Post Approval Requirements Audit Report

November 2024

Project Name: M1 Pacific Motorway extension to Raymond Terrace (SSI 7319)

The September 2024 Independent Environmental Audit was received 19 November 2024. The project's response to non-compliances, observations and recommendations identified during the audit are presented in Table 1.

Table 1: Responses to Non-compliances (NC) and Observations (Obs).

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
A30	The Proponent must provide the ER with documentation requested in order for the ER to perform their functions specified in Condition A29 (including preparation of the ER monthly report), as well as: (a) the complaints	Stage 1 (Southern): The complaints register for the BH2T was not provided for the week of 23-29 September. This was documented in the September ER Monthly Report dated 3 October 2024.	The complaints register for the missing week has been provided to the ER. **No further actions recommended.**	The complaints report was provided to the ER on Tuesday 1 October 2024. Discussions were held with the Project and the ER during the fortnightly meeting regarding the on-going timing of provision of the complaints report. Agreement was made that an	Closed

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	register (to be provided on a weekly basis or as requested where complaints have been received); 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.*			electronic copy of the reports would be provided every Thursday going forward. The provision of the report on a Thursday commenced on 3 October 2024. Item is now closed.	
C11	The CEMP(s) and CEMP Sub-plans as approved, including any minor amendments approved by	Stage 1 (Southern): On 15 May 2024 there was a non-compliance associated with the new	Action has been undertaken to rectify all weather access within the previously approved boundary and	Item closed during audit period. No action required.	Closed

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	the ER, must be implemented for the duration of construction.	west bound New England Hwy/ John Renshaw Slip Lane, involving the horizontal grinder machine to be taken outside the construction boundary for refuelling due to limited access resulting from poor conditions after a rain event. Installation of an all weather access into the works area was to commence on 23 May 2024 to avoid future issues. A NCR was raised on 22/05/2024.	boundary protocols reminder was completed in the weekly toolbox on 17 May 2024. No change in project boundary considered to be required. **No further actions recommended.**		
E11	The Proponent must submit to the Planning Secretary and DCCEEW for information:(a)a copy of the **Credit Retirement Report**; and/or(b)a receipt confirming payment to the Biodiversity Conservation Fund; and/or(c) correspondence from	Copies of the Credit Retirement Reports were not provided to DCCEEW for information within the one month of receiving them and therefor this condition is non-compliant. A NCR was raised for this omission on 22/10/2024.	Reports have been submitted. **No further action recommended.**	Item closed during audit period. No action required.	Closed

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	NPWS, for the retirement of the ecosystem and species credits required by Condition E7 within one month of receiving the report and/or making the payments and/or receiving correspondence from NPWS.	Copies of the reports were sent to DCCEEW on 22/10/2024.			
E118	Evidence that an EPA accredited Site Auditor has reviewed: (a) each of the plans and reports listed in Condition E117, and has issued an Interim Audit Advice or a relevant Site Audit Statement regarding the appropriateness of those plans or reports. The Interim Audit Advice or relevant Site Audit Statement must be provided when the plan or	Stage 1 (Southern): An administrative error resulted in four SAS and/or Interim Site Audit Advice reviews not being submitted to the Planning Secretary within the nominated two-week time from of Condition E118(a). The report included: - Sampling Analysis and Quality Plan for Area of Potential Contamination Risk (AOPCR) 3, AOPCR 10	As the documents have been provided to the Planning Secretary, no further action for the specific documents is recommended. A review of the administrative process for submitting future documents was undertaken and actions included updating of compliance tracker, 3-6-12 month lookahead document, and agenda item in weekly	A review of administrative processes for submitting of documents required under E118 and all conditions of approval has been completed. Actions taken included: - Updating of the TfNSW /DPHI/ER post approvals tracker to include E118 submissions. - Agenda update to the project team weekly meeting to review submissions due	Closed

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	report is submitted to the Planning Secretary for information. Where the report or plan is not required to be submitted, the Interim Audit Advice or Site Audit Statement must be submitted to the Planning Secretary within two weeks of being issued to the Proponent; and (b) the risk rating of areas of potential contamination in Table 4-1 of Appendix J of the Submissions Report and has issued an Interim Audit Advice confirming the risk rating has been done appropriately. A copy of the Interim Audit Advice must be provided to the Planning Secretary for information within two weeks of being issued to the Proponent.	and AOPCR19 ISAA - issued to TfNSW on 28 July 2023 - Consolidated Detailed Site Investigation (DSI) and Remedial Action Plan (RAP) SAS for AOPCR3 - Waste burial asbestos - issued to TfNSW on 8 December 2023 - Consolidated DSI and RAP SAS for AOPCR10 - Asbestos Waste - issued to TfNSW on 10 January 2024 - ISAA for AOPCR19 - Former night soil disposal - issued to TfNSW on 14 December 2023 The identified documents were provided to the Planning Secretary via the Planning Portal on 8 April 2024. The non-compliance was raised and submitted to DPHI on 10 April 2024, the	meetings. **No further action recommended.**	- Development of a project lookahead register.	

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	Where the NSW EPA accredited Site Auditor confirms that no further investigations are warranted, Conditions E119, E121 to E126 do not apply. Note: The NSW EPA accredited Site Auditor may recommend as part of the required review to either upgrade or downgrade the risk rating(s) of areas of potential contamination in Table 4-1 of Appendix J of the Submissions Report.	project team having been made aware of the non-compliance on 03 April 2024.			