

Table 1: Response to Audit Findings – Following completion of Audit undertaken 28th and 29th October 2024

CoA No	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponents Proposed Action	Proposed Due Date
Non- Compliances (identified in audit period)					
C18	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.	During an ER inspection on 2/9/24, dust was observed being generated at numerous locations across the site due to a combination of high winds and dry ground conditions. The ER considered there was insufficient priority of resourcing and application of dust mitigation to assist with the management of dust at the locations observed, including at Fowlers Farm and the C6 Compound at Wallacia.	Ongoing planning and execution of works to ensure: <ul style="list-style-type: none"> Weather forecasts are undertaken daily When hot, dry and windy conditions are forecast, ensure adequate resources (water carts) are available to suppress dust Ensure water carts are not used for purposes other than dust suppression during hot/ windy weather. Ongoing stabilisation of exposed soil to reduce the risk of fugitive dust emissions. 	The non-compliance was addressed as noted in the audit report and the non-compliance report previously submitted to the Department. Immediate corrective action was undertaken, including a review of water carts usage, including the identification of priority areas. During the NC event, a stop work was in place, however, dust was still generated onsite. Areas where dust was previously noted have since been restored and stabilised.	N/A – all actions associated with the non-compliance have since been closed.
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.	A Non-compliance (NC-240902-01) was raised in relation to dust management on the Project and a Non-Compliance Report was prepared, dated 6/9/24 and submitted to Sydney Water, DPHI and the ER. Dust mitigation was not being undertaken as required under the Project's Air Quality CEMP Sub-plan, specifically mitigation measures AQ14, AQ31 and AQ38, resulting in dust generation from site. During subsequent ER inspection undertaken on 09/09/2024 and 16/09/2024, additional dust management measures, including more frequent and targeted use of the water cart was observed, consistent with the corrective actions proposed in the CoA A45 Non-compliance report. The associated Non-compliance (NC-240902-01) was closed by the ER on 09/09/2024.	Regular visual monitoring and implement stop work protocol for dust activities such as excavation and working within stockpiles.	Ongoing visual monitoring of site works and of weather forecasts will be undertaken on a daily basis. All actions associated this non-compliance have since been closed.	
		[Note - The 1 NC event raised 2 NCs with the listed conditions with the same findings, recommendations, actions and due date]			

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Recommendation/ Observation/ Positive Finding					
E67	Plant maintenance (watering and weeding) must continue during construction and operation on land owned by Sydney Water. Sydney Water must continue plant maintenance on other land specified in the Rehabilitation Management Plan under Condition E19 and Condition E20 and committed to in the documents listed in Condition A1 for the maintenance period specified, in consultation with EHG and relevant landowner(s), as required. Should any plant loss occur during the maintenance period, the plants should be replaced by the same plant species and growth form (i.e. a tree with a tree and local native provenance species where the original planting was of local native provenance) unless it is determined by a suitably qualified person that a different species is more suitable for that location.	<p>The prevalence of Sticky Nightshade was observed during the audit site inspection, particularly around the AWRC project site, including the sediment basin and areas surrounding the disturbed project footprint.</p> <p>It was noted during the audit site inspection and interview that weeding contractors have been engaged and are implementing weed control protocols.</p>	The project should ensure ongoing weed control measures are applied in accordance with the Rehabilitation Management Plan, VMP and LMP.	<p>JH have engaged a weed management contractor who has been progressively managing weeds at AWRC, including Sticky Nightshade, throughout the year. JH will continue to manage weeds in accordance with the relevant plans Rehabilitation Management Plan, VMP and LMP.</p> <p>It is noted that an additional round of herbicide application was undertaken in December 2024.</p>	Ongoing throughout construction
E110	<p>Waste generated during construction and operation must be dealt with in accordance with the following priorities:</p> <p>(a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;</p> <p>(b) where avoiding or reducing waste is not possible, waste must</p>	<p>While a high standard of housekeeping was observed across multiple sites, there were some areas within the AWRC site where waste materials and litter was stored outside the designated waste storage bins.</p> <p>Chemicals were observed to be stored on the ground adjacent to a chemical storage container and the spill kit in place was depleted.</p>	Reinforcement and messaging via toolbox talks and other appropriate means of the importance of good housekeeping and the correct use of bins provided. The project should ensure a process is in place and implemented for checking and replenishing spill kits across the site.	JH will reinforce the importance of good housekeeping, proper use of waste receptacles and the management of spill kits across the site through the delivery of prestarts/toolboxes and continued education of the workforce.	28/02/2025

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	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.				
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.	A diesel cell used for refuelling was located adjacent to the HES Basin, posing a risk of water pollution in the event of a leak or spill.	Review the risk assessment for refuelling to ensure requirements for positioning of refuelling equipment near waterways is addressed. Move the diesel refuelling cell to an appropriate location away from the HES Basin, and ensure controls are implemented as per the risk assessment.	The diesel cell adjacent to the HES-basin has since been relocated. This action is considered closed. JH will review the relevant risk assessment to ensure fuel storage is appropriately included and managed.	28/02/2025
E 116	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.	Rehabilitation work at the creek crossings and on the eastern bank of the Nepean River has now been completed. The rehabilitation work appeared to be a very high standard and incorporated the re-use of habitat features.	No recommendations are made as this is a positive observation by the auditor	Nil	N/A – positive finding