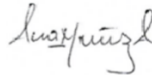


INDEPENDENT AUDIT – OPERATIONS

MOOREBANK INTERMODAL PRECINCT WEST STAGE 2
(SSD 7709)

SEPTEMBER 2025

Authorisation

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EXECUTIVE SUMMARY

ESR is responsible for delivering the development of intermodal freight terminal facilities, linked to Port Botany and the interstate rail network. The site is located on both sides of Moorebank Avenue, Moorebank, within the Liverpool City Council local government area, approximately 27 kilometres south-west of the Sydney Central Business District.

In 2022, LOGOS joined the ESR group of companies and since August 2024, the LOGOS and ESR operations have been integrated to now operate under the name ESR Australia & NZ (ESR). The Applicant/approval holder entity remains unchanged, and references to LOGOS continues and remains relevant where LOGOS and ESR are used interchangeably. LOGOS is the responsible body for developing and operating the Development.

The Moorebank Precinct West (MPW) involves the development of intermodal freight facilities linked to the interstate and intrastate freight-rail network and includes warehouse and distribution facilities, freight village and ancillary facilities, a rail connection to the Moorebank Precinct East (MPE) rail link connecting the MPW Site to the Southern Sydney Freight Line (SSFL) and a road entry and exit point from Moorebank Avenue. The MPW development site is centred on an approximately 220-hectare area of Commonwealth-owned land, which is adjacent to the SSFL, the East Hills Rail Line, the M5 Motorway and Moorebank Avenue.

MPW development is a staged development subject to several development consents granted under the State Significant Development (SSD) provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (the EP&A Act). On 11 November 2019, the NSW Independent Planning Commission (the Commission or IPC) approved the development application for the MPW – Stage 2, SSD 7709 (MPW2, the Development or the Project). MPW2 comprises:

- Construction and 24/7 operation of an intermodal terminal (IMT) facility to support a container freight throughput volume of 500,000 twenty-foot equivalent units (TEUs) per annum
- Construction and 24/7 operation of a warehousing estate on the northern part of the site servicing the IMT facility
- Intersection upgrades on Moorebank Avenue at Anzac Road and Bapaume Road
- Construction and operation of on-site detention basins, bioretention/ biofiltration systems and trunk stormwater drainage for the entire site, and
- Construction works and temporary ancillary facilities.

The objective of this Independent Audit is to verify compliance with the relevant consent conditions and assess the effectiveness of environmental management of the development.

This Audit Report presents the outcomes from the first audit for operations of the Project, covering the period from 1 August 2024 to 30 September 2025. The Audit was undertaken in accordance with the SSD 7709 Conditions C17 and in accordance with *Independent Audit Post Approval Requirements* (IAPAR).

The overall outcome of the Audit indicated that compliance was tracked by development personnel. Compliance records were organised and available at the time of the site inspection and during interviews with development personnel on 17 September 2025.

Summary of Findings

- 295 conditions were assessed.
- 139 conditions were considered to be complied with.
- 148 condition were considered to be not triggered.
- 8 non-compliances were identified. These relate to status of Greenstar ratings, reporting and notifications to the Department, noise management, completion of auditing.
- In addition to the above, nine observation were identified regarding container handling and movements, compliance reporting, train emission requirements, complaint management, noise monitoring, and the absence of the container washdown facility.

With respect to key strengths and environmental performance the Auditor notes that:

- Documentation is of a very high quality.
- The precinct appeared to be well maintained, free of waste with no evidence of spills, leaks etc. The noise walls were erected and intact. The on site detention basins appeared to be well installed and functioning.
- Maersk had electrical forks in use across its warehouse. Primary Connect had numerous electrical vehicle charging stations for its staff and visitors.
- The interviewed tenants and project / facility managers and coordinators were aware of their obligations under the Consent, relevant to the activities that they are responsible for.

Detailed findings are presented in Section 3, along with actions proposed or undertaken by the auditees to address the findings.

The Auditor would like to thank the auditees from Tactical, Knight Frank, Maersk and Systems Connect for their high level of organisation, cooperation, and assistance during the audit.

1. INTRODUCTION

1.1 Development overview

The MPW2 is a component of the Moorebank Precinct West (MPW) development which, in turn, is part of the broader Moorebank Intermodal Precinct development. The Moorebank Intermodal Precinct (also referred to as the Moorebank Intermodal Freight Precinct or Moorebank Logistics Precinct (MLP)) is located at Moorebank Avenue, Moorebank, and is proposed to comprise an interstate, intrastate and port shuttle freight, and logistics handling facility for the Sydney Metropolitan Area.

The MPW development site is centred on an approximately 220-hectare area of Commonwealth-owned land, which is adjacent to the SSFL, the East Hills Rail Line, the M5 Motorway and Moorebank Avenue.

The MPW development is a staged development, requiring a number of development consents over its duration. This Independent Audit focuses on MPW2 SSD 7709. Consent for the Development was granted under the SSD provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (the Act). On 11 November 2019, the NSW Independent Planning Commission (the Commission or IPC) approved the development application for the MPW2, SSD 7709. ESR is the responsible body for developing and operating the Development.

The approval for the MPW2 involves the following works:

- Construction and 24/7 operation of an intermodal terminal (IMT) facility to support a container freight throughput volume of 500,000 TEUs per annum, including:
 - a rail terminal with nine rail sidings and associated locomotive shifter
 - a rail link connection from the sidings to the rail link constructed under MPE Stage 1 (SSD 6766) to the SSFL
 - rail and truck container loading and unloading and container storage areas
 - truck waiting area and emergency truck storage area
 - container wash-down facilities and degassing area
 - mobile locomotive refueling station, and
 - engineer's workshop, administration facility and associated car parking.
- Operation of the IMT facility includes operation of the rail link to the SSFL and container freight movements by truck to and from the Moorebank Precinct East (MPE) site.
- Construction and 24/7 operation of a warehousing estate on the northern part of the site servicing the IMT facility and including:
 - six warehouses with a total gross floor area (GFA) of 215,000 m² and, for each warehouse, associated offices, staff amenities, hardstands and truck and light vehicle parking
 - 800 m² freight village (operating from 7am to 6pm, 7 days/ week) including staff/ visitor amenities, and

- internal roads, noise wall, landscaping, lighting and signage.
- Intersection upgrades on Moorebank Avenue at:
 - Anzac Road providing site access
 - Bapaume Road for left turn only out of the site
- Construction and operation of on-site detention basins, bioretention/ biofiltration systems and trunk stormwater drainage for the entire site.
- Construction works and temporary ancillary facilities, including:
 - vegetation clearing, top soil stripping and stockpiling and site earthworks and temporary on-site detention
 - importation of up to 1,600,000 m³ of uncompacted fill, temporary stockpiling and placement over the entire site to raise existing ground levels by up to 3m
 - materials screening, crushing and washing facilities importation and placement of engineering fill and rail line ballast
 - installation and use of a concrete batching plant, and
 - utilities installation/ connection.

1.2 Changes to the Development

The Development has been modified on three occasions:

- MOD-1 was approved on 24 December 2020 and relates to adjust the southern operational boundary of the MPW2 warehouse area (footprint) and change the maximum warehouse building heights across warehouse areas 5 and 6 (JN and JR). Amendments were also made to increase operational noise criteria and to allow for the storage of dangerous goods on-site at warehouse areas 5 and 6.
- MOD-2 was approved on 30 September 2021 and relates to amendments to the extent of maintenance track requirements (Condition B2(g)), enable location of power services within the roadway (Condition B87), and amend Out of Hours Works Protocol requirements (Condition B135(g)).
- MOD-3 was approved on the 22 July 2024 and relates to changes to the quantities and classes of Dangerous Goods that can be stored at Warehouse areas 5 and 6 (JN and JR) amending Table 7 to condition B176A.

1.3 Operations

The operational activities within the Development are set out in Section 2.1 of the Operational Environmental Management Plan.¹ The layout is presented in Figure 1, below.

¹ Operational Environmental Management Plan: Moorebank Intermodal Precinct - West Precinct Stage 2, (OEMP) Revision 08 dated 8 November 2024.

service road, which loops around the rear of the precinct amenities area and exits via the car park.

Operational areas come online progressively as warehouses and the terminal facility are constructed, commissioned, and tenanted. According to the evidence sighted and feedback from Tactical, operations were notified to commence on 27 May 2024 and actual operations commenced on 1 August 2024, with the first train arriving on 4 August 2024.

Management of operational components, on behalf of ESR, are provided by Tactical Group, Knight Frank and each of the tenants. For the purposes of this audit they are collectively referred to as 'the auditees'.

1.4 Approval requirements

SSD 7709 Conditions C16 to C19 of Schedule 2 set out the requirements for undertaking Independent Environmental Audits.

1.5 Audit team

In accordance with Section 3.1 of the IAPAR, Independent Auditors must be suitably qualified, experienced, and independent of the Development, and appointed by the Planning Secretary. The list of independent auditors who performed the auditing works are shown on Table 1.

Table 1: Audit Team

Name	Company	Participation	Certification
Derek Low	WolfPeak	Lead Auditor	Exemplar Global Certified Lead Environmental Auditor (Certificate No 114283 (updated by Exemplar Global during the audit period to C-367713))
Ana Maria Munoz	WolfPeak	Auditor	Exemplar Global Certified Lead Environmental Auditor (Certificate No 115421)

Approval of the Audit Team was provided by the Department on 8 August 2025. The letter is presented in Appendix B. Declarations of independence are presented in Appendix F.

1.6 Audit objectives

The objective of this Independent Audit is to satisfy SSD 7709 Schedule 2, Condition C17.

Condition C17 states:

Independent Audits of the development must be carried out in accordance with:

- (a) the Independent Audit Program submitted to the Planning Secretary and the Certifier under condition C16 of this consent; and*
- (b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).*

The Operational Independent Audit Program was prepared in accordance with Condition C16 and IAPAR and submitted to and approved by the Department. The IAPAR sets out the scope, methodology and reporting requirements for Independent Audit.

This Audit seeks to fulfill the requirements of Condition C17, to verify compliance with the relevant Conditions and assess the effectiveness of environmental management on the Development.

1.7 Audit scope

This audit is the first for the operations for the MPW2 Development covering the period from commencement of operations (1 August 2024) to 30 September 2025 (the audit period). Construction activities do not form part of the audit scope.

The scope of the Independent Audit comprises:

- An assessment of compliance with:
 - all conditions of consent applicable to the phase of the development that is being audited
 - all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and
- A review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the development during the audit period
- A review of the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
- A high-level review of the development's environmental management systems
- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and

- Any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance.

2. AUDIT METHODOLOGY

2.1 Audit process

The Audit was conducted in a manner consistent with *AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems* (AS/NZS ISO 19011) and the methodology set out in the Department's IAPAR.

2.2 Audit process detail

2.2.1 Audit initiation and scope development

Prior to the commencement of the Audit the following tasks were completed:

- Establish initial contact with the auditee
- Confirm the audit team, and
- Confirm the audit purpose, scope and criteria.

2.2.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan, and prepared work documents (audit checklists) and distributed to the Development team in preparation for the Audit.

2.2.3 Consultation

On 15 August 2025 WolfPeak consulted with the Department to obtain their input on the scope of the Independent Audit and to confirm whether other stakeholders should be consulted, in accordance with Section 3.2 of the IAPAR. No response was received from the Department. The consultation record is attached in Appendix C.

2.2.4 Meetings

The opening and closing meetings were held on site on 17 September 2025 with development personnel and WolfPeak auditor. During the opening meeting, the objectives and scope of the Audit, the resources required and methodology to be applied were discussed. At the closing meeting, preliminary audit findings were presented, preliminary recommendations (as appropriate) were made, and any post-audit actions were confirmed.

2.2.5 Interviews

The auditor conducted interviews on 17 September 2025 with key development personnel during the site inspection and document review. The names of personnel interviewed during the audit are provided in Table 2. All other communication was conducted remotely, which included detailed requests for information and auditee responses to the request.

Table 2: Audit meeting attendance and personnel interviewed

Personnel	Position	Company
Mark Howley	Senior Project Manager	Tactical Group
Matthew Kim	Project Coordinator	Tactical Group
Suzana James	Facilities Coordinator	Knight Frank
Steven Contanario	Facilities Manager	Knight Frank
Deep Bhinder	Operations Manager	Maersk
George Parousis	Facilities Manager	Primary Connect

2.2.6 Site inspection

The on-site audit activities took place on 17 September 2025 and included an inspection of the entire operational area of the MPW2 site, excluding Warehouse N2 Sydney Tools Pty Ltd which was not accessible on the day of the inspection. Photos taken during the inspections are presented in Appendix E.

2.2.7 Document review

The Audit included the investigation and review of Development files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are included within Appendix A.

2.2.8 Generating audit findings

Audit findings were based on verifiable evidence. The evidence included:

- Relevant records, documents and reports
- Interviews of relevant site personnel
- Photographs
- Figures and plans, and
- Site inspections of relevant locations, activities and processes.
- Section 3 and Appendix A present the general audit findings and Section 4 presents the summary of findings.

2.2.9 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR. These are replicated in Table 3.

Table 3: Compliance status descriptors

Status	Description
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Compliant	WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.
Non-compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Observations and notes may also be made to provide context, identify opportunities for improvement or highlight positive initiatives.

2.2.10 Evaluation of post approval documentation

The Auditor assessed whether post-approval documents:

- have been developed in accordance with the Conditions and their content is adequate.
- have been implemented in accordance with the Conditions.

The adequacy of post approval documents was determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document.
- whether there are any opportunities for improvement.

2.2.11 Completing the audit

The Audit Report was distributed to the Applicant to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

The Auditor's findings have been determined independent of the auditees, the Department and any other parties, based on the evidence assessed during the audit.

3.2 Previous audit findings

This is the first audit on the operations of the Development, delivered under the approved Operation Independent Audit Program. As such there are no previous findings.

There are findings that were open on completion of the previous construction phase audit. These all relate to construction (not operations) and are reported within the audit reports conducted under the construction phase audit program.

3.3 Summary of compliance

The summary of conditions assessed and compliance status from the audit is presented in Table 4. The non-compliances and observations (along with associated recommended or completed actions) are presented in Table 5. Detailed findings against each requirement are presented in Appendix A.

Table 4: Summary of conditions assessed and compliance status

Part of the Consent	No. of conditions assessed	Compliance status		
		Compliant	Non-compliant	Not triggered
Part A	62	42	1	19
Part B	212	88	4	120
Part C	21	9	3	9
Total	295	139	8	148

- The OEMP and Sub-plans are of a very high quality and the noise and air quality monitoring records are for the most part up to date. Evidence of water quality monitoring needs to be retrieved.
- The precinct appeared to be well maintained, free of waste with no evidence of spills, leaks etc. The noise walls were erected and intact. The on site detention basins appeared to be well installed and functioning.
- Maersk had electrical forks in use across its warehouse. Primary Connect had numerous electrical vehicle charging stations for its staff and visitors.
- The interviewed tenants and project / facility managers and coordinators were aware of their obligations under the Consent, relevant to the activities that they are responsible for.



APPENDIX A – SSD 7709 CONDITIONS OF CONSENT

