reporting aligned with the progress indicator symbol. USC should consider whether volumes and quantities can be reported without the Base Case Approach verification.

ID	Review finding	Recommendation
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2** – Update section 6 (Circular Economy) or the GRI Index to provide material quantities consistent with GRI e.g. material and waste quantities.

3.3 Balance

The organisation shall report information in an unbiased way and provide a fair representation of the organisation's negative and positive impacts.

ID	Review finding	Recommendation
B1	**Rev 1—**The project completed its establishment period on 26 April 2023. The USC Report is an inaugural report that only presents 12 months of data to 26 April 2024, limiting the project's ability to compare positive or negative year-on-year trends. The report appears to represent the activities and achievements; however, it provides limited detail on potential negative impacts, such as complaints or compliance matters. Section 5 states no significant incidents to date.	**Rev 1** - USC should consider including a summary of highlights that include achievements as well as negative and positive impacts that may have occurred during the reporting period. These highlights should consider all sustainability elements and state no incidents.
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2** – See Rev 1 recommendation.

3.4 Clarity

The organisation shall present information in a way that is accessible and understandable.

ID	Review finding	Recommendation
C1	The Sustainability Report is concise but contains limited information about the project and its context to enable the reader to understand its challenges, relevant stakeholders, material risks and opportunities.	USC should clarify who the target audience is and provide additional content to assist in understanding the: • Project context • Stakeholders • Material risks and opportunities.
	Rev 2 – The Rev 1 recommendation has generally been addressed. Additional context has been added to the Project Description (Section 2.1) with location figures. Section 4.3 has been added to identify and list relevant stakeholders.	
C2	**Rev 1** - There is a reliance on the John Holland Group (JHG) ESG Report 2023 to satisfy GRI management Disclosures. However, it is unclear how this is relevant to the USC project.	**Rev 1:** • USC should clarify how the JHG ESG Report 2023 is relevant to the USC project. • Consider updating the GRI Index with relevant information or be specific to what JHG information is applicable.
	Rev 2 – The Rev 1 recommendation has generally been addressed. Additional clarification detail has been added to Section 4.2.	
C3	**Rev 1** - The approach to sustainability (section 1.3) does not reference the Projects Sustainability Policy or project commitments.	**Rev 2:** • USC should include the Projects Sustainability Policy in the report and describe the project commitments. • Consider the use of graphics to improve the presentation of information.

ID	*Review finding*	*Recommendation*
	Rev 2 – The Rev 1 recommendation has generally been addressed.	**Rev 2** – Additional clarification detail has been added to Section 4.4.
C4	**Rev 1 -**There is limited graphical content to ensure concise and clear communication for external audiences.	**Rev 1 -** Review comparable industry sustainability reports for the use of graphical content and structure.
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2**—Additional graphical content has been added; however, the document is still very wordy. Future reports should review additional graphical content that can improve the reader's experience.
C5	**Rev 1** - The status indicator criteria used to report Target progress (Section 3) could create confusion when trying to interpret what has been achieved versus the outcomes required to be achieved e.g. “Well Progressed” criteria only require preliminary milestones to be met. These criteria may overstate the progress actually made especially when the provided detail narrative is limited or at a summary level.	**Rev 1:** • Review the naming convention and criteria descriptions. • Confirm if the “Completed” indicator should be replaced with “Achieved.” • Consider adding “At Risk” as a status indicator.
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2**—The symbols have changed to Red, Amber and Green. However, there are no criteria. A legend and criteria could improve this.
C6	**Rev 1 -** The report's content and structure were more in line with an internal management report	**Rev 1:** • Review comparable industry sustainability reports for the use of graphical content and structure. • Consider if it would be more appropriate for the Target tables in section 3 to be a report appendix to enable additional project content to be included in the body of the report. This content may assist in addressing GRI disclosure requirements.

ID	Review finding	Recommendation
C7	**Rev 1 -** There are instances in the report where 1st person language has been used e.g. the circular economy case study narration in the Initiative Summary section.	**Rev 1 -** USC should review the use of 1st and 3rd person language and ensure consistency throughout the body of the report
	Rev 2 – The Rev 1 recommendation has generally been addressed. The inclusion of additional context has improved the report.	

3.5 Comparability

The organisation shall select, compile, and report information consistently to enable an analysis of changes in the organisation's impacts over time and an analysis of these impacts relative to those of other organisations.

ID	Review finding	Recommendation
D1	**Rev 1 -** It is unclear which GRI standards the project will use and whether all requirements will be reported against them. The use of applicable GRI standards will support future analysis of trends and provide transparent disclosures.	**Rev 1 -** USC should confirm its approach to reporting in alignment with GRI and either update the Sustainability Report or GRI Index to include the required disclosures.
	Rev 2 – The Rev 1 recommendation has generally been addressed. A GRI Content Table containing relevant GRI disclosures has been updated.	

D2	**Rev 1—**The project targets have been documented, including a progress status indicator (Section 3). However, the indicator criteria must be improved to ensure consistency and prevent overstating progress.	**Rev 1 -** See “clarity” findings **C5.**
D3	**Rev 1 -** Quantitative data using accepted international metrics have been used e.g. kJ, kL, m3, The Sustainability Report and GRI Index do not include the required GRI disclosures regarding the “basis of preparation” for the data.	**Rev 1 -** See “Accuracy” finding A3.
D4	**Rev 1 -** This USC Sustainability report is an inaugural report so no data restatements are required.	**Rev 1 -** Not Applicable

3.6 Completeness

The organization shall provide sufficient information to enable an assessment of the organization’s impacts during the reporting period.

ID	*Review finding*	*Recommendation*
E1	**Rev 1 -** The Sustainability Report provides limited project context and explanation for how the material issues were identified (Sections 1.2 and 1.4) without the need to refer to the USC Sustainability Management Plan.	**Rev 1 -** See “Accuracy” finding A1.

ID	*Review finding*	*Recommendation*
E2	**Rev 1 -** Certain data has not been reported on the justification that "the IS Base Case Approach is currently with the IS Council for verification and therefore the reduction percentages have not been provided for energy, material and water targets for this reporting period." The omission of this data reduces the completeness of the information reported in the Sustainability Report.	**Rev 1 -** For transparency, USC should consider whether volumes and quantities can be reported without the Base Case Approach verification. Reduction percentages can be reported in future Sustainability Reports. .
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2** – See Rev 1 recommendation.
E3	**Rev 1 -** The project has relied on the *John Holland Group (JHG) ESG Report 2023* to support various management disclosures. Using aggregated group information that is not specific to the USC project can limit information transparency and prevent readers from understanding the project.	**Rev 1 -** See "Clarity" finding C2.

3.7 Sustainability context

The organisation shall report information about its impacts in the wider context of sustainable development.

ID	Review finding	Recommendation
F1	**Rev 1 -** USC is implementing the project against the IS rating scheme where sustainability has been a core principle of the design, to achieve an ISC 2.1 Gold Rating in support of Sydney Water's net zero ambitions.	**Rev 1 -** To achieve the Gold Rating, the USC project will need to demonstrate how it has met the required sustainability outcomes (targets) and report information about its impacts.
	Rev 2 – The Rev 1 recommendation has generally been addressed. USC has reported progress against various credits and relevant targets in this Sustainability Report	
F2	**Rev 1 -** Key metrics for Water, Energy, and Emissions have been reported in reference to GRI, but this data has not been reviewed for accuracy, and the required disclosures are incomplete.	**Rev 1 -** See "Accuracy" finding A2.
F3	**Rev 1 -** The report does not provide any details on the project stakeholders or the existing/potential positive or negative impacts. The report provides a case study on the project's actions to avoid complaints, but there is limited other information to understand the project's positive or negative social impacts.	**Rev 1 -** USC should consider updating the report in line with GRI 413 disclosures.
	Rev 2 – The Rev 1 recommendation has generally been addressed. Additional detail has been provided in Section 4.3.	

3.8 Timeliness

The organization shall report information on a regular schedule and make it available in time for information users to make decisions.

ID	Review finding	Recommendation
G1	The USC Sustainability Report is required to be published on the Project (or organisation) website by no later than 6 months after the end of the reporting period to meet the requirements of Lea 1 DL and AB 2.2 where reporting performance against its sustainability Targets (DL and ABL 1.1 and 2.1) The reporting period is from 26 April 2023 to 26 April 2024.	• USC must publish the sustainability report no later than the 26 October 2024.
	Rev 2 – **Rev 2** – USC understands the Rev 1 recommendation.	

3.9 Verifiability

The organisation shall gather, record, compile, and analyse information in such a way that the information can be examined to establish its quality.

ID	Review finding	Recommendation
H1	In accordance with Lea 1 DL and AB 3.2, the USC Sustainability Report has been independently reviewed by a suitably qualified professional (SQP), and this report and its findings confirm whether this verifiable principle is achieved.	• USC to consider the recommendations in this report and retain evidence to confirm that the feedback was addressed (where applicable).
	Rev 2 – The Rev 1 recommendation has generally been addressed. USC has updated *USC - JHG - Sust Annual Report - 23_24 - Draft 2 – with GRI revision to address recommendations from the Rev 1 review.*	
H2	It is unclear which GRI standards the project will use and whether all requirements will be reported against them.	• See “Comparability” finding D1.
H3	Quantitative data for water, waste, energy and emissions metrics has not been verified for accuracy.	• See “Accuracy” finding A2.
H4	The Sustainability Report and GRI Index do not include the required GRI disclosures regarding the “basis of preparation” for the data.	• See “Accuracy” finding A3.

4 Review Conclusion

The inaugural *Upper South Creek – Advanced Water Recycling Centre and Pipelines Sustainability Report 2024* has been prepared to meet the requirements of Lea-1 of the ISv2.1 Technical Manual.

The Independent Reviewer reviewed two versions of the draft Sustainability Report. A meeting was held with the USC team to provide verbal feedback on the first draft. This report provides a record of the key findings and recommendations from both reviews and identifies where recommendations have been adopted in support of the updated draft report.

The review identified that the Sustainability Report:

- identifies the UNSDGs relevant to the project, including potential positive and negative contributions. The UNSDGs have been adequately mapped against the various targets.
- reports progress on the project's sustainability performance by outlining progress against its Sustainability Targets.
- has adopted the GRI framework to report relevant sustainability performance, however further work is required to ensure the required disclosures are documented to ensure transparency and comparability.

The data management systems and processes being implemented ensure that the reported data is complete and supported by robust internal QA/QC processes to ensure data quality and integrity.

Considering that this is the first sustainability report for the project, there is no prior year data to enable performance comparisons, however adopting the GRI framework will enable future comparisons to occur.

Improvements in the 2nd version of the report incorporated additional stakeholder information and sustainability and material risk context.

Subject to considering the recommendations in this report, it has been assessed that USC has demonstrated a commitment to ensure that the inaugural Sustainability Report considers the GRI Sustainability Reporting Principles, however an ongoing continuous improvement approach should be taken to future Sustainability Reports.

Yours sincerely,

Jamie Lees
Independent Reviewer

ATTACHMENT 1 – Jamie Lees CV

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+61 428 619 577
www.intiapac.com.au

inti

Jamie Lees
Sustainability Specialist

ABOUT ME

Jamie Lees, with 20 years of experience working for and consulting to major resource and infrastructure companies in project, operational, and corporate environmental and sustainability roles, is a highly accomplished senior leader in the mineral resources sector. He has notable expertise in operational roles, project development, environmental approvals, and corporate management. With a dedicated focus on Sustainability and Environmental, Social, and Governance (ESG) performance, Jamie boasts a commendable track record of creating frameworks, policies, and procedures that seamlessly align with both business and environmental objectives.

AREAS OF EXPERTISE

- Environmental Approvals
- Operational Environmental Management
- Compliance Management
- Environmental Risk Assessment
- Project Management
- Rehabilitation & Mine Closure Planning
- Closure Liability Assessment
- Sustainability & ESG
- Stakeholder & Community Engagement

QUALIFICATIONS

- Bachelor of Applied Science
- Associate Diploma of Applied Finance & Investment, Securities
- Cert IV Assessment and Workplace Training

CERTIFICATION

- Environmental Institute Australia & New Zealand (EIANZ)
- Certified Infrastructure Sustainability Accredited Professional (ISAP)
- Community Justice Services (Commissioner for Declarations) (Justice of the Peace – Qualified)

EXPERIENCE

- Infrastructure sustainabilty management – ISP reviews and audits.
- Environmental compliance & sustainability auditing .
- ESG standards assurance e.g. RGMP, CopperMark, GRI
- Developing and implementing environmental management systems.
- Environmental risk management and governance.
- Climate change risk assessments.
- Expertise in leading and delivering complex major projects.
- Sustainability and regulatory reporting, e.g., NPI & NGERS.
- Experienced in operational and corporate environmental and sustainability management.
- Technical experience in environmental impact assessments and managing water (surface and groundwater), greenhouse gas emissions, air/noise, ecology/offsets, and cultural heritage.
- Environmental permitting and regulatory compliance management for major projects.
- Environmental M&A due diligence assessments.

INTERESTS

Camping | Food | Rugby

ATTACHMENT 2 – ISAP Certification

CERTIFICATE
OF ACCREDITATION

Infrastructure Sustainability Council

This is to certify that

Jamie Lees

has completed
ISAP Renewal IS v1.2 D&AB ONLY
with the **Infrastructure Sustainability Council** and is recognised as an **Infrastructure Sustainability Accredited Professional.**

ACCREDITATION VALID FOR 12 MONTHS FROM

10 July 2023

Ainsley Simpson
Chief Executive Officer

ATTACHMENT 3 – Memorandum of Understanding (MOU) - Independence

MOU: ISP – JAMIE LEES

Upper South Creek – Independent SQP Review of Lea-1

June 2023

Ref Number: 01

table of contents

MEMORANDUM OF UNDERSTANDING

1 Purpose

This Memorandum of Understanding (MOU) has been prepared to demonstrate independence of the individual nominated as Suitably Qualified Professional (SQP).

The nomination and establishment of an SQP will enable the Project to deliver Infrastructure Sustainability (IS) Design and As Built Ratings using IS the version 2.1 rating tool. Under the version 2.1 credit Lea-1 - Integrating Sustainability, Design Level (DL) 2.1 and As-Built Level (ABL) 2.1 credit criteria, the project must:

- Publicly report on its sustainability performance annually (e.g. on the project or organisation website), outlining performance against its material sustainability targets, no later than six months after the end of the reporting period.
- Map sustainability performance against the 17 UN Sustainable Development Goals (where material), demonstrating how the project has positively or negatively contributed to the achievement of the SDGs.

To fulfill the Lea-1 DL 3.2 and ABL 3.2 criteria, the annual project's sustainability performance reporting must be independently reviewed by a SQP, specifically:

- The reviewer must consider the principles of sustainability reporting for the Global Reporting Initiative (GRI) or the International Integrated Reporting (IIR) Frameworks in their assessment of the report and indicate they are satisfied with the content and quality of what is being reported, including reporting of contribution to the SDGs.
- The reviewer must consider if the project has shown that feedback raised in the review has been addressed.
- A Suitably Qualified Professional has at least 7 years' experience in sustainability, including experience in sustainability performance reporting and reporting principles.
- The independent reviewer needs to be independent from the project itself but can be a SQP from the proponent (client) organisation or a third party.

The nature of the Independent SQP role may be expanded upon to provide other external audit or support roles which do not compromise the independent nature of this role (and where agreed with ISC) and where it adds value to the Project team.

It is understood that this MOU will also be used as evidence to be included in the Project's Design and As-Built IS Rating submissions relating to the achievement of IS Lea-1 requirements.

2 Nominated ISP

The following sustainability professional is nominated as the Independent SQP for the project listed:

NAME	COMPANY	ROLE	PROJECT
Jamie Lees	Inti APAC Pty Ltd	Environment & Sustainability Specialist	Upper South Creek

TABLE 1: INDEPENDENT SUSTAINABILITY PROFESSIONAL

3 Demonstration of independence

To demonstrate the independence of the nominated SQP from all project activities, Upper South Creek – Infrastruture Projects, ensure completion of a formal IS Rating Independent Sustainability Professional Checklist. This checklist can be seen in Section 4.

4 Qualifications

In undertaking this role, the Independent SQP confirms their credentials satisfy the minimum requirements for undertaking the ISP's role consistent with the criteria detailed in the IS Rating Technical Manual (IS Technical Manual v2.1, Lea-1) as listed below. This information is supported by a Curriculum Vitae and other supporting evidence addressing qualifications of the nominated Independent SQP (refer to Section 5 below).

ISC 'INDEPENDENT SUSTAINABILITY PROFESSIONAL' ROLE REQUIREMENTS	SUMMARY STATEMENT AND SUPPORTING EVIDENCE TO DEMONSTRATE COMPLIANCE
Qualifications in an environmental, social or economic field	Bachelor of Applied Science Associate Diploma of Applied Finance & Investment, Securities Cert IV Assessment and Workplace Training Certified Infrastructure Sustainability Accredited Professional (ISAP)
At least 10 years' experience practicing in one or more of these fields	Jamie Lees, has 20 years' experience working for, and consulting to major resource and infrastructure companies in project, operational and corporate environmental and sustainability roles. Jamie is a certified Infrastructure Sustainability Accredited Professional

	(ISAP) who has extensive experience in environmental management and approvals, stakeholder engagement, compliance management, auditing and governance frameworks for major projects. (Refer CV)
At least 7 years' experience in sustainability, including experience in sustainability performance reporting and reporting principles.	Jamie Lees has over 20 years of experience providing sustainability advice and support, including on a number of Infrastructure and Resources projects across a range of sectors (refer CV for more information).
Be independent and have no vested interest in the project	Jamie Lees is independenent and has no vested interest in the project. Jamie Lees is employed by Inti APAC Pty Ltd and has had no direct involvement with the project listed above.
Must not work directly on the project	Jmaie Lees does not work directly on project. Jamie Lees is employed by Inti APAC Pty Ltd and has had no direct involvement with the project listed above.
The person must be engaged to act independently of the project.	This letter confirms the engagement of services to act independently of the project.

TABLE 2: DEMONSTRATION OF COMPLIANCE

5 Deliverables

The following are key deliverables:

- Provide an annual assessment report outlining satisfaction, gaps and recommendations for improvement against the principles of sustainability reporting (GRI), mapping against, and contribution to the SDGs
- Assess whether feedback/recommendations raised in the annual assessment have been addressed by the project (from the second report onwards)

6 Attachments

The following documents are attached regarding the qualifications of the nominated ISP:

- Current CV
- Infrastructure Sustainability Accredited Professional (ISAP) Certificate

7 Signatures

	NAME	COMPANY	POSITION	SIGNATURE
Nominated SQP	Jamie Lees	Inti APAC Pty Ltd	Environment & Sustainability Specialist	
Project Sustainability Representative	Mark Trethew	John Holland - Upper South Creek	Sustainability Manager	

TABLE 3: SIGNATURES OF PROPONENTS

Attachments

ATTACHMENT 1 – Jamie Lees CV

Jamie.lees@intiapac.com.au

+61 428 619 577

www.intiapac.com.au

inti

Jamie Lees

Sustainability Specialist

ABOUT ME

Jamie Lees, with 20 years of experience working for and consulting to major resource and infrastructure companies in project, operational, and corporate environmental and sustainability roles, is a highly accomplished senior leader in the mineral resources sector. He has notable expertise in operational roles, project development, environmental approvals, and corporate management. With a dedicated focus on Sustainability and Environmental, Social, and Governance (ESG) performance, Jamie boasts a commendable track record of creating frameworks, policies, and procedures that seamlessly align with both business and environmental objectives.

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- Closure Liability Assessment
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- Infrastructure sustainabilty management – ISP reviews and audits.
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- Environmental risk management and governance.
- Climate change risk assessments.
- Expertise in leading and delivering complex major projects.
- Sustainability and regulatory reporting, e.g., NPI & NGERS.
- Experienced in operational and corporate environmental and sustainability management.
- Technical experience in environmental impact assessments and managing water (surface and groundwater), greenhouse gas emissions, air/noise, ecology/offsets, and cultural heritage.
- Environmental permitting and regulatory compliance management for major projects.
- Environmental M&A due diligence assessments.

INTERESTS

Camping

Food

Rugby

ATTACHMENT 2 – ISAP Certification

CERTIFICATE OF ACCREDITATION

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This is to certify that

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ACCREDITATION VALID FOR 12 MONTHS FROM

10 July 2023

Ainsley Simpson
Chief Executive Officer

+61 451 425 187

Matt.Dimarco@intiapac.com.au

Grow, Growth, Generate

20 Appendix D: Independent Review Report – October 2024

9 October 2024

MARK TRETHEWEY
UPPER SOUTH CREEK – AWRC & PIPELINES
JOHN HOLLAND
CLIFTON AVENUE
KEMPS CREEK NSW 2178

JAMIE LEES
INTI APAC PTY LTD
LEVEL 1, COLLINS ST
MELBOURNE, VIC
EMAIL: JAMIE.LEES@INTIAPAC.COM.AU:

Dear Mark

Independent Review Supplementary Report - Upper South Creek AWRC&P Sustainability Report 2024

Overview

This supplementary report has been prepared to document the final findings of the independent review of the draft *Upper South Creek—Advanced Water Recycling Centre and Pipelines (USC)* Sustainability Report for the period April 2023 to April 2024.

The review of the USC Sustainability Report was completed in accordance with Lea-1 DL and AB 3.2 of the ISv2.1 technical manual, with a requirement to consider the GRI Reporting Principles. The review should not be relied upon to detect errors, omissions or misstatements that may exist within the report.

The review was conducted by Jamie Lees (Inti APAC), an Infrastructure Sustainability Accredited Professional (ISAP) who is independent of the USC project and deemed a suitably qualified professional (SQP). Copies of Jamie's CV, ISAP Certification and Memorandum of Understanding confirming Independence are included in **Attachment 1, 2 and 3.**

An initial review of earlier versions of the Sustainability Report (Version 1 and Draft 2) was completed in July and August 2024, and a report that documented the findings and provided recommendations was issued on 14 August 2024.

In October 2024, IntiAPAC received an updated report (Version 2) that had been amended to address the recommendations in the 14 August 2024 Report.

Table 1 details the issues identified and corresponding recommendations from reviewing the first two Sustainability Report drafts (Version 1 and Draft 2) when assessed against the GRI Sustainability Reporting Principles. The table includes a column that contains the Independent Reviewer's comments relevant to the Sustainability Report (Oct 2024).

A review of the amended report (October 2024) confirmed that:

- All recommendations were addressed, and relevant amendments were made to the draft report (October 2024).
- the Global Reporting Initiative (GRI) reporting principles have been considered, and the report's content and quality are satisfactory, including reporting of contributions to the Sustainable Development Goals (SDGs).

GRI Reporting Principles Review

The following tables have been updated to confirm that the amended USC—JHG—Sust Annual Report—23_24—Version 2 (October 2024) (referred to as Rev 3 (Oct 2024) has adequately addressed the recommendations detailed in the 14 August 2024 report following the reviews of:

- *USC - JHG - Sust Annual Report - 23_24 - Draft 1 - For Issue 1* (referred to as Rev 1), and
- *"USC—JHG—Sust Annual Report—23_24—Draft 2—with GRI revision* (referred to as Rev 2).

Table 1 GRI Reporting Principles Review

ID	*Review Finding*	*Recommendations*	*Rev 3 (Oct 2024) Findings*
Stakeholder Inclusiveness *The reporting organisation shall identify its stakeholders and explain how it has responded to their reasonable expectations and interests.*			
AA1	**Rev 1** - The Sustainability Report provides limited detail on stakeholders relevant to the project and does not describe how they are impacted or engaged/consulted. Limited detail is provided on the processes the project has in place to respond to stakeholders' reasonable expectations and interests; however, a case study has been provided to describe stakeholder engagement practices to avoid complaints.	**Rev 1** - USC should consider providing additional context on how the project manages stakeholder expectations and interests, including complaints and grievances.	*Section 4.3 has been updated with additional information.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.*
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made. Additional stakeholder information has been included in Section 4.3.	**Rev 2** – Review disclosure requirements in GRI 413 and update the report or GRI Index accordingly.	

ID	Review Finding	Recommendations	Rev 3 (Oct 2024) Findings
Sustainability Context *Present the reporting organisation's performance in the wider context of sustainability*			
AA2	**Rev 1 -**The approach to sustainability provides limited detail on the project's sustainability context. However, Section 1.2.1 describes some of the project's benefits. There is limited information about the wider context of sustainability.	**Rev 1 -** USC should update the report to provide further sustainability context for the project and how it integrates into the strategic initiatives for the Sydney Water Catchment.	*Additional context has been added to Section 4.4 to describe the Sustainability Framework and Approach.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1.*
	Rev 2 – The Rev 1 recommendation has generally been addressed. • Additional context has been added to Section 4.4, to describe the Sustainability Framework and Approach		
Materiality *The organisation's significant economic, environmental, and social impacts*			
AA3	**Rev 1** – Section 1.4 detailed the material issues for the project but provided limited information to understand why these were selected based on significant economic, environmental, and social impacts	**Rev 1** - USC should update the report to provide further details on how the material topics were identified and why.	*Sections 2.2, 2.3 and 2.4 have been updated with additional detail.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.*
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made. Section 2.2 has been updated to include additional detail on project risks and the materiality assessment; however, it is unclear how the key risks described in section 2.3 relate to the material issues detailed in section 6.	**Rev 2**—Update the report to clearly align the key risks (section 2.3), key opportunities (section 2.4) and stakeholder concerns (section 4.3.4) with the material issues in section 6.	

ID	Review Finding	Recommendations	Rev 3 (Oct 2024) Findings
Completeness *This includes coverage of material topics and their boundaries, sufficient to reflect significant economic, environmental, and social impacts and enable stakeholders to assess the reporting organisation's performance in the reporting period.*			
AA4	**Rev 1 –** USC has adapted its reporting approach to GRI and established a GR Index as an appendix to the Sustainability Report. It is unclear which GRI standards the project will use and whether all disclosure requirements will be reported. The sustainability report has been developed to report progress against the project's sustainability targets and to address the project's material issues and contractual obligations. The management disclosures are limited and incomplete, limiting stakeholders' ability to understand and assess USC's performance in the reporting period. It is noted that this is the first Sustainability Report, so comparing year-on-year trends is not possible.	**Rev 1 -** USC should confirm its approach to reporting in alignment with GRI and update either the Sustainability Report or GRI Index to include the required disclosures.	*Section 3 of the report states that it has been prepared in accordance with Global Reporting Initiative (GRI) principles. Section 14 includes a GRI Content Table, which contains relevant GRI disclosures.* *Due to the selective use of GRI standards in the sustainability report, it is recommended that section 3 be amended to read, "The sustainability report has been prepared in reference to Global Reporting Initiative (GRI) principles."* *Subject to the amendment to Section 3, the Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.*
	Rev 2 - The finding has generally been addressed, but further improvements could be made. A review of the quantitative data confirmed that USC's data management system and processes to ensure data capture completeness appear comprehensive. The data QA/QC monthly and quarterly processes implemented by both USC and JHG ensure data accuracy.	**Rev 2 –** USC should review all relevant disclosure requirements in the GRI standards and update the Sustainability Report or GRI Index accordingly.	

ACCURACY

The organisation shall report information that is correct and sufficiently detailed to allow an assessment of the organisation's impacts.

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
A1	**Rev 1 -** The Sustainability Report provides limited project context and explanation for how the material issues were identified (Sections 1.2 and 1.4) without referring to the USC Sustainability Management Plan.	**Rev 1** - USC should consider providing additional context around the material issues and how they were determined (including stakeholder involvement).	*Sections 2.2 and 4.4.4 have been updated with additional context. The graphic in section 2.2 will also be updated to include a legend in the published version.* *Subject to a legend being added to the graphic in section 2.2, the Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1.*
	Rev 2 – The Rev 1 recommendation has generally been addressed. Additional context has been added to sections 2.2 and 4.4.4		
A2	**Rev 1 -** Key metrics for Water, Energy, and Emissions have been reported in reference to GRI, but this data has not been reviewed for accuracy, and the required disclosures are incomplete.	**Rev 1** - USC should arrange a data review session with the independent reviewer.	*A review of the Sustainability Data and collection processes confirmed that the data management systems and processes being implemented ensured that the reported data was complete and supported by robust internal QA/QC processes to ensure data quality and integrity.* *Section 14 includes a GRI Content Table, updated to contain relevant GRI disclosures.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.*
	Rev 2: • A review of the quantitative data confirmed that USC's data management system and processes to ensure data capture completeness appear comprehensive. The data QA/QC monthly and quarterly	**Rev 2:** • Update the Report or the GRI index table to include the required disclosures and breakdown of quantitative data e.g. Material Used (GRI 301), energy consumption sources (GRI302), water take sources and volumes and water. discharge location and volume (GRI303-3 & 4), Waste Categories and volumes	

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
	processes implemented by both USC and JHG ensure data accuracy. Limited testing of key data sets confirmed data accuracy. • Topic disclosure requirements should align with GRI Topic standards.	• Review the use of Water Consumption (GRI303-5), as USC's methodology is inconsistent with GRI. • Confirm that all energy and emissions factors being used are current and provide evidence. • Confirm that the Emissions Factor (0 for purchased renewable energy of 0 tCO2e) is correct, considering the power bills report GHG emissions, e.g., Jan 2024 = 14.44 Tonnes.	
A3	**Rev 1** - The Sustainability Report and GRI Index do not include the required GRI disclosures regarding the "basis of preparation" for the data.	**Rev 1** - USC should confirm its approach to reporting in alignment with GRI and either update the Sustainability Report or GRI Index accordingly to include the required disclosures.	*Section 3 of the report states that it has been prepared in accordance with Global Reporting Initiative (GRI) principles. Section 14 includes a GRI Content Table containing relevant GRI disclosures.* *Due to the selective use of GRI standards in the sustainability report, it is recommended that section 3 be amended to read, "The sustainability report has been prepared <u>in reference to</u> Global Reporting Initiative (GRI) principles."* *Additional disclosure information has been updated in each Material Issue section (6 - 13).* *Subject to the amendment to Section 3, the Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.*
	Rev 2 – The Rev 1 recommendation has not been addressed.	**Rev 2 –** Consider providing overarching disclosure information at the start of each material issue section (above the target table). This section could provide information to address the general GRI topic management disclosures that satisfy Disclosure 3-3 in *GRI 3: Material Topics 2021* and detail how USC manages these issues to address the risks and Target requirements.	

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
A4	**Rev 1** - The use of the current status ratings could be misleading as there are Targets that have been assigned "Well Progressed" as a result of a model or a design confirming that the project will achieve the required Target, e.g., T22, T23, T24, T 14, T15. However, no monitoring has been completed to confirm that the target will be achieved.	**Rev 1:** • See "clarity" findings **C5**. • Review all Targets based on revised status indicators and criteria to ensure the indicator accurately reflects progress.	*The published version will include a legend describing each icon. The icon description provides a more representative description of progress.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2*
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2**—The symbols have changed to Red, Amber and Green. However, there are no criteria. A legend and criteria could improve this.	
A5	**Rev 1—**The details provided against each target are mostly qualitative. A few Targets have limited detail because "The Base Case Approach is yet to be verified; hence, no figure is provided."	**Rev 2 -** USC should consider reporting key milestones or achievements to provide more accurate progress reporting aligned with the progress indicator symbol. USC should consider whether volumes and quantities can be reported without the Base Case Approach verification.	*Additional disclosure information has been updated in each Material Issue section (6 - 13).* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.*
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2** – Update section 6 (Circular Economy) or the GRI Index to provide material quantities consistent with GRI e.g. material and waste quantities.	

BALANCE

The organisation shall report information in an unbiased way and provide a fair representation of the organisation's negative and positive impacts.

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
B1	**Rev 1—**The project completed its establishment period on 26 April 2023. The USC Report is an inaugural report that only presents 12 months of data to 26 April 2024, limiting the project's ability to compare positive or negative year-on-year trends. The report appears to represent the activities and achievements; however, it provides limited detail on potential negative impacts, such as complaints or compliance matters. Section 5 states no significant incidents to date.	**Rev 1** - USC should consider including a summary of highlights that include achievements as well as negative and positive impacts that may have occurred during the reporting period. These highlights should consider all sustainability elements and state no incidents.	*Section 8 includes a summary of significant incidents. The report confirms that no significant incidents occurred during the reporting period. A significant incident is defined as an environmental incident that compromises the environmental thresholds for the Project.* *Potential project delivery risks are detailed in section 2.3.* *The Independent* Reviewer *has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.*
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2** – See Rev 1 recommendation.	

CLARITY

The organisation shall present information in a way that is accessible and understandable.

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
C1	The Sustainability Report is concise but contains limited information about the project and its context to enable the reader to understand its challenges, relevant stakeholders, material risks and opportunities.	USC should clarify who the target audience is and provide additional content to assist in understanding the: • Project context • Stakeholders • Material risks and opportunities.	*Additional context has been added to the Project Description (Section 2.1) with location figures. Section 4.3 has been added to identify and list relevant stakeholders.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1.*
	Rev 2 – The Rev 1 recommendation has generally been addressed. Additional context has been added to the Project Description (Section 2.1) with location figures. Section 4.3 has been added to identify and list relevant stakeholders.		
C2	**Rev 1** - There is a reliance on the John Holland Group (JHG) ESG Report 2023 to satisfy GRI management Disclosures. However, it is unclear how this is relevant to the USC project.	**Rev 1:** • USC should clarify how the JHG ESG Report 2023 is relevant to the USC project. • Consider updating the GRI Index with relevant information or be specific to what JHG information is applicable.	*Sections 4.1, 4.2 and 4.4 have been updated to provide additional context on how the John Holland systems apply to the project.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1.*
	Rev 2 – The Rev 1 recommendation has generally been addressed. Additional clarification detail has been added to Section 4.2.		
C3	**Rev 1** - The approach to sustainability (section 1.3) does not reference the Projects Sustainability Policy or project commitments.	**Rev 2:** • USC should include the Projects Sustainability Policy in the report and describe the project commitments.	*Section 4.4.1 includes a link to Sydney Water's Environmental Policy and Our Strategy 2020-2030, and additional graphics have been inserted.*

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
		• Consider the use of graphics to improve the presentation of information.	*The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.*
	Rev 2 – The Rev 1 recommendation has generally been addressed.	**Rev 2** – Additional clarification detail has been added to Section 4.4.	
C4	**Rev 1 -**There is limited graphical content to ensure concise and clear communication for external audiences.	**Rev 1 -** Review comparable industry sustainability reports for the use of graphical content and structure.	*The amended report has been updated to provide additional graphics that improve clarity of information.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2.* *Future reports should review additional graphical content that can improve the reader's experience.*
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2**—Additional graphical content has been added; however, the document is still very wordy. Future reports should review additional graphical content that can improve the reader's experience.	
C5	**Rev 1** - The status indicator criteria used to report Target progress (Section 3) could create confusion when interpreting what has been achieved versus the outcomes required to be achieved e.g. "Well Progressed" criteria only require preliminary milestones to be met. These criteria may overstate the progress actually made especially when the provided detail narrative is limited or at a summary level.	**Rev 1:** • Review the naming convention and criteria descriptions. • Confirm if the "Completed" indicator should be replaced with "Achieved." • Consider adding "At Risk" as a status indicator.	*The published version will include a legend describing each icon. The icon description provides a more representative description of progress and includes:* *Green - Project target achievement is on track.* *Amber - Project target achievement is potentially compromised* *Red - Project target achievement is compromised* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1 and Rev 2*

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2**—The symbols have changed to Red, Amber and Green. However, there are no criteria. A legend and criteria could improve this.	
C6	**Rev 1 -** The report's content and structure were more in line with an internal management report	**Rev 1:** • Review comparable industry sustainability reports for the use of graphical content and structure. • Consider if it would be more appropriate for the Target tables in section 3 to be a report appendix to enable additional project content to be included in the body of the report. This content may assist in addressing GRI disclosure requirements.	*The additional report content and graphics ensure that this sustainability report provides adequate information about the project that is easily understood by readers unfamiliar with it.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1.*
C7	**Rev 1 -** There are instances in the report where 1st person language has been used e.g. the circular economy case study narration in the Initiative Summary section.	**Rev 1 -** USC should review the use of 1st and 3rd person language and ensure consistency throughout the body of the report	*Including additional context and ensuring consistent language has improved the report*. *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1.*
	Rev 2 – The Rev 1 recommendation has generally been addressed. The inclusion of additional context has improved the report.		

COMPARABILITY

The organisation shall select, compile, and report information consistently to enable an analysis of changes in the organisation's impacts over time and an analysis of these impacts relative to those of other organisations.

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
D1	**Rev 1 -** It is unclear which GRI standards the project will use and whether all requirements will be reported against them. The use of applicable GRI standards will support future analysis of trends and provide transparent disclosures.	**Rev 1 -** USC should confirm its approach to reporting in alignment with GRI and update either the Sustainability Report or GRI Index to include the required disclosures.	*Section 3 of the report states that it has been prepared in accordance with Global Reporting Initiative (GRI) principles. Section 14 includes a GRI Content Table containing relevant GRI disclosures.* *Due to the selective use of GRI standards in the sustainability report, it is recommended that section 3 be amended to read, "The sustainability report has been prepared in reference to Global Reporting Initiative (GRI) principles."*
	Rev 2 – The Rev 1 recommendation has generally been addressed. A GRI Content Table containing relevant GRI disclosures has been updated.		
D2	**Rev 1—**The project targets have been documented, including a progress status indicator (Section 3). However, the indicator criteria must be improved to ensure consistency and prevent overstating progress.	**Rev 1 -** See "clarity" findings **C5.**	*See Independent reviewer comments for C5.*
D3	**Rev 1 -** Quantitative data using accepted international metrics have been used e.g. kJ, kL, m3,	**Rev 1 -** See "Accuracy" finding A3.	*See Independent reviewer comments for A3.*

	The Sustainability Report and GRI Index do not include the required GRI disclosures regarding the “basis of preparation” for the data.		
D4	**Rev 1 -** This USC Sustainability report is an inaugural report, so no data restatements are required.	**Rev 1 -** Not Applicable	*No additional comments.*

COMPLETENESS

The organisation shall provide sufficient information to enable an assessment of the organisation's impacts during the reporting period.

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
E1	**Rev 1 -** The Sustainability Report provides limited project context and explanation for how the material issues were identified (Sections 1.2 and 1.4) without the need to refer to the USC Sustainability Management Plan.	**Rev 1 -** See "Accuracy" finding A1.	*See Independent reviewer comments for A1.*
E2	**Rev 1 -** Certain data has not been reported on the justification that "the IS Base Case Approach is currently with the IS Council for verification and therefore the reduction percentages have not been provided for energy, material and water targets for this reporting period." The omission of this data reduces the completeness of the information reported in the Sustainability Report.	**Rev 1 -** For transparency, USC should consider whether volumes and quantities can be reported without the Base Case Approach verification. Reduction percentages can be reported in future Sustainability Reports. .	*Additional quantitative and qualitative information have been added to demonstrate what activities are occurring.* *The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1*
	Rev 2 – The Rev 1 recommendation has generally been addressed, but further improvements could be made.	**Rev 2** – See Rev 1 recommendation.	

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
E3	**Rev 1 -** The project has relied on the *John Holland Group (JHG) ESG Report 2023* to support various management disclosures. Using aggregated group information that is not specific to the USC project can limit information transparency and prevent readers from understanding the project.	**Rev 1 -** See “Clarity” finding C2.	*See Independent reviewer comments for C2*

SUSTAINABLITY CONTEXT

The organisation shall report information about its impacts in the wider context of sustainable development.

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
F1	**Rev 1 -** USC is implementing the project against the IS rating scheme where sustainability has been a core principle of the design, to achieve an ISC 2.1 Gold Rating in support of Sydney Water's net zero ambitions.	**Rev 1 -** To achieve the Gold Rating, the USC project will need to demonstrate how it has met the required sustainability outcomes (targets) and report information about its impacts.	*The adequacy of the evidence to support the achievement of the ISC credits (and targets) is subject to verification by the appointed ISC Verifier.* *USC has reported progress against various credits and relevant targets in this Sustainability Report to comply with Lea 1.* *The Independent Reviewer has confirmed that this information adequately addresses the Lea 1 requirements.* *Ongoing implementation of the USC sustainability management system will support Revi 1 recommendation.*
	Rev 2 – The Rev 1 recommendation has generally been addressed. USC has reported progress against various credits and relevant targets in this Sustainability Report		
F2	**Rev 1 -** Key metrics for Water, Energy, and Emissions have been reported in reference to GRI, but this data has not been reviewed for accuracy, and the required disclosures are incomplete.	**Rev 1 -** See "Accuracy" finding A2.	*See Independent reviewer comments for A2.*
F3	**Rev 1 -** The report does not provide any details on the project stakeholders or the existing/potential positive or negative impacts.	**Rev 1 -** USC should consider updating the report in line with GRI 413 disclosures.	*Section 4.3. has been updated with additional information.*

	The report provides a case study on the project's actions to avoid complaints, but there is limited other information to understand the project's positive or negative social impacts.		*The Independent Reviewer has confirmed that this information adequately addresses the recommendations for Rev 1.*
	Rev 2 – The Rev 1 recommendation has generally been addressed. Additional detail has been provided in Section 4.3.		

TIMELINESS

The organization shall report information on a regular schedule and make it available in time for information users to make decisions.

ID	*Review finding*	*Recommendation*	*Rev 3 (Oct 2024) Findings*
G1	The USC Sustainability Report is required to be published on the Project (or organisation) website by no later than 6 months after the end of the reporting period to meet the requirements of Lea 1 DL and AB 2.2 where reporting performance against its sustainability Targets (DL and ABL 1.1 and 2.1) The reporting period is from 26 April 2023 to 26 April 2024.	• USC must publish the sustainability report no later than the 26 October 2024.	*Submitting the Sustainability Report by the Due date will ensure the Lea-1 DL and AB 3.2 requirements of the ISv2.1 technical manual are met.*
	Rev 2 – USC understands the Rev 1 recommendation.		

VERIFIABLE

The organisation shall gather, record, compile, and analyse information in such a way that the information can be examined to establish its quality.

ID	Review finding	Recommendation	Rev 3 (Oct 2024) Findings
H1	In accordance with Lea 1 DL and AB 3.2, the USC Sustainability Report has been independently reviewed by a suitably qualified professional (SQP), and this report and its findings confirm whether this verifiable principle is achieved.	• USC to consider the recommendations in this report and retain evidence to confirm that the feedback was addressed (where applicable).	*This supplementary report confirms that USC has considered the recommendations detailed in the report dated 14 August 2024, and relevant amendments have been made to the USC Sustainability Report Rev 3 (Oct 2024).*
	Rev 2 – The Rev 1 recommendation has generally been addressed. USC has updated *USC - JHG - Sust Annual Report - 23_24 - Draft 2 – with GRI revision to address recommendations from the Rev 1 review.*		
H2	It is unclear which GRI standards the project will use and whether all requirements will be reported against them.	• See "Comparability" finding D1.	*See Independent reviewer comments for D1.*
H3	Quantitative data for water, waste, energy and emissions metrics has not been verified for accuracy.	• See "Accuracy" finding A2.	*See Independent reviewer comments for A2.*
H4	The Sustainability Report and GRI Index do not include the required GRI disclosures regarding the "basis of preparation" for the data.	• See "Accuracy" finding A3.	*See Independent reviewer comments for A3.*

Review Conclusion

The inaugural *Upper South Creek – Advanced Water Recycling Centre and Pipelines Sustainability Report 2024* has been prepared to meet the requirements of Lea-1 of the ISv2.1 Technical Manual.

The Independent Reviewer reviewed two versions of the draft Sustainability Report. Relevant findings and recommendations were provided in a report dated 14 August 2024.

The review (third review) of the Sustainability Report (October 2024) confirmed:

- The report identifies the UNSDGs relevant to the project, including potential positive and negative contributions. The UNSDGs have been adequately mapped against the various targets.
- The report details the project's sustainability performance by outlining progress against its Sustainability Targets.
- All recommendations have been incorporated in the draft report.
- the Global Reporting Initiative (GRI) reporting principles have been considered, and the report's content and quality are satisfactory, including reporting of contributions to the Sustainable Development Goals (SDGs).

The data management systems and processes being implemented ensure that the reported data is complete and supported by robust internal QA/QC processes to ensure data quality and integrity.

Since this is the project's first sustainability report, there is no prior year data to enable performance comparisons; however, adopting the GRI framework will enable future comparisons.

USC has demonstrated a commitment to ensuring that the inaugural Sustainability Report considers the GRI Sustainability Reporting Principles; however, future sustainability reports should implement a continuous improvement approach.

Yours sincerely,

Jamie Lees
Independent Reviewer

ATTACHMENT 1 – Jamie Lees CV

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inti

Jamie Lees

Sustainability Specialist

ABOUT ME

Jamie Lees, with 20 years of experience working for and consulting to major resource and infrastructure companies in project, operational, and corporate environmental and sustainability roles, is a highly accomplished senior leader in the mineral resources sector. He has notable expertise in operational roles, project development, environmental approvals, and corporate management. With a dedicated focus on Sustainability and Environmental, Social, and Governance (ESG) performance, Jamie boasts a commendable track record of creating frameworks, policies, and procedures that seamlessly align with both business and environmental objectives.

AREAS OF EXPERTISE

- Environmental Approvals
- Operational Environmental Management
- Compliance Management
- Environmental Risk Assessment
- Project Management
- Rehabilitation & Mine Closure Planning
- Closure Liability Assessment
- Sustainability & ESG
- Stakeholder & Community Engagement

QUALIFICATIONS

- Bachelor of Applied Science
- Associate Diploma of Applied Finance & Investment, Securities
- Cert IV Assessment and Workplace Training

CERTIFICATION

- Environmental Institute Australia & New Zealand (EIANZ)
- Certified Infrastructure Sustainability Accredited Professional (ISAP)
- Community Justice Services (Commissioner for Declarations) (Justice of the Peace – Qualified)

EXPERIENCE

- Infrastructure sustainabilty management – ISP reviews and audits.
- Environmental compliance & sustainability auditing .
- ESG standards assurance e.g. RGMP, CopperMark, GRI
- Developing and implementing environmental management systems.
- Environmental risk management and governance.
- Climate change risk assessments.
- Expertise in leading and delivering complex major projects.
- Sustainability and regulatory reporting, e.g., NPI & NGERS.
- Experienced in operational and corporate environmental and sustainability management.
- Technical experience in environmental impact assessments and managing water (surface and groundwater), greenhouse gas emissions, air/noise, ecology/offsets, and cultural heritage.
- Environmental permitting and regulatory compliance management for major projects.
- Environmental M&A due diligence assessments.

INTERESTS

Camping | Food | Rugby

ATTACHMENT 2 – ISAP Certification

CERTIFICATE
OF ACCREDITATION

Infrastructure Sustainability Council

This is to certify that

Jamie Lees

has completed **ISAP Renewal FY25** with the **Infrastructure Sustainability Council** and is recognised as an **Infrastructure Sustainability Accredited Professional.**

ACCREDITATION VALID FOR 12 MONTHS FROM

Patrick Hastings
Chief Executive Officer

ATTACHMENT 3 – Memorandum of Understanding (MOU) - Independence

MOU: ISP – JAMIE LEES

Upper South Creek – Independent SQP Review of Lea-1

June 2023

Ref Number: 01

table of contents

MEMORANDUM OF UNDERSTANDING

1 Purpose

This Memorandum of Understanding (MOU) has been prepared to demonstrate independence of the individual nominated as Suitably Qualified Professional (SQP).

The nomination and establishment of an SQP will enable the Project to deliver Infrastructure Sustainability (IS) Design and As Built Ratings using IS the version 2.1 rating tool. Under the version 2.1 credit Lea-1 - Integrating Sustainability, Design Level (DL) 2.1 and As-Built Level (ABL) 2.1 credit criteria, the project must:

- Publicly report on its sustainability performance annually (e.g. on the project or organisation website), outlining performance against its material sustainability targets, no later than six months after the end of the reporting period.
- Map sustainability performance against the 17 UN Sustainable Development Goals (where material), demonstrating how the project has positively or negatively contributed to the achievement of the SDGs.

To fulfill the Lea-1 DL 3.2 and ABL 3.2 criteria, the annual project's sustainability performance reporting must be independently reviewed by a SQP, specifically:

- The reviewer must consider the principles of sustainability reporting for the Global Reporting Initiative (GRI) or the International Integrated Reporting (IIR) Frameworks in their assessment of the report and indicate they are satisfied with the content and quality of what is being reported, including reporting of contribution to the SDGs.
- The reviewer must consider if the project has shown that feedback raised in the review has been addressed.
- A Suitably Qualified Professional has at least 7 years' experience in sustainability, including experience in sustainability performance reporting and reporting principles.
- The independent reviewer needs to be independent from the project itself but can be a SQP from the proponent (client) organisation or a third party.

The nature of the Independent SQP role may be expanded upon to provide other external audit or support roles which do not compromise the independent nature of this role (and where agreed with ISC) and where it adds value to the Project team.

It is understood that this MOU will also be used as evidence to be included in the Project's Design and As-Built IS Rating submissions relating to the achievement of IS Lea-1 requirements.

2 Nominated ISP

The following sustainability professional is nominated as the Independent SQP for the project listed:

NAME	COMPANY	ROLE	PROJECT
Jamie Lees	Inti APAC Pty Ltd	Environment & Sustainability Specialist	Upper South Creek

TABLE 1: INDEPENDENT SUSTAINABILITY PROFESSIONAL

3 Demonstration of independence

To demonstrate the independence of the nominated SQP from all project activities, Upper South Creek – Infrastruture Projects, ensure completion of a formal IS Rating Independent Sustainability Professional Checklist. This checklist can be seen in Section 4.

4 Qualifications

In undertaking this role, the Independent SQP confirms their credentials satisfy the minimum requirements for undertaking the ISP's role consistent with the criteria detailed in the IS Rating Technical Manual (IS Technical Manual v2.1, Lea-1) as listed below. This information is supported by a Curriculum Vitae and other supporting evidence addressing qualifications of the nominated Independent SQP (refer to Section 5 below).

ISC 'INDEPENDENT SUSTAINABILITY PROFESSIONAL' ROLE REQUIREMENTS	SUMMARY STATEMENT AND SUPPORTING EVIDENCE TO DEMONSTRATE COMPLIANCE
Qualifications in an environmental, social or economic field	Bachelor of Applied Science Associate Diploma of Applied Finance & Investment, Securities Cert IV Assessment and Workplace Training Certified Infrastructure Sustainability Accredited Professional (ISAP)
At least 10 years' experience practicing in one or more of these fields	Jamie Lees, has 20 years' experience working for, and consulting to major resource and infrastructure companies in project, operational and corporate environmental and sustainability roles. Jamie is a certified Infrastructure Sustainability Accredited Professional

	(ISAP) who has extensive experience in environmental management and approvals, stakeholder engagement, compliance management, auditing and governance frameworks for major projects. (Refer CV)
At least 7 years' experience in sustainability, including experience in sustainability performance reporting and reporting principles.	Jamie Lees has over 20 years of experience providing sustainability advice and support, including on a number of Infrastructure and Resources projects across a range of sectors (refer CV for more information).
Be independent and have no vested interest in the project	Jamie Lees is independenent and has no vested interest in the project. Jamie Lees is employed by Inti APAC Pty Ltd and has had no direct involvement with the project listed above.
Must not work directly on the project	Jmaie Lees does not work directly on project. Jamie Lees is employed by Inti APAC Pty Ltd and has had no direct involvement with the project listed above.
The person must be engaged to act independently of the project.	This letter confirms the engagement of services to act independently of the project.

TABLE 2: DEMONSTRATION OF COMPLIANCE

5 Deliverables

The following are key deliverables:

- Provide an annual assessment report outlining satisfaction, gaps and recommendations for improvement against the principles of sustainability reporting (GRI), mapping against, and contribution to the SDGs
- Assess whether feedback/recommendations raised in the annual assessment have been addressed by the project (from the second report onwards)

6 Attachments

The following documents are attached regarding the qualifications of the nominated ISP:

- Current CV
- Infrastructure Sustainability Accredited Professional (ISAP) Certificate

7 Signatures

	NAME	COMPANY	POSITION	SIGNATURE
Nominated SQP	Jamie Lees	Inti APAC Pty Ltd	Environment & Sustainability Specialist	
Project Sustainability Representative	Mark Trethew	John Holland - Upper South Creek	Sustainability Manager	

TABLE 3: SIGNATURES OF PROPONENTS

Attachments

ATTACHMENT 1 – Jamie Lees CV

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inti

Jamie Lees

Sustainability Specialist

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- Climate change risk assessments.
- Expertise in leading and delivering complex major projects.
- Sustainability and regulatory reporting, e.g., NPI & NGERS.
- Experienced in operational and corporate environmental and sustainability management.
- Technical experience in environmental impact assessments and managing water (surface and groundwater), greenhouse gas emissions, air/noise, ecology/offsets, and cultural heritage.
- Environmental permitting and regulatory compliance management for major projects.
- Environmental M&A due diligence assessments.

INTERESTS

Camping

Food

Rugby

ATTACHMENT 2 – ISAP Certification

CERTIFICATE OF ACCREDITATION

Infrastructure Sustainability Council

This is to certify that

Jamie Lees

has completed
ISAP Renewal IS v1.2 D&AB ONLY
with the **Infrastructure Sustainability Council** and is recognised as an **Infrastructure Sustainability Accredited Professional.**

ACCREDITATION VALID FOR 12 MONTHS FROM

10 July 2023

Ainsley Simpson
Chief Executive Officer

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Grow, Growth, Generate