



Independent DPE Compliance Audit

SSI-8609189 – Upper South Creek Advanced Water Recycling Centre

Trigalana Environmental Pty Ltd
12 January 2024

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Executive Summary

Trigalana Environmental Pty Ltd has been engaged by Sydney Water Corporation (SWC) to undertake an Independent Environmental Audit (IEA) of the Upper South Creek Water Recycling Centre, Project. The Project involves the construction and operation of an Advanced Water Recycling Centre (AWRC) at Kemps Creek, approximately 17 km treated water treated water pipeline from the AWRC to the Nepean River and approximately 24 km of pipeline for the transmission of brine from the AWRC to the sewage reticulation system at Lansdowne. SWC are the proponent, John Holland Group (JHG) are the construction contractor.

Infrastructure Approval (SSI 8609189) covers both the construction and operational phases of the Project and requires IEA's to be undertaken in accordance with the Department of Planning and Environments (DPE) Independent Post Approval Requirements (2020).

This initial audit covers the period from the commencement of work on 20 February 2023 until the 6th of November 2022. The audit included a site inspection, consultation with Project stakeholders and a review of management plans, documents, and management records.

The site inspection was undertaken on 6th of November 2023 with members of SWC and JHG present.

The findings of the audit are:

- Construction activities undertaken at the time of the audit include final establishment works at the AWRC site, excavation, and installation of both the brine and treated water pipelines, excavation using Horizontal Directional Drilling (HDD) and conventional trenching methods and establishment of construction ancillary facilities
- Key environmental issues including erosion and sediment control, dust, traffic, heritage, biodiversity, noise and vibration are being managed effectively and in accordance with the approved Construction Environmental Management Plan (CEMP) and specialist subplans
- A total of seven complaints have been received during the audit period, appropriate actions have been taken by SWC/JHG to address each complaint.
- Independent appointments including the Environmental Representative (ER) and the Acoustics Advisor (AA) are performing their respective roles in accordance with the Conditions of Approval
- The environmental impacts observed during the audit are within the predictions made in the EIS, work was observed to be within the EIS Project boundary
- One non-compliance relating to the provision of relevant information on the project website was identified by the auditor (SWC had self-reported one non-compliance during the audit period relating to the use of ungazetted local roads.
- Two recommendations are made to ensure the ongoing compliance with the conditions of approval.

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

1 Introduction

1.1 Project overview

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

- A new Advanced Water Recycling Centre (AWRC) to collect and treat wastewater from businesses and homes
- The production of high-quality treated water, renewable energy and biosolids for beneficial reuse
- A new green space area around the AWRC, adjacent to South Creek and Kemps Creek, to support the ongoing development of a green spine through Western Sydney
- New infrastructure from the AWRC to South Creek, to release excess treated water during significant wet weather events, estimated to occur between 3 – 14 days per annum
- A new treated water pipeline from the AWRC to Nepean River at Wallacia Weir, to release high-quality treated water to the river during normal weather conditions
- A new brine pipeline from the AWRC connecting into Sydney Water's existing wastewater system to transport brine to the Malabar Wastewater Treatment Plant
- A range of ancillary infrastructure.

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

1.2 Project Approval

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

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

- **Modification 1 (26 May 2023)** – to removal of the 4.5km environmental flows pipeline from the Project approval. This includes removing the trenched and tunnelled sections of pipeline and release structure at Warragamba River
- **Modification 2 – (10 October 2023)** realignments of the treated water and brine pipelines and relocation of the flow, splitter structure and/valve station.

1.3 Supplementary Approvals and Licences

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

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

1.4 Construction Activities

Pre-construction (low impact works) commenced on the 20th of February 2023 with full construction commencing on the 28th of August 2023. Table 1 describes the pipeline construction phases and key activities.

Table 1: Pipeline Construction Phases and Key Activities

Phase	Key Activities
Phase 1 – Site Establishment	• Low impact works at the AWRC site including geotechnical and utility investigations, contamination testing and heritage salvage works • Removal of existing structures (AWRC) • Install traffic control and delineate site • Traffic control • Ancillary construction works such as roads, site compounds and fencing • Plant and equipment delivery • Clearing.
Phase 2 – Excavation	• Excavate trenches, drilling pits (trenchless construction) and install shoring • Dewater excavation • Waste disposal.
Phase 3 – Pipe Installation	• Pipe delivery and placement of the section of the pipes near the trench in a line (pipe stringing) • Field blending of pipe • Welding of each section of pipe together into one continuous length • Pipe lowering into trench • Pulling pipe through bore (trenchless construction) • Backfilling • Inspection and test of pipes.
Phase 4- Commissioning	• Pipe pressure testing and disinfection • Discharging commissioning wastewater.
Phase 5 – Landscaping and restoration	• Topsoil placement and restoration.

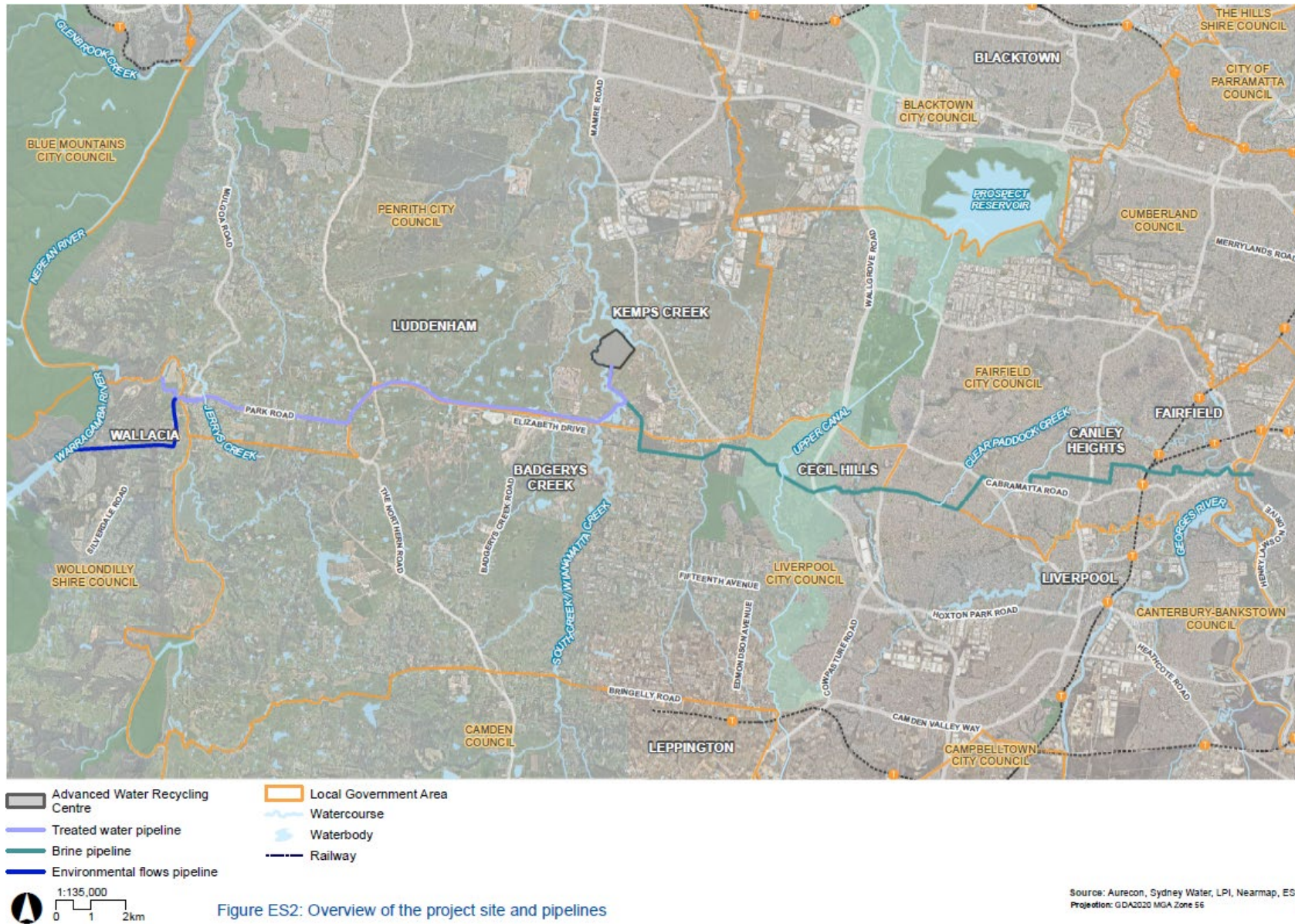


Figure 1: Project Location as described in the EIS

1.5 Auditor

Trigalana Environmental Pty Ltd has been appointed to undertake this independent environmental audit. The Auditor was approved by the Department of Planning and Environment in accordance with condition A38. Details of the Auditor are provided in Table 2.

Table 2: Auditor Details

Name	Qualifications	Key Experience
Richard Peterson	B. E Civil M. Environmental Management Management Systems Auditing Leading Management Systems Audit teams Exemplar Global Lead Auditor	25 years of environmental management experience in the infrastructure sector. Have undertaken over 100 audits including independent DPE audits for major infrastructure Projects including: • EnergyConnect - Western • Crudine Ridge Windfarm • Sapphire Windfarm • Rye Park Windfarm • Albion Park Bypass • Walla Walla Solar Farm • Warrell Creek to Nambucca Heads • Northern Road upgrade • Tweed Valley Hospital • Windsor Bridge.

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

1.6 Audit Objectives

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

1.7 Audit Scope and Period

This audit has been undertaken in accordance with Condition A37 of the Ministers Conditions of approval as outlined in Table 3.

Table 3: Independent Audit – Requirements

Condition Reference	Condition	Comment
A37	Independent Audits of Stage 1 of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020)	This audit was undertaken on 6 th of November 2023 within three months of the commencement of construction and in accordance with the Independent Audit PAR

This is the initial for the Project. This audit covers the period from the commencement of work on 20 February 2023 to the audit site inspection on the 6th of November 2023.

2 Audit Methodology

2.1 Scope Development

The audit scope was developed in consideration of:

- The NSW Department of Environment Independent Audit Post Approval Requirements (May 2020)
- Project Conditions of Approval (SSI 8609189) as modified, dated 10 October 2023
- Stakeholder feedback from relevant government stakeholders including:
 - Department of Planning and Environment
 - Environment Protection Authority
 - Heritage NSW
 - Local Councils
 - Transport for NSW.

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

2.2 Stakeholder Consultation – Key Issues

In undertaking the audit, key issues raised by the government agencies groups that are relevant to the audit are summarised in Section 3.6.

2.3 Summary of Audit Processes

To complete the audit, the following was undertaken:

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

2.4 Opening Meeting

An opening meeting was held on 6th of November 2023 where the Auditor provided an overview of the audit process and confirmed the agenda for the audit.

2.5 Site Inspection

A site inspection was undertaken on Monday 6th of November 2023.

The Project was in early stages of development with activities undertaken at the time of the audit including:

- Final establishment works for the AWRC Site
- Establishment and operation of temporary construction compounds
- Construction of both the brine and treated water pipelines including establishment of traffic control systems, HDD activities, open trenching works and pipe installation
- Progressive implementation and maintenance of environmental controls, internal access roads, fencing etc.

Observations made during the site inspection are presented in Table 4. A photographic record of observations made during the site inspection are provided in Appendix D.

Table 4: Site inspection observations

Issue	Observations	Photographs (refer to Appendix D)
General Construction	General construction activities observed to be undertaken at the time of the audit inspection include: • Final establishment work for the AWRC site and the associated construction compound/laydown area • Ground engineering and piling at the AWRC site • Establishment of temporary site compounds and laydown areas • Establishment of HDD sites and undertaking directional drilling • Trench excavation and shoring • Clearing and grubbing • Installation of environmental and traffic controls.	1-8
Soil, Water and Dust Management	Measures to control soil, water and dust observed during the audit site inspection include: • High efficiency sediment basin at the AWRC • Sediment fences, rock checks, bunds, jute mesh, polymer spray and mulch • Retained vegetation, progressive rehabilitation and mulch groundcover cover to minimise erosion risk • Extended paved access road with wheel wash to prevent mud tracking • Geofabric covered soil stockpiles • Vehicle speed restrictions, stabilised site access, sealed internal access roads, water cart and street sweeper. There was no dust, mud tracking or evidence of water pollution observed during the audit site inspection.	9-18
Ecology	Measures to minimise ecological impacts observed during the site inspection include: • No go signage and perimeter fencing • Tree protection zones surrounding the dripline of protected trees. • Retention of trees and vegetation for reuse.	19-22
Traffic Management	Measures to minimise traffic/pedestrian impacts observed during the site inspection included: • Traffic control supervision • Restricted work zones • Traffic boom gates • Community notifications for changed parking arrangements. • Alternate pedestrian access routes (with advisory signage) • General traffic information signage.	23-26
Noise and Vibration	Measures to minimise noise and vibration impacts observed during the site inspection included: • Realtime noise monitor • Acoustic blankets.	27-28
Chemical Storage, Waste	Measures to minimise chemical and fuel spills and ensure the appropriate storage and disposal of waste observed during the audit include: • Appropriate storage of chemical and fuel containers, there were no waste containers located on site and no evidence of spilt material such as soil staining • Spill kits for oil and fuel were in a readily accessible location • Covered and secured waste storage and recycling bins.	29-32

2.6 Document Review

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

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

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

2.7 Closing Meeting

The closing meeting was held on 8th of January 2024 where a summary of the audit findings was provided, noting areas of good practice and recommendations for improvement.

2.8 Compliance Descriptors

The compliance status of each condition was determined using the relevant descriptors in and as described in the DPE 2020 Auditing Post Approval Requirement and summarised in Table 5.

Table 5 - Compliance Descriptors

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

2.9 Risk Assessment

Following the assessment of compliance, the risk levels of any non - compliance was undertaken in accordance with the risk assessment framework described in Table 6.

Table 6 - Risk Assessment Framework

Risk Level	Description
Critical	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Major	Non-compliance with: • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences but is likely to occur.
Minor	Non-compliance with: • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences but is likely to occur.
Minor - Administrative	Only to be applied where the non-compliance does not result in any risk of environmental harm and is generally for administrative non compliances

3 Audit Findings

3.1 Compliance Performance

A summary of compliance performance is provided in Table 7.

Table 7: Compliance summary

Section	Number of Conditions	Compliant	Non-Compliant	Not Triggered	Noted
A	48	33	0	12	3
B	12	10	1	1	-
C	18	17	0	1	-
D	4	0	0	4	-
E	137	61	1	75	1
Total	219	121	2	93	4

In summary, all conditions of approval have been complied with except for two conditions. As noted in Table 8, these are assessed as administrative non compliances with no off-site environmental impacts.

Table 8: Non compliances observations and recommendations

Condition No	Details of Condition	Finding	Recommendation	Risk Level
Non-Compliances and observations identified by the auditor				
B12	A website or webpage providing information in relation to Stage 1 of the CSSI must be established before commencement of Work and be maintained for the duration of construction, and for a minimum of 24 months following the completion of construction of Stage 1 of the CSSI. The following up-to-date information (excluding confidential, private, commercial information or any other information that the Planning Secretary has approved to be excluded) must be published before the relevant Work commences and maintained on the website or dedicated pages including.....: (d) a copy of each statutory approval, licence or permit required and obtained in relation to Stage 1 of the CSSI; (e) a copy of the current version of each document required under the terms of this approval; and.....	The website includes most of the information as required by this condition, however, does not include the following: • Environment Protection Licence • Commonwealth Controlled Activity Approval (EPBC 2020/8816) • Staging Report	Update and maintain the website to ensure all relevant documents as required by the Approval are provided on the Project website.	Minor administrative
E12/E13	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities, threatened species and their habitat. Impacts to plant community types and species credit species must not exceed those identified in Table 5 and Table 6.	The Project is in its early stages of construction with minimal clearing undertaken to date. The Project has an established pre-clearing process which is overseen by the Project ecologist (Biosis) whose role is to advise and report on clearing limits. The initial ecologists report had not been finalised at the time of the audit inspection.	As part of the ecologist's report, it is recommended a schedule is developed and included in each report so that the limits prescribed by Tables 5 and 6 are reported on so compliance can be tracked on an ongoing basis and any corrective actions implemented, should there be a risk of exceeding the limits.	Observation
A47	Heavy vehicles used for spoil haulage must be clearly marked on the sides and rear with the Project name and CSSI application number to enable immediate identification by a person viewing the heavy vehicle. No more than one set of Project markings can be displayed on a heavy vehicle at any point of time.	Sufficient evidence was provided to demonstrate the spoil trucks have the appropriate identification labels in place. During the site inspection three vehicles were observed to have Parramatta Rail Link labels attached. None of the vehicles were observed to be hauling spoil.	Remove the labels relating to other Projects when they are working on the Upper South Creek AWRC Project.	Observation

Condition No	Details of Condition	Finding	Recommendation	Risk Level
Non-Compliances identified and reported by SWC				
E95	Local roads that are proposed to be used by heavy vehicles (for the purposes of Stage 1 of the CSSI) that are immediately adjacent to the construction boundary and ancillary facilities, and that are not identified for use by heavy vehicles in the documents listed in Condition A1, must be approved by the Planning Secretary as part of the Traffic and Transport Management CEMP Sub-plan.	SWC self-reported a noncompliance for the incorrect use of a recently gazetted local road previously assessed under the EIS.	Appropriate actions have been identified and implemented with no further recommendations made at this time.	Minor administrative

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

No agency notices, orders, penalty notices or prosecutions have been issued to the Project to date.

3.3 Community Complaints

During the audit period, a total of seven community complaints were received and recorded in the complaints register. A summary of the complaints is summarised in Table 9 with the actions taken. The Auditor reviewed the details of each complaint, the actions taken and any further information and comments in relation to each complaint. The Auditor considers the actions taken and communications with each complainant to be appropriate. At the time of the audit, all complaints had been noted as resolved.

The complaints are summarised in Table 9.

Table 9: Complaints Summary

Date of Complaint	Details of Complaint	Actions Taken
26/9/23	Complainant stated that SWC must request approval to use the access road that is partially owned by the complainant and must pay the complainant compensation for the easement for the pipeline to be installed on his road.	The complainant was advised that they did not own the right of way access and are therefore ineligible for compensation for the easement. The complainant was provided with some information on construction staging and a commitment was given to keep them informed regarding work along the road and forewarning of when they would cross his gate access.
6/10/23	Complaint stated they had observed a member of the construction team jumping the front fence and walking around their property spraying surveyors' paint. The complainant approached the individual and requested why they were on their property. The worker confirmed they were marking the location of a utility.	An apology was made to the complainant and noted that if access to a property is needed for surveying, the worker is required to knock on the door, explain the work and request permission to access. A commitment to speak to the team regarding the event was made with a further update to the complainant.
17/10/23	Complainant stated they had not received notification about the work commencing on the property they lease. The complainant approached the work crew stating they know nothing about the site mobilisation and telephoned the community information line	Communications with the complainant had occurred on two occasions (by email) to provide information and to arrange a site meeting to explain the work. These opportunities to engage with the Project team had been refused by the complainant.
17/10/23	Complainant stated they had been delayed by nearby traffic changes on Montgomery Road by approximately 5 minutes when returning to their property on Brown Road. Complainant had stated that they were not notified of the works and that it was an inconvenience for their family.	The work and traffic changes were notified in the October 2023 standard hours notification which was distributed to the Bonnyrigg area. The complainant was contacted by telephone and advised of the movement of traffic controls and the progress of work, investigations, and pipeline installation works. The complainant was advised to allow extra time for travel while work is being undertaken in the area and committed was made to provide further updates regarding works progress.
19/10/23	The complainant was unable to access their property due to their property padlock being excluded from the daisy chain. The complainant advised they would be withdrawing their consent for SWC to enter the property to conduct the works	An apology was made to the complainant noting that it was an error by an individual and not a deliberate action. A gift card was offered as a gesture of goodwill. The landowner has consented to the continuation of work on the complainant's property.

Date of Complaint	Details of Complaint	Actions Taken
24/10/23	The complainant emailed Sydney Water and described two traffic control vehicles parked side by side impeding traffic travelling westbound on High Street	Site diaries were reviewed, and the relevant work crew were interviewed. The work crew did not recall the incident. During pre-starts, workers were reminded to drive with courtesy.
24/10/23	Complainant explained horse had been startled by electric fence along the construction corridor and as a result was injured by a nearby barbed wire fence	The property owner was contacted, and it was agreed that the electric fence would be replaced by ATF and vet bills would be re-imbursed.

3.4 Actions from previous audits

There are no actions from previous audits as this is the initial independent audit undertaken for the Project.

3.5 Adequacy of Environmental Management Plans

The management plans implemented for this construction phase have been prepared by suitably qualified personnel, endorsed by the independent Environmental Representative, and approved by the Department of Planning and Environment following consultation with relevant stakeholders. The plans meet the conditions of approval and other relevant legislative requirements. The management plans are adequate for the current scope of work and were observed to be implemented effectively in the field.

3.6 Stakeholder Consultation Outcomes

Issues raised by project stakeholders that were consulted with prior to undertaking the audit are summarised in Table 10 below with the auditor's response to each issue.

Table 10: Key stakeholder issues and auditor response

Organisation	Key Issues/Comments	Auditor Response
Fairfield City Council	Significant impacts on a range of Council assets and operations provided by Council including the local road network, stormwater assets, public open space, council car parks, community facilities, activities and services relying on these assets.	Noted. Appropriate management plans and controls are being implemented by SWC and JHG to mitigate these impacts
	Reinstatement of various assets/facilities to Council's requirements, including mitigating impacts on Council operations	Noted. Appropriate management plans and controls are being implemented by SWC and JHG to mitigate these impacts
	The route of the pipeline also has the potential to generate numerous impacts/hardship for numerous private landowners and businesses across the City	Noted
	Council would be interested in gaining a better understanding of the approach to be followed under the audit process to effectively address both Council and private landowner issues.	Noted. A copy of the DPE audit guideline was provided to Council by the Auditor through the audit consultation process. SWC are in regular contact with Council and can respond to any specific questions regarding the audit process
Heritage NSW	Compliance with the Heritage Conditions of Approval, the Heritage Construction Environmental Management (CEMP) Sub-plan, and the commitments in the Aboriginal Cultural Heritage Assessment Report (ACHAR).	- Appropriate documented evidence was provided to the Auditor to demonstrate effective implementation of these documents - No unexpected finds have been reported. - No incidents relating to Aboriginal Heritage were reported during the audit period.
	Heritage NSW has no specific issues in relation to Aboriginal cultural heritage or Environmental Heritage.	Noted
NSW EPA	Air quality impacts particularly the management and monitoring of dust generation and the effectiveness of dust suppression measures	Appropriate measures installed to minimise the generation of dust including water carts and progressive rehabilitation.

Organisation	Key Issues/Comments	Auditor Response
		No incidents or complaints relating to air quality were reported during the audit period.
	Adequacy of and compliance with surface water controls to prevent discharge	Appropriate erosion and sediment controls were implemented on all sites with no water observed to be leaving the site during the audit site inspection. There were no water or pollution related incidents reported during the audit period.
	Compliance with noise limits and mitigation strategies	- Mitigation measures observed during the site inspection included the use of non-tonal reversing beepers (quackers) - Extensive mitigation strategies are documented in the construction management plans with extensive review and oversight provided by the independent Acoustics Advisor - Monitoring is undertaken for noise with management strategies implemented.
Transport for NSW (M12)	Sediment impacted water leaving your site towards our boundary and releasing to South Creek within our COA monitoring area	Appropriate erosion and sediment controls were implemented on all sites with no water observed to be leaving the site during the audit site inspection. There were no water or pollution related incidents reported during the audit period.
	Site access road interface between where Sydney water REF and M12 EIS meet	No site access issues or obstructions to site access were observed during the audit site inspection or reported during the audit period.
	Dust controls for relevant construction stages	Appropriate dust controls were observed during the audit site inspection including the provision of groundcover, speed restrictions, stabilised site access water carts and road sweeper to remove accumulated sediment. No dust related incidents or complaints have been recorded during the audit period.
	Road surface conditions for Clifton Ave	No issues with road surface conditions identified by the audit for Clifton Avenue due to the project works. The auditor notes that Clifton Avenue is a shared access roads to several construction projects.

Organisation	Key Issues/Comments	Auditor Response
	Resolution of community complaints where each Project may have a role in resolving	The Project has received a total of seven complaints. All complaints have been resolved. None of the complaints received required any input from TfNSW.

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

An assessment of construction impacts against those predicted in the Environmental Impact Statement prepared by SWC (September 2021) is provided in Table 11.

Table 11: Comparison with EIS Predictions

Category	EIS Prediction (Summary)	
Water Quality	- Direct impacts on waterways (where construction activities are required for pipeline crossings and release structures) - Indirect impacts from potential erosion and sedimentation. - Impacts are not expected to be significant and can be effectively mitigated through standard management measures for erosion and sediment control - Some waterways will be crossed using tunnelling methods which will minimise impacts	- No direct or indirect surface water impacts have been identified during the audit period. - Erosion and sediment controls installed and maintained to prevent offsite impact - Waterway crossings using HDD methods minimise and avoid impacts - It may be reasonably concluded that the water quality impacts of the Project to date are within the predictions documented in the EIS.
Terrestrial Biodiversity	- Removal of up to 13.77 ha of native vegetation. - Seven individual threatened plants will be removed as a result of the Project. - A range of management measures will be implemented to minimise biodiversity impacts including pre-clearance surveys, delineating no-go zones to protect vegetation and Upper South Creek - Sydney Water will also implement a Biodiversity Offset Strategy to offset residual impacts	- At this stage of the project, minimal clearing has been undertaken. Further assessment will need to be undertaken during future audits to assess compliance with the project clearing limits. - SWC noted that post clearing reports will be prepared for various sections of the clearing undertaken. Clearing is strictly managed to ensure it does not exceed conditional limits and there is no impact beyond the EIS assessed impact area, unless subject to additional assessment.
Flooding	- The Project will have a negligible impact on flood behaviour and downstream flooding and will not result in detrimental impacts to other developments or land. - Small potential impact on flooding where construction activities encroach on flood-prone land on South Creek, Nepean River and other waterways. - Construction activities on flood-prone land may change local flooding characteristics, displacing floodwaters and causing downstream flood levels to increase. Flooding has the potential to impact construction activities by creating hazardous working conditions, and displacing temporary buildings, equipment or materials.	- No incidents or complaints relating to flooding have been identified during the audit period - It may be reasonably concluded that the flooding impacts of the Project to date are within the predictions documented in the EIS.
Air Quality	Dust may be generated, for short periods of time, from earthworks at the AWRC site and along the pipeline alignments. Standard construction management measures for dust control can effectively manage these impacts	- Appropriate measures installed to minimise the generation of dust including water carts, streetsweeper, speed control, progressive rehabilitation groundcover and application of a soil binder - No incidents or complaints relating to air quality were reported during the audit period

Category	EIS Prediction (Summary)	
Noise and Vibration	- Noise management levels likely to be exceeded at six sensitive receivers, but only when worst-case noise generation and propagation scenarios are considered. This will be reduced (by up to 10 dBA) with management measures. - Noise impacts from pipeline construction are typically short-term for individual receivers as the construction process involves activities moving along the pipeline alignment. - The significance of impacts during construction will be greatest where work is required outside of standard construction hours (such as the environmental flows pipeline and along the brine pipeline alignment), where sensitive receivers are located within 100 m of construction activities, and where construction activities are required for extended periods.	- It may be reasonably concluded that the air quality impacts of the Project to date are within the predictions documented in the EIS. - No noise or vibration related complaints have been received during the audit period - Acoustic Advisor oversees the implementation of noise controls, management plans and reviews OOH work applications - Temporary acoustic barriers installed to reduce noise impacts - Assessment and approvals for any OOH works undertaken - It may be reasonably concluded that the noise and vibration impacts of the Project to date are within the predictions documented in the EIS.
Visual and Landscape	- Both the pipeline and AWRC components of the Project will have temporary landscape character and visual impacts during construction - character impacts during construction are associated with visible construction activities and machinery and the removal of vegetation, including mature trees. The duration of impacts will be longer in some locations such as the AWRC site and compounds and shorter in others such as pipeline construction areas, where construction moves progressively along the alignment. Depending on the location and its sensitivity, the significance of impacts ranges from negligible to high but these will only be temporary.	- Visual observations made during the audit site inspection are minor, temporary and are consistent with the predictions made in the EIS - No visual and landscape related complaints have been received during the audit period - It may be reasonably concluded that the visual and landscape impacts of the Project to date are within the predictions documented in the EIS.
Construction Traffic	- Majority of construction vehicle movements will be to and from the AWRC site, with vehicle movements between the AWRC and Northern Road at peak times estimated at about 400 light vehicle movements and 300 heavy vehicle movements each day. - Pipeline construction will also generate construction traffic, particularly associated with construction compounds including those required for tunnelling near Bents Basin Road, at Wallacia and in Cabravale Park, Cabramatta. - Construction work for pipelines will also temporarily disrupt active transport (through disruptions to footpaths and cycleways), public transport (through temporary displacement of bus stops) and access to properties and parking in some areas. - Disruptions are typically short-term in any one location as pipeline construction moves along the alignment.	- No traffic impacts exceeding the predictions in the EIS have been identified. - Appropriate traffic control and pedestrian management systems implemented on local roads and residential streets where trenching work occurs - It may be reasonably concluded that the traffic impacts of the Project to date are within the predictions documented in the EIS.
Socio Economic	Communities close to the construction activities, may experience negative socio-economic impacts mainly relating to temporary traffic, access and noise impacts and to some personal property and open space.	- Appropriate management plans, strategies and controls have been implemented to minimise amenity, noise and property access during the construction phase - Only seven community complaints received during the audit period

Category	EIS Prediction (Summary)	
	- These can cause amenity and nuisance issues and reduce social cohesion where they disrupt people's everyday activities. With management measures, most of these negative socio-economic impacts reduce to moderate or low in significance. Construction impacts are unlikely to impact the economic or demographic profile of the suburbs directly affected, or the wider Western Sydney community. - Construction impacts on land use will also be minor, with temporary impacts on land use on portions of some properties while infrastructure is built. The exception is the impact on the AWRC facility site itself, which Sydney Water will acquire from the current landowner	It may be reasonably concluded that the socio-economic impacts of the Project to date are within the predictions documented in the EIS.
Aboriginal Heritage	Some Aboriginal archaeological items will be impacted by Project construction. Project design has avoided all items with high significance and impacts on items with low or moderate significance have been minimised. No further impacts to Aboriginal heritage items and sites are expected during Project operation.	- Known aboriginal heritage artefacts were salvaged prior to ground disturbance in accordance with the Heritage Management Plan - No unexpected finds have been reported - No incidents relating to Aboriginal Heritage were reported during the audit period - It may be reasonably concluded that the aboriginal heritage impacts of the Project to date are within the predictions documented in the EIS.
Non-Aboriginal Heritage	The Project has the potential to create moderate impacts on non-Aboriginal heritage items during construction, particularly the Fleurs Radio Telescope site, the South, Kemps and Badgerys Creek Confluence Weirs Scenic Landscape and the Blaxland Farm. There is minimal potential for impacts during operation	- Non aboriginal heritage investigations and archival recording program was implemented prior to construction in accordance with the heritage management subplan - No impacts to non aboriginal heritage items were observed during the audit reported. - No unexpected finds have been reported - No incidents relating to Non-Aboriginal Heritage were reported during the audit period - It may be reasonably concluded that the non aboriginal heritage impacts of the Project to date are within the predictions documented in the EIS.
World and National Heritage	The Project is not located within the boundary of any World or National heritage-listed items so will not have any direct impacts on any listed items.	- No impacts to World and National Heritage areas were observed during the audit. - It may be reasonably concluded that impacts to World or National heritage listed items are within the predictions documented in the EIS.

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

The original Environmental Assessment and modifications defined the proposed Project boundaries. A review of site maps for the AWRC site, route maps for the pipelines and the Auditor's observations during the site inspection found that the construction works are confined to the approved site boundaries.

3.9 Key Strengths

The key strength identified during the audit are as follows:

- SWC and JHG have engaged a dedicated and experienced team of environmental, approvals, stakeholder engagement, planning specialists and consultants with substantial experience in the delivery of major infrastructure Projects. The team is pro-actively managing compliance with the conditions of approval and were able to demonstrate a systematic and well organised approach to managing site environmental and compliance risks. Information to demonstrate compliance with the conditions of approval was readily available and provided to the Auditor in an organised manner.
- Erosion, sediment control and dust management activities appear to be well planned and implemented with areas of retained groundcover and rehabilitation to prevent sediment or dust generation. An experienced CPESC has been engaged to provide ongoing advice to the team and to periodically review the implementation and maintenance of erosion and sediment controls.

Appendix A DPE Auditor Approval

Our ref: SSI-8609189-PA-36

Your ref: Sydney Water

via Major Projects Portal

21 July 2023

Attention: Ms Cheryl Cahill, Environment Lead, Sydney Water

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

Dear Cheryl

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

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

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

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

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

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

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

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

Yours sincerely,



Alex McGuirk

A/Team Leader Compliance – Government Projects
NSW Planning

As nominee of the Planning Secretary

Appendix B Independent Audit Table

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
A1	The Proponent must carry out Stage 1 of the CSSI in accordance with the terms of this approval and generally in accordance with the: (a) Upper South Creek Advanced Water Recycling Centre Environmental Impact Statement, dated September 2021; (b) Upper South Creek Advanced Water Recycling Centre Submissions Report, dated March 2022; (c) Upper South Creek Advanced Water Recycling Centre Amendment Report, dated March 2022; (d) Upper South Creek Advanced Water Recycling Centre Submissions Report – Project Amendments, dated April 2022; (e) Response to DPE RFI 1, regarding responses to advice received on the Response to Submissions Report (dated, 1 June 2022, 1 July 2022, and 11 July 2022); (f) Response to DPE RFI 2, regarding additional information on Flood Impact Assessment (dated, 11 July 2022). (g) in accordance with modification application SSI-8609189 Mod 1 and supporting documentation (h) in accordance with modification application SSI 8609189-Mod 2 and supporting documentation	Consistency Assessment Register Compliance Tracking Register Project Modifications - (MOD 1 Removal of Environmental Flows Pipeline), MOD 2 (Pipeline Realignments) Audit Interview 6/11/23 Site Inspection 6/11/23	The project is being undertaken generally in accordance with the terms and conditions of this approval and the environmental assessment documentation. Consistency assessments are undertaken and a register is kept up to date with 16 CA's prepared or in draft form. Two Modifications have been approved as follows: - MOD 1 - to remove pipeline and release structure from Warragamba River (26/5/23) - MOD 2 - Pipeline Realignments (10/10/23)	Compliant
A2	Stage 1 of the CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	Documents reviewed as noted in this audit report Compliance Tracking Register Audit Interview 6/11/23 Site Inspection 6/11/23	SWC and JHG were able to demonstrate through the preparation, review, approval and the implementation of the Construction Environmental Management Plan and subplans that the commitments and obligations are being fulfilled. A compliance tracking register has been prepared and is used as a management tool to ensure ongoing compliance with the conditions of approval. Both SWC and JHG have experienced and dedicated teams along with specialist consultants and advisors to implement the management plans in the field.	Compliant
A3	In the event of an inconsistency between: (a) the terms of this approval and any document listed in Condition A1 inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in Condition A1 inclusive, the most recent document will prevail to the extent of the inconsistency. Note: For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.	Audit Interview 6/11/23 Site Inspection 6/11/23	As noted above, consistency assessments are undertaken to ensure all activities are consistent with the terms of approval. No inconsistencies have been identified to date	Compliant
A4	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to: (a) the environmental performance of Stage 1 of the CSSI; (b) any document or correspondence in relation to Stage 1 of the CSSI; (c) any notification given to the Planning Secretary under the terms of this approval; (d) any audit of the construction or operation of Stage 1 of the CSSI; (e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); (f) the carrying out of any additional monitoring or mitigation measures; and (g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.	Audit Interview 6/11/23 Site Inspection 6/11/23	No written directions have been received from the Department to date	Compliant
A5	This approval lapses five years after the date on which it is granted, unless Work has physically commenced on or before that date.	SSI 8609189 Approval dated 10/10/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Noted. The project was approved on the 28/11/22. Work commenced on the 20/2/23	Compliant
A6	The maximum capacity of the AWRC must not exceed an average dry weather flow (ADWF) of 50 megalitres per day (ML/day) under Stage 1.	Audit Interview 6/11/23 Site Inspection 6/11/23	The maximum capacity of Stage 1 of the Development is 35 ML/d and less than the criteria in this condition	Compliant
A7	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of this approval, unless otherwise approved by the Planning Secretary.	Audit Interview 6/11/23 Site Inspection 6/11/23	Noted	Noted
A8	Any document that must be submitted or action taken within a timeframe specified in or under the terms of this approval may be submitted or undertaken within a later timeframe agreed in writing with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident or a non-compliance.	Audit Interview 6/11/23 Site Inspection 6/11/23	Noted	Noted

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
A9	Where the terms of this approval require consultation to be undertaken, evidence of the consultation undertaken must be submitted to the Planning Secretary and ER (as relevant) with the corresponding documentation. The evidence must include: (a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval; (b) a log of the dates of engagement or attempted engagement with the identified party; (c) documentation of the follow-up with the identified party where engagement has not occurred to confirm that they do not wish to engage or have not attempted to engage after repeated invitations; (d) outline of the issues raised by the identified party and how they have been addressed; and (e) a description of the outstanding issues raised by the identified party and the reasons why they have not been addressed.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189)- Approval of Construction Environmental Management Plan, Subplans monitoring programs and Out of Hours Work Protocol dated 8/8/23 Upper South Creek, Advanced Water Recycling Centre and Pipelines CoA9 Consultation Summary Report - Air Quality CEMP Subplan dated 26/5/23 Audit Interview 6/11/23 Site Inspection 6/11/23	DPE Letter of approval notes the management plans have been prepared in consultation with EPA, EHG, DPE Water, DPI Fisheries, Water NSW, SES, TfNSW, Heritage NSW, Penrith City Council, Fairfield City Council, Liverpool City Council, Wollondilly Shire Council and the City of Canterbury Bankstown Council (where required under these conditions. Condition A9 Consultation reports are appended to each subplan	Compliant
A10	Stage 1 of the CSSI may be constructed and operated in stages (including but not limited to temporal, location or activity based staging). Where staged construction and/or operation is proposed, a Staging Report (for either or both construction and operation as the case may be) must be prepared. The Staging Report must be endorsed by the ER and then submitted to the Planning Secretary for information no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation). Note: Unless otherwise specified in this approval, early works are a stage of construction.	Upper South Creek Advanced Water Recycling Centre and Pipelines Project - Stage 1 Staging Report Rev 2 dated 8/6/23 Letter from BB Enviro to Sydney Water titled "SSI 8609189 - Upper South Creek Advanced Water Recycling Centre (Environmental Representative (ER Endorsement) of the Stage 1 Staging Report 13 June 2023 DPE Post Approval form reference 20230613231227 Audit Interview 6/11/23 Site Inspection 6/11/23	The Staging report was submitted to the Department on 13th of June 2023 following endorsement by the Environmental Representative and within the timeframe required by this condition.	Compliant
A11	The Staging Report must: (a) if staged construction is proposed, set out how the construction of the whole of Stage 1 of the CSSI will be staged, including details of Work and activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; (b) if staged operation is proposed, set out how the operation of the whole of Stage 1 of the CSSI will be staged, including details of activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant); (c) specify how compliance with conditions will be achieved across and between each of the stages of Stage 1 of the CSSI; and (d) set out mechanisms for managing any cumulative impacts arising from the proposed staging. Note: A Staging Report may reflect the staged construction and operation of Stage 1 of the project through geographical activities, temporal activities or activity-based contracting and staging.	Upper South Creek Advanced Water Recycling Centre and Pipelines Project - Stage 1 Staging Report Rev 2 dated 8/6/23 Letter from BB Enviro to Sydney Water titled "SSI 8609189 - Upper South Creek Advanced Water Recycling Centre (Environmental Representative (ER Endorsement) of the Stage 1 Staging Report 13 June 2023 DPE Post Approval form reference 20230613231227 Audit Interview 6/11/23 Site Inspection 6/11/23	The Staging report contains this information and was endorsed by the Environmental Representative. The Staging report notes that Construction of the Project will largely be constructed in 1 Stage to include: - Advanced Water Recycling Centre (AWRC) - Infrastructure from the AWRC to South Creek, to release excess treated water during significant wet weather events - A treated water pipeline from the AWRC to the Nepean River at Wallacia Weir, to release high-quality treated water - A brine pipeline from the AWRC connecting into Sydney Water's existing wastewater system to transport brine to the Malabar Wastewater Treatment Plant.	Compliant
A12	Where staging is proposed, Stage 1 of the CSSI must be staged in accordance with the Staging Report.	Audit Interview 6/11/23 Site Inspection 6/11/23	Construction works observed during the site inspection were consistent with those described in the staging report as noted above	Compliant
A13	Where staging is proposed, the terms of this approval that apply or are relevant to the Work or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	Audit Interview 6/11/23 Site Inspection 6/11/23	Noted	Noted
A14	Where changes are proposed to the staging of construction or operation, a revised Staging Report must be prepared, endorsed by the ER and submitted to the Planning Secretary for information no later than one month prior to the proposed change in the staging.	Audit Interview 6/11/23 Site Inspection 6/11/23	Noted, no changes to the staging of the project are currently proposed	Not Triggered
A15	Strategies, plans or programs required by this approval can be submitted on a progressive basis, with the agreement of the Planning Secretary. With the agreement of the Planning Secretary, the Proponent may prepare the updated strategy, plan or program without undertaking all the consultation required under the applicable condition in this approval. Nothing in this condition prevents the preparation of either separate or combined strategies, plans or programs required under this approval. Notes: 1. While any strategy, plan or program may be submitted on a progressive basis, the Proponent must ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times; and 2. If the submission of any strategy, plan or program is to be undertaken in a progressive manner, then the relevant strategy, plan or program must clearly describe the specific stage to which strategy, plan or program applies, the relationship of this stage to future stages, and the trigger for updating the strategy, plan or program.	Audit Interview 6/11/23 Site Inspection 6/11/23	The secretary's approval to submit plans or strategies on a progressive basis has not been sought.	Not Triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
A16	Construction ancillary facilities (excluding minor construction ancillary facilities established under Condition A19) that are not identified by description and location in the documents listed in Condition A1 can only be established and used in each case if: (a) they are located within or immediately adjacent to the construction boundary; and (b) they are not located next to sensitive land use(s) (including where an access road is between the facility and the land use), unless the landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location; and (c) they have no impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and (d) the establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts.	Ancillary Facility Diligence Assessment - Compounds C6, C7, C7 and C12 Consistency Assessment of HDD Additional Ancillary Facility - Environemntal impact assessment project change: Elizabeth Drive/Northern Road HDD Additional Ancillary Facility dated 10/10/23 Consistency Assessment of Ancillary Facility -Extension of Access at Chainage 3500. Environemntal impact assessment project change: Consistency Assessment dated 18/9/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Ancillary Facilities observed during the site inspection were installed in accordance with these requirements. A due diligence assessment process has been implemented to ensure these requirements are complied with. Consistency Assessment have been undertaken.	Compliant
A17	Before the establishment of a construction ancillary facility that is required prior to the approval of a CEMP (excluding minor construction ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A19), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the construction ancillary facility(ies). The Site Establishment Management Plan must be prepared in consultation with the relevant council and government agencies. The Plan must be endorsed by the ER and then submitted to the Planning Secretary for approval one month before the establishment of any construction ancillary facility(ies). The Site Establishment Management Plan must detail the management of the construction ancillary facility(ies) and include: (a) a description of activities to be undertaken during establishment of the construction ancillary facility(ies) (including scheduling and duration of Work to be undertaken at the site); (b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s); (c) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken prior to the commencement of site establishment work; (d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to: (i) meet the performance outcomes stated in the documents listed in Condition A1, and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and (e) a program for monitoring the performance outcomes, including a program for construction noise monitoring during site establishment works. Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each construction ancillary facility. Note: This plan is only needed before a CEMP is approved. Once a CEMP is approved a Site Establishment Management Plan(s) is not required and any ancillary facilities not approved under a Site Establishment Management Plan must be included in the CEMP.	Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Document Number: USCP-JHG-MPL-ENV-0008 Revision: A DPE Approval dated 08/08/2023 their ref:SSI-8609189 Audit Interview 6/11/23 Site Inspection 6/11/23	Site Establishment was identified in Table 1.2 of CEMP which was approved on 23/08/2023 SWC confirmnt Site Establishment commenced after 23/08/2023 therefore there was no requirement for a separate SEMP	Compliant
A18	The use of a construction ancillary facility must not commence until the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition C4 and relevant Construction Monitoring Programs required by Condition C13 have been approved by the Planning Secretary.	Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Document Number: USCP-JHG-MPL-ENV-0008 Revision: A DPE Approval dated 08/08/2023 their ref:SSI-8609189 Audit Interview 6/11/23 Site Inspection 6/11/23	As noted above, the operation of construction ancillary facilities did not commence until the CEMP was approved.	Compliant
A19	Minor construction ancillary facilities can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria: (a) are located within or immediately adjacent to the construction boundary; and (b) have been assessed by the ER to have - (i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (DECC, 2009) (ICNG), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and (ii) minimal environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval.	Letter from BB Enviro to SWC titled "Environmental Representative (ER) Review of proposed AWRC Minor Ancillary Facility SSI 8609189 - Upper South Creek Advanced Water Recycling Centre" dated 19 June 2023 Letter from BB Enviro to SWC titled "Environmental Representative (ER) Review of proposed AWRC Minor Ancillary Facility for pipe laydown - Upper South Creek Advanced Water Recycling Centre" dated 27 September 2023 Upper South Creek Ancanced Water Recycling Centre and Pipelines - Minor Ancillary Facility Assessment Revision 4 dated 21/8/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Appropriate assessments have been undertaken against the criteria documented in this condition. The Environmental Representative has endorsed several Minor Ancillary Facilities.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
A20	Boundary screening must be erected between construction ancillary facilities (excluding minor construction ancillary facilities) and adjacent to sensitive land use(s) for the duration of the time that the construction ancillary facility is in use, unless otherwise agreed with the owner and occupier of the adjacent sensitive land use(s).	Audit Interview 6/11/23 Site Inspection 6/11/23	The AWRC site is located in a sparsely populated area and adjacent to the existing M12 construction site. There were no sensitive receivers that would be visually impacted by the works.	Not triggered
A21	All Independent Appointments required by the terms of this approval must have regard to Seeking approval from the Department for the appointment of independent experts (DPIE, 2020). All Independent Appointments must hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Acoustics Advisors" dated 16/12/22 Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives" dated 16/12/22 Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Agreement to independent auditor" dated 21/07/22 Audit Interview 6/11/23 Site Inspection 6/11/23	Independent experts including the ER, AA and the Independent Auditor all hold current membership of relevant bodies as noted in DPE approval letters	Compliant
A22	The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must: (a) facilitate and assist the Planning Secretary in any such audit; and (b) make it a term of their engagement of an Independent Appointment that the Independent Appointment facilitate and assist the Planning Secretary in any such audit.	Audit Interview 6/11/23 Site Inspection 6/11/23	The planning secretary has not commissioned an audit of how an independent appointment has exercised their functions.	Not triggered
A23	The Planning Secretary may withdraw its approval of an Independent Appointment should they consider the Independent Appointment has not exercised their functions in accordance with this approval. Note: Conditions A22 and A23 apply to all Independent Appointments including the ER and AA.	Audit Interview 6/11/23 Site Inspection 6/11/23	The Planning secretary has not withdrawn their approval of an independent appointment.	Not triggered
A24	Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives" dated 16/12/22 Audit Interview 6/11/23 Site Inspection 6/11/23	The appointment of the ER on the 16/12/22 was prior to the commencement of work on 20/2/23	Compliant
A25	The Planning Secretary's approval of an ER must be sought no later than one month before the commencement of Work.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives" dated 16/12/22 Audit Interview 6/11/23 Site Inspection 6/11/23	The appointment of the ER on the 16/12/22 was prior to the commencement of work on 20/2/23	Compliant
A26	The proposed ER must meet the requirements of the Environmental Representative Protocol (Department of Planning and Environment, October 2018) and must be a suitably qualified and experienced person(s) who was not involved in the preparation of the documents listed in Condition A1, and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives" dated 16/12/22 Audit Interview 6/11/23 Site Inspection 6/11/23	The ER and alternate are experienced and meet the requirements of this condition	Compliant
A27	More than one ER may be engaged for Stage 1 of the CSSI, in which case the functions to be exercised by an ER under the terms of this approval may be carried out by any ER that is approved by the Planning Secretary for the purposes of Stage 1 of the CSSI.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Environmental Representatives" dated 16/12/22 Audit Interview 6/11/23 Site Inspection 6/11/23	Two ER's have been appointed and approved by DPE	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
A28	For the duration of the Work until the completion of construction, or as agreed with the Planning Secretary, the approved ER must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of Stage 1 of the CSSI; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval; (c) consider and recommend to the Proponent any improvements that may be made to Work practices to avoid or minimise adverse impact to the environment and to the community; (d) review documents identified in Conditions A10, A17, C1, C4 and C13 and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary/Department); Note: The written statement must be made via the Major Projects Portal. (e) regularly monitor the implementation of the documents listed in Conditions A10, A17, C1, C4 and C13 to ensure implementation is being carried out in accordance with the document and the terms of this approval; (f) as may be requested by the Planning Secretary, help plan or attend audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A37 of this approval; (g) as may be requested by the Planning Secretary, assist in the resolution of community complaints; (h) review the appropriateness of any activities reliant on the definition of Low Impact Work; (i) consider or assess the impacts of minor construction ancillary facilities comprising lunch sheds, office sheds and portable toilet facilities as required by Condition A19 of this approval; (j) consider any minor amendments to be made to the Site Establishment Management Plan, Community Communications Strategy, CEMP, CEMP Sub-plans and monitoring programs without increasing impacts to nearby sensitive land uses or that comprise updating or are of an administrative nature, and are consistent with the terms of this approval and the Site Establishment Management Plan, Community Communications Strategy, CEMP, CEMP Sub-plans and monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the	Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Document Number: USCP-JHG-MPL-ENV-0008 Revision: A Surface Water & Groundwater CEMP Sub-plan (USCP-JHG-MPL-ENV-0001) Flood Emergency Response CEMP Sub-plan (USCP-JHG-MPL-ENV-0002) Soils & Contamination CEMP Sub-plan (USCP-JHG-MPL-ENV-0003) Biodiversity CEMP Sub-plan (USCP-JHG-MPL-ENV-0004) Traffic & Transport CEMP Sub-plan (USCP-JHG-MPL-ENV-0005). Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) Noise & Vibration CEMP Sub-plan (USCP-JHG-MPL-ENV-0007) Air Quality CEMP Sub-plan (USCP-JHG-MPL-ENV-0009) Waste & Resource Use CEMP Sub-plan (USCP-JHG-MPL-ENV-0010) Outgoing letter from ER to DPE 25/08/2023 Subject: Environmental Representative (ER) review and approval – Revised CEMP and Subplans – Rev A SSI-8609189 – Upper South Creek Advanced Water Recycling Centre DPE Approval dated 08/08/2023 their ref:SSI-8609189 Audit Interview 6/11/23 Site Inspection 6/11/23	The ER is performing the role as required by this condition. Substantial documented evidence was provided to demonstrate their involvement to date which was confirmed through an interview with the ER undertaken as part of this audit.	Compliant
A29	The Proponent must provide the ER with documentation requested in order for the ER to perform their functions specified in Condition A28 (including preparation of the ER monthly report), as well as: (a)the complaints register (to be provided on a weekly basis where complaints have been received or as requested); and (b)a copy of any assessment carried out by the Proponent of whether proposed Work is consistent with the approval (which must be provided to the ER before the commencement of the subject Work). Note: Personal details of the complainant are not to be provided to the ER unless otherwise agreed to or requested by the complainant.	Audit Interview 6/11/23 Site Inspection 6/11/23	SWC has provided the ER with the documentation as required by this condition.	Compliant
A30	A suitably qualified and experienced Acoustics Advisor(s) (AA) in noise and vibration management, who is independent of the design and construction personnel, must be nominated by the Proponent and engaged for the duration of Work and for no less than six months following completion of construction of Stage 1 of the CSSI.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Acoustics Advisors" dated 16/12/22 Audit Interview 6/11/23 Site Inspection 6/11/23	SWC have appointed a team of acoustic experts to perform the role of acoustics advisor for the project.	Compliant
A31	Work must not commence until an AA has been approved by the Planning Secretary.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Acoustics Advisors" dated 16/12/22 Audit Interview 6/11/23 Site Inspection 6/11/23	The AA was approved by the Planning Secretary on the 16/12/22. Work commenced on the 20/2/23	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
A32	The Proponent must cooperate with the AA by: (a) providing access to noise and vibration monitoring activities as they take place; (b) providing for review of noise and vibration plans, assessments, monitoring reports, data and analyses undertaken; and (c) considering any recommendations to improve practices and demonstrating, to the satisfaction of the AA, why any recommendation is not adopted.	Acoustics Advisor Endorsement - Sydney Water Upper South Creek Project, Noise and Vibration CEMP and Subplan dated 4/5/23 AA Review Comments Register - Construction Noise and Vibration Impact Statement- AWRC 8/6/23 ER/AA Review Comments Register - Construction Noise and Vibration Impact Statement- Pipelines 4/7/23 Acoustics Advisor Endorsement - Sydney Water Upper South Creek Project, Noise and Vibration Impact Statement - AWRC dated 21/8/23 Acoustics Advisor Endorsement - Sydney Water Upper South Creek Project, Noise and Vibration Impact Statement - Pipelines dated 14/9/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The AA confirmed SWC/JHG has been co-operative and has provided them with access to the necessary information in accordance with this condition. The AA has reviewed and endorsed the NVCSP as well as other documents including the CNVIS for both the AWRC and pipelines as well as the OOH permits (assessed under the EPL).	Compliant
A33	The Proponent may nominate additional suitably qualified and experienced persons to assist the lead AA for the Planning Secretary’s approval.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI -8609189) - Nomination of lead and Alternative Acoustics Advisors" dated 16/12/22 Audit Interview 6/11/23 Site Inspection 6/11/23	Three alternatives to the Lead AA have been approved by DPE	Compliant
A34	The approved AA must: (a) receive and respond to communication from the Planning Secretary in relation to the performance of Stage 1 of the CSSI in relation to noise and vibration; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval relating to noise and vibration; (c) consider and recommend to the Proponent, improvements that may be made to avoid or minimise adverse noise and vibration impacts; (d) review proposed night-time Works to determine if sleep disturbance would occur and recommend measures to avoid sleep disturbance or appropriate additional alternative mitigation measures; (e) review noise and vibration documents required to be prepared under the terms of this approval, and should they be consistent with the terms of this approval, endorse them before submission to the Planning Secretary (if required to be submitted to the Planning Secretary) or before implementation (if not required to be submitted to the Planning Secretary); (f) regularly monitor the implementation of all noise and vibration documents required to be prepared under the terms of this approval to ensure implementation is in accordance with what is stated in the document(s) and the terms of this approval; (g) notify the Planning Secretary of noise and vibration incidents in accordance with Conditions A43 and A45 of this approval; (h) in conjunction with the ER, the AA must: (i) as may be requested by the Planning Secretary, help plan, attend or undertake audits of noise and vibration management of Stage 1 of the CSSI including briefings, and site visits, (ii) in the event that conflict arises between the Proponent and the community in relation to the noise and vibration performance of Stage 1 of the CSSI, follow the procedure in the Community Communication Strategy approved under Condition B2 to attempt to resolve the conflict, and if it cannot be resolved, notify the Planning Secretary, (iii) consider relevant minor amendments made to the Site Establishment Management Plan, CEMP, relevant sub-plans and noise and vibration monitoring programs that require updating or are of an administrative nature, and are consistent with the terms of this approval and the management plans and monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, endorse the amendment, (this does not include any modifications to the terms of this approval), (iv) review the noise impacts of minor construction ancillary facilities, and (v) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, a Monthly Noise and Vibration Report detailing the AA’s actions and decisions on matters for which the AA was responsible in the preceding month. The frequency of this report can be	Audit Interview 6/11/23 Site Inspection 6/11/23	The ER is performing their role in accordance with the requirements of this condition and are provided with the information and access to the site in order for them to perform the role	Compliant
A35	The Department must be notified in writing of the dates of commencement of Works, construction and operation at least one month before those dates.	Various Letters from SWC to DPE titled "Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Notification of commencement of works in accordance with Conditon A35" dated 9/12/22, 19/5/23, 24/8/23 Letter from SWC to DPE titled "Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Amended Notification of commencement of works in accordance with Conditon A35" dated 17/2/23 Audit Interview 6/11/23 Site Inspection 6/11/23	DPE were notified at least one month prior to the commencement of Work and the commencement of construction. When changes to the commencement dates occurred due to delays ion obtaining CEMP and Commonwealth approval occurred, subsequent notifications were issued to DPE advising them of the revised date.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
A36	If the construction or operation of Stage 1 of the CSSI is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of the commencement of that stage.	Various Letters from SWC to DPE titled "Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Notification of commencement of works in accordance with Conditon A35" dated 9/12/22, 19/5/23, 24/8/23 Letter from SWC to DPE titled "Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Amended Notification of commencement of works in accordance with Conditon A35" dated 17/2/23 Audit Interview 6/11/23 Site Inspection 6/11/23	As above DPE were notified of the commencement of Stage 1 in accordance with the requirements of this condition	Compliant
A37	Independent Audits of Stage 1 of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).	This audit report	This audit was commissioned and is being undertaken in accoddance with the DPE Post Approval Audit Requirements (2020). DPE granted approval for a 2 week extension to the audit report due to the XMAS / New Year period until 19/1/24 in accordance with Condition A41 below.	Compliant
A38	Proposed independent auditors must be agreed to in writing by the Planning Secretary before the commencement of an Independent Audit. This condition does not apply to the engagement of auditors required under Condition E105.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre - Agreement to Independent Auditor" dated 21/7/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The Auditors were approved by DPE on the 21/7/23 prior to the commencement of the initial audit.	Compliant
A39	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (DPIE, 2020), upon giving at least four weeks’ notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.	Audit Interview 6/11/23 Site Inspection 6/11/23	The Planning Secretary has not requested the initial and subsequent audits to be undertaken at different times	Not triggered
A40	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (DPIE, 2020), the Proponent must: (a) review and respond to each Independent Audit Report prepared under Condition A37 or Condition A39; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report and response to it publicly available two months after submission to the Planning Secretary, or as otherwise agreed by the Planning Secretary.	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre - Extension Request for Audit Report" dated 21/12/23 Audit Interview 6/11/23 Site Inspection 6/11/23	SWC are required to respond to the audit findings and submit the response to the Planning Secretary following the finalisation of this audit report by the 19th of January 2023 (as noted in condition A37 above, DPE granted an extension of time to allow the submission of the audit report by 19/1/24	Not triggered
A41	Independent Audit Reports and the Proponent’s response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (DPIE, 2020).	Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre - Extension Request for Audit Report" dated 21/12/23 Audit Interview 6/11/23 Site Inspection 6/11/23	SWC are required to respond to the audit findings and submit the response to the Planning Secretary by the 19th of January 2023 (as noted in condition A37 above, DPE granted an extension of time to allow the submission of the audit report by 19/1/24	Not triggered
A42	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (DPIE, 2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary’s satisfaction that independent operational audits have demonstrated operational compliance.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
A43	The Planning Secretary must be notified via the Major Projects Website as soon as possible and no later than 12 hours after the Proponent becomes aware of an incident. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the location and nature of the incident.	Audit Interview 6/11/23 Site Inspection 6/11/23	There have been no incidents that are reportable to the Planning Secretary in accordance with the conditions of consent	Not Triggered
A44	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A of this approval.	Audit Interview 6/11/23 Site Inspection 6/11/23	There have been no incidents that are reportable to the Planning Secretary in accordance with the conditions of consent	Not Triggered
A45	The Planning Secretary must be notified via the Major Projects Website within seven days after the Proponent becomes aware of any non-compliance. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one), identify the condition/s against which the CSSI is non-compliant, the nature of the non-compliance; the reason for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	DPE Portal Post Approval form Ref 20231025223646 Upper South Creek Advanced Water Recycling Centre and Pipelines CoA A45 Non Compliance Report Audit Interview 6/11/23 Site Inspection 6/11/23	One non compliance was reported during the audit period . The non compliance related to the use of local roads in accordance with condition E95. As noted in the main report, an assessment of the non compliance has been undertaken and this is deemed to be an administrative non compliance with no potential impacts	Compliant
A46	A non-compliance which has been notified as an incident under Condition A43 does not need to be notified as a non-compliance.	Audit Interview 6/11/23 Site Inspection 6/11/23	Noted, the auditor notes that the non compliance with condition E95 was not an incident.	Not Triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
A47	Heavy vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and CSSI application number to enable immediate identification by a person viewing the heavy vehicle. No more than one set of project markings can be displayed on a heavy vehicle at any point of time.	Photographs showing the name and CSSI number Audit Interview 6/11/23 Site Inspection 6/11/23	This condition relates to spoil haulage and the vehicles observed during the site inspection were not being used to haul spoil. Photographic evidence was provided to demonstrate compliant signage has been installed on spoil vehicles Recommendation It is recommended that all vehicles with any stickers relating to other projects have their stickers removed when working on the Upper South Creek AWRC project.	Compliant
A48	The CSSI name; application number; telephone number, postal address and email address required under Condition B8 of this approval must be made available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also be provided on the website required under Condition B12 of this approval.	https://www.sydneywatertalk.com.au/uppersouthcreek Audit Interview 6/11/23 Site Inspection 6/11/23	Appropriate signage was displayed at the site construction sites detailing the requirements.	Compliant
B1	A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication about construction and operation of Stage 1 of the CSSI with: (a) the community (including adjoining affected landowners and businesses, and others directly impacted by Stage 1 of the CSSI); (b) Aboriginal people, Registered Aboriginal Parties (RAPs) and LALCs; and (c) the relevant councils and relevant government agencies.	Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines August 2023 USCP-JHG-MPL-CSR-0002 Letter from DPE to SWC titled " Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-B5)" dated 20/1/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The Community Communication Strategy includes the relevant information as required by this condition and was approved by DPE on the 20/1/23.	Compliant
B2	The Community Communication Strategy must: (a) identify people, organisations, councils and agencies to be consulted during the design and Work phases of Stage 1 of the CSSI; (b) identify details of the community and its demographics; (c) identify timing of consultation; (d) set out procedures and mechanisms for the regular distribution of accessible information including to RAPs, LOTE, Culturally and Linguistically Diverse, and vulnerable communities about or relevant to Stage 1 of the CSSI; (e) identify opportunities for education within the community about construction sites; (f) detail the measures for advising the community in advance of upcoming construction including upcoming out-of-hours work as required by Condition E43; (g) detail measures for consulting with Fairfield City Council about disruption to Cabravale Leisure Centre car park and potential investigation of an alternate brine pipeline alignment at this location; (h) provide for the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community(ies) for Stage 1 of the CSSI; (i) detail the role and responsibilities of the Public Liaison Officer(s) engaged under Condition B6; (j) set out procedures and mechanisms: (i) through which the community can discuss or provide feedback to the Proponent; (ii) through which the Proponent will respond to enquiries or feedback from the community; and (iii) to resolve any issues and mediate any disputes that may arise in relation to the environmental management and delivery of Stage 1 of the CSSI, including disputes regarding rectification or compensation; (k) address who will engage with the community, relevant councils and agencies.	Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines August 2023 USCP-JHG-MPL-CSR-0002 Letter from DPE to SWC titled " Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-B5)" dated 20/1/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The Community Communication Strategy includes the relevant information as required by this condition and was approved by DPE on the 20/1/23.	Compliant
B3	The Community Communication Strategy must be submitted to the Planning Secretary and be approved prior to the commencement of any Work.	Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines August 2023 USCP-JHG-MPL-CSR-0002 Letter from DPE to SWC titled " Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-B5)" dated 20/1/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The Community Communication Strategy was approved by DPE on the 20/1/23 prior to work commencing on the 20/2/23.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
B4	Work for the purposes of Stage 1 of the CSSI must not commence until the Community Communication Strategy has been approved by the Planning Secretary.	Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines August 2023 USCP-JHG-MPL-CSR-0002 Letter from DPE to SWC titled " Upper South Creek Advanced Water Recycling Centre (SSI-8609189) – Approval of Community and Stakeholder Engagement Plan (Community Communication Strategy) (Conditions B1-B5)" dated 20/1/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The Community Communication Strategy was approved by DPE on the 20/1/23 prior to work commencing on the 20/2/23.	Compliant
B5	The Community Communication Strategy as approved by the Planning Secretary, including any minor amendments approved by the ER, must be implemented for the duration of the Work and for 12 months following the completion of construction.	Audit Interview 6/11/23 Site Inspection 6/11/23	Substantial evidence was reviewed by the auditor to demonstrate the effective implementation of the Community Communications Strategy.	Compliant
B6	A Public Liaison Officer must be appointed to assist the public with questions and complaints they may have at any time during Work. The Public Liaison Officer must be available at all times that Work is occurring.	Audit Interview 6/11/23 Site Inspection 6/11/23	The JHG Community Relations Manager is the nominated Public Relations Manager and has suitable and relevant experience to perform the role	Compliant
B7	A Complaints Management System must be prepared and implemented before the commencement of any Work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of Stage 1 of the CSSI. The Complaints Management System must be consistent with Sydney Water’s Complaint Policy (Document number: 735107, version 4, dated 27 October 2021). Note: In the situation where there are different entities constructing and operating Stage 1 of the CSSI, continuity of access to the Complaints Management System must be maintained.	Flyer dated 5 August 2023 "Start of work and how you can talk to us - Upper South Creek Advanced Water Recycling Centre" Complaints Policy in Appendix B Noise and Vibration DEMP sub plan Complaints Policy in Appendix J Community and Stakeholder Engagement Plan Audit Interview 6/11/23 Site Inspection 6/11/23	Consultation Manager is the Complaints system and has been implemented for the duration of the project. Supporting information regarding the complaints system and SWC policy is provided on the project website.	Compliant
B8	The following information must be available to facilitate community enquiries and manage complaints one month before the commencement of Work and for 12 months following the completion of construction: (a) a 24- hour toll free telephone number for the registration of complaints and enquiries about Stage 1 of the CSSI; (b) a postal address to which written complaints and enquires may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved, consistent with Sydney Water’s Complaint Policy (Document number: 735107, version 4, dated 27 October 2021 or its subsequent versions), and inclusive of escalation of a complaint to an independent dispute resolution body. This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.	Complaints Management System not on website only one page flyer. Complaints Policy in Appendix B Noise and Vibration DEMP sub plan Complaints Policy in Appendix J Community and Stakeholder Engagement Plan https://www.sydneywatertalk.com.au/uppersouthcreek Audit Interview 6/11/23 Site Inspection 6/11/23	The website includes the following details: - Complaints and enquires line (1800 064 127) - email uppersouthcreek@sydneywater.com.au - Post PO Box 160 Kemps Creek NSW 2178 - Complaints system that is linked to the latest version of the SWC complaints policy The SWC information including an interpreter service covering ten different languages.	Compliant
B9	A Complaints Register must be maintained recording information on all complaints received about Stage 1 of the CSSI during the carrying out of any Work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the: (a) number of complaints received; (b) the date and time of the complaint; (c) the method by which the complaint was made; (d) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (e) nature of the complaint; (f) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and (g) if no action was taken, the reason(s) why no action was taken.	USC Complaints Register - Master dated 24/10/23 Audit Interview 6/11/23 Site Inspection 6/11/23	"Consultation Manager" has been established to record, monitor and close out complaints. In addition an excel spreadsheet is produced to track and monitor complaints. Consultation Manager/excel spreadsheet include all of the information as required by this condition. At the time of the audit 15 complaints had been received and all were noted as being closed out	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
B10	Complainants must be advised of the following information before, or as soon as practicable after, providing personal information: (a) the Complaints Register may be forwarded to government agencies, including the Department (Department of Planning and Environment, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150), to allow them to undertake their regulatory duties; (b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies; (c) the supply of personal information by the complainant is voluntary; and (d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement). The Collection Statement must be included on the Proponent or development website to make prospective complainants aware of their rights under the Privacy and Personal Information Protection Act 1998 (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.	Upper South Creek Advanced Water Recycling Centre Sydney Water Talk Audit Interview 6/11/23 Site Inspection 6/11/23	The project website includes a statement that addresses these requirements. When complainants contact the project, it is normally done by email. The stakeholder is contacted and verbally advised of this information. Community contact cards provide details of the project website.	Compliant
B11	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	Upper South Creek Advanced Water Recycling Centre Sydney Water Talk Audit Interview 6/11/23 Site Inspection 6/11/23	The Planning Secretary has not requested a copy of the complaints register	Not triggered
B12	A website or webpage providing information in relation to Stage 1 of the CSSI must be established before commencement of Work and be maintained for the duration of construction, and for a minimum of 24 months following the completion of construction of Stage 1 of the CSSI. The following up-to-date information (excluding confidential, private, commercial information or any other information that the Planning Secretary has approved to be excluded) must be published before the relevant Work commences and maintained on the website or dedicated pages including: (a) information on the current implementation status of Stage 1 of the CSSI; (b) a copy of the documents listed in Condition A1, and any documentation relating to any modifications made to the CSSI or the terms of this approval; (c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval; (d) a copy of each statutory approval, licence or permit required and obtained in relation to Stage 1 of the CSSI; (e) a copy of the current version of each document required under the terms of this approval; and (f) a copy of the audit reports required under this approval. Where the information / document relates to a particular Work or is required to be implemented, it must be published before the commencement of the relevant Work to which it relates or before its implementation. All information required in this condition must be provided on the Proponent's website, ordered in a logical sequence and which is easy to navigate. Note: The intention of this condition is to increase transparency and for information/documents required as part of the approval to be provided proactively and publicly in an easily accessible manner. Where information is excepted by this condition, it is intended that these documents are provided in their redacted form.	Upper South Creek Advanced Water Recycling Centre Sydney Water Talk Audit Interview 6/11/23 Site Inspection 6/11/23	At the time of the audit, the website included the substantial majority of information as required by this condition, however does not include the following: - Environment Protection Licence - Staging Report - Commonwealth (EPBC Approval) While a link is provided to the DPE Website, the condition requires the documents to be placed on the Proponents Website. Recommendation Update the website to include this and any other information	Non Compliant
C1	A Construction Environmental Management Plan (CEMP) must be prepared having regard to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). The CEMP must detail how the performance outcomes, commitments and mitigation measures specified in the documents list in Condition A1 will be implemented and achieved during construction.	Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Document Number: USCP-JHG-MPL-ENV-0008 Revision: A 22/08/2023 Audit Interview 6/11/23 Site Inspection 6/11/23	A construction Environmental Management Plan has been prepared in accordance with this condition. Sufficient evidence was reviewed by the auditor that demonstrates the effective implementation of the plan on site	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
C2	The CEMP must provide: (a) a description of activities to be undertaken during construction (including the scheduling of construction); (b) details of environmental and social policies, guidelines and principles to be followed in the construction of Stage 1 of the CSSI; (c) a program for ongoing analysis of the key environmental and social impact risks arising from the activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of construction of Stage 1 of the CSSI; (d) details of how the activities described in subsection (a) of this condition will be carried out to: (i) meet the performance outcomes stated in the documents listed in Condition A1 and as required by this approval; and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; (e) an inspection program detailing the activities to be inspected and frequency of inspections; (f) a protocol for managing and reporting any: (i) incidents; and (ii) non-compliances with this approval or statutory requirements; (g) procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction; (h) a list of all the CEMP Sub-plans required in respect of construction, as set out in Condition C4. Where staged construction of Stage 1 of the CSSI is proposed, the CEMP must also identify which CEMP Sub-plan applies to each of the proposed stages of construction; (i) an organisational chart including description of the roles and environmental responsibilities for relevant employees and any independent appointments; (j) for training and induction for employees, including contractors and sub-contractors, in relation to environmental, social and compliance obligations under the terms of this approval;	Surface Water & Groundwater CEMP Sub-plan (USCP-JHG-MPL-ENV-0001) Flood Emergency Response CEMP Sub-plan (USCP-JHG-MPL-ENV-0002) Soils & Contamination CEMP Sub-plan (USCP-JHG-MPL-ENV-0003) Biodiversity CEMP Sub-plan (USCP-JHG-MPL-ENV-0004) Traffic & Transport CEMP Sub-plan (USCP-JHG-MPL-ENV-0005). Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) Noise & Vibration CEMP Sub-plan (USCP-JHG-MPL-ENV-0007) Air Quality CEMP Sub-plan (USCP-JHG-MPL-ENV-0009) Waste & Resource Use CEMP Sub-plan (USCP-JHG-MPL-ENV-0010) Outgoing letter from ER to DPE 25/08/2023 Subject: Environmental Representative (ER) review and approval – Revised CEMP and Subplans – Rev A SSI-8609189 – Upper South Creek Advanced Water Recycling Centre DPE Approval dated 08/08/2023 their ref:SSI-8609189 Audit Interview 6/11/23 Site Inspection 6/11/23	The CEMP includes the relevant information and was endorsed by the independent Environmental Representative. Prior to approval by DPE on the 8/823	Compliant
C3	The CEMP (and relevant CEMP sub-plans) must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one month before the commencement of construction, or where construction is staged, no later than one month before the commencement of each stage.	ER recommendation letter 25/08/2023 from BBEEnviro toSWC DPE Approval dated 08/08/2023 their ref:SSI-8609189 Audit Interview 6/11/23 Site Inspection 6/11/23	The CEMP was endorsed by the ER on 21/4/23 and approved by DPE on the 8/8/23. Construction commenced on 28/8/23	Compliant
C4	The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan. Details of all information requested by an agency during consultation must be provided to the Planning Secretary as part of any submission of the relevant CEMP Sub-plan, including copies of all correspondence from those agencies as required by Condition A9.	Surface Water & Groundwater CEMP Sub-plan (USCP-JHG-MPL-ENV-0001) Flood Emergency Response CEMP Sub-plan (USCP-JHG-MPL-ENV-0002) Soils & Contamination CEMP Sub-plan (USCP-JHG-MPL-ENV-0003) Biodiversity CEMP Sub-plan (USCP-JHG-MPL-ENV-0004) Traffic & Transport CEMP Sub-plan (USCP-JHG-MPL-ENV-0005). Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) Noise & Vibration CEMP Sub-plan (USCP-JHG-MPL-ENV-0007) Air Quality CEMP Sub-plan (USCP-JHG-MPL-ENV-0009) Waste & Resource Use CEMP Sub-plan (USCP-JHG-MPL-ENV-0010) Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189)- Approval of Construction Environmental Management Plan, Subplans monitoring programs and Out of Hours Work Protocol dated 8/8/23 Upper South Creek, Advanced Water Recycling Centre and Pipelines CoA9 Consultation Summary Report - Air Quality CEMP Subplan dated 26/5/23 Audit Interview 6/11/23 Site Inspection 6/11/23	DPE Letter of approval notes the management plans have been prepared in consultation with EPA, EHG, DPE Water, DPI Fisheries, Water NSW, SES, TfNSW, Heritage NSW, Penrith City Council, Fairfield City Council, Liverpool City Council, Consultation reports have been prepared for all management plans that require consultation and were appended to each subplan	Compliant
C5	The CEMP Sub-plans must state how: (a) the environmental performance outcomes identified in the documents listed in Condition A1 will be achieved; (b) the mitigation measures identified in the documents listed in Condition A1 will be implemented; (c) the relevant terms of this approval will be complied with; and (d) issues requiring management during construction (including cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART (Specific, Measurable, Achievable, Realistic and Timely) principles.	CEMP Subplans as above. Audit Interview 6/11/23 Site Inspection 6/11/23	The CEMP subplans include the relevant information and was endorsed by the independent Environmental Representative.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
C6	The Surface Water and Groundwater CEMP Sub-Plan must be prepared by a suitably qualified expert and include, but not limited to: (a) measures to achieve compliance with the NSW Government Wianamatta South Creek waterway health objectives and construction phase stormwater management targets, in accordance with the Wianamatta MUSIC modelling toolkit and Technical Guidance for Achieving Wianamatta South Creek Stormwater Management Targets (DPE, 2022); (b) detail erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the ‘Blue Book’; (c) detail all off-site flows from the AWRC site; (d) the Dewatering Procedure and Drilling Fluid Management Procedure as committed to in the documents listed in Condition A1.	Surface Water & Groundwater CEMP Sub-plan (USCP-JHG-MPL-ENV-0001) Audit Interview 6/11/23 Site Inspection 6/11/23	The Surface and Groundwater CEMP subplan was prepared by a suitably qualified expert and contains the relevant information as required by this condition.	Compliant
C7	The Flood Emergency Response CEMP Sub-Plan must include measures for managing flood risks during construction and address flood recovery.	Flood Emergency Response CEMP Sub-plan (USCP-JHG-MPL-ENV-0002) Audit Interview 6/11/23 Site Inspection 6/11/23	The flood emergency subplan includes the relevant information as required by this condition.	Compliant
C8	The Soils and Contamination CEMP Sub-Plan must be prepared by a Contaminated Land Consultant certified under either the Environment Institute of Australia and New Zealand’s Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The Soils and Contamination CEMP Sub-Plan must include measures to address any contamination found during construction. The Soils and Contamination CEMP Sub-Plan must include (but not limited to): (a) details of construction activities and their locations which have the potential to expose areas known to contain, or potentially contain, contaminated soils and/or other contaminated materials; (b) measures for the handling, treatment and management of hazardous and contaminated soils and materials, including measures to manage and/or minimise worker and public health and safety risks with regard to exposure to contamination; (c) a description of how the effectiveness of the actions and measures for managing contamination impacts would be monitored during the proposed works, clearly indicating how often this monitoring would be undertaken, the locations where monitoring would take place, and how the results of the monitoring would be recorded and reported; (d) measures to identify contamination during Works; (e) measures to manage acid sulfate soils; (f) measures to manage asbestos finds; and (g) measures to detail unexpected finds consistent with the Unexpected Finds Procedure for Contamination required under Condition E88. The procedure must include details of who will be responsible for implementing the Unexpected Finds Procedure for Contamination and the roles and responsibilities of all parties involved. The Soils and Contamination CEMP Sub-Plan must be reviewed by the Site Auditor engaged under Condition E74. The Site Auditor must issue interim audit advice or a relevant site audit statement stating whether they consider the Soils and Contamination CEMP Sub-Plan to be adequate. Once reviewed by the Site Auditor and approved by the Planning Secretary, the Soils and Contamination CEMP Sub-Plan must be implemented throughout the duration of construction.	Soils & Contamination CEMP Sub-plan (USCP-JHG-MPL-ENV-0003) Audit Interview 6/11/23 Site Inspection 6/11/23	The Soils and Contamination CEMP subplan was prepared by a suitably qualified expert and contains the relevant information as required by this condition.	Compliant
C9	The Biodiversity CEMP Sub-Plan must be prepared by a suitably qualified and experienced ecologist and include, but not limited to: (a) details of the measures to avoid and minimise disturbance to native vegetation, and other habitat of native flora and fauna species; (b) procedures for undertaking pre-clearance surveys for native fauna, including surveys by a suitably qualified and experienced ecologist to determine the presence of native fauna in the areas impacted by Stage 1 of the CSSI, and procedures and measures to manage their relocation; (c) measures to prevent the spread of weeds, pathogens and to manage biosecurity; (d) protocols for incidental finds of threatened species and ecological communities within the construction boundary;	Biodiversity CEMP Sub-plan (USCP-JHG-MPL-ENV-0004) Audit Interview 6/11/23 Site Inspection 6/11/23	The Biodiversity CEMP subplan was prepared by a suitably qualified expert and contains the relevant information as required by this condition.	Compliant
C10	The Noise and Vibration CEMP Sub-Plan must include, but not limited to: (a) details of all sensitive land use(s) (including noise and vibration sensitive working areas) that are potentially exposed to construction noise and vibration; (b) construction noise and vibration performance criteria for Stage 1 of the CSSI; (c) details of mitigation and management measure and procedures that will be implemented to manage construction noise and vibration impacts; (d) construction timetabling, in particular construction activities outside of standard hours; and	Noise & Vibration CEMP Sub-plan (USCP-JHG-MPL-ENV-0007) Audit Interview 6/11/23 Site Inspection 6/11/23	The Noise and Vibration CEMP subplan was prepared by a suitably qualified expert and contains the relevant information as required by this condition.	Compliant
C11	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary.	DPE Approval dated 08/08/2023 ref:SSI-8609189 Audit Interview 6/11/23 Site Inspection 6/11/23	Construction commenced after the CEMP and subplans were approved by the Planning Secretary	Compliant
C12	The CEMP and CEMP Sub-plans as approved, including any minor amendments approved by the ER, must be implemented for the duration of construction of Stage 1 of the CSSI.	Documents reviewed as noted in this audit report Audit Interview 6/11/23 Site Inspection 6/11/23	CEMP and management subplans are being implemented as required by this condition	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
C13	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies identified for each to compare actual performance of construction of Stage 1 of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP: Required Construction Monitoring Programs Relevant government agencies to be consulted for each Construction Monitoring Program (a) Surface water quality EPA, EHG, DPE Water, DPI Fisheries, WaterNSW and relevant council(s) (b) Groundwater EPA, DPE Water (c) Noise and vibration EPA, WaterNSW and relevant council(s)	Surface Water Quality Monitoring Program - CEMP Appendix B1 – Surface Water and Groundwater Management Sub Plan Groundwater Monitoring Program CEMP Appendix B1 – Surface Water and Groundwater Management Sub Plan Noise and Vibration Monitoring Program CEMP Appendix B5 – Noise and Vibration Management Sub Plan Audit Interview 6/11/23 Site Inspection 6/11/23	The Construction Monitoring Programs are included in the relevant CEMP Subplans and were prepared in consultation with relevant agencies as noted above	Compliant
C14	Each Construction Monitoring Program (CMP) must have consideration of SMART principles and provide: (a) details of baseline data available; (b) details of baseline data to be obtained and when; (c) details of all monitoring of the project to be undertaken; (d) the parameters of the project to be monitored; (e) the frequency of monitoring to be undertaken; (f) the location of monitoring; (g) the reporting of monitoring results and analysis results against relevant criteria; (h) details of the methods that will be used to analyse the monitoring data; (i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicate unacceptable project impacts; and (j) any consultation to be undertaken in relation to the monitoring programs.	Surface Water Quality Monitoring Program - CEMP Appendix B1 – Surface Water and Groundwater Management Sub Plan Groundwater Monitoring Program CEMP Appendix B1 – Surface Water and Groundwater Management Sub Plan Noise and Vibration Monitoring Program CEMP Appendix B5 – Noise and Vibration Management Sub Plan Audit Interview 6/11/23 Site Inspection 6/11/23	The Construction Monitoring Programs include the relevant information as required by this condition	Compliant
C15	The CMP(s) must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one month before the commencement of construction, or where construction is staged, no later than one month before the commencement of each stage.	ER recommendation letter 25/08/2023 from BBEnviro toSWC DPE Approval dated 08/08/2023 their ref:SSI-8609189 Audit Interview 6/11/23 Site Inspection 6/11/23	Monitoring programs were endorsed by the ER and submitted to DPE progressively in April/May 2023. Construction did not commence until 28 August 2023, therefore the timeframes required by this condition have been complied with.	Compliant
C16	Construction must not commence until the relevant CMP(s) have been approved by the Planning Secretary and all relevant baseline data for the specific construction activity has been collected.	DPE Approval dated 08/08/2023 their ref:SSI-8609189 7837350ddbe0e3d3e54f9bb23cb65c7f_Approval_Letter_USC_AWRC_CEMP_Signed_8_August_2023.pdf Audit Interview 6/11/23 Site Inspection 6/11/23	Monitoring programs were endorsed by the ER and submitted to DPE progressively in April/May 2023. Construction did not commence until 28 August 2023, therefore the timeframes required by this condition have been complied with.	Compliant
C17	The CMP(s), as approved, including any minor amendments approved by the ER, must be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary, whichever is the greater.	Noise Monitoring Results Vibration Monitoring Results Audit Interview 6/11/23 Site Inspection 6/11/23	Noise and Vibration Monitoring Results were sighted by the Auditor	Compliant
C18	The results of the CMP(s) must be submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant CMP. Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered, the timeframe for submission to the Departmnet is 6 months from the commencement of construction (i.e is due in February 2024	Not triggered
D1	An Operational Environmental Management Plan (OEMP) must be prepared having regard to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). The OEMP must detail how the performance outcomes, commitments and mitigation measures made and identified in the documents listed in Condition A1 will be implemented and achieved during operation. Condition D1 does not apply if Condition D2 of this approval applies.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operarational requirement	Not triggered
D2	An OEMP is not required for Stage 1 of the CSSI if the Proponent has a certified Environmental Management System (EMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that through the certified EMS or equivalent: (a) the performance outcomes, commitments and mitigation measures, made and identified in the documents listed in Condition A1, and specified relevant terms of this approval can be achieved; (b) issues identified through ongoing risk analysis can be managed; and (c) procedures are in place for rectifying any non-compliance with this approval identified during compliance auditing, incident management or any other time during operation.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operarational requirement	Not triggered
D3	The OEMP or evidence of EMS certification or equivalent as agreed with the Planning Secretary, must be submitted to the Planning Secretary for information no later than one month before the commencement of operation of Stage 1 of the CSSI.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operarational requirement	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
D4	The OEMP or certified EMS or equivalent, as submitted to the Planning Secretary and amended from time to time, must be implemented for the duration of operation of Stage 1 of the CSSI, and the OEMP or EMS certification or equivalent must be made publicly available before the commencement of operation.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E1	In addition to the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1, all reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants, including odours during the construction and operation of Stage 1 of the CSSI.	Air Quality CEMP Sub-plan (USCP-JHG-MPL-ENV-0009)	Section 8 of the Air Quality CEMP subplan describes measures to be implemented to minimise air quality impacts All reasonable and feasible measures were observed to be implemented on site. No odour issues identified during the construction phase. No air quality or odour related complaints have been received during the audit period	Compliant
E2	The final design of the discharge stacks of each co-generation engine must include a sampling plane compliant with Australian Standard AS4323.1 Stationary source emissions – Selection of sampling positions (2021).	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E3	The Waste Gas Burner must be designed to comply with relevant provisions of Division 4 of Part 5 of the Protection of the Environment Operations (Clean Air) Regulation 2021.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E4	All plant and equipment installed and used for the project must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Air Quality CEMP Sub-plan (USCP-JHG-MPL-ENV-0009) Audit Interview 6/11/23 Site Inspection 6/11/23 Equipment maintenance reccords	All equipment was observed to be operating effectively with no visible exhaust plumes observed. Maintenance records were reviewed by the auditor.	Compliant
E5	Prior to the commencement of operation, the Proponent must prepare, implement and maintain an Odour Management Plan (OMP) for the AWRC. The OMP must be prepared by a suitably qualified and experienced person(s) in consultation with the EPA and submitted to the Planning Secretary for information.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E6	The OMP must describe measures to minimise odour impacts associated with operation and include, but not necessarily limited to: (a) objectives and targets; (b) key performance indicators; (c) identification of all sources of odour associated with the operation; (d) a detailed description of odour mitigation methods and management practices; (e) a detailed description of the methods used for monitoring the effectiveness of the odour mitigation methods and management practices; (f) location, frequency and duration of monitoring; (g) details of proposed contingency measures should odour impacts occur; (h) a communications strategy for handling potential odour complaints that includes recording, investigation, reporting and actioning; and (i) system and performance review for continuous improvements.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E7	The Proponent must engage a suitably qualified and experienced person(s) to undertake post commissioning air emissions sampling to verify the emission performance of the co-generation engine.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E8	The post commissioning sampling required under Condition E7 must occur within 3 months of the commissioning of the co-generation plant and corresponding air pollution controls.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E9	Sampling at the co-generation engine ventilation outlet must be performed for all pollutants specified in column 1 of Table 3, using the methods listed in column 3 of Table 3. All sampling and analysis must be undertaken in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales. Table 3: Co-generation engine ventilation outlet criteria Pollutant Units of measure Sampling method Nitrogen dioxide Milligrams per cubic metre TM-11 Volatile organic compoundsMilligrams per cubic metreTM-34 Carbon monoxideMilligrams per cubic metreTM-32 Temperaturedegrees CelsiusTM-2 Velocitymetres per secondTM-2 MoisturePercentTM-22 Note: Where an alternative method is proposed to be used, this must be approved in writing by the EPA prior to its use.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E10	A minimum of two rounds of sampling must be undertaken to provide a suitable characterisation of emissions. Sampling must be undertaken when plant/process conditions are representative of emissions during representative periods of normal operation.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E11	An air emissions verification report must be prepared and submitted to the EPA and Planning Secretary for information no later than two months after completion of post commissioning sampling and monitoring. The air emissions verification report must contain, as a minimum, the following information: (a) a description of the process operating conditions at the time of sampling, including fuel usage rates and electricity generation (kWh); (b) a detailed description of the sampling location, including engineering drawings, schematics or photographs to support the description; (c) all information required to be reported under Section 4 of the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales; (d) comparison of measured emissions against the concentrations listed in Table 4: Table 4: Emission concentration standards PollutantUnits of measure 100 percentile concentration standard Reference conditions Oxygen correctionAveraging period Nitrogen dioxide Milligrams per cubic metre 450 Dry, 273K, 101.3 kPa 3.0%1 hour Volatile organic compounds (as n- propane) Milligrams per cubic metre 40 Dry, 273K, 101.3 kPa3.0 1 hour (e) Where the comparison under Condition E11(d) identifies monitoring results greater than the 100th percentile concentration standard, the air emissions verification report must identify additional mitigation measures to achieve the concentration standards. A timeline for implementation of any additional mitigation measures identified must also be nominated within the report. Notes: 1. Supporting evidence must be included which confirms that the plant/process was operating under normal, representative conditions at the time of sampling. 2. The EPA may utilise information contained in the report submitted to include additional conditions in any EPL issued for the project, including emissions limits and requirements for ongoing monitoring.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operarational requirement	Not triggered
E12	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities, threatened species and their habitat.	Consistency Assessment for HDD Preparaton Site Setup at Chainage 4075-4025. Environmental Impact Assessment Project Change - Consistency Assessment dated 14/9/23 Consistency Assessment of BW3: Shooting Centre at Chainage 4075-4025. Environmental Impact Assessment Project Change - Consistency Assessment dated 14/12/23 Consistency Assessment for Chainage 6875 Access on Elizabeth Drive Badgerys Creek dated 17/11/23 Audit Interview 6/11/23 Site Inspection 6/11/23	An ecologist has been engaged to oversee clearing activities with pre-clearance inspections undertaken. Consistency Assessments assess the impacts of flora and fauna and note opportunities to reduce impacts are identified in the consistency assessments.	Compliant
E13	Impacts to plant community types and species credit species must not exceed those identified in Table 5 and Table 6.	Audit Interview 6/11/23 Site Inspection 6/11/23	The Project is in its early stages of construction with minimal clearing undertaken to date. The Project has an established pre-clearing process which is overseen by the Project ecologist (Biosys) whose role is to advise and report on clearing limits. The initial ecologists report had not been finalised at the time of the audit inspection. Recommendation As part of the ecologists report, it is recommended a schedule is developed and included in each report so that the limits prescribed by Tables 5 and 6 are reported on so compliance can be tracked on an ongoing basis and any corrective actions implemented, should there be a risk of exceeding the limits.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E14	Prior to impacts on the biodiversity values of Stage 1 of the CSSI, the number and classes of ecosystem credits and species credits (like-for-like) as set out in Table 5 and Table 6, must be retired. The retirement of the credits must be carried out in accordance with the Biodiversity Conservation Act 2016, and can be achieved by: (a) acquiring and retiring “biodiversity credits” within the meaning of the BC Act; and / or (b) making a payment into the Biodiversity Conservation Fund of an amount equivalent to the class and number of ecosystem and species credits, as calculated by the Biodiversity Offsets Payment Calculator; and/or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. Table 5: Ecosystem Credits to be Retired Table 6: Species Credits to be Retired Note: Excludes certified areas.	Letter from SWC to DPE titled "Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Evidence of retirement of Biodiversity Credits in accordance with Condition E16 in Satisfaction of Condition E14" Audit Interview 6/11/23 Site Inspection 6/11/23	Appropriate evidence was provided to the Planning Sectetary on 4 July 2023 and prior to the commencement of construction that demonstrated the retirement of the credits in accordance with this condition	Compliant
E15	Where evidence of compliance with the Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits (OEH, 2017) for the purpose of applying the variation rules has been provided to the Planning Secretary, variation rules may be applied to retire the relevant ecosystem credits and species credits as set out in the BAM Biodiversity Credit Biodiversity Report (Variation). The variation rule does not apply to biodiversity credits for threatened species or threatened ecological communities that are listed as critically endangered under the Biodiversity Conservation Act 2016 or listed in any capacity under the Environment Protection and Biodiversity Conservation Act 1999. Note: “Impacted site” in the application of the like-for-like offset rules is taken to be the subject land described in the Biodiversity Development Assessment Report and Project Amendments: Biodiversity Assessment referred to in Condition A1. The subject land is the disturbance footprint subject to assessment under the Biodiversity Assessment Method.	Audit Interview 6/11/23 Site Inspection 6/11/23	Noted	Noted
E16	Evidence of the retirement of credits in satisfaction of Condition E14 must be provided to the Planning Secretary prior to impacts on biodiversity values.	Letter from SWC to DPE titled "Upper South Creek Advanced Water Recycling Centre (CSSI 8609189): Evidence of retirement of Biodiversity Credits in accordance with Condition E16 in Satisfaction of Condition E14" Audit Interview 6/11/23 Site Inspection 6/11/23	Appropriate evidence was provided to the Planning Sectetary on 4 July 2023 and prior to the commencement of construction that demonstrated the retirement of the credits in accordance with this condition	Compliant
E17	Where lands mapped as non-certified existing native vegetation (ENV) under the Order to confer biodiversity certification on the State Environmental Planning Policy (Sydney Regional Growth Centres) 2006 (the Order) are proposed to be impacted, the Proponent must prepare a Growth Centres Biodiversity Certification Offset Strategy. The strategy must: (a) be prepared in consultation with EHG and submitted to the Planning Secretary for approval prior to the commencement of construction; (b) be prepared in accordance with the Order; (c) detail how the Proponent proposes to meet the requirements specified under Relevant Biodiversity Measure (RBM) 8 of the Order; and (d) include the location of the offsets and the proposed measures to ensure the long-term protection of the offsets. Note: The Growth Centres Biodiversity Certification Offset Strategy under Condition E17 is only required in the event impacts on non-certified existing native vegetation (ENV) are proposed.	Audit Interview 6/11/23 Site Inspection 6/11/23	The project is not impacting native vegetation under the order at this point.	Not triggered
E18	The Proponent must avoid direct or indirect impacts to ENV within RBM 12 red-hatched lands at Kemps Creek and Cross Street during construction of Stage 1 of the CSSI.	Audit Interview 6/11/23 Site Inspection 6/11/23	RMB12 lands have not been impacted at the time of the audit	Not triggered
E19	The Proponent must prepare a Rehabilitation Management Plan to revegetate and restore impacted RBM 12 red-hatched lands at Kemps Creek, mapped within the amended impact assessment area at Appendix B. Rehabilitation must occur as soon as practical after construction of the brine pipeline mapped at Appendix B, or as otherwise agreed with relevant landowner(s) or EHG.	Audit Interview 6/11/23 Site Inspection 6/11/23	Preparation of the rehabilitation plan has commenced however is not required to be completed until the brine pipeline is constructed	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E20	The Rehabilitation Management Plan required under Condition E19 must be prepared in consultation with EHG and submitted to the Planning Secretary for approval one month before the commencement of construction in the RBM 12 red-hatched lands. The plan must include: (a) removal of all equipment, materials and environmental controls from site; (b) where like-for-like re-vegetation is not possible (for example, to minimise risk to pipelines from tree roots), consider vegetation suited to the infrastructure requirements and environmental conditions; (c) return disturbed areas to preconstruction ground level where practical; (d) rehabilitate areas of native vegetation removal to the highest ecological condition possible; (e) in areas of native vegetation removal, reuse felled vegetation (logs and tree-hollows) and other habitat features such as rocks and boulders to increase habitat values; (f) in areas of native vegetation removal, use locally sourced (local provenance) tube stock only. All species installed are to be locally indigenous and suitable and characteristic of the Plant Community Type (PCT) that would have originally occurred at the site; (g) where possible, reuse stockpiled vegetation as part of rehabilitation works; (h) where open trenching of waterways is required, enhance aquatic habitat and restore creeks to an improved state; and (i) preparation of six-monthly summary progress report(s) over the revegetation maintenance period, for submission to EHG for comment until EHG is satisfied that the vegetation is established.	Audit Interview 6/11/23 Site Inspection 6/11/23	Preparation of the rehabilitation plan has commenced however is not required to be completed until the brine pipeline is constructed	Not triggered
E21	The Proponent must minimise impacts to Key Fish Habitat (KFH) as defined in Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update).	Audit Interview 6/11/23 Site Inspection 6/11/23	Preparation of the rehabilitation plan has commenced however is not required to be completed until the brine pipeline is constructed	Not triggered
E22	The Proponent must take all reasonable and practicable measures to avoid open trenching of waterways, particularly Kemps Creek and South Creek, between late April and early June, and late October to late December, to minimise disruption of downstream and upstream Australian Bass migration.	Audit Interview 6/11/23 Site Inspection 6/11/23	No trenching of waterways was being undertaken at the time of the audit. Planning for open trenching is being undertaken to avoid these periods.	Not triggered
E23	Stage 1 of the CSSI must maximise the reuse of native vegetation and other habitat features that have been approved for removal. Where reuse by the CSSI is not possible, relevant council(s), NSW National Parks & Wildlife Service, Western Sydney Parklands Trust, Greater Sydney Local Land Services, local Landcare groups, DPI Fisheries and any additional relevant government agencies must be consulted prior to the removal of vegetation and other habitat to determine if: (a) hollows, tree trunks (greater than 25-30 centimetres in diameter and 2-3 metres in length), mulch, bush rock and root balls salvaged from native vegetation impacted by the CSSI; and (b) collected plant material, seeds and/or propagated plants from native vegetation impacted by the CSSI, could be used by others in habitat enhancement and rehabilitation activities, before pursuing other disposal options. If the native vegetation and other habitat features can be reused by others, the Proponent must advise them and facilitate access for salvage.	Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRC-TRA-PLN-DES-0001 dated 26/07/2023. Audit Interview 6/11/23 Site Inspection 6/11/23	Reasonable efforts have been made with various organisations to maximise re-use of native vegetation and other habitat features with varied results. Opportunities to re-use vegetation are described in the UDLP.	Compliant
E24	Measures identified in the documents listed in Condition A1 to not worsen flood characteristics during operation or other measures that achieve the same outcomes, must be incorporated into the AWRC site detailed design of Stage 1 of the CSSI. The incorporation of these measures into the detailed design must be reviewed and endorsed by a suitably qualified flood consultant, who is independent of the project's design and construction, in consultation with directly affected landowners, EHG, and relevant council(s).	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E25	Unless otherwise agreed by the Planning Secretary, Stage 1 of the CSSI must be designed and constructed to limit impacts on flooding characteristics in areas outside the project boundary, to those impacts documented in the amended Flood Impact Assessment (FIA) (July 2022) listed in Condition A1. Where the requirements set out in the amended FIA (July 2022) listed in Condition A1 cannot be met alternative flood levels or mitigation measures may be agreed to with the affected landowner. In the event that the Proponent and the affected landowner cannot agree on the measures to mitigate the impact as described in the amended FIA (July 2022) listed in Condition A1, the Proponent must engage a suitably qualified and experienced independent person to advise and assist in determining the impact and relevant mitigation measures.	Audit Interview 6/11/23 Site Inspection 6/11/23	There were no construction activities observed during the site inspection that would result in unacceptable impacts. The operational aspects of this condition have not been triggered. No flooding events of complaints related to flooding recorded during the audiit period.	Compliant
E26	Flood information including flood reports, models and geographic information system outputs, and work as executed information from a registered surveyor certifying finished ground levels and the dimensions and finished levels of all structures within the flood prone land, must be provided to the relevant council(s), EHG and the SES in order to assist in preparing relevant documents and to reflect changes in flood behaviour as a result of Stage 1 of the CSSI. The council(s), EHG and the SES must be notified in writing that the information is available no later than one month following the completion of construction. Information requested by the relevant council(s), EHG or the SES must be provided no later than six months	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E27	Prior to the commencement of construction within the green space area as mapped in Figure 4- 7 and Figure 4-8 of the Environmental Impact Statement listed in Condition A1, the Proponent must prepare a Flood Impact and Risk Assessment (FIRA) for the proposed concept design of the green space area. The FIRA must incorporate all proposed elements (including but not limited to vegetation, walking paths, fences, irrigation area and outdoor learning spaces). The FIRA must be prepared by a suitably qualified and experienced flood consultant in consultation with EHG, and provided to the Planning Secretary for approval. Note: Condition E27 excludes construction of elements required for effective operation and management of operational components of the AWRC plant. This includes release infrastructure to South Creek, fences around the AWRC operational area and fire trail around the AWRC operational area.	Audit Interview 6/11/23 Site Inspection 6/11/23	Construction activites have not commenced in the green space, therefore not triggered.	Not triggered
E28	The FIRA required under Condition E27 must address the performance outcome criteria specified in Table 9.1.2 of the draft Western Sydney Aerotropolis Development Control Plan 2021 (draft Aerotropolis DCP Phase 2, October 2021).	Audit Interview 6/11/23 Site Inspection 6/11/23	Construction activites have not commenced in the green space, therefore not triggered.	Not triggered
E29	All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects or places of cultural significance except as authorised by this approval.	John Holland - Environmental Induction Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) Letter from Kelleher Knightingale to SWC titled "Completion of Archaeological Fieldwork, Upper South Creek Advanced Water Recycling Centre State Significant Infrastructure Approval (SSI 8609189) dated 12/9/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Aboriginal artefacts were salvaged from the AWRC site prior to the commencement of excavation works. Kellerher Knightingale have been appointed as the aboriginal archaeologist to oversee the salvage and reporting work and confirmed on 12/9/23 that the fieldwork component of the salvage was completed. The salvage report has not been completed as there is a need for cataloguiing the finds. There have been no unexpected finds or impacts on aboriginal herigage reported during the audit period.The JHG Site Induction includes unexpected finds and stop work procedures in the ecent an item of heritage significance is discovered. Heritage CEMP includes mitigation measures to be implemented.	Compliant
E30	The Registered Aboriginal Parties (RAPs) must be kept regularly informed about Stage 1 of the CSSI. The RAPs must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of Stage 1 of the CSSI. The Proponent must allow the RAPs an opportunity to undertake cultural salvage at each Aboriginal archaeological site identified for salvage in the Aboriginal Cultural Heritage Assessment Report (ACHAR) (June 2021) listed in Condition A1. Note: Details regarding ongoing engagement with RAP's must be provided in the Communication Strategy required under Condition B1.	Upper South Creek Project - Advanced Water Recycling Centre and Pipelines - CoA A9 Consulation Summary Report -Heritage CEMP Subplan dated 14/7/23 Community & Stakeholder Engagement Plan Sydney Water & John Holland Pty Ltd Upper South Creek Advanced Water Recycling Centre and Pipelines August 2023 USCP-JHG-MPL-CSR-0002 Audit Interview 6/11/23 Site Inspection 6/11/23	Registered Aboriginal Parties were consulted with during the preparation of the Heritage CEMP Subplan with their comments addressed in the consultation report appended to the Heritage Subplan The communication strategy provides details of consultation with the RAPS as required by this condition (refer to Appendix B and C)	Compliant
E31	At the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s) must be prepared by a suitably qualified person. The Aboriginal Cultural Heritage Excavation Report(s), must: (a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and (b) document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds). The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant council(s), LALC, the RAPs and local libraries within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).	Letter from Kelleher Knightingale to SWC titled "Completion of Archaeological Fieldwork, Upper South Creek Advanced Water Recycling Centre State Significant Infrastructure Approval (SSI 8609189) dated 12/9/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The fieldwork component is complete, however there is further work required to be undertaken prior to the finalisation of the salvage report (which is currently being prepared. Experienced consultant Kelleher Knightingale have been appointed to undertake this work.	Not triggered
E32	Where previously unidentified Aboriginal objects or places of cultural significance are discovered, all Work must immediately stop in the vicinity of the affected area. Works potentially affecting the previously unidentified objects and places must not recommence until Heritage NSW has been informed. The measures to consider and manage this process must be specified in the Unexpected Heritage Finds and Human Remains Procedure required by Condition E37 and include registration in the Aboriginal Heritage Information Management System (AHIMS).	John Holland - Environmental Induction Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) Audit Interview 6/11/23 Site Inspection 6/11/23	No previously unidentified Aboriginal objects or places of cultural significance are discovered to date. The site induction includes procedures to be followed in the event of an uexpected find with the Unexpected Finds Protocol included in the Heritage CEMP subplnm	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E33	Archival photographic digital recording must be undertaken as proposed in the documents listed in Condition A1 for all listed heritage items which will be affected by Stage 1 of the CSSI. The recording must be undertaken prior to the commencement of Work which may impact the items and sites. The Archival recording must be undertaken by a suitably qualified heritage specialist and prepared in accordance with NSW Heritage Office's How to Prepare Archival Records of Heritage Items (1998) and Photographic Recording of Heritage Items Using Film or Digital Capture (2006). A copy must be provided to Heritage NSW and the relevant council(s) and submitted as part of the Heritage Report required by Condition E35.	Aboriginal, non-Aboriginal, World and National Heritage CEMP Sub-plan (USCP-JHG-MPL-ENV-0006) Historical Test Excavation Report = PAS 1 and PAS 9, Artefact September 2023 Audit Interview 6/11/23 Site Inspection 6/11/23	Artefact engaged as the heritage consultant - , archival recording has been undertaken, heiritage report is currently being prepared.	Compliant
E34	Prior to commencement of archaeological excavation, the Proponent must nominate a suitably qualified Excavation Director who complies with Heritage NSW's Criteria for Assessment of Excavation Directors (September 2019) to oversee and advise on matters associated with historical archaeology. The Excavation Director must be present to oversee excavation, advise on archaeological issues, advise on the duration and extent of oversight required during archaeological excavations consistent with the Archaeological Research Design and Excavation Methodology included as part of the Environmental Impact Statement listed in Condition A1 .	SWC Internal email dated 25/11/22 Letter from Artefact to SWC titled "Upper South Creek Advanced Water Recycling Centre project - nomination of Excavation Director" dated 18/11/22 Letter from Artefact to SWC titled "Upper South Creek Advanced Water Recycling Centre project - response to excavation Directors Criteria" dated 18/11/22 Letter from Artefact to SWC titled "Upper South Creek Advanced Water Recycling Centre project - nomination ofSecondary Excavation Director" dated 18/11/22 Audit Interview 6/11/23 Site Inspection 6/11/23	Artefact heritage are an experienced Heritage Consultant and have nominated three Archaeological Directors	Compliant
E35	Following completion of archaeological excavation programs a Heritage Report must be prepared that includes: (a) the details of any archival recording, (b) further historical research undertaken (c) results of archaeological excavations (including artefact analysis and identification of a final repository for finds); and (d) details of any significant artefacts recovered, where they were located, and details of their ongoing conservation and protection in perpetuity. The report must be prepared in accordance with guidelines and standards required by Heritage NSW.	Archaeological Monitoring Excavation Results: Blaxlands Crossing (PAS 3), Artefact, December 2023 Archaeological Monitoring Excavation Results:Fleurs Radio Telescope (PAS 7) - Salvage Area 1, Artefact, December 2023 Upper South Creek AWRC Modification 2: Pipeline Alignments, Non Aboriginal (Historical Heritage Assessments, Artefact June 2023 Upper South Creek Advanced Water Recycling Centre, Historical Archaeological Test Excavation Report - PAS 1 and PAS 9, Artefact November 2023 Email from Artefact to SWC dated 21/11/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The majority of salvage work and excavations has taken place, there is a lot of work required to be undertaken in documenting and cataloguing the artefacts. The preparation of the report has commenced but has not been completed at this stage	Not triggered
E36	The Heritage Report must be submitted to the Planning Secretary, Heritage NSW, the relevant council(s), relevant local libraries and relevant local historical societies no later than 12 months after the completion of archaeological excavation programs.	Archaeological Monitoring Excavation Results: Blaxlands Crossing (PAS 3), Artefact, December 2023 Archaeological Monitoring Excavation Results:Fleurs Radio Telescope (PAS 7) - Salvage Area 1, Artefact, December 2023 Upper South Creek AWRC Modification 2: Pipeline Alignments, Non Aboriginal (Historical Heritage Assessments, Artefact June 2023 Upper South Creek Advanced Water Recycling Centre, Historical Archaeological Test Excavation Report - PAS 1 and PAS 9, Artefact November 2023 Email from Artefact to SWC dated 21/11/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The majority of salvage work and excavations has taken place, there is a lot of work required to be undertaken in documenting and cataloguing the artefacts. The preparation of the report has commenced but has not been completed at this stage	Not triggered
E37	An Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected heritage finds in accordance with any guidelines and standards prepared by Heritage NSW and the Heritage Council of NSW. The Unexpected Heritage Finds and Remains Procedure must be submitted to the Planning Secretary for information before the commencement of Work. The procedure must be included in the Heritage CEMP Plan required by Condition C4.	Upper South Creek - Advanced Water Recycling Centre and Pipelines, Heritage CEMP Subplan (Aboriginal, Non Aboriginal, World and National Heritage) - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 14/7/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The unexpeced finds and human remains procedured is included as Appendix C of the Heritage Subplan . The procedure was submitted to DPE prior to the commencement of works with the Heritage Plan	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E38	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of Work. Where archaeological investigations have been undertaken as a result of Unexpected Finds notifications then a Final Archaeological Report must be provided in accordance with Heritage Council guidance and standard requirements for final reporting under Excavation Permits. Note: Human remains that are found unexpectedly during the carrying out of Work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.	Audit Interview 6/11/23 Site Inspection 6/11/23	No unexpected heritage finds have been recorded or identified during the audit period	Not triggered
E39	A detailed land use survey must be undertaken to confirm sensitive land use(s) (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration, construction ground-borne noise and operational noise. The survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of activities which generate construction or operational noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Noise and Vibration CEMP Sub-plan required by Condition C4.	Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23	The detailed land use survey is provided in Appendix D of the Noise and Vibration CEMP	Compliant
E40	Work must be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 1:00pm Saturdays; and (c) at no time on Sundays or public holidays.	Upper South Creek Advanced Water Recycling Centre - November Out of Hours Works dated 2/11/23 Audit Interview 6/11/23 Site Inspection 6/11/23	There have been no incidents reported or complaints received for OOH work. Community notification has been issued for forthcoming out of hours works	Compliant
E41	Except as permitted by an EPL, highly noise intensive Works that result in an exceedance of the applicable NML at the same receiver must only be undertaken: (a) between the hours of 8:00 am to 6:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) if continuously, then not exceeding three hours, with a minimum cessation of Work of not less than one hour. For the purposes of this condition, 'continuously' includes any period during which there is less than one hour between ceasing and recommencing any of the Work.	Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 Audit Interview 6/11/23 Site Inspection 6/11/23	There have been no incidents reported or complaints received for highly intensive noisy activities. These requirements are documented in the Noise and Vibration CEMP	Compliant
E42	Notwithstanding Conditions E40 and E41 Work may be undertaken outside the hours specified in the following circumstances (a, b, or c): (a) Safety and Emergencies, including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm. On becoming aware of the need for emergency work in accordance with Condition E42(a), the AA, the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. Best endeavors must be used to notify all noise and/or vibration affected residents and owners/occupiers of properties identified sensitive land use(s) of the likely impact and duration of those works; or (b) Work that meets all of the following criteria: (i) construction that causes LAeq(15 minute) noise levels: · no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and · no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land use(s); or (ii) construction that causes: · continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or · intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006). (c) By Approval, including: (i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or (ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E43; or (iii) negotiated agreements with directly affected residents and sensitive land use(s).	Upper South Creek Project - Out of Hours Works Permit - 1/9/23 Audit Interview 6/11/23 Site Inspection 6/11/23	One oversize/overmass delivery occurred on the 16/10/23. The out of hours delivery was planned for safety reasons and not considered to be emergency work	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E43	An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of Work which is outside the hours defined in Conditions E40, and that are not subject to an EPL. The Protocol must be submitted to and approved by the Planning Secretary before commencement of the out-of-hours work. The Protocol must be prepared in consultation with the ER, AA and EPA. The Protocol must include: (a) identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: (i) the ER and AA review all proposed out-of-hours activities and confirm their risk levels, (ii) low risk activities can be approved by the ER in consultation with the AA, and (iii) high risk activities that are approved by the Planning Secretary; (b) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria; (c) a process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of Condition E55. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land use(s) would be exposed to, including the number of noise awakening events; (d) procedures to facilitate the coordination of out-of-hours work including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided; and (e) notification arrangements for affected receivers for approved out-of-hours work and notification to the Planning Secretary of approved low risk out-of-hours works. This condition does not apply if the requirements of Condition E42(a) or (b) are met. Note: If the Work is subject to an EPL and the EPA does not endorse extended hours as part of the EPL, the extended hours can not be considered under this Protocol.	DPE Approval dated 08/08/2023 their ref:SSI-8609189 Environment Protection Licence EPL No 21800 Audit Interview 6/11/23 Site Inspection 6/11/23	The project has obtained an Environment Protection Licence (EPL 21800), OOH work is undertaken in accordance with the EPL, therefore this condition is not triggered	Not triggered
E44	Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration objectives: (a) construction ‘Noise affected’ NMLs established using the Interim Construction Noise Guideline (DECC, 2009); (b) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); (c) Australian Standard AS 2187.2 - 2006 “Explosives - Storage and Use - Use of Explosives”; (d) BS 7385 Part 2-1993 “Evaluation and measurement for vibration in buildings Part 2” as they are “applicable to Australian conditions”; and (e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage). Work that exceeds the noise management levels and/or vibration criteria must be managed in accordance with the Noise and Vibration CEMP Sub-plan required by Condition C4, as applicable.	Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23	Appropriate mitigation measures were observed during the audit site inspection including provision of temporary acoustic barriers and the use of low tonal reversing alarms instead of intrusive noise beepers. The Noise and Vibration Management Plan documents reasonable and feasible measures to be implemented.	Compliant
E45	Mitigation measures must be applied when the following residential ground-borne noise levels are exceeded: (a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and (b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A). The mitigation measures must be outlined in the Noise and Vibration CEMP Sub-plan, including in any Out-of-Hours Work Protocol, required by Condition E43.	Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23	No activities have occurred during the audit period that would result in groundborne noise that would exceed these levels. Activities observed are highly unlikely to result in groundborne noise generation.	Compliant
E46	Noise generating Work in the vicinity of community, religious, educational institutions, noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) resulting in noise levels above the NMLs must not be timetabled during sensitive periods, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution.	Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP-JHG-MPL-ENV-0006 Rev 9 dated 28/6/23	No work observed to be undertaken in the vicinity of community facilities such as schools and educational institutions. No complaints received relating to noise during the audit period.	Not triggered
E47	At no time can noise generated by construction exceed the National Standard for exposure to noise in the occupational environment of an eight-hour (8hr) equivalent continuous A-weighted sound pressure level of LAeq,8h of 85 dB(A) for any employee working at a location near the CSSI.	Noise and Vibration Monitoring Summary - 14/11/23 Noise Monitoring Field Forms x 2 (26/9/23)	Noise monitoring undertaken demonstrates compliance with this condition. The recorded noise levels are well below the 85dBA threshold.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E48	Construction Noise and Vibration Impact Statements (CNVIS) must be prepared for Work that may exceed the noise management levels, vibration criteria and/or ground-borne noise levels specified in Condition E44 and Condition E45 at any residence outside construction hours identified in Condition E40, or where receivers will be highly noise affected. The CNVIS must include specific mitigation measures identified through consultation with affected sensitive land use(s) and the mitigation measures must be implemented for the duration of the Works. A copy of the CNVIS must be provided to the AA and ER prior to the commencement of the associated Works. The Planning Secretary may request a copy/ies of CNVIS.	Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP- JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 Upper South Creek - Advanced Water Recycling Centre, Construction Noise and Vibration Impact Statement - AWRC, Renzo Tonin and Associates, dated 21/8/23 Upper South Creek - Advanced Water Recycling Centre, Construction Noise and Vibration Impact Statement - Pipelines, Renzo Tonin and Associates, dated 5/9/23	Renzo Tonin have prepared CNVIS for the project in accordance with this condition. Section 9.2 of the CNVIS describes the consultation undertaken with affected residents, Section 9.4 includes additional management measures to be employed. The CNVIS has been provided to both the ER and the AA for their review	Compliant
E49	Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before Work that generates vibration commences in the vicinity of those properties. If the potential exceedance is to occur more than once or extend over a period of 24 hours, owners and occupiers are to be provided a schedule of potential exceedances on a monthly basis for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Noise and Vibration CEMP Sub-plan required by Condition C4 and the Community Communication Strategy required by Condition B1.	Audit Interview 6/11/23 Site Inspection 6/11/23	No activities were observed being undertaken near or adjacent to properties that would exceed the screening criteria for cosmetic damage.	Not triggered
E50	Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise levels are minimised. Practices must include, but are not limited to: (a) use of regularly serviced low sound power equipment; (b) early occupation and later release of road carriageways and construction sites; (c) scheduling of noisiest Works before 11.00 pm Sunday to Thursday and before 12 midnight Friday and Saturday; (d) temporary noise barriers (including the arrangement of plant and equipment) around noisy equipment and activities such as rock hammering and concrete cutting; and (e) use of alternative construction and demolition techniques.	Upper South Creek - Advanced Water Recycling Centre and Pipelines, Noise and Vibration CEMP Subplan - Document No USCP- JHG-MPL-ENV-0006 Rev 9 dated 28/6/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Appropriate noise mitigation measures were observed on site, Noise management measures are documented in the CNVIS. No noise complaints have been received during the audit period.	Compliant
E51	The Proponent must conduct vibration testing before and during vibration generating activities that have the potential to impact on heritage items to identify minimum working distances to prevent cosmetic damage. In the event that the vibration testing and attended monitoring shows that the preferred values for vibration are likely to be exceeded, the construction methodology must be reviewed and, if necessary, additional mitigation measures implemented.	Vibration testing monitoring results 30/10/23 - 6/11/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Vibration monitoring testing was undertaken from 30/10/23 - 6/11/23	Compliant
E52	Advice from a heritage specialist must be sought on methods and locations for installing equipment used for vibration, movement and noise monitoring at heritage-listed structures. Note: The installation of noise and vibration equipment must not impact on the heritage values of the Heritage items.	Technical Memorandum from ERM to JHG titled "Upper South Creek Advanced Water Recycling Centre and Pipelines Horizontal Directional Drilling - Upper Canal Crossing Vibration Monitoring Plan dated 14/9/23	ERM were appointed as the heritage specialist and provided the advice in accordance with this condition.	Compliant
E53	Before conducting at-property treatment at any heritage item identified in the documents listed in Condition A1, the advice of a suitably qualified and experienced built heritage expert must be obtained and implemented to ensure any such Work does not have an adverse impact on the heritage significance of the item.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered as no need to do at property treatments as the noise impacts are short term in duration.	Not triggered
E54	All work undertaken for the construction of Stage 1 of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided. This must include: (a) rescheduling Work to provide respite to impacted noise sensitive land use(s) so that the respite is achieved in accordance with Condition E55; or (b) the provision of alternative respite or mitigation to impacted noise sensitive land use(s); and (c) the provision of documentary evidence to the AA in support of any decision made in relation to respite or mitigation. The consideration of respite must also include all other CSSI, SSI and SSD projects which may cause cumulative and/or consecutive impacts at receivers affected by the delivery of Stage 1 of the CSSI.	Audit Interview 6/11/23 Site Inspection 6/11/23	At the time of the audit, there had not been work on near or adjacent projects or utility work that would require coordination for the purposes of respite. Project coordination meetings with other projectsand any OOH works are reviewed by the AA to ensure appropriate coordination and respite is provided. SWC/JHG demonstrated an awareness of other project activites planned that may require coordination.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E55	In order to undertake out-of-hours work outside the hours specified under Condition E40, the appropriate respite periods must be identified for the out-of-hours work in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with: (a) a progressive schedule for periods of likely out-of-hours work; (b) a description of the potential work, location and duration of the out-of-hours work; (c) the noise characteristics and likely noise levels of the work; and (d) likely mitigation and management measures which aim to achieve the relevant noise management levels and vibration criteria under Condition E44 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers). The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the AA, ER, EPA and the Planning Secretary for information prior to undertaking the Work scheduled for the subject period. Note: Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the rating background noise level at any residence.	Upper South Creek Advanced Water Recycling Centre - November Out of Hours Work - Community Notification dated 2 November 2023 Upper South Creek - Weekly Enviro Team Meeting dated 3/11/23 Audit Interview 6/11/23 Site Inspection 6/11/23	No out of hours works have been undertaken to date with the exception of an oversize, overmass delivery undertaken in accordance with condition E42. Planning for OOH work is underway with a community notification issued in November for planned works. OOH works are planned to be undertaken in accordance with the Environment Protection Licence.	Not triggered
E56	An Operational Noise Review (ONR) must be prepared to confirm noise control measures that would be implemented for the operation of Stage 1 of the CSSI. The ONR must be prepared in consultation with relevant council(s) and the EPA and must: (a) confirm the appropriate operational noise and vibration objectives and levels for surrounding development, including existing sensitive land use(s); (b) confirm the operational noise predictions based on the final design. Confirmation must be based on an appropriately calibrated model(s) (which has incorporated noise monitoring, and concurrent traffic counting, where necessary for calibration purposes). The assessment must specifically include verification of noise levels at all fixed facilities, based on noise monitoring undertaken at appropriately identified noise catchment areas surrounding the facilities; (c) identify all noise and vibration mitigation measures including location, type and timing of mitigation measures, with a focus on: (i) source control and design; and (ii) 'best practice' achievable noise and vibration outcome for each activity; (d) include a consultation strategy to seek feedback from directly affected landowners on the noise measures; and (e) procedures for the management of operational noise complaints, including investigation and monitoring (subject to complainant agreement). The ONR must be verified by the AA or an independent acoustic expert. The ONR must be undertaken at the projects expense and submitted to the Planning Secretary for information at least 12 months prior to the commencement of operation, unless otherwise agreed by the Planning Secretary. The identified noise measures must be implemented and the ONR must be made publicly available.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E57	Within 12 months of the commencement of operation of Stage 1 of the CSSI, monitoring of operational noise must be undertaken to compare actual noise performance of Stage 1 of the CSSI against the noise performance predicted in the review of noise mitigation measures required by Condition E56.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E58	Stage 1 of the CSSI must be constructed in a manner that minimises visual impacts of construction sites. For example, decorative hoarding, landscaping and/or vegetative screening of ancillary facilities, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, including recognition of Country.	Audit Interview 6/11/23 Site Inspection 6/11/23	The main construction site compound is located in an area with low visual sensitivity. There are no residents adjacent to the site that would be impacted visually. Pipeline works are generally short term in nature with limited visual impacts. No complaints have been received regarding visual impacts	Compliant
E59	Stage 1 of the CSSI must be constructed and operated with the objective of minimising light spillage to surrounding properties. All lighting associated with the construction and operation of Stage 1 of the CSSI must be consistent with the requirements of AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting, relevant Australian Standards in the series AS/NZ 1158 – Lighting for Roads and Public Spaces, and National Airports Safeguarding Framework (NASF) Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports. Additionally, mitigation measures must be provided to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners. Note: The outcomes of this condition must be demonstrated in the Urban Design and Landscape Plan.	Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRC-TRA-PLN-DES-0001 dated 26/07/2023. Audit Interview 6/11/23 Site Inspection 6/11/23	No out of hours works have been undertaken to date. No complaints have been received relating to lighting. The OOH form addresses temporary lighting	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E60	Temporary and permanent active transport facilities along the pipeline alignment must be designed, constructed and/or rectified in accordance with: (a) the process set out in the Movement and Place Framework (NSW Government) including: (i) the Walking Space Guide: Toward Pedestrian Comfort and Safety (TfNSW, 2020); and (ii) the Cycleway Design Toolbox: Designing for Cycling and Micromobility (TfNSW, 2020). (b) the Guide to Road Design Part 6A: Paths for Walking and Cycling (Austroads 2017) where not otherwise covered by (a); (c) relevant Australian Standards (AS) such as AS 1428.1-2009 Design for access and mobility; and (d) relevant Crime Prevention Through Environmental Design (CPTED) principles. Note: In the event of an inconsistency, the latest guidance document prevails to the extent of the inconsistency.	Audit Interview 6/11/23 Site Inspection 6/11/23	No Impacts to active travel links at this stage in the project. Temporary ATL's are not proposed to be constructed	Not triggered
E61	The place making, design and landscape outcomes for the AWRC site of Stage 1 of the CSSI must be: (a) informed by and be consistent with the Upper South Creek Advanced Water Recycling Centre Urban Design Report, dated July 2021 (provided as Attachment A to RFI 1, dated 1 June 2022) and identified in the documents listed in Condition A1, including but not limited to the objectives and design principles, requirements, and opportunities; and (b) prepared in consultation with the community (including the affected landowners and businesses or a representative of the businesses), LALCs, RAPs and relevant council(s).	Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRC-TRA-PLN-DES-0001 dated 26/07/2023. Audit Interview 6/11/23 Site Inspection 6/11/23		Not triggered
E62	Where Work results in the temporary removal of a recreational or community use, and no similar use with sufficient capacity for regular users is located within two (2) kilometres of the site, then a temporary facility of comparable scale must be provided for the duration of the use of that site.	Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRC-TRA-PLN-DES-0001 dated 26/07/2023. Audit Interview 6/11/23 Site Inspection 6/11/23	There has not been any works completed on the project to date that has resulted in the temporary removal of a recreational or community use.	Not triggered
E63	An Urban Design and Landscape Plan (UDLP) must be prepared for the AWRC site to document and illustrate the permanent built works and landscape design of Stage 1 of the CSSI and how these works are to be maintained. The UDLP must be: (a) prepared by a suitably qualified and experienced person(s) in place, urban and landscape design and bush regeneration; (b) prepared in consultation with relevant council(s) and the community, including affected landowners and businesses; (c) submitted to the Planning Secretary for approval no later than one month before the construction of permanent built surface works and/or landscaping in the area to which the UDLP applies; and (d) implemented during construction and operation of Stage 1 of the CSSI. Note: The UDLP may be developed and considered in stages to facilitate design progression and construction. Any such staging and associated approval would need to facilitate a cohesive final design and not limit final design outcomes.	Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRC-TRA-PLN-DES-0001 dated 26/07/2023. Audit Interview 6/11/23 Site Inspection 6/11/23	The Draft Urban Design and Landscape Plan has been prepared and is available on the SWC website. The UDLP is not required to be completed until although it has been submitted to DPE for comments.	Not triggered
E64	The UDLP must document how the following matters have been considered in the design and landscaping of the project: (a) the requirements of Conditions E61 to E62; (b) the requirements of the Wildlife Management Plan under Condition E130; (c) demonstrated integration of Crime Prevention Through Environmental Design (CPTED) principles; (d) Designing with Country and the principles and objectives of the draft Connecting with Country Framework; (e) the finalised version of the draft guideline 'Recognise Country – Draft Guidelines for development in the Aerotropolis'; (f) constraints associated with bushfire, flooding and airport safeguarding; (g) vegetation management that considers the principles of Guidelines for Vegetation Management Plans on Waterfront Land (NSW Office of Water, DPI 2012), draft Western Sydney Aerotropolis Riparian Revegetation Strategy, and the tree planting provisions in the draft Western Sydney Aerotropolis Development Control Plan – Phase 2 (October 2021); (h) architectural design to soften the industrial aesthetic; (i) integrating heritage character of the site with treatment and finishes of the new design; and (j) inputs from relevant experts in architecture, landscape architecture, bushfire management, heritage, revegetation, ecology, wildlife hazard management and flooding.	Sydney Water - Upper South Creek Advanced Water Recycling Centre, Urban Design and Landscape Plan Stage 1, Tract, Rev 5 dated 13/11/23 Audit Interview 6/11/23 Site Inspection 6/11/23	The UDLP is comprehensive and addresses the requirements of this condition.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E65	The UDLP must include descriptions and visualisations (as appropriate) of: (a) the design of the permanent built elements for the AWRC site including their form, materials and detail; (b) place, design and landscape outcomes for the proposed green space area, consistent with the Upper South Creek Advanced Water Recycling Centre Urban Design Report, dated July 2021 (provided as Attachment A to RFI 1, dated 1 June 2022) and identified in the documents listed in Condition A1; (c) the design of the project landform and landscaping elements; (d) the type and design of public and open space; (e) details of strategies to rehabilitate, regenerate or revegetate disturbed areas with local native species; and (f) management and routine maintenance standards and regimes for design elements and landscaping Work (including adequate watering of plants following planting depending on forecast weather conditions and weed management) to ensure the success of the design and landscape outcomes. Unless otherwise agreed with the Planning Secretary, construction of permanent built work or landscaping that are the subject of the UDLP must not be commenced (in the area to which the UDLP applies) until the UDLP has been approved by the Planning Secretary.	Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRC-TRA-PLN-DES-0001 dated 26/07/2023. Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-52)- Condition E65-Request to commence construction of permanent built work prior to approval of the Urban Design and Landscape Plan, dated 29/9/23 Letter from DPE to SWC titled "Upper South Creek Advanced Water Recycling Centre (SSI-8609189-PA-39)- Condition E63,E64 E65 Approval of the Urban Design and Landscape Plan, dated 29/11/23 Audit Interview 6/11/23 Site Inspection 6/11/23	On 29/9/23 DPE approved the construction of structural concrete works prrior to the ULDP as follows: - Oxidation ditches - MBR - inlet works - digestors DPE subsequently approved the UDLP on 29/11/23. The UDLP addresses the requirements of this condition.	Compliant
E66	The ongoing maintenance and operation costs of urban design, open space, landscaping and recreational items and work implemented for the AWRC site as part of this approval remain the Proponent’s responsibility until satisfactory arrangements have been put in place for the transfer of the asset to the relevant authority. Before the transfer of assets, the Proponent must maintain items and work to at least the design standards established in the UDLP, required by Condition E65. The Planning Secretary must be advised of the date of transfer of the asset(s) to the relevant authority.	Sydney Water Upper South Creek Advanced Water Recycling Centre Urban Design and Landscape Plan Stage 1 Prepared for Sydney Water Document number AWRC-TRA-PLN-DES-0001 dated 26/07/2023. Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E67	Plant maintenance (watering and weeding) must continue during construction and operation on land owned by Sydney Water. Sydney Water must continue plant maintenance on other land specified in the Rehabilitation Management Plan under Condition E19 and Condition E20 and committed to in the documents listed in Condition A1 for the maintenance period specified, in consultation with EHG and relevant landowner(s), as required. Should any plant loss occur during the maintenance period, the plants should be replaced by the same plant species and growth form (i.e. a tree with a tree and local native provenance species where the original planting was of local native provenance) unless it is determined by a suitably qualified person that a different species is more suitable for that location.	Audit Interview 6/11/23 Site Inspection 6/11/23	RMB 12 areas have not been impacted therefore the requirement to produce the managemen plan has not been triggered. The drafting of rehabilitation management plans has commenced for pipeline areas (already drafted by JH	Not triggered
E68	The Proponent must identify the utilities and services (hereafter “services”) potentially affected by construction to determine requirements for diversion, protection and/or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. The Proponent in consultation with service providers must ensure that disruption to services resulting from Stage 1 of the CSSI are avoided where practical and advised to customers.	Activity Method Statement - Upper South Creek Pipelines, Pipeline Installation AMS USC/00025 Rev 0 dated 9/10/23 Upper South Creek Pipelines Endeavour Interface Meeting Minutes dated 21/9/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Work activity planning includes the identification of inground services through a number of processes including Dial begore you Dig, potholing and Survey. Meetings are held with external service providers to discuss and negotiate impacts to services and relocation requirements.	Compliant
E69	The Proponent must offer pre-construction surveys to the owners of surface and sub-surface structures and other relevant assets identified at risk from vibration, including all listed heritage items and buildings/structures of heritage significance as identified in the documents listed in Condition A1. Where the offer is accepted, the survey must be undertaken by a suitably qualified and experienced engineer and/or building surveyor prior to the commencement of vibration generating Works that could impact on the structure/asset. The results of each survey must be documented in a Pre-construction Condition Survey Report and the report must be provided to the owner of the item(s) surveyed no later than one month before the commencement of all other potentially impacting Works.	Audit Interview 6/11/23 Site Inspection 6/11/23 AusDilaps - Geotagged Pre-Construction Survey OPT (Upper Canal South Creek), 24 July 2023	Pre construction surveys have been undertaken. The auditor was provided with a copy of the pre-construction survey undertaken of the upper canal heritage structure	Compliant
E70	Where pre-construction surveys have been undertaken in accordance with Condition E69, subsequent post-construction surveys of the structure / asset must be undertaken by a suitably qualified and experienced engineer and/or building surveyor to assess damage that may have resulted from the vibration-generating Works. The results of the post-construction surveys must be documented in a Post-Construction Condition Survey Report for each item surveyed. The Post-construction Condition Survey Reports must be provided to the owner of the structures/assets surveyed, and no later than four months following the completion of construction activities that have the potential to impact on the structure / asset.	Audit Interview 6/11/23 Site Inspection 6/11/23	Post construction surveys to be undertaken at the completion of the construction works	Not triggered
E71	Where damage has been determined to occur as a result of Stage 1 of the CSSI, the Proponent must carry out rectification at its expense and to the reasonable requirements of the owner of the structure/asset within nine months of the completion of construction activities that have the potential to create damage unless another timeframe is agreed with the owner. Alternatively, the Proponent may pay compensation for the damage as agreed with the owner.	Audit Interview 6/11/23 Site Inspection 6/11/23	No damage has occurred, therefore not triggered	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E72	Prior to the commencement of any Work, erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'. In the South Creek catchment, controls must also be in accordance with the construction phase targets and sediment and erosion control design principles outlined in the Technical Guidance for Achieving Wianamatta South Creek Stormwater Management Targets (DPE, 2022).	Progressive Erosion and Sediment Control Plan - Kemps Creek Sewerage network, Site Compound 12, General Arrangement, 13/9/23 Farm Dam Entry ESCP dated 13/9/23 Kemps Creek Sewerage Network - Generic Cross Sections, General Arrangement dated 25/10/23 Audit Interview 6/11/23 Site Inspection 6/11/23	An Erosion and Sediment Control Plan has been prepared and has been implemented on site. A CPESC has been appointed who prepares the ERSed plans, undertakes routine inspections to ensure ongoing compliance. The ERSed controls inspected were a high standard.	Compliant
E73	The Proponent must engage a Certified Professional in Erosion and Sediment Control (CPESC) with minimum five years' experience to oversee all construction and sediment controls required for the AWRC.	Upper South Creek Advanced Water Recycling Centre and Pipelines soils & Contamination CEMP Sub-plan Document Number: USCP-JHG-MPL-ENV-0003 Revision: A Audit Interview 6/11/23 Site Inspection 6/11/23	An experienced CPESC has been engaged to oversee all construction and sediment controls required for the AWRC	Compliant
E74	A NSW EPA accredited Site Auditor(s) must be engaged before the commencement of contamination investigations until the completion of construction to ensure that any Work required in relation to contamination is appropriately managed. The Site Auditor is to be provided with all documentation relevant to the consideration of contamination risk and the management of contamination for the project, including previous site audits and site audit statements. The Site Auditor is to review all relevant documentation and provide a written opinion on the contamination risk and the appropriateness of the reports and any proposed management measures of the site, including (but not limited to): (a) the contamination aspects of management and monitoring plans in Conditions C1 and C4 including any updates or amendments to those plans; (b) the review of the Proponent's risk rating for Areas of Environmental Concern (AECs) in Condition E76; (c) Sampling and Analysis Quality Plan in Condition E77; (d) Detailed Site Investigation Report(s) in Condition E79; (e) Remedial Action Plans in Condition E83; (f) Unexpected Finds Procedure for Contamination in Condition E88; and (g) Post-remediation validation reports.	of Upper South Creek Advanced Water Recycling Centre and Pipelines soils & Contamination CEMP Sub-plan Document Number: USCP-JHG-MPL-ENV-0003 Revision: A Audit Interview 6/11/23 Site Inspection 6/11/23	An experienced NSW accredited site auditor has been engaged. Substantial evidence was provided of their involvement throughout the project to date	Compliant
E75	Evidence that the NSW EPA accredited Site Auditor has reviewed each of the plans and reports listed in Condition E74, and has issued an interim audit advice or a relevant Site Audit Statement regarding the appropriateness of those plans or reports, must be provided when the plan or report is submitted to the Planning Secretary for information. Where the NSW EPA accredited Site Auditor confirms that no further investigations are warranted, Conditions E76 to E82 do not apply.	Letter from JBSG to SWC titled "L02 Interim Audit Advice (0503-2307-03) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling CentreUnexpected Finds Protocol" dated 9 December 2022 Letter from JBSG to SWC titled "L03 Interim Audit Advice (0503-2307-03) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Soils and Contaminated Land Impact Assessment" dated 17 March 2023 Letter from JBSG to SWC titled "L04 Interim Audit Advice (0503-2307-04) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Soils and Contstruction Environmental Management Subplan" dated 12 May 2023 Letter from JBSG to SWC titled "L06 Interim Audit Advice (0503-2307-05) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Plant Sampling and Analysis Quality Plan, 22 June 2023 DPE Post Approval Form - 20230901061601 DPE Post Approval Form - 20230901061601	A total of nine interim advice documents were reviewed by the auditor Interim audit advice notes the following documents were reviewed by the Auditor: - Soils and Contaminated Land Impact Assessment - Preliminary Site Investigation - Options assessment Preliminary Site Investigation - Detailed Site Investigation - Menorandum re Hazardous Materials Survey - Soils and Construction Environmental Management Plan - Unexpected finds procedure for contamination The Post Approval forms reviewed by the auditor provides evidence of submission of the Interim Audit Statements to the Department with the relevant contamination documents.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E76	The NSW EPA accredited Site Auditor must be engaged to review the risk rating for AECs identified in Appendix N (Soils and Contamination Impact Assessment) of the Environmental Impact Statement listed in Condition A1. Following this review, the Site Auditor must issue an interim audit advice confirming whether the risk rating has been undertaken appropriately.	Letter from JBSG to SWC titled "L03 Interim Audit Advice (0503-2307-03) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Soils and Contaminated Land Impact Assessment" dated 17 March 2023 Letter from JBSG to SWC titled "L05 Interim Audit Advice (0503-2307-05) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Soils and Contaminated Land Impact Assessment - Pipelines" dated 16 May 2023 Audit Interview 6/11/23 Site Inspection 6/11/23	Risk Reviews were undertaken in accordance with this condition with Interim Advice issued by the Accredited Auditor.	Compliant
E77	Prior to the commencement of construction, a Sampling and Analysis Quality Plan (SAQP) for medium and high risk AECs, as confirmed by the Site Auditor and identified in the documents referred to in Condition E76, must be prepared to ensure that field investigations and analyses will be undertaken in a way that enables the collection and reporting of reliable data to meet project objectives, including the relevant site characterisation requirements of the detailed site investigations. The SAQP must: (a) be prepared (or reviewed and approved) by consultants certified under either the Environment Institute of Australia and New Zealand’s Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme; and (b) be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (CLM Act).	Sampling and Analysis Quality Plan. Upper South Creek Advanced Water Recycling Centre, ERM, 6/62/3 Letter from JBS&G to SWC titled "L06 Interim Audit Advice (0503-2307-06) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of USC AWRC Plant Sampling and Analysis Quality Plan" dated 22/6/23 Letter from JBS&G to SWC titled "L07 Interim Audit Advice (0503-2307-07) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Pipelines Sampling and Analysis Quality Plan" dated 14/8/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Sampling and Analysis Quality Plans were prepared for both the AWRC site and pipelines. The SAQPs were both reviewed by the independent site auditor with interim audit advice statements provided.	Compliant
E78	For medium to high-risk AECs as confirmed by the NSW EPA accredited Site Auditor, Detailed Site Investigations(s) must be conducted to determine the full nature and extent of the contamination at project areas identified in the SAQP(s). The Detailed Site Investigations(s) must: (a) be prepared (or reviewed and approved) by consultants certified under either the Environment Institute of Australia and New Zealand’s Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme (b) be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the CLM Act; and (c) state if the land within the project footprint is suitable for the proposed use or if the land requires remediation to be made suitable for the proposed use.	Letter from JBS&G to SWC titled "L09 Interim Audit Advice (0503-2307-09) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Plant Site 6/9/23 Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 Audit Interview 6/11/23 Site Inspection 6/11/23	ERM have undertaken Detailed site investigationns as required by this condition. The DSI has been revieied by the Site Auditor and an interim audit advice issued.	Compliant
E79	A Detailed Site Investigation Report must be submitted to the Planning Secretary upon request following the completion of the Detailed Site Investigation(s) required by Condition E78. The Detailed Site Investigation Report must be prepared in accordance with: (a) the land use criteria applicable to the final land use at the opening of Stage 1 of the CSSI. Where the final land use is unknown the most stringent criteria for the land use assumed in the documents listed in Condition A1 is to be applied; and (b) relevant guidelines made or approved by the EPA under section 105 of the CLM Act including Consultants Reporting on Contaminated Land: Contaminated Land Guidelines (NSW EPA 2020). The report must be prepared by a Contaminated Land Consultant certified under either the Environment Institute of Australia and New Zealand’s Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. Notes: 1. Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports for separate contaminated sites. 2. Where Detailed Site Investigation(s) have already been undertaken for contaminated soils, materials, groundwater or sediments, and the Site Auditor agrees that these Detailed Site Investigation(s) are appropriate in determining the nature and extent of contamination, they do not need to be undertaken again for the purposes of this condition.	Email from DPE to SWC titled "Clarification of DSI Submission - E74, E75 and E79" dated 12/9/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered, DPE have not requested a copy of the DSI Report. Preparation of the DSI Report is underway. The Detailed site investigations have been completed and are ongoing for the pipelines	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E80	The Detailed Site Investigation Report must provide details on: (a) primary sources of contamination, for example potentially contaminating activities, infrastructure (such as underground storage tanks, fuel line, sumps or sewer lines) or site practices; (b) contaminant dispersal in air, hazardous ground gases, surface water, groundwater, soil vapour, separate phase contaminants, sediments, infrastructure (e.g. concrete), biota, soil and dust; (c) contaminant characterisation and behaviour (volatility, leachability, speciation, degradation products and physical and chemical conditions on-site which may affect how contaminants behave); (d) potential effects of contaminants on human health, including the health of occupants of built structures (for example arising from risks to service lines from hydrocarbons in groundwater, or risks to concrete from acid sulphate soils) and the environment; (e) potential and actual contaminant migration routes including potential preferential pathways; (f) the adequacy and completeness of all information available for use in the assessment of risk and for making decisions on management requirements, including an assessment of uncertainty; (g) the review and update of the conceptual site model from the preliminary and detailed site investigations; (h) nature and extent of any existing remediation (such as impervious surface cappings); and (i) whether the land is suitable (for the intended final land use) or can be made suitable through remediation.	Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered,. Preparation of the DSI Report is underway. The Detailed site investigations have been completed at the AWRC site and are ongoing for the pipelines	Not triggered
E81	Detailed Site Investigation Reports must be reviewed by the NSW EPA accredited Site Auditor in accordance with Condition E74 and all recommendations made by the NSW EPA accredited Site Auditor implemented before Work commencing that could result in any disturbance of any land confirmed as a moderate to high risk area of potential contamination by the NSW EPA accredited Site Auditor. Notes: 1. The intention of this condition is to require Detailed Site Investigation(s) of locations identified as an area of potential contamination to be completed before any form of excavation including the use of hand tools to expose soil to prevent unacceptable risk to human health or the environment on or off site. 2. This condition does not prevent disturbance required to complete the Detailed Site Investigation(s). 3. This condition does not prevent other activities that do not disturb the land where the ER has reviewed the appropriateness of those activities in accordance with Condition A28(j).	Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 Audit Interview 6/11/23 Site Inspection 6/11/23 Letter from JBS&G to SWC titled "L09 Interim Audit Advice (0503-2307-09) - Sydney Water Corporation - Upper South Creek Advanced Water Recycling Centre- Review of Detailed Site Investigation - Plant Site 6/9/23	Noted as compliant for the current stage of the project works. The DSI for the AWRC site has been completed and reviewed by the EPA accredited auditor as evidenced in interim audit statement L09.	Compliant
E82	Any recommendations made in the Detailed Site Investigation Report for changes to management measures in the CEMP sub-plan(s) must be incorporated into the relevant subplan required by Condition C4, unless otherwise approved by the Planning Secretary.	Detailed Site Investigation, Upper South Creek Advanced Water Recycling Centre, ERM 16 /8/23 Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered,. Preparation of the DSI Report is underway. The Detailed site investigations have been completed at the AWRC site and are ongoing for the pipelines	Not triggered
E83	Where remediation is required to make land suitable for the final intended land use, a Remedial Action Plan must be prepared and/or reviewed and approved by consultants certified under either the Environment Institute of Australia and New Zealand’s Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The Remedial Action Plan must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the CLM Act and must include measures to remediate the contamination at the site to ensure the site will be made suitable for the final intended land use. Note: Nothing in this condition prevents the Proponent from preparing individual Remedial Actions Plan(s) for separate contaminated sites.	Remediation Action Plan, Upper South Creek Advanced Water Recycling Centre, John Holland, 29/8/23 Letter from SWC to DPE Titled "Upper South Creek Advanced Water Recycling Centre: Provision of Remedial Action Plan (RAP) in accordance with Condition E84 Letter from JBSG to SWC titled "L08 Interim Audit Advice (0503-2307-08) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Remedial Action Plan - Plant Site" dated 30/8/23 Audit Interview 6/11/23 Site Inspection 6/11/23	One Remedial Action Plan has been prepared for the AWRC site and submitted to the Department with the Auditors Interim Audit advice. A further RAP is being prepared for the pipelines.	Compliant
E84	If remediation is required to make land suitable for the final intended land use, then prior to commencing with the remediation, the Proponent must submit the Remedial Action Plan(s) and an interim audit advice from a NSW EPA accredited Site Auditor to the Planning Secretary for information, which considers that the Remedial Action Plan is appropriate and that the site can be made suitable for the proposed land use. The Remedial Action Plan must be implemented and any changes to the Remedial Action Plan must be approved in writing by the NSW EPA accredited Site Auditor.	Remediation Action Plan, Upper South Creek Advanced Water Recycling Centre, John Holland, 29/8/23 Letter from SWC to DPE Titled "Upper South Creek Advanced Water Recycling Centre: Provision of Remedial Action Plan (RAP) in accordance with Condition E84 Letter from JBSG to SWC titled "L08 Interim Audit Advice (0503-2307-08) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Remedial Action Plan - Plant Site" dated 30/8/23 Audit Interview 6/11/23 Site Inspection 6/11/23	One Remedial Action Plan has been prepared for the AWRC site and submitted to the Department with the Auditors Interim Audit advice. A further RAP is being prepared for the pipelines.	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E85	For any land confirmed as a moderate to high risk area of potential contamination by the NSW EPA accredited Site Auditor as per Condition E76, a Section A1 or A2 Site Audit Statement (accompanied by an Environmental Management Plan) and its accompanying Site Audit Report, which state that the contaminated land disturbed by the Work has been made suitable for the intended land use, must be submitted to the Planning Secretary and relevant council(s) after remediation and no later than one month before the commencement of operation of Stage 1 of the CSSI. Note: Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational Requirement	Not triggered
E86	Contaminated land must not be used for the purpose approved under the terms of this approval until a Section A1 or A2 Site Audit Statement is obtained which states that the land is suitable for that purpose and any conditions on the Section A Site Audit Statement have been complied with.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered until the completion of construction	Not triggered
E87	Any recommendations to minimise risk to human health or the environment or for the management of contamination arising, the NSW EPA accredited Site Auditor review, advice or audits must be incorporated into the relevant CEMP sub-plan and implemented.	Letter from JBSG to SWC titled "L04 Interim Audit Advice (0503-2307-04) - Sydney Water Corporation - "Upper South Creek Advanced Water Recycling Centre - Review of the Upper South Creek Advanced Water Recycling Centre Soils and Contstruction Environmental Management Subplan" dated 12 May 2023 Audit Interview 6/11/23 Site Inspection 6/11/23	Interim Audit Advice (L04) provides detailed comments on the Soils and Contamination Construction Environmental Management Plan. Interim Audit Advice notes the auditors comments have been satisfactorily addressed.	Compliant
E88	An Unexpected Finds Procedure for Contamination must be prepared before the commencement of Work and must be followed should unexpected contamination or asbestos (or suspected contamination) be excavated or otherwise discovered. The procedure must include details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved. The Procedure must be reviewed by the Site Auditor and interim audit advice or a Section B Site Audit Statement provided certifying that the Unexpected Finds Procedure is appropriate. The Unexpected Finds Procedure must be submitted to the Planning Secretary for approval at least one month prior to the commencement of Work and a copy of the interim audit advice or Section B Site Audit Statement attached. The Unexpected Finds Procedure for Contamination must be implemented throughout Work. Note: Nothing in this condition prevents the Unexpected Finds Procedure for Contamination required under Condition E88 to be submitted for approval as part of the Soils and Contamination CEMP Sub-Plan under Condition C8.	Appendix C Soils and Contamination CEMP Sub Plan	The unexpected finds procedure is included as Appendix C of the Soils and Contamination CEMP Subplan	Compliant
E89	A Sustainability Strategy must be prepared and implemented to achieve a minimum “Gold” ‘Design’ and ‘As built’ rating under the Infrastructure Sustainability Council infrastructure v2.1 rating tool, or at least “Excellent” under v1.2.	Upper South Creek Advanced Water Recycling Centre and Pipelines Sustainability Managemet Plan Document No: USCP-JHG-MPLPMT 009 Revision No: A Email from DPE to SWC dated 3/11/23	The sustainability strategy commits to a "Gold" Rating"	Compliant
E90	Evidence that the minimum rating in Condition E89 have been achieved must be provided to the Planning Secretary for information within one month of receiving the ratings.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not required to be undertaken prior to the completion of the project and the attainment of the final rating	Not triggered
E91	The Sustainability Strategy must be implemented throughout design, construction and operation, and be submitted to the Planning Secretary for information.	Upper South Creek Advanced Water Recycling Centre and Pipelines Sustainability Managemet Plan Document No: USCP-JHG-MPLPMT 009 Revision No: Email from DPE to SWC dated 3/11/23	JHG have appointed a sustainability lead to implement the plan. The sustainability strategy was issued to the DPE on 3/11/23	Compliant

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E92	A Water Reuse Strategy must be prepared, which sets out options for the reuse of collected stormwater and groundwater during construction and operation. The Water Reuse Strategy must include, but not be limited to: (a) evaluation of reuse options; (b) details of the preferred reuse option(s), including indicative volumes of water to be reused, proposed reuse locations and/or activities, proposed treatment (if required), and any additional licences or approvals that may be required; (c) measures to avoid misuse of stormwater and groundwater as potable water; (d) consideration of the public health risks from reuse of stormwater or groundwater; (e) a time frame for the implementation of the preferred reuse option(s). The Water Reuse Strategy must be prepared based on best practice and advice sought from relevant agencies, as required. The Strategy must be applied during construction and operation. Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail before the commencement of construction. A copy of the Water Reuse Strategy must be made publicly available prior to the commencement of construction. If reuse is only proposed during operation, then the Strategy must be made publicly available prior to the commencement of operation. Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational phases of the CSSI.	Upper South Creek Advanced Water Recycling Centre and Pipelines CoA E92 Construction Water Reuse Strategy Document No: USCP-JHG-PLN-ENV-0001 Revision No: A	The Construction Water reuse strategy addresses these requirements and has been provided on the SWC website. The strategy was approved by DPE on 10/10/23	Compliant
E93	Access to all utilities and properties must be maintained during construction, where practicable, unless otherwise agreed with the relevant utility owner, landowner or occupier.	Audit Interview 6/11/23 Site Inspection 6/11/23	No observations of restricted access to utilities or properties during the site inspection. Traffic control is being used at work sites to manage access arrangements where local roads are impacted by construction	Compliant
E94	Any property access physically affected by Stage 1 of the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered, no property access observed to be physically impacted during the site inspection	Not triggered
E95	Local roads that are proposed to be used by heavy vehicles (for the purposes of Stage 1 of the CSSI) that are immediately adjacent to the construction boundary and ancillary facilities, and that are not identified for use by heavy vehicles in the documents listed in Condition A1, must be approved by the Planning Secretary as part of the Traffic and Transport Management CEMP Sub-plan.	Upper South Creek, Advanced Water Recycling Centre and Pipelines Local Roads Approval, Document Number: USCP-JHG-MPL-ENV-012, Revision F dated 4/9/23 DPE Post Approval Form - 20230904231901 Audit Interview 6/11/23	SWC self reported a non compliance for the incorrect use of a local road. Appropriate actions have been identified and implemented with no further recommendations made at this time.	Non Compliant
E96	All requests to the Planning Secretary under Condition E95 must include the following: (a) a swept path analysis; (b) demonstration that the use of local roads by heavy vehicles for the Stage 1 of the CSSI will not compromise the safety of pedestrians and cyclists or the safety of two-way traffic flow on two-way roadways; (c) provide details as to the date of completion of the road dilapidation surveys for the subject local roads; (d) measures that will be implemented to avoid where practicable the use of roads past schools, aged care facilities and child care facilities during their peak operation times; and (e) written advice from an appropriately qualified professional on the suitability of the proposed heavy vehicle route which takes into consideration items (a), (b), (c), and (d) of this condition.	Upper South Creek, Advanced Water Recycling Centre and Pipelines Local Roads Approval, Document Number: USCP-JHG-MPL-ENV-012, Revision F dated 4/9/23 DPE Post Approval Form - 20230904231901	The Request for Local Roads Approval was submitted to the Department on the 4/9/23 and was subsequently approved by DPE on 24/11/23. -	Compliant
E97	The locations of all heavy vehicles used for spoil haulage must be monitored in real time and the records of monitoring be made available electronically to the Planning Secretary and the EPA upon request for a period of no less than one year following the completion of construction. Note: Refer to Condition A47 in relation to vehicle identification.	Audit Interview 6/11/23 Site Inspection 6/11/23	An electronic monitoring and management system has been implemented. EPA or DPE have not requested monitoring data or information	Compliant
E98	Before any local road is used by a heavy vehicle for the purposes of the Stage 1 of the CSSI, a Road Dilapidation Report must be prepared for the road. A copy of the Road Dilapidation Report must be provided to the relevant council(s) within three weeks of completion of the survey and no later than one month prior to the road being used by heavy vehicles associated with Stage 1 of the CSSI.	Pre-construction Condition Survey - OPT 31522 Upper South Creek AWRC Kemps Creek NSW,- AUDSILAPS Document Transmittal Ref JH-TRANSMIT-000063 dated 4/9/23 Document Transmittal Ref JH-GCOR-000456 - dated 25/8/23	The Road Dilapidation Report was completed and submitted to both Fairfield and Penrith Councils	Compliant
E99	If damage to roads occurs as a result of Stage 1 of the CSSI, the Proponent must either (at the relevant road authority's discretion): (a) compensate the relevant road authority for the damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-works as identified in the Road Dilapidation Report(s).	Audit Interview 6/11/23 Site Inspection 6/11/23	No damage to roads has occurred to date.	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E100	Safe pedestrian and cyclist access must be maintained around Work sites during construction. In circumstances where pedestrian and cyclist access is restricted or removed due to construction activities, a proximate alternative route which complies with relevant standards, unless otherwise endorsed by an independent, appropriately qualified and experienced person, must be provided (including signposting) prior to the restriction or removal of the impacted access.	Audit Interview 6/11/23 Site Inspection 6/11/23	Appropriate measures are in place to manage compliance with these requirements with no issues observed during the audit site inspection.	Compliant
E101	Vehicles (including light and heavy vehicles) associated with Stage 1 of the CSSI must be managed to: (a) minimise parking on public roads; (b) minimise idling and queueing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive land user(s); (d) not block or disrupt access across pedestrian or shared user paths at any time; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the Traffic and Transport Management CEMP Sub-plan.	Audit Interview 6/11/23 Site Inspection 6/11/23	Appropriate measures are in place to manage compliance with these requirements with no issues observed during the audit site inspection.	Compliant
E102	A Construction Parking and Access Strategy must be prepared to identify and mitigate impacts resulting from on- and off-street parking changes during construction in highly urbanised settings. The Strategy must include, but not necessarily be limited to: (a) achieving the requirements of Condition E101; (b) confirmation and timing of the removal of on- and off-street parking associated with construction of Stage 1 of the CSSI; (c) parking surveys of all parking spaces to be removed or occupied by the CSSI workforce in the vicinity of the tunnelling compounds at Cabravale Leisure Centre and Bartley Street, Cabramatta to determine current demand during peak, off-peak, school drop off and pickup, weekend periods and during special events; (d) consultation with affected stakeholders utilising existing on- and off-street parking stock which will be impacted as a result of construction; (e) assessment of the impacts to on- and off-street parking stock taking into consideration, occupation by the CSSI workforce, outcomes of consultation with affected stakeholders and considering the impacts of special events; (f) identification of mitigation measures to manage impacts to stakeholders as a result of on-and off-street parking changes including, but not necessarily limited to, staged removal and replacement of parking, and provision of alternative parking arrangements; (g) mechanisms for monitoring, over appropriate intervals, to determine the effectiveness of implemented mitigation measures; (h) details of shuttle bus service(s) to transport the CSSI workforce to construction sites from public transport hubs and off-site car parking facilities (where these are provided) and between construction sites; (i) provision of contingency measures should the results of mitigation or monitoring indicate implemented measures are ineffective; and (j) provision of reporting of monitoring results to the Planning Secretary and relevant council(s) at three monthly intervals. The Construction Parking and Access Strategy must be submitted to the Planning Secretary for information at least one month before the commencement of any construction that reduces the availability of existing parking. The Strategy must be implemented before impacting on on-street parking and incorporated into the Traffic and Transport Management CEMP Sub-plan.	Upper South Creek Advanced Water Recycling Centre and Pipelines Traffic & Transport CEMP Sub-plan Document No: USCP-JHG-MPL-ENV-0005 Revision: A Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Parking and Access Strategy CEMP Sub-plan Document No: USCP-JHG-MPL-ENV-0013 Revision: G DPE Post Approval Form 20230907042209	The CPAS meets the requirements of this condition and was submitted to DPE on the 7/9/23.	Compliant
E103	During construction, all reasonably practicable measures must be implemented to maintain pedestrian and vehicular access to, and parking in the vicinity of, businesses and affected properties. Disruptions are to be avoided, and where avoidance is not possible, minimised. Where disruption cannot be minimised, alternative pedestrian and vehicular access, and parking arrangements must be developed in consultation with affected businesses and implemented prior to the disruption. Adequate signage and directions to businesses must be provided prior to, and for the duration of, any disruption.	Audit Interview 6/11/23 Site Inspection 6/11/23	Appropriate traffic controls were implemented at each site to minimise impacts to motorists and pedestrians. There were no businesses observed to be impacted during the inspection	Compliant
E104	Stage 1 of the CSSI (including new or modified local roads, parking, pedestrian and cycle infrastructure) must be designed to meet relevant design, engineering and safety guidelines, including the Austroads Guide to Traffic Management.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered as no new or permanently modified local road, parking, permanent infrastructure etc observed	Not triggered
E105	An independent Road Safety Audit must be undertaken to assess the safety performance of new or permanently modified local road, parking, pedestrian and cycle infrastructure provided as part of Stage 1 of the CSSI (including ancillary facilities) to ensure that they meet the requirements of relevant design, engineering and safety guidelines, including Austroads Guide to Traffic Management. The audit(s) must be undertaken by an appropriately qualified and experienced person during detailed design development (audit of plans) and prior to opening (pre-opening audit). The audit findings and recommendations of the detailed design plans (audit of the plans) must be actioned prior to construction of the relevant infrastructure. The pre-opening audit findings and recommendations must be actioned prior to the relevant infrastructure being made available for use. All audit findings must be made available to the Planning Secretary on request, within the timeframe stated in the request.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered as no new or permanently modified local road, parking, permanent infrastructure etc observed	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E106	The Proponent must assess whether detailed design of the project would result in any increase to operational traffic movements identified in the documents listed in Condition A1 for the AWRC site, and submit the assessment to the Planning Secretary for information. If any such changes to operational traffic movements are identified, the Proponent must prepare a Road Network Performance Plan in consultation with the relevant council(s) and TfNSW. The Plan must be prepared to address the following: (a) an updated analysis, including modelling of traffic impacts to the adjoining road network, as a consequence of Stage 1 of the CSSI; (b) an assessment of the performance of the road network, inclusive of the Clifton Avenue / Elizabeth Drive intersection; and (c) mitigation measures to manage any predicted traffic performance impacts. If a Road Network Performance Plan is triggered under this condition, it must be submitted to the Planning Secretary, relevant council(s) and TfNSW for information six months prior to the operation of Stage 1 of the CSSI. The mitigation measures in the Plan must be implemented by the Proponent before the operation of Stage 1 of the CSSI.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered - operational requirement	Not triggered
E107	A Utilities Management Strategy must be prepared and implemented for all utility Work undertaken as a result of Stage 1 of the CSSI. The Strategy must identify how utility Work will be defined and managed. The Utilities Management Strategy must include: (a) The functions of the Utility Coordination Manager as required by Condition E109; (b) A description of all utility Work to be undertaken; and (c) Management measures to be implemented to manage dust, noise, traffic, access, lighting and other relevant impacts associated with utility Work. The Utilities Management Strategy must be submitted to the Planning Secretary for information at least one month before the commencement of utility Work.	Audit Interview 6/11/23 Site Inspection 6/11/23 Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Document Number: USCP-JHG-MPL-ENV-0008 Revision: A 22/08/2023	The Utilities Management Strategy has been incorporated into the CEMP. Section 3.3.12 includes the responsibilities of the Utilities Coordinator.	Compliant
E108	Nothing in this approval permits the carrying out of any utility Work not required for the purpose of the Stage 1 of the CSSI.	Audit Interview 6/11/23 Site Inspection 6/11/23	There have not been any utility works undertaken as part of the project to date that are not required for the construction of the SSI	Not triggered
E109	A Utility Coordination Manager must be appointed for the duration of Stage 1 of the CSSI Work. The role of the Utility Coordination Manager must include, but not be limited to: (a) the management and coordination of all utility Work associated with the delivery of Stage 1 of the CSSI, to ensure respite is provided to the community; (b) providing advice to the Public Liaison Officer(s) regarding upcoming utility Work, including the scope of the Work and the responsibility for the Work; and (c) investigating complaints received from the Public Liaison Officer(s) relating to utility Work and providing a response to the Public Liaison Officer(s).	Audit Interview 6/11/23 Site Inspection 6/11/23 Upper South Creek Advanced Water Recycling Centre and Pipelines Construction Environmental Management Plan Document Number: USCP-JHG-MPL-ENV-0008 Revision: A 22/08/2023	A utility manager has been appointed for the project. The CEMP describes the roles and responsibilities of the Utility Manager	Compliant
E110	Waste generated during construction and operation must be dealt with in accordance with the following priorities: (a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; (b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and (c) where re-using, recycling or recovering waste is not reasonably practicable, waste must be treated or disposed of.	Audit Interview 6/11/23 Site Inspection 6/11/23 AWRC Waste Tracking Register	Minimum amounts of waste have been generated at this early stages of the project. Appropriate waste and recycling bins have been provided on site. A waste tracking register records the volumes of waste generated.	Compliant
E111	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the EPL in force for Stage 1 of the CSSI, or be done in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, as the case may be.	Audit Interview 6/11/23 Site Inspection 6/11/23	Waste is not imported to the site	Not triggered
E112	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	Audit Interview 6/11/23 Site Inspection 6/11/23 AWRC Waste Tracking Register	A waste tracking register has been prepared and is kept up to date. The register includes details of the materials and their destination (including the docket number and the EPL reference of the receiving site)	Compliant
E113	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	Bingo Industries Waste Delivery Docket # 12898 dated 19/10/23 S143 Certificate - Defence Establishment Orchard Hills dated 9/10/23 Resource Reporting Tracking Schedule dated 31/10/23	Minimal amounts of waste has been generated at the project to date. Appropriate waste contractors have been engaged to provide waste facilities and	Compliant
E114	Works on waterfront land and within watercourses must have regard to Guidelines for controlled activities on waterfront land – Riparian Corridors (NRAR, 2018), Controlled activities on waterfront land – Guidelines for watercourse crossings on waterfront land (NSW Office of Water, 2013) and Policy and Guidelines for Fish Habitat Conservation and Management (DPI Fisheries, 2013). This includes outlets and watercourse crossings.	Audit Interview 6/11/23 Site Inspection 6/11/23	No work on waterfront land undertaken within the audit period	Not triggered
E115	Suitably qualified expert(s) must agree to methods of construction of pipelines across waterways and through shallow aquifers, in consultation with relevant State and/or local authorities.	Audit Interview 6/11/23 Site Inspection 6/11/23		Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E116	Drainage feature crossings (permanent and temporary watercourse crossings and stream diversions) and drainage swales and depressions must be carried out taking into consideration relevant guidelines and designed by a suitably qualified and experienced person.	Audit Interview 6/11/23 Site Inspection 6/11/23	No drainage features (permanent and temporary waterway crossings) were impacted at the time of the audit.	Not triggered
E117	Rehabilitation and revegetation of the riparian corridor and banks of watercourses impacted by Stage 1 of the CSSI must be commenced within three months of the completion of the watercourse Work and any other Work required in the riparian corridor.	Audit Interview 6/11/23 Site Inspection 6/11/23	No water courses impacted at the time of the audit	Not triggered
E118	The Proponent must ensure sufficient water entitlement is held in a Water Access License(s) (WAL) to account for the maximum predicted take for each water source prior to the take occurring.	Water Access Licence - Reference WAL 44922 dated 28/9/23 Audit Interview 6/11/23 Site Inspection 6/11/23	A water access licence has been obtained due to minimal impact on groundwater during underboring activities.	Compliant
E119	The Proponent must develop and implement an ongoing Water Quality Monitoring Program (WQMP) to assess the impacts of the AWRC effluent discharges on water quality. The WQMP must include: (a) monitoring of treated effluent from the AWRC under different release streams; (b) monitoring of waterways that may be impacted by AWRC discharges (including comparison with baseline and upstream conditions). (c) details of the sampling frequency, analysis, and locations used in the program; (d) reporting requirements for the program to the EPA, including consideration of any expanded Beachwatch monitoring program in the Hawkesbury Nepean catchment.	Appendix E Upper South Creek Advanced Water Recycling Centre and Pipelines Surface Water & Groundwater CEMP Sub-Plan Document No: USCP-JHG-MPL-ENV-0001 Revision No: A Audit Interview 6/11/23 Site Inspection 6/11/23	Operational Requirement - Not triggered	Not triggered
E120	The WQMP required under Condition E119 must be submitted to the EPA for review at least 18 months prior to the commencement of operation of Stage 1 of the CSSI, and must be approved by the EPA and submitted to the Planning Secretary for information at least one year prior to the commencement of operation of Stage 1 of the CSSI.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational Requirement - Not triggered	Not triggered
E121	The Proponent must develop and implement a monitoring program to assess wet weather infiltration into the sewer network connected to the AWRC. The program must include: (a) monitoring of sewer infiltration rates throughout the AWRC sewer catchment from the commencement of operation onward; (b) proposed investigative actions and potential remedial actions for wet weather infiltration in the sewer network in the event that high wet weather infiltration is identified; and (c) reporting requirements for the program to the EPA.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational Requirement - Not triggered Sydney Water has its own wet weather infiltration monitoring program and the project will be integrated with this program when complete.	Not triggered
E122	The monitoring program required under Condition E121 must be submitted to the EPA for review at least 18 months prior to the commencement of operation of Stage 1 of the CSSI, and must be approved by the EPA and submitted to the Planning Secretary for information at least one year prior to the commencement of operation of Stage 1 of the CSSI. Note: 1. Part C-B of Schedule 2 of this approval provides additional water quality assessment and monitoring requirements that must be met. 2. The WQMP and monitoring program to assess wet weather infiltration into the sewer network must be provided to the Planning Secretary and/or the EPA upon request. 3. The WQMP and monitoring program to assess wet weather infiltration into the sewer network are required to be updated on an ongoing basis throughout operation of Stage 1 of the CSSI.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational Requirement - Not triggered	Not triggered
E123	Surface water drainage on the AWRC site as part of Stage 1 of the CSSI must be designed, constructed and operated to achieve compliance with the NSW Government Wianamatta South Creek waterway health objectives and construction and operational phase stormwater management targets, in accordance with the Wianamatta MUSIC modelling toolkit and Technical Guidance for Achieving Wianamatta South Creek Stormwater Management Targets (DPE, 2022).	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational Requirement - Not triggered	Not triggered
E124	If construction stage stormwater discharges are proposed, a Water Pollution Impact Assessment will be required to inform licensing consistent with section 45 of the POEO Act. Any such assessment must be prepared in consultation with the EPA and be consistent with the National Water Quality Guidelines, with a level of detail commensurate with the potential water pollution risk.	Letter from EPIC Environmental to JHG titled " Upper South Creek Advanced Water Recycling Centre Water Pollution Impact Assessment for Construction Stage Stormwater Discharges" dated 27 October 2023 Audit Interview 6/11/23 Site Inspection 6/11/23	A Water Pollution Impact Assessment has been prepared and issued to the EPA in accordance with the EPL	Compliant
E125	The Proponent must undertake further hydrological and hydraulic modelling for the AWRC site based on the detailed design of Stage 1 of the CSSI to determine the ability of the receiving stormwater drainage systems to effectively convey pavement drainage from Stage 1 of the CSSI where it is proposed to discharge these flows to council or Sydney Water receiving stormwater drainage systems. The modelling must be undertaken in consultation with the relevant council(s) and the outcomes documented in the Stormwater Drainage Report required under Condition E126.	According to Surface Water and Groundwater CEMP sub plan :This condition is not applicable to the scope of John Holland's work as there are no existing stormwater drainage systems that will receive stormwater from the AWRC site. Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered , permanent drainage works that would discharge into Council or Sydney Water Assets not constructed. Temporary site runoff water discharges into South Creek.	Not triggered

Reference	Condition	Evidence	Auditor Conclusion	Audit Finding
E126	The Stormwater Drainage Report must be prepared at least one month prior to the commencement of any new permanent drainage Works, modifications or connections to existing drainage Works, construction of hard surfaces that are associated with the operation of the project and would result in runoff to existing council or Sydney Water stormwater drainage systems. The Stormwater Drainage Report must: (a) assess the potential impacts of pavement drainage discharges from Stage 1 of the CSSI drainage systems on the receiving environment and capacity of council(s) or Sydney Water’s drainage infrastructure; (b) identify all mitigation measures to be implemented where pavement drainage from Stage 1 of the CSSI drainage systems are predicted to adversely impact on the receiving environment or capacity of council or Sydney Water drainage infrastructure; and (c) set out a clear time frame for the implementation of mitigation measures. Nothing in this condition prevents the Proponent from preparing separate Stormwater Drainage Reports for pavement discharges to the drainage system provided that each report is prepared at least one month prior to the subject Works/discharges commencing.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered , permanent drainage works that would discharge into Council or Sydney Water Assets not constructed. Temporary site runoff water discharges into South Creek.	Not triggered
E127	All new or modified drainage systems associated with Stage 1 of the CSSI must be designed to: (a) where they connect with council(s) or Sydney Water drainage system, meet the capacity constraints to receive and convey the proposed flows from Stage 1 of the CSSI, or otherwise upgrade council(s) or Sydney Water drainage system at the Proponent’s expense, in consultation with the relevant council(s); (b) minimise impacts on the receiving environment at the final outflow point resulting from any additional flow volume (including, but not limited to scour, flooding, water quality impacts, and impacts on riparian vegetation, aquatic ecology and property); and (c) ensure mitigation measures are implemented where increased flows through cross drainage systems adversely impact on council or Sydney Water drainage infrastructure and the receiving environment.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E128	Prior to the commencement of operation of Stage 1 of the CSSI, the Proponent must submit a report to the Planning Secretary, the EPA and EHG for information, that provides an update on the status of implementing any proposed stormwater harvesting system(s) across the Western Sydney Parkland City that connect to the AWRC.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E129	The Proponent must consider the provisions of the Airports (Protection of Airspace) Regulation 1996 for any intrusions into prescribed airspace, including: (a) constructing permanent structures, such as buildings, into the protected airspace; (b) temporary structures such as cranes protruding into the protected airspace; or (c) activities causing non-structural intrusions into the protected airspace, such as air turbulence from stacks or vents, smoke, dust, steam or other gases or particulate matter. If any of the above components result in an impact on protected airspace, then approval is required in accordance with the Airports Act 1996 and the Airports (Protection of Airspace) Regulation 1996.	Audit Interview 6/11/23 Site Inspection 6/11/23	Not triggered as the WSA has not yet been completed	Not triggered
E130	Prior to the commencement of operation of Stage 1 of the CSSI, the Proponent must prepare a Wildlife Management Plan to identify the project’s contribution to increased risk of wildlife strikes by aircraft. The Wildlife Management Plan must include: (a) wildlife monitoring surveys and regular wildlife hazard assessments; (b) wildlife awareness and management training for operational staff; (c) implementation of activities to reduce hazardous bird populations; (d) adoption of wildlife deterrent technologies to reduce hazardous bird populations; (e) performance indicators to evaluate implementation and compliance; (f) a review process to regularly assess implementation against performance indicators, identify gaps, and ensure currency; and (g) roles and responsibilities for plan implementation and review. The Wildlife Management Plan must be submitted to the Planning Secretary, Western Sydney Airport and DPI Agriculture for information prior to the commencement of operation of Stage 1 of the CSSI, and be implemented throughout operation.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E131	Condition Deleted		Condition Deleted by MOD 1	N/A
E132	The Proponent must prepare a World Heritage Monitoring Program (WHMP) to verify whether potential impacts on the Greater Blue Mountains Area World Heritage property and National Heritage place during Stage 1 of the CSSI are in accordance with impacts assessed in the documents listed in Condition A1. The WHMP must be prepared in consultation with EHG and submitted to the Planning Secretary and EHG for information prior to the commencement of operation of Stage 1 of the CSSI. The WHMP must include, but not necessarily limited to: (a) baseline and post-commissioning monitoring of representative attributes that: (i)contribute to the Outstanding Universal Value (OUV) of the Greater Blue Mountains Area; and (ii)are identified in the documents listed in Condition A1 as potentially impacted during Stage 1 of the CSSI; (b) relevant water quality monitoring data; and (c) photos at each monitoring point.	Audit Interview 6/11/23 Site Inspection 6/11/23	No impacts to World Heritage Areas at the time of the audit.	Not triggered

Reference		Condition	Evidence	Auditor Conclusion	Audit Finding
E133		Within twelve months after the commencement of operation of Stage 1 of the CSSI, and every year thereafter, unless otherwise agreed by the Planning Secretary, the Proponent must prepare an annual World Heritage monitoring report. The World Heritage monitoring report must include, but not necessarily limited to: (a) analysis of results from the WHMP under Condition E132, including verifying whether potential impacts are as predicted in the documents listed in Condition A1; (b) mitigation measures proposed, where the WHMP under Condition E132 identifies an impact on the Blue Mountains World Heritage Property and National Heritage place, that is attributable to the project and exceeds the impacts described in the documents listed in Condition A1; (c) effectiveness of mitigation measures implemented, and any necessary additional mitigation measures; and (d) any corrective actions that may be required and/or have been employed. The World Heritage monitoring report must be provided to EHG for information within one month of completion of each annual report.	Audit Interview 6/11/23 Site Inspection 6/11/23	Operational requirement	Not triggered
E134		No Work within Blue Mountains National Park (part of the Greater Blue Mountains Area) is to occur as part of Stage 1 of the CSSI (such as for investigations, monitoring or temporary construction compounds), unless authorisation is granted by the NSW National Parks and Wildlife Service under the National Parks and Wildlife Act 1974 (NPW Act) or the National Parks and Wildlife Regulation 2019.	Audit Interview 6/11/23 Site Inspection 6/11/23	No work was being undertaken within the Blue Mountains National Park at the time of the audit site inspection	Not triggered
E135		At least one month prior to the commencement of construction of the AWRC development (except for construction of those works that are outside the scope of the hazard studies), or within such further period as the Planning Secretary may agree, the Proponent must prepare and submit to the Planning Secretary the studies set out under subsections (a) to (b) below (the pre-construction studies). Construction, other than of works, must not commence until recommendations have been considered and, where appropriate, acted upon. With respect to the Fire Safety Study, the study must meet the requirements of Fire and Rescue NSW. (a) a Final Hazard Analysis of the AWRC development, prepared generally consistent with the Department’s Hazardous Industry Planning Advisory Paper No. 6, ‘Hazard Analysis’ and Multi-Level Risk Assessment. The Final Hazard Analysis must: (i) include a final site layout including dangerous goods storage locations; (ii) provide verification to Australian Standards for the storage and handling of the dangerous goods stored on the AWRC site including, but not limited to: · flammable dangerous goods (Class 3); and · corrosive liquids (Class 8). The verification should be focused on key elements such as separation distances described in the relevant standard and critical controls. (b) A Fire Safety Study for the AWRC development. This study must cover the relevant aspects of the Department’s Hazardous Industry Planning Advisory Paper No. 2, ‘Fire Safety Study Guidelines’ and the New South Wales Government’s Best Practice Guidelines for Contaminated Water Retention and Treatment Systems (NSW HMPCC, 1994). The study must meet the requirements of Fire and Rescue NSW.	Memo from JHG to SWC titled "CSSI8609189 - USC AWRC Condition of Approval E135 Hazards and Risks" dated 18/7/23 Letter from SWC to DPE titled " Upper South Creek Advanced Recycling Centre Request for Extension of Time for provision of deliverables required under condition 135 Audit Interview 6/11/23 Site Inspection 6/11/23	Construction works with direct relevance to the Fire Safety Study had not commenced at the time of the audit inspection. SWC have written to DPE to confirm the timing of the study. The HAZOP study had commenced at the time of the audit	Not triggered
E136		The Proponent must develop and implement the plans and systems set out under subsections (a) to (c) below, no later than two months prior to the commencement of the commissioning of the AWRC development, or within such further period as agreed with the Planning Secretary. (a) arrangements covering the transport of dangerous goods including details of routes to be used for the movement of vehicles carrying dangerous goods to the AWRC development. The routes must be selected in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 11, ‘Route Selection’. Suitable routes identified in the study must be used except where departures are necessary for local deliveries or emergencies; (b) a comprehensive Emergency Plan and detailed emergency procedures for the AWRC development. The Emergency Plan must include consideration of the safety of all people outside of the AWRC development who may be at risk from the AWRC development. The plan must be prepared in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 1, ‘Emergency Planning’; (c) a document setting out a comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. The document must clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records must be kept on-site and must be available for inspection by the Planning Secretary upon request. The Safety Management System must be developed in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 9, ‘Safety Management’. This document is not required if the Proponent has a certified Safety Management System (SMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that the certified SMS or equivalent addresses these requirements.	Audit Interview 6/11/23 Site Inspection 6/11/23	Commissioning Requirement	Not triggered
E137		Within twelve months after the commencement of operation of Stage 1 of the CSSI, and every five years thereafter, or at such intervals as the Planning Secretary may agree, the Proponent must carry out a comprehensive Hazard Audit in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 5 ‘Hazard Audit Guidelines’ of the AWRC development. The Hazard Audit must be carried out at the Proponent’s expense by a qualified person or team, who have been approved by the Planning Secretary and are independent of the development.	Audit Interview 6/11/23 Site Inspection 6/11/23	Commissioning Requirement	Not triggered

Appendix C Stakeholder Consultation Records

Appendix C-1 Correspondence Issued

From: Richard Peterson
Sent: Monday, 18 September 2023 3:01 PM
To: DPE PSVC Compliance Mailbox
Cc: nathan.heath@planning.nsw.gov.au
Subject: SSI 8609189 - Upper South Creek Advanced Water Recycling Facility - Independent Environmental Audit Consultation

To whom it may concern

I have been approved by the Department of Planning and Environment to undertake an initial audit of the Upper South Creek Advanced Water Recycling Facility.

The audit is planned to commence in early November 2023.

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

- Seek feedback from the Department regarding any specific issues that the Department would like to be focussed on by the audit
- Confirm whether the Department would like me to consult with any other stakeholders in preparation for the audit.

I would appreciate a response by 10th of October to ensure adequate time is allowed for consultation with other parties.

Many thanks in advance



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

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

richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, 29 October 2023 12:07 PM
To: mail@fairfieldcity.nsw.gov.au; lcc@liverpool.nsw.gov.au;
council@wollondilly.nsw.gov.au; council@cbc.city.nsw.gov.au
<council@cbc.city.nsw.gov.au>; council@penrith.city
Subject: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

To whom it may concern,

I have been appointed to undertake an independent audit of the Upper South Creek Advanced Water Recycling Centre in November 2023. [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

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

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

In this regard, a response by Wednesday 15th November would be greatly appreciated.

Many thanks



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

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

richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, 29 October 2023 11:56 AM
To: OEH HD Heritage Mailbox
Subject: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

To whom it may concern,

I have been appointed to undertake an independent audit of the Upper South Creek Advanced Water Recycling Centre in November 2023. [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

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

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

In this regard, a response by Wednesday 15th November would be greatly appreciated.

Many thanks



Richard Peterson | Director

Trigalana Environmental Pty Ltd

M: 0429 227 775

E: richard.peterson-trigalana@outlook.com

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Sent from [Mail](#) for Windows 10

richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, 29 October 2023 11:54 AM
To: info@epa.nsw.gov.au
Subject: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

To whom it may concern,

I have been appointed to undertake an independent audit of the Upper South Creek Advanced Water Recycling Centre in November 2023. [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

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

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

In this regard, a response by Wednesday 15th November would be greatly appreciated.

Many thanks



Richard Peterson | Director

Trigalana Environmental Pty Ltd

M: 0429 227 775

E: richard.peterson-trigalana@outlook.com

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Sent from [Mail](#) for Windows 10

richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, 29 October 2023 12:24 PM
To: m12motorway@transport.nsw.gov.au
Subject: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

To whom it may concern,

I have been appointed to undertake an independent audit of the Upper South Creek Advanced Water Recycling Centre in November 2023. [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

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

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

I have sent this email directly to the M12 Project office as I am aware the project is in the same area as the M12 and there may be some specific issues to be considered by the audit.

In this regard, a response by Wednesday 15th November would be greatly appreciated.

Many thanks



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

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Sent from [Mail](#) for Windows 10

Appendix C-2 Correspondence Received

From: Aleesha Rodgers
Sent: Monday, 13 November 2023 9:06 AM
To: Richard.peterson-trigalana@outlook.com
Subject: RE: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

Dear Mr Peterson,

Thank you for your email regarding the upcoming Independent Audit ("audit") of the Upper South Creek Advanced Water Recycling Centre ("AWTP") to be conducted by Trigalana Environmental Pty Ltd. From the information provided, the EPA understands that broadly, the purpose of the audit is:

- to assess compliance with conditions of consent and post approval documents; and
- review the environmental performance of the development.

The EPA does not currently have any major area of concerns with the development of the AWTP and is supportive of an approach that audits a full range of environmental aspects. We recommend that the following are included in the audit scope:

- Air quality impacts particularly the management and monitoring of dust generation and effectiveness of dust suppression measures.
- Adequacy of and compliance with site surface water controls to prevent discharge.
- Compliance with noise limits and noise mitigation strategies.

The EPA looks forward to reviewing the audit report and findings. Please contact me on (02) 8837 6398 or email info@epa.nsw.gov.au and copy aleesha.rodgers@epa.nsw.gov.au if you wish to discuss this further.

Kind Regards,

Aleesha Rodgers
Senior Operations Officer
NSW Environment Protection Authority
D 02 8837 6398



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the Traditional Custodians of the land, waters and sky where we work. As part of the world's oldest surviving cultures we pay our respect to Aboriginal Elders past and present.



Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: Environment Line <info@environment.nsw.gov.au>
Sent: Monday, 30 October 2023 7:53 AM
To: EPA Delivery Hub Mailbox <EPA.DeliveryHub@epa.nsw.gov.au>
Subject: FW: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre [ref:!00D7F06iTix.!5007F01QyDiJ:ref]

Response requested by 15/11/23

Alice
Senior Information Officer

Department of Planning and Environment
info@environment.nsw.gov.au
info@epa.nsw.gov.au
Phone: 131555
Follow us on twitter for the latest news and media release alerts @NSW_EPA

<https://www.dpie.nsw.gov.au/>

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

----- Forwarded Message -----

From: Richard Peterson [richard.peterson-trigalana@outlook.com]
Sent: 29/10/2023 11:54
To: info@epa.nsw.gov.au
Subject: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

To whom it may concern,

I have been appointed to undertake an independent audit of the Upper South Creek Advanced Water Recycling Centre in November 2023. [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

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

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

From: Andrew Mooney
Sent: Tuesday, 14 November 2023 1:29 PM
To: Richard Peterson
Cc: Margaret Diebert; Mursaleen Shah; Hao Dang; Daniel Begnell
Subject: RE: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

Hi Richard

Your email has just reached me and given your request for feedback by tomorrow, I am providing a short response on behalf of key stakeholders within Council (cc'd to this email), regarding further consultation with Council relating to the independent audit of conditions of approval for the Upper South Creek Advanced Water Recycling Centre (AWRC).

As you would be aware, the route of the AWRC Brine Pipeline runs through extensive parts of the Fairfield LGA and has significant impacts on a range of Council assets and operations provided by Council including the local road network, stormwater assets, public open space, council car parks, community facilities, activities and services relying on these assets.

Council officers have had numerous discussions with Sydney Water regarding the above and have made clear our expectations regarding reinstatement of various assets/facilities to Council's requirements, including mitigating impacts on Council operations.

The route of the pipeline also has the potential to generate numerous impacts/hardship for numerous private landowners and businesses across the City.

At this stage, it is understood that Sydney Water is yet to undertake detailed consultation with the majority of the affected private landowners. In this regard, Council would be interested in gaining a better understanding of the approach to be followed under the audit process to effectively address both Council and private landowner issues.

We look forward to hearing from you further regarding this matter.

Regards

Andrew Mooney
Executive Strategic Planner | Strategic Land Use Planning
City Planning Directorate

PO Box 21, Fairfield NSW 1860
P 9725 0214 | M 0438 429 601

www.fairfieldcity.nsw.gov.au
mail@fairfieldcity.nsw.gov.au



*We acknowledge the Cabrogal of the Darug nation who are the Traditional Custodians of this Land.
We also pay our respect to the Elders both past, present and emerging of the Darug Nation*

From: Samantha Gibbins
Sent: Monday, 20 November 2023 4:10 PM
To: Richard Peterson
Subject: RE: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

Hi Richard,

Thanks for discussing this with me on the phone today.

I can confirm that Heritage NSW requires compliance with the Heritage Conditions of Approval, the Heritage Construction Environmental Management (CEMP) Sub-plan, and the commitments in the Aboriginal Cultural Heritage Assessment Report (ACHAR).

Heritage NSW has no specific issues in relation to Aboriginal cultural heritage or Environmental Heritage.

Kind regards,

Sam

Sam Gibbins, BA (Hons), PhD

Senior Assessments Officer (Historical Archaeology)

Environment and Heritage - Heritage NSW

Department of Planning and Environment

T (02) 9873 8500 E Samantha.Gibbins@environment.nsw.gov.au

heritage.nsw.gov.au and dpie.nsw.gov.au

Locked Bag 5020
Parramatta NSW 2124

Working days Monday to Friday, 8:00am – 4:00pm



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

Please consider the environment before printing this email.

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, 29 October 2023 11:56 AM

richard.peterson-trigalana@outlook.com

From: Daniel Saunders <Daniel.Saunders@transport.nsw.gov.au>
Sent: Monday, 30 October 2023 11:38 AM
To: 'richard.peterson-trigalana@outlook.com'
Subject: FW: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

Hi Richard

Please consider the following elements in your audit process:

- Sediment impacted water leaving your site towards our boundary and releasing to South Creek within our COA monitoring area
- Site access road interface between where Sydney water REF and M12 EIS meet
- Dust controls for relevant construction stages
- Road surface conditions for Clifton Ave
- Resolution of community complaints where each project may have a role in resolving

Regards

Daniel Saunders

Environment & Sustainability Manager
Safety Environment and Regulation

Transport for NSW

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

transport.nsw.gov.au



Transport
for NSW



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

OFFICIAL

OFFICIAL

From: M12 Motorway <m12motorway@transport.nsw.gov.au>
Sent: Monday, 30 October 2023 7:53 AM
To: Daniel Saunders <Daniel.Saunders@transport.nsw.gov.au>
Subject: FW: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

Hi Daniel,

Please see below.

Thanks

Lisa Keliele

Communication & Stakeholder Engagement Officer
M 0499 540 703

OFFICIAL

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, 29 October 2023 12:24 PM
To: M12 Motorway <m12motorway@transport.nsw.gov.au>
Subject: Independent Environmental Audit - Upper South Creek Advanced Water Recycling Centre

You don't often get email from richard.peterson-trigalana@outlook.com. [Learn why this is important](#)

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

To whom it may concern,

I have been appointed to undertake an independent audit of the Upper South Creek Advanced Water Recycling Centre in November 2023. [Upper South Creek Advanced Water Recycling Centre | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

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

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

I have sent this email directly to the M12 Project office as I am aware the project is in the same area as the M12 and there may be some specific issues to be considered by the audit.

In this regard, a response by Wednesday 15th November would be greatly appreciated.

Many thanks

Appendix D Site Photographs

General Construction Activities



Photo 1: General construction works – AWRC site



Photo 2: Piling and ground engineering – AWRC site



Photo 3: Soil stabilisation and rehabilitation work – AWRC site



Photo 4: Project boundary (with M12 adjacent) and sediment fence – AWRC site



Photo 5: General construction activities – brine pipeline



Photo 6: HDD retrieval pit - treated water pipeline

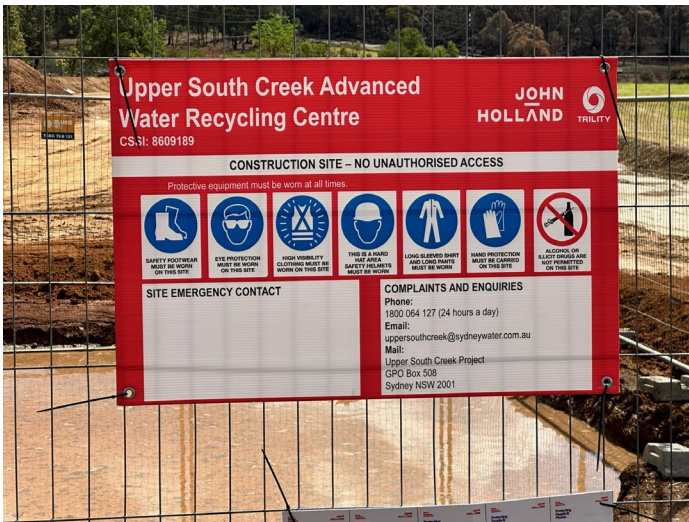


Photo 7: Project information signage – treated water pipeline



Photo 8: HDD Site – treated water pipeline

Soil and Water Management, Dust



Photo 9: Soil Stabilisation and rehabilitation – AWRC site



Photo 10: Temporary Stockpile covered – AWRC Site



Photo 11: Speed restriction signage and wheel wash - AWRC site



Photo 12: Dust cart – AWRC site



Photo 13: Street Sweeper – AWRC Site



Photo 14: Stabilised site access – treated water pipeline compound site



Photo 15: Spoil stockpile covered with geofabric - treated water pipeline compound site



Photo 16: Effective re-use of mulch as groundcover - treated water pipeline compound site



Photo 17: groundcover and sediment fence – AWRC site



Photo 18: high efficiency sediment basin under construction – AWRC site

Ecology



Photo 19: Retained tree – AWRC site



Photo 20: Retained vegetation – brine pipeline compound site



Photo 21: Environmental protection, no go fencing



Photo 22: Clearing limits and habitat tree identification tape

Traffic Management



Photo 23: Traffic control – brine pipeline



Photo 24: Alternative pedestrian access – brine pipeline



Photo 25: Community notice – brine pipeline



Photo 26: Traffic information signage – brine pipeline

Noise and Vibration



Photo 27: Noise monitoring station - AWRC site



Photo 28: Acoustic blankets (HDD operations)– treated water pipeline

Chemical Storage, Waste



Photo 29: Chemical storage container – bunded and ventilated



Photo 30: Waste storage facilities



Photo 31: Bunded fuel storage container – AWRC site



Photo 32: Oil and fuel spill kit – AWRC site

Appendix E Auditor Declaration

Project name	Upper South Creek Water Recycling Centre
Consent Number	SSI 8609189
Description of Project	Construction and operation of a sewage treatment plant at Kemps Creek sized to treat an average dry weather flow of up to 50 ML/day. approximately 21 km of pipeline for the transmission of treated water from the AWRC to the Nepean River at Wallacia (treated water pipeline) approximately 17 km of pipeline for the transmission of brine from the AWRC to the sewage reticulation system at Lansdowne
Proponent	Sydney Water Corporation
Date	12 January 2024

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

I declare that

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

Notes:

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

Name of Auditor Richard Peterson

Signature 

Qualification BE Civil, M Environmental Management

Company: Trigalana Environmental Pty Ltd

