

Independent Environmental Audit

M1 Pacific Motorway extension to Raymond Terrace



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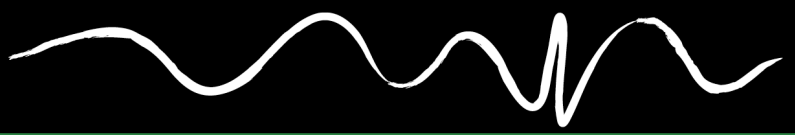
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Prepared for: Transport for NSW
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Certification

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UPR	Description	Issued By	Date Issued
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1. Introduction

1.1 Background

GeoLINK was engaged by Transport for NSW (Transport), to carry out an Independent Environmental Audit (IEA) of the M1 Pacific Motorway to Raymond Terrace to satisfy Development Consent SSI-7319 Condition A33.

A previous IEA (Independent Environmental Audit No.1) was undertaken for the period of 10/10/2023 to 27/02/2024 during the construction phase and submitted on 19/04/2024.

1.1.1 Project Overview

Transport is constructing the M1 Pacific Motorway Extension to the Pacific Highway to Raymond Terrace (the Project). The Project involves the construction of 15 kilometres (km) of new four lane divided road between the M1 Pacific Motorway near the John Renshaw Drive intersection at Black Hill in the west and the existing Pacific Highway at Raymond Terrace in the east. The Project is located in the Newcastle and Port Stephens local government areas, about 27 km north-west of the Newcastle central business district and about 154 km north of Sydney.

The Project will be constructed in two stages as follows:

- Stage 1 (Southern) – a 10-kilometre section that extends from Black Hill to Tomago which will be constructed by John Holland Gamuda Australia Joint Venture
- Stage 2 (Northern) – a five-kilometre section that bypasses Heatherbrae which will be constructed by Seymour Whyte Constructions.

Approval for the Project was granted by the NSW Minister for Planning on 8 November 2022 (application number SSI 7319).

The Project will include the following key features:

- 15 km motorway comprised of a four lane divided road (two lanes in each direction)
- motorway access from the existing road network via four new interchanges at:
 - Black Hill: connection to the M1 Pacific Motorway;
 - Tarro: connection and upgrade (six lanes) to the New England Highway between John Renshaw Drive and the existing Tarro interchange at Anderson Drive;
 - Tomago: connection to the Pacific Highway and Old Punt Road; and
 - Raymond Terrace: connection to the Pacific Highway
- a 2.6 km viaduct over the Hunter River flood plain including new bridge crossings over the Hunter River, the Main North Rail Line, and the New England Highway
- bridge structures over local waterways at Tarro and Raymond Terrace, and an overpass for Masonite Road in Heatherbrae
- connections and modifications to the adjoining local road network
- traffic management facilities and features
- roadside furniture including safety barriers, signage, fauna fencing and crossings and street lighting
- adjustment of waterways, including Purgatory Creek at Tarro and a tributary of Viney Creek
- environmental management measures including surface water quality control measures
- adjustment, protection and/ or relocation of existing utilities

- walking and cycling considerations, allowing for existing and proposed cycleway route access
- permanent and temporary property adjustments and property access refinements
- construction activities, including establishment and use of temporary ancillary facilities, temporary access tracks, haul roads, batching plants, temporary wharves, soil treatment areas, clearing of vegetation, earthworks and installation of environmental controls.

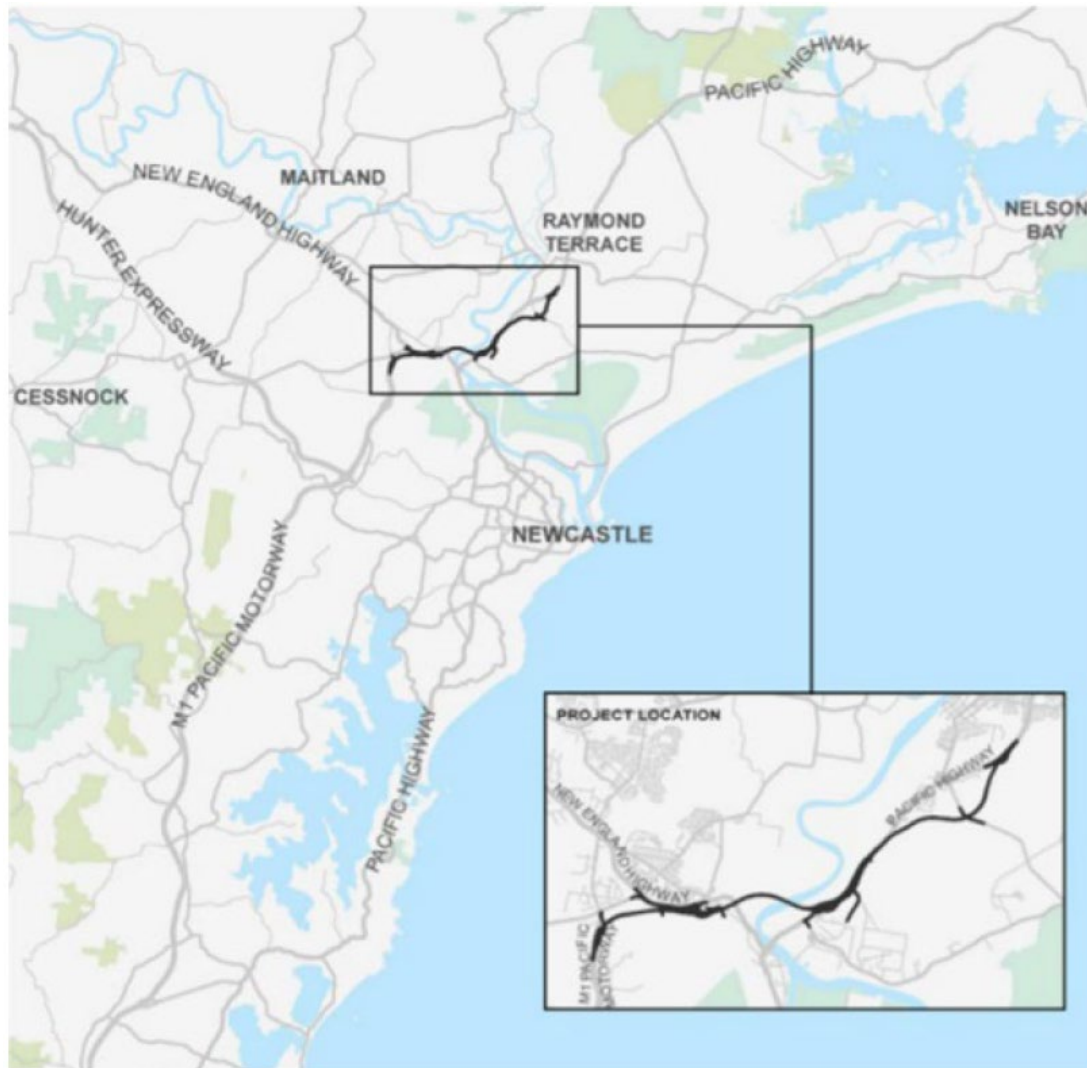


Figure 1.1 Regional context of the project (Source: Transport Staging Report)

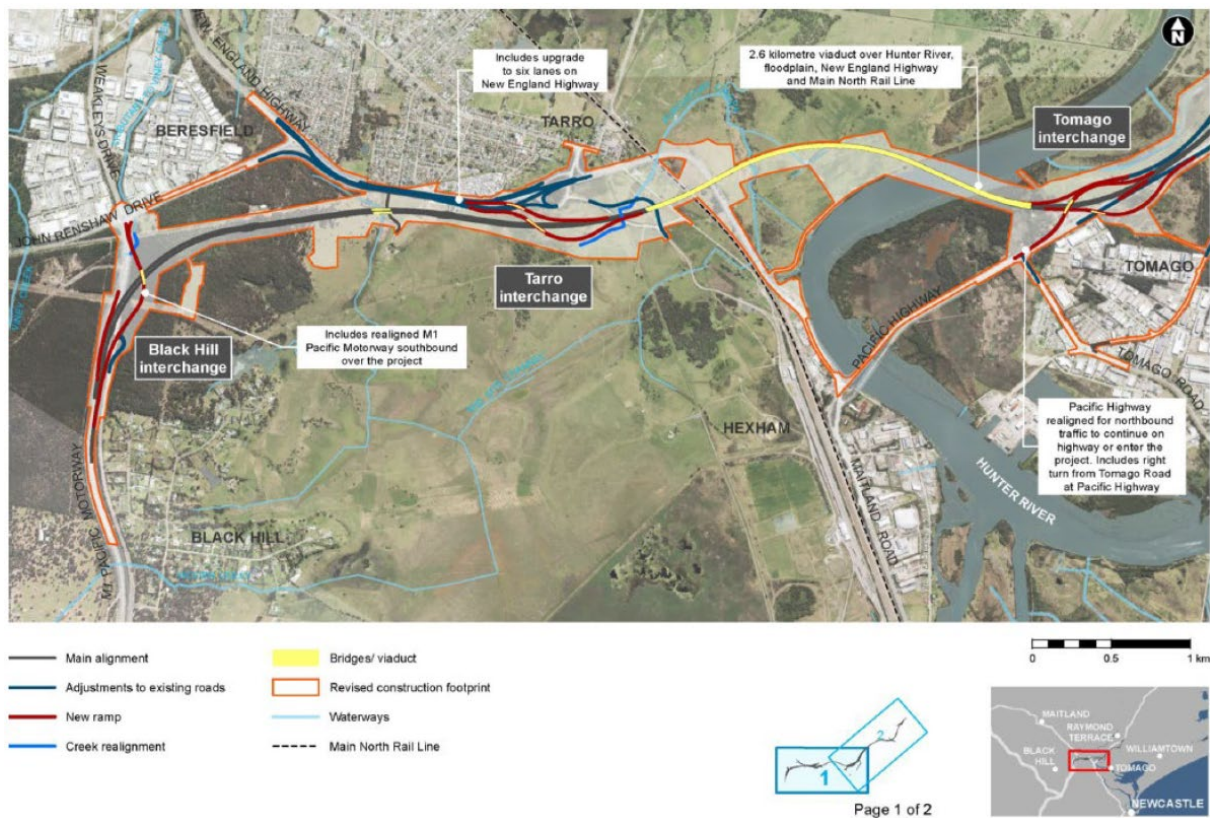


Figure 1.2 Project key features - Map 1 of 2 (Source: Transport Staging Report)

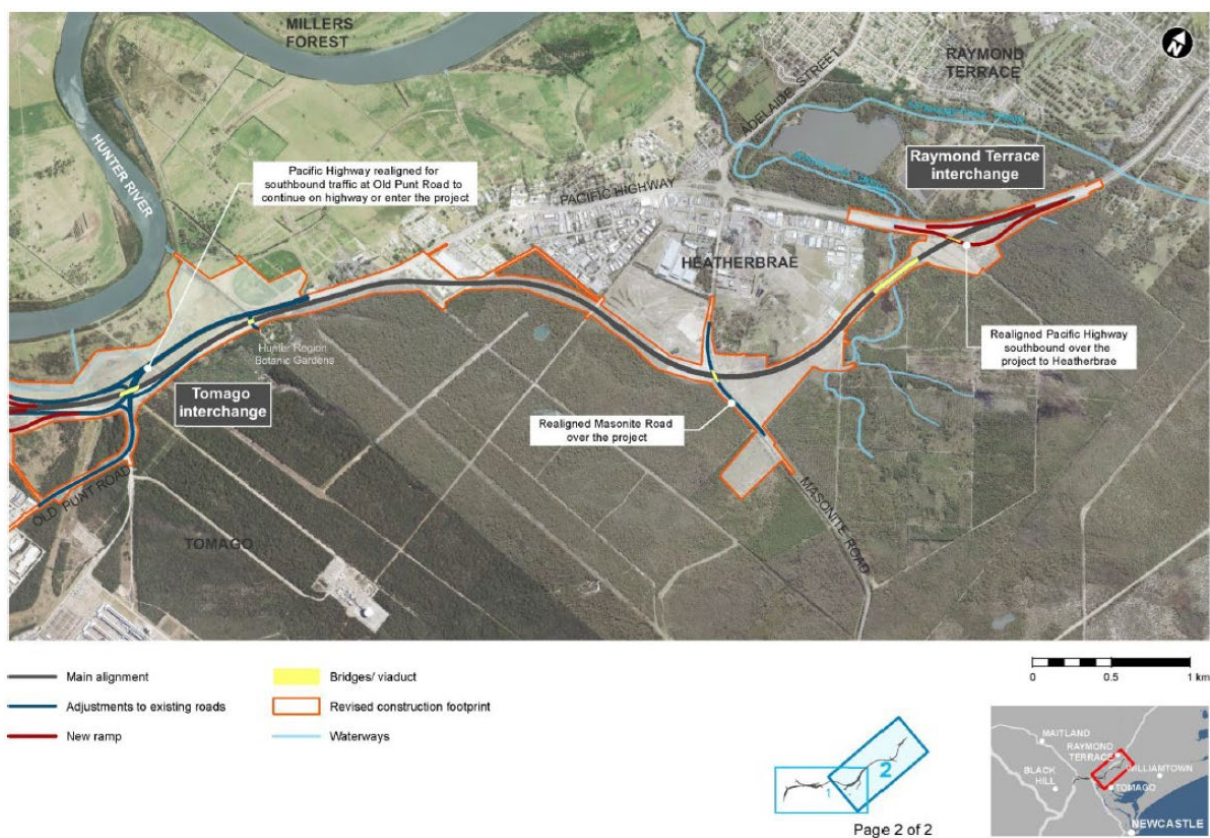


Figure 1.3 Project key features - Map 2 of 2 (Source: Transport Staging Report)



1.2 Audit Team

The audit team comprised of Simon Williams with assistance from Michelle Campione-van Zetten. Simon Williams has extensive experience in environmental auditing of large construction and commercial operation including road construction, quarry, mining, bridges, dams, and pipelines. He is a member of the Environmental Institute of Australia and New Zealand, Certified Environmental Practitioner, and an IEMA Registered Lead Environmental Auditor. Michelle Campione-van Zetten is an auditor in training. A copy of the approval of the audit team by the Department of Planning, Housing and Infrastructure (DPHI) is provided in **Appendix A**. The independent audit report declaration form is provided in **Appendix B**.

1.3 Audit Objectives

The objective of this independent environmental audit was to assess compliance of the project with the requirements of consent. Specifically, to satisfy the Development Consent SSI-7319 Condition A34, being:

Independent Audits of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).

1.4 Audit Scope

The audit scope was developed based on a review of the consent, input provided by DPHI and relevant parties and agencies (refer to **Appendix C**), and the *Independent Audit Post Approval Requirements* (DPIE, 2020).

The scope of the audit included:

- Assessment of compliance with the conditions of consent, and post approval and compliance documents prepared to satisfy conditions of consent.
- Review of the environmental performance of the development, and its effects on the surrounding environment including the community.
- Review of the status of the implementation of previous audit findings.
- High-level assessment of whether the environmental management documentation is adequate.

1.5 Audit Period

This current audit covers the period from 28 February 2024 to 27 September 2024.



2. Methodology

2.1 Project Start-up

Initial communication between Transport representatives and the audit team was via phone calls and emails. This provided opportunities to discuss the project, introduce members of each team and establish communication protocols. Information exchanged during the initial communication included:

- Status of the project.
- Site and facility boundaries.
- Scope and objectives of the audit.
- Proposed audit activities, including document reviews, personnel interviews and site inspections, communication protocols, logistics and administrative arrangements.
- Interactions with government agencies.
- Audit schedule and milestones.

2.2 Consultation

Pursuant to the Independent Audit Post Approval Requirements 2020 (NSW Department of Planning, Industry and Environment), input was requested regarding the scope of the audit (refer to letter example in **Appendix C**). Consultation for this audit was sought from the following agencies:

- Department of Planning, Housing and Infrastructure
- NSW Environmental Protection Agency
- Port Stephens Council
- NSW Department of Primary Industries - Fisheries
- City of Newcastle
- Maitland City Council
- Hunter Water Corporation

Outcomes of the consultation is discussed in **Section 3.9** of this report.

2.3 Site Inspection and Interviews

A site visit was undertaken on the 17th and 19th September 2024 to complete a site inspection and conduct interviews with key personnel. Opening and closing meetings were held with relevant management personnel. The audit agenda and site interview attendance registers are provided in **Appendix D**.

Separate meetings for Stage 1 (Southern) and the Stage 2 (Northern) were held on different days, with the Stage 1 (Southern) meeting on the 17 September and the Stage 2 (Northern) meeting on the 19 September. The opening and closing meetings were incorporated into these meetings.

The interviews and meetings were conducted with the personnel listed below. Signed audit attendance sheets are provided at **Appendix D**.

Stage 1 (Southern) - 17 September 2024:

- Simon Williams (Lead Auditor, GeoLINK)
- Michelle Campione-van Zetten (Trainee Auditor, GeoLINK) (Online only)
- Mathew Billings (Environmental Representative, Healthy Buildings International) (Online only)

- 
- Kathy Lloyd (Environment and Sustainability Lead, John Holland Gamuda Australia Joint Venture)
 - Erin Horder (Environmental Cadet, Transport for NSW)
 - James Stokes (Senior Environmental Advisor, John Holland Gamuda Australia Joint Venture)
 - Adrian Dube (Senior Approvals Advisor, John Holland Gamuda Australia Joint Venture)
 - Trent Doyle (Senior Environmental Advisor, John Holland Gamuda Australia Joint Venture)
 - Ben Williams (Environment and Sustainability Officer, Transport for NSW)
 - Brett Hoad (Deputy Project Director, Transport for NSW)
 - Kai Neville (Senior Environment and Sustainability Officer, Transport for NSW)
 - Andrew Grainger (Environment and Sustainability Officer, Transport for NSW)
 - Lawson Gill (Senior Manager Environment and Sustainability, Transport for NSW)
 - Tara Armstrong (TfNSW Environment Grad, Transport for NSW)

Stage 2 (Northern) - 19 September 2024:

- Simon Williams (Lead Auditor, GeoLINK)
- Michelle Campione-van Zetten (Trainee Auditor, GeoLINK) (Online only)
- Lincoln Carter (Environment and Sustainability Manager, Transport for NSW)
- Emmalee Jesser (Environmental Advisor, Seymour Whyte)
- Erin Horder (Environmental Cadet, Transport for NSW)
- Ben Williams (Environment and Sustainability Officer, Transport for NSW)
- Brad Whittard (Senior Environment and Sustainability Officer, Transport for NSW)
- Mathew Billings (Environmental Representative, Healthy Buildings International)
- Simon R Williams (Environment Manager, Seymour Whyte)

The interviews and meetings provided an opportunity to discuss and confirm the environmental management processes, as well as assess compliance with specific documentation. Some additional documentation was requested and provided by email after the site visit to address particular items that were discussed.

A site inspection of Stage 1 (Southern) was undertaken the afternoon on the 17 September after the site meeting. A site inspection of Stage 2 (Northern) was undertaken the morning of the 19 September before the site meeting. A thorough inspection was undertaken of both stages' sites and was considered to be adequate for the purposes of the audit. Vehicles were used to tour the majority of the site and key areas were viewed.

It should be noted that there is a Simon Williams from GeoLINK acting as auditor for this independent audit and a Simon Williams from Seymour Whyte as Environment Manager. These are two separate people with no association.

2.4 Compliance Descriptors

The compliance status descriptors utilised in this audit are:

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.

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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.



2.5 Audit Findings

Audit outcomes were based on verifiable evidence. Generally, this evidence is:

- Interviews with relevant site personnel
- Documents, records, reports and forms
- Siting material during meetings and online
- Photographs,
- Plans, illustrations and figures
- Site inspection including viewing locations, processors and locations.

2.6 Previous Audit Outcomes

For the purposes of background and thoroughness, the Independent Audit Table (refer to **Appendix E**) includes a column stating the condition status from the previous audit. This is to show the reader continuity between the audits and to ensure clarity where an audit matter might remain active and compliant, despite no activity within this audit period, due to having been completed within the previous audit period.



3. Findings

3.1 Document Review

Relevant environmental management and project documents were obtained through various sources, including the project website, the Transport representatives, and through information requests. The following documents were reviewed or sighted for this audit:

Documents covering entire CSSI:

- M1 Pacific Motorway extension to Raymond Terrace Staging Report V 5-0 July 2023, Transport for NSW
- M1 Pacific Motorway extension to Raymond Terrace Unexpected Heritage Finds and Human Remains Procedure V2.0 December 2022, Transport for NSW
- M1 Pacific Motorway Extension to Raymond Terrace Out of Hours Work Protocol-Works not subject to an EPL June 2023, Transport for NSW
- M1 Pacific Motorway Extension to Raymond Terrace Unexpected Finds Procedure for Contamination V2.0 February 2023, Transport for NSW
- M1 Pacific Motorway Extension to Raymond Terrace Unexpected Threatened Species and Threatened Ecological Communities Finds Protocol V4 August 2023, Transport for NSW
- M1 Pacific Motorway extension to Raymond Terrace Communication Strategy V2.0 January 2023, Transport for NSW
- M1 Pacific Motorway extension to Raymond Terrace Traffic Noise Monitoring program Rev 1 24/11/22, Arup
- Independent Flood Impact Advisory Panel Terms of Reference report Rev 1 December 2023, Transport November 2023
- M1 Pacific Motorway extension to Raymond Terrace Flood Design Report Version 3.0 June 2024, Transport for NSW
- M1 Pacific Motorway extension to Raymond Terrace BBAM Credit Retirement Report (202404-RT-939) 04/04/2024
- M1 Pacific Motorway extension to Raymond Terrace BBAM Credit Retirement Report (202404-RT-940) 09/04/2024

Documents covering Stage 1 (Southern - Black Hill to Tomago):

- Black Hill to Tomago CEMP Rev 5 July 2024, John Holland Gamuda Australia Joint Venture
- Black Hill to Tomago CEMP Appendix B Traffic, Transport and Access Management Sub-plan Rev 5 May 2024, John Holland Gamuda Australia Joint Venture
- Black Hill to Tomago CEMP Appendix C Noise and Vibration Management Sub-plan Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
- Black Hill to Tomago CEMP Appendix D Flora and Fauna Management Sub-plan Rev 01 March 2024, John Holland Gamuda Australia Joint Venture
- Black Hill to Tomago CEMP Appendix E Flooding Management Sub-plan Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
- Black Hill to Tomago CEMP Appendix F Air Quality Management Sub-plan Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
- Black Hill to Tomago CEMP Appendix G Soil and Surface Water Management Sub-plan Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
- Black Hill to Tomago CEMP Appendix H Groundwater Management Sub-plan Rev 0 November 2023, John Holland Gamuda Australia Joint Venture

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- Black Hill to Tomago CEMP Appendix I Aboriginal Heritage Management Sub-plan Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
 - Black Hill to Tomago CEMP Appendix J Non-Aboriginal Heritage Management Sub-plan Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
 - Black Hill to Tomago CEMP Appendix K Surface Water and Groundwater Quality Construction Monitoring Program Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
 - Black Hill to Tomago CEMP Appendix L Bushfire Management Sub-plan Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
 - Black Hill to Tomago CEMP Appendix M Waste and Resource Management Sub-plan Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Sustainability Strategy Rev 0 November 2023, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway Extension to Raymond Terrace (Black Hill to Tomago) Ancillary Facility Site Establishment Management Plan – AS5 Rev E August 2023, John Holland Gamuda Australia Joint Venture
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Appendix E Water Reuse Strategy Rev 1 November 2023, John Holland Gamuda Australia Joint Venture
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Sampling and Analysis Quality Plan Rev 0 July 2023, Epic Environmental
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Detailed Site Investigation – AOPCR3 Rev 1 September 2023, Epic Environmental
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Detailed Site Investigation – AOPCR10 Rev 0 October 2023, Epic Environmental
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Construction Noise and Vibration Impact Statement Rev 1 November 2023, Hutchison Weller
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Low Impact Work Submission – Geotechnical and Utility Investigation – Phase 3 Rev 02 August 2023, Transport for NSW
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Remedial Action Plan – AOPCR3 Rev 0 October 2023, Epic Environmental
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Remedial Action Plan – AOPCR10 Rev 0 October 2023, Epic Environmental
 - Remediation Action Plan Former RZM Site Rev D Tomago February 2023, WSP
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Design and Landscape Plan Rev H March 2024, Conybeare Morrison, Tract Consultants and Saretta Art & Design on behalf of John Holland and Gamuda Joint Venture
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Operational Noise Review Rev C October 2023, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Six Monthly Construction Noise and Vibration Monitoring Report (November 2023 – May 2024) Rev 1 y 2024, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Local Road Traffic and Pedestrian Impact Assessment Report – Woodlands Close Rev 0 May 2024, John Holland Gamuda Australia Joint Venture

Documents covering Stage 2 (Northern - Heatherbrae Bypass):

- M1 Pacific Motorway to Raymond Terrace (Heatherbrae Bypass) Ancillary Facility Site Establishment Management Plan Rev H August 2023, Seymour Whyte Pty Ltd
- M1 Pacific Motorway to Raymond Terrace (Heatherbrae Bypass) Sustainability Strategy Rev B 06/12/23, Seymour Whyte Pty Ltd
- Heatherbrae Bypass CEMP Rev E October 2023, Seymour Whyte Pty Ltd

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- Heatherbrae Bypass CEMP Appendix B1 Traffic, Transport and Access Management Sub-plan Rev 01 April 2024, Seymour Whyte Pty Ltd
 - Heatherbrae Bypass CEMP Appendix B2 Construction Noise and Vibration Management Sub-plan Rev F August 2023, Seymour Whyte Pty Ltd
 - Heatherbrae Bypass CEMP Appendix B3 Construction Flora and Fauna Management Sub-plan Rev I September 2023, Seymour Whyte Pty Ltd
 - Heatherbrae Bypass CEMP Appendix B4 Construction Flood Management Sub-plan Rev F August 2023, Seymour Whyte Pty Ltd
 - Heatherbrae Bypass CEMP Appendix B5 Air Quality Management Sub-plan Rev D June 2023, Seymour Whyte Pty Ltd
 - Heatherbrae Bypass CEMP Appendix B6 Construction Soil and Water Management Sub-plan Rev G September 2023, Seymour Whyte Pty Ltd
 - Heatherbrae Bypass CEMP Appendix B7 Construction Cultural Heritage Management Sub-plan Rev F August 2023, Seymour Whyte Pty Ltd
 - Heatherbrae Bypass CEMP Appendix B8 Bushfire Management Sub-plan Rev C September 2023, Seymour Whyte Pty Ltd
 - Heatherbrae Bypass CEMP Appendix B9 Construction Waste Management Sub-plan Rev C September 2023, Seymour Whyte Pty Ltd
 - Construction Water Reuse Strategy, Heatherbrae Bypass Rev C September 2023
 - M1 Pacific Motorway to Raymond Terrace (Heatherbrae Bypass) Ancillary Facility Site Establishment Management Plan Rev H August 2023, Seymour Whyte Pty Ltd
 - M1 Pacific Motorway to Raymond Terrace Low Impact Works – Bridge 12 Geotechnical Investigation Rev 02 August 2023, Transport for NSW
 - M1 Pacific Motorway to Raymond Terrace (Heatherbrae Bypass) Design and Landscape Plan Rev E March 2024, Conybeare Morrison, Tract Consultants and Saretta Art & Design on behalf of Seymour Whyte
 - Heatherbrae Bypass Stormwater Drainage Report Rev B March 2024, Seymour Whyte
 - M1 Pacific Motorway to Raymond Terrace Heatherbrae Ancillary Compound Sample Analysis and Quality Plan v1f October 2023, ADE Consulting Group
 - M1 Pacific Motorway to Raymond Terrace (Heatherbrae Bypass) Six Monthly Construction Noise and Vibration Monitoring Report (October 2023 – March 2024) Rev 01 May 2024, Seymour Whyte
 - M1 Pacific Motorway to Raymond Terrace (Heatherbrae Bypass) Six Monthly Construction Surface Water and Groundwater Monitoring Report (October 2023 – March 2024) Rev 01 June 2024, Seymour Whyte
 - M1 Pacific Motorway to Raymond Terrace (Heatherbrae Bypass) Ancillary Facility Site Establishment Management Plan Consultation Report Rev A April 2023, Transport for NSW
 - Heatherbrae Bypass Waste and Resource Recovery Reporting, Transport for NSW
 - Heatherbrae Bypass Out of Hours Works Permit (M12RT-OOHW-02) 07/12/2023, Seymour Whyte
 - Heatherbrae Bypass Out of Hours Works Permit (M12RT-OOHW-21) 15/08/2024, Seymour Whyte

3.2 Compliance performance

The M1 Pacific Motorway extension to Raymond Terrace Conditions of Approval contains 238 Conditions for the CSSI, divided into five sections. Of these conditions, 159 were found to be compliant, 75 were not triggered, and four were found to be non-compliant. **Table 3.1** below provides a breakdown of the distribution of compliance across the sections.

Table 3.1 Breakdown of distribution of compliance

SSI Category	Number of conditions	Compliant	Non-compliant	Not triggered
Part A – Administrative	43	31	1	11
Part B – Community Information and Reporting	13	11	0	2
Part C – Construction Environmental Management	18	15	1	2
Part D – Operational Environmental Management	4	0	0	4
Part E – Key Issue Conditions	160	102	2	56
Total	238	159	4	75

3.3 Agency Notices, Orders, Penalty Notices or Prosecutions

No agency notices, orders, penalty notices were received, nor prosecutions undertaken, during this audit period.

3.4 Non-Compliances

Table 3.2 identifies the non-compliances found during this audit period and provides the recommendations for improvement.

Table 3.2 Non-Compliances

Condition Number	Requirement	Issue sighted	Recommendation	Non-compliance Identifier
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 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). <i>Note: Personal details of the complainant are not to be provided to the ER unless otherwise agreed to or requested by the complainant.</i>	Stage 1 (Southern): The complaints register for the BH2T was not provided for the week of 23-29 September ; therefore, Condition A30(a) was non-compliant. 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.	NC-02/01



Condition Number	Requirement	Issue sighted	Recommendation	Non-compliance Identifier
C11	The CEMP(s) and CEMP Sub-plans as approved, including any minor amendments approved by the ER, must be implemented for the duration of construction.	Stage 1 (Southern): On 15 May 2024 there was a non-compliance associated with the new 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.	Action has been undertaken to rectify all weather access within the previously approved boundary and 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.	NC-02/02
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 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 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. Copies of the reports were sent to DCCEEW on 22/10/2024.	Reports have been submitted. No further action recommended.	NC-02/03



Condition Number	Requirement	Issue sighted	Recommendation	Non-compliance Identifier
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 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. 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.	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 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 identified on the 3 April and submitted to DPHI on 10 April.	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 meetings. No further action recommended.	NC-02/04

3.5 Previous Audit

A previous IEA (EIA No. 1) was undertaken in April 2024. This was the first independent environmental audit undertaken for the CSSI. Five non-compliances were identified in the previous IEA associated with the Conditions of Consent. **Table 3.3** outlines the outcomes of the previous audit, recommended actions, action taken, and status of the non-compliance.

Table 3.3 Non-compliances from previous audit

	Previous Audit Recommendation	Action	Completion date	Status
A1	Recommendations noted under other non-compliant conditions.	Action as per other non-compliant conditions.		
C11	Update CEMP and EWMS and undertake targeted training of personnel engaged in these activities, including subcontractors.	Action taken following clearing outside the Project Boundary, and reported to DPHI in accordance with CoA A41 on 18 December 2023: - The Flora and Fauna CEMP Sub-plan was revised. The revision included additional controls, including direction on the installation of boundary flagging within areas of dense vegetation. The amendments were approved as a Minor Amendment to Sub-plan by the project's Environmental Representative on 13 March 2024. A copy of the revised Flora and Fauna management Sub-plan was provided to the Secretary for information on 19 March 2024. Actions taken following relocation of vegetation stockpile, reported to DPHI in accordance with CoA A41 on 5 February 2024: - Corrective training was implemented in the form of a comprehensive toolbox training session provided to all Project personnel at the BH2T pre-start on Thursday 8 February 2024. - JHGA made the decision to remove works beyond the Clearing Boundary (and subsequently the approved construction footprint where these are the same) from the "Permit to Enter a No-Go Zone" process. Implemented 8 February 2024. - The BH2T Site Induction was amended. Implemented 8 February 2024.	Completed as noted.	Completed/ closed



Previous Audit Recommendation	Action	Completion date	Status
	- The location and frequency of boundary advisory signage has been increased across the Project. Additional signage ordered 12 Feb 2024 and implemented 21 Feb 2024. - The clearing permit has been updated to include the requirement to document the locations for fauna habitat/ refuge stockpiles and end-use prior to clearing commencing. Updated 12 February 2024. - The CEMP and Environmental Work Method Statements (EWMS) for the activity have been reviewed. No changes or updates were required to the CEMP. The EWMS was updated, with a section included requiring the location of all habitat replacement and refuge to be identified and marked on the Clearing Permit prior to commencement of clearing. Reviewed and updated 13 February 2024. - Contractor processes were updated requiring the Permit Holder for Clearing Permits be the contractor supervisor for the area, not the Leading Hand. 12 February 2024. Refer to Condition E1 for dust response. No further action required.		
E1	Update CEMP and EWMS and undertake targeted training of Immediate actions taken as noted in CoA A41 Notification to DPHI dated 21 December 2023. The commitments made in the Air Quality Management Plan, mitigation measures AQMM6, AQMM7, AQMM8, AQMM9, and AQMM10, were followed through the following measures: - Predicted weather conditions communicated at the pre-start on 17th December 2023 and the risk of dust due to weather conditions (AQMM6). Proactive management of the potential for dust was undertaken through the pre-soaking of the area with watercarts. - Assessment of weather conditions during the course of the day to determine if mitigation measures were effective for reasonably managing dust during the activity – the activity had been slowed on two occasions on the morning of 14th December 2023 by the Leading Hand for	Noted actions completed as per stated dates. Actions include those proposed to continue for the duration of the construction period.	Additional measures resulting from the previous audit were sited and RFI responses confirmed the additional measures continue to be in place. This non-compliance is considered to be closed out, with the measures put in place to be on-going for the remainder of the project.



Previous Audit Recommendation	Action	Completion date	Status
	the area to reduce dust generation (AQMM7 and AQMM8) and an assessment was made by the Environment and Sustainability Manager and the Foreperson regarding the conditions of the need to pause the activity (AQMM6). - During the site inspection, a watercart was observed in operation at the Gate 3 location (the location from where the observation regarding the scraper operation was made) wetting down the stockpile of drainage rock prior to loading into trucks to mitigate dust. Two other watercarts were observed operating during the inspection in the Black Hill area (AQMM9 and AQMM10). An Air Quality Management Review was undertaken during February 2024. Outcomes of the management review were provided to DPHI on 11 February 2024. The finding of the review are being progressively actioned and implemented proactively prior to revision and approval of the updated AQMP. Actions undertaken from this management review have included but are not limited to: - Installation of a high flow water hydrant on the Chichester Gravity Truck Main (CTGM) within the Project Site, allowing faster refill of water carts. Implemented 21 February 2024. - Development of a site-based guideline with air quality controls required to be implemented in the event that adverse weather conditions are forecast. Implemented 01 April 2024. - Procurement of 6 x Additional watercarts, including off-road watercarts. 5 February 2024. - Installation of 2 x depositional dust monitors 18 March 2024. - Procurement and application of haul road binder. Implemented 28 February 2024. - Procurement of trailer mounted hydro-mulcher unit, in order to enable progressive stabilisation of the project 14 March 2024. Engagement of landscaping contractor with mobile hydro mulcher March 2024.		



	Previous Audit Recommendation	Action	Completion date	Status
		Action proposed: - Continue to implement the actions recommended in the Air Quality Management Review. - Revision of the Air Quality CEMP Sub-plan to include the outcomes of the Independent Environmental Audit and Air Quality Management Review.		
E57	Undertake awareness training via a site-wide “toolbox talk”.	Remedial actions undertaken at time of non-compliance as per notification reported to DPHI on 29 May 2023. - On 22 March 2023 the modifications made were able to be reversed, enabling photographic recording to be completed as required by CoA E57. - Advice from the archaeologist completing the recording advised that there was no material impact to meeting the requirements in CoA57 and full photographic recording was completed on Wednesday 24 May 2023. - Communication as to the status of all activities is now required prior to the commencement of works including archival recording and scheduled dates for completion. Progressive implementation. - Review of and greater focus on non-Aboriginal heritage and associated conditions in project inductions 24 March 2024. Note, no specific amendments were required to inductions, however greater focus is applied by the presenter. - Toolbox refresher on non-Aboriginal heritage protection was completed on 29 May 2023. - No further archival recording is proposed for remainder of Project. No further action required.	Completed as noted.	Complete/ closed
E64	Undertake awareness training via a site-wide “toolbox talk” regarding requirement to complete works within standard construction hours unless	Action taken: Directions were issued on 7 February 2024 to the sub-contractor regarding planning of works, resource availability and early communication of any issues that	Completed on dates noted.	Complete/ closed. Actions taken considered to be appropriate to meet the



Previous Audit Recommendation	Action	Completion date	Status
OOHW permit sought and obtained prior.	may result in works continuing beyond the hours listed in E64. - Discussions held and reminders given at Weekly Construction Leads meeting on 8 February 2024 regarding the definition of emergency works and the need for early communication of any issues, including but not limited to late or delayed deliveries. - Early notification of current work that could exceed approved hours has been occurring since these reminders were given. No further action required.		previous audit requirements.

3.6 Environmental Management Documentation

The adequacy of the environmental management documents listed in **Section 3.1** has been reviewed as part of this audit. No issues were identified, except for those noted and discussed in the preceding sections.

3.7 EMP, Sub-plans and Compliance Documents

The adequacy of the EMP, Sub-plans, and compliance documents listed in **Section 3.1** has been reviewed as part of this audit. No issues were identified, except for those noted and discussed in the preceding sections.

3.8 Environmental Performance

On the basis of the audit scope, this Project demonstrated compliance with their environmental obligations under the Approval, with the following key strengths observed by the Auditor:

- No environmental Incidents (as defined in the Approval Definitions)
- Erosion and sediment controls were found to be of a very high standard generally across the project.
- No Directions, Penalty Notices or Show Cause's letters.
- Environmental records were well-organised and readily available during the site inspection and interview with key Project personnel. The CEMP and associated subplans were implemented, site inspections being undertaken regularly, and records kept up to date.
- The Site Environmental staff Teams were knowledgeable, helpful and transparent about the environmental management of the construction works.

3.9 Consultation Outcomes

Feedback received as a result of the consultation undertaken for this audit is presented in **Table 3.4**.

Table 3.4 Consultation outcomes

Requested from	Response received
Department of Planning, Housing and Infrastructure	Please carry out the Audit in accordance with the Conditions of Approval and Independent Audit Post Approval Requirement Guidelines 2020. I do not require to you look into anything specific at the site outside what is required under the Approval and Guidelines. Response received 28/08/2024
NSW Environmental Protection Agency	No comments to provide. Response received 12/09/2024



Requested from	Response received
Port Stephens Council	With regards to specific measures to audit, it would be good to understand whether measures such as those detailed in Section 6.8 and 6.9 of the Flora and Fauna Management Plans (FFMP) were implemented including: 1. The re-use of timber and bushrock as detailed in Section 6.8 of the FFMP and as required in accordance with E17 of the conditions of approval for the project, including consulting with relevant government agencies on donation of materials where appropriate. 2. The relocation of threatened flora as detailed in Section 6.9 of the FFMP. It was proposed to liaise with the Hunter Region Botanic Gardens prior to disturbance to confirm whether translocation of <i>Diuris arenaria</i> and <i>Persicaria elatior</i> was viable, and if so, opportunistic salvage of these species prior to clearance was to occur. Response received 9/09/2024 Addressing the inquiries above: 1. As per the findings noted for Condition E17 in the Independent Audit Table (refer to Appendix E), all timber for Stage 1 has left the site and no timber reuse has occurred for Stage 2 in this audit period. 2. As per Condition E17 in the Independent Audit Table (refer to Appendix E), relocation is not clear as reuse has not yet been triggered within the project.
DPI NSW - Fisheries	Fisheries advised that they are satisfied with the progression of the project, and its Modifications. Response received 22/10/2024
City of Newcastle	No response received
Maitland City Council	No response received
Hunter Water Corporation	Clarification questions received 28/08/2024. No further response.

3.10 Complaints

A total of 36 complaints were received during this audit period, 35 for Stage 1 (Southern) and one for Stage 2 (Northern). Two of the complaints remain open, with the remainder having been closed out.

The complaint for Stage 2 (Northern) related to vibration and noise. Complaints for Stage 1 (Southern) included: dust, property impacts/damage, truck movements, traffic impacts/ control, light spill, OOHW, noise, vibration, drainage, visual impacts, and communication.

Closed complaints were investigated and, where appropriate, action was taken to resolve the issue. Responses were provided to the person who lodged the complaint.

The two open complaints require additional investigation and communication with the residents.

3.11 Incidents (as defined in the definitions in MCoA)

No incidents occurred during this audit period.

3.12 Actual verses Predicted Environmental Impacts

The Project approval and post approval included thousands of pages of material including an EIS, Submissions Report, specialist assessments, CEMP and sub plans, just to name a few. To undertake an actual versus predicted assessment of this project would take enormous resources which are outside the scope of this audit.

On the basis of the verifiable evidence assessed as part of this Audit, some commentary can be provided on the actual versus predicted environmental impacts of the project.

Table 3.5 provides a comparison between the predicted impacts of the key impacts identified in the EIS with the audit findings.

Table 3.5 Key potential impacts of EIS compared to audit findings

Key Impact	EIS Predicted Impacts	Audit Findings
Biodiversity	Where possible, the project has been aligned with existing infrastructure, already-cleared land and along the edges of existing developed land, resulting in minimal impacts to vegetation connectivity. Notwithstanding, the following impacts have been identified: • Removal of about 174 hectares of native vegetation, including 136 hectares of threatened ecological communities (TEC) listed under the Threatened Species Conservation Act 1999 (TSC Act) • Removal of 0.55 hectares of Subtropical and Temperate Coastal Saltmarsh TEC, listed under the EPBC Act • Impacts to four threatened flora species, including <i>Diuris arenaria</i>, <i>Callistemon linearifolius</i>, <i>Eucalyptus parramattensis</i> subsp. <i>decadens</i> and <i>Persicaria elatior</i>, as well as the loss of fauna habitat features which are known to support locally occurring threatened fauna species • Targeted and opportunistic surveys carried out in 2015, 2016 and 2019 did not identify any evidence of koalas or koala activity within the construction footprint, including within areas identified as potential koala habitat. While the project has avoided impacts to vegetation connectivity where feasible by following the edge of existing vegetation, particularly north of Tomago Road, around 51.12 hectares of vegetation types which contain koala feed tree species would be removed by the project at Tomago and Heatherbrae. With consideration of the broader Port Stephens koala population, the impact of potential koala habitat loss arising from the project is considered low. As the project is located close to existing roads and industrial areas, only minimal impacts on koala movements are expected. Given the position of the project, the findings from the background review, spatial review and field surveys, and the outcomes of the Assessment	This audit found that the draft Condition E6 Clearing Report identified that no exceedance of threatened species and threatened ecological communities has occurred during this audit period. Additionally, it is noted that clearing of vegetation as a whole has been minimised wherever possible. Attention has been paid to minimising clearing of koala habitat and mangroves. An unexpected finds protocol for threatened species and threatened ecological communities is in place for the CSSI. This audit found a non-compliance of Condition E11 under Biodiversity. This non-compliance relates to copies of the Credit Retirement Reports not being submitted to the DCCEEW within the allotted timeframe. This non-compliance is not considered to result in variation between predicted and actual impacts.

Key Impact	EIS Predicted Impacts	Audit Findings
	of Significance, the project is not expected to significantly impact on the Koala.	
Noise and vibration	The following key noise and vibration impacts of the project have been identified: • Construction: Highly intrusive noise impacts are predicted for up to 13 residential receivers closest to the construction work in Tarro during most construction periods when noise intensive plant and equipment are operating. Up to 24 residential receivers in total may be subject to construction noise levels above the Highly Noise Affected threshold (greater than 75 dB(A)). These receivers are all located directly north of the New England Highway in Tarro	There were complaints recorded during this audit period related to noise and vibration. Based on the Complaints Register, all but one complaint for noise and vibration have been closed out. The remaining open complaint, logged at the end of August 2024, requires more time to address. This audit found that noise and vibration conditions are being met and Out-Of-Hours Work permits are in place for work outside of the standard construction hours. There are no non-compliances related to the Noise and Vibration section of Part E of the Conditions of Approval within this audit period.
Hydrology and flooding	Currently, flood depths on the Hunter River floodplain are typically two to 2.5 metres in the 5% AEP event. During construction, the project is expected to result in the following impacts: • Generally, increases in flood level of between 0.02 and 0.1 metres in the 5% AEP event • Nineteen lots, with no habitable buildings, have been identified as experiencing increased flood levels above criteria (0.1 metres) • Five habitable buildings have been identified as experiencing an increase in flood levels of up to 0.08 metres, marginally exceeding the adopted criteria (0.05 metres). Currently flood depths on the Hunter River floodplain are typically three to 4.5 metres in the 1% AEP event. During operation, the project is expected to result in the following impacts: • Flood levels in the 1% AEP event generally increase by up to 0.07 metres in some localised areas near Tarro • Ten lots, with no habitable buildings, have been identified as experiencing increased flood levels above criteria (0.1 metres) • One habitable building has been identified as experiencing an increase in flood level of up to 0.06 metres, marginally exceeding the adopted criteria (0.05 metres).	Managing the impacts of flooding on the residents appears to be ongoing. Measures outlines in the approval documents are being followed and no non-compliance were observed. On this basis, it is considered the project is consistent with the MCoA and approval documentation,

Key Impact	EIS Predicted Impacts	Audit Findings
Surface and groundwater quality	Generally, existing water quality in waterways and wetlands to which the project would discharge does not meet the nominated NSW water quality objectives (WQOs). Waterways and wetlands surrounding the project are typically high in nutrients and heavy metal concentrations and are representative of a catchment that has been impacted by urbanisation, industrial and commercial use, and land clearing. During construction, the project is expected to have only minor to negligible impacts on existing water quality. To minimise impacts to surface water and groundwater quality during construction, water quality control measures, such as temporary sediment basins, have been incorporated into the design of the project.	This audit found that the CSSI has been designed and is being constructed to maintain the NSW Water Quality Objectives and applicable guidelines and measures. There are no non-compliances related to the Water section of Part E of the Conditions of Approval within this audit period.
Aboriginal heritage	Extensive engagement with the local Aboriginal community, including archaeological investigations, was carried out during project development and has improved the knowledge of Aboriginal cultural heritage in the locality of the project. The project would impact 26 Aboriginal sites across the construction footprint, comprising both whole and partial impacts. Management measures to control impacts to Aboriginal sites have been developed in consultation with the local Aboriginal community and include the collection of surface artefacts, salvage excavation, exclusion fencing, artefact analysis and long-term management of collected artefacts.	This audit found that reasonable steps are being taken to not harm, modify or otherwise impact Aboriginal objects or places of cultural significance. Aboriginal Cultural Heritage Awareness training/induction is undertaken as per the Aboriginal Heritage Management Sub-plans for each stage. Information about Aboriginal Heritage and the CSSI are provided through the project update posts on the project website. There are no non-compliances related to Aboriginal Heritage of Part E of the Conditions of Approval within this audit period.
Soils and contamination	The key soils and contamination impacts of the project are generally applicable to the construction phase, with no ongoing impacts expected during operation. The key issues identified are: • Exposure of potential and actual acid sulfate soils, especially within the low-lying floodplain areas next to the Hunter River and Windeyers Creek • Erosion and sedimentation through vegetation removal and disturbance of the ground surface • Disturbance of existing contamination, including four high risk areas of potential contamination identified within the construction footprint (these being asbestos waste at Tarro, the former mineral sands processing facility at Tomago, potentially contaminated Hunter River sediments and	The site inspection for this audit observed erosion and sediment controls were generally in place and being maintained. Contamination investigations were completed during the previous audit period for existing contamination. An unexpected find procedure for contamination is in place for the CSSI. This audit found a non-compliance of Condition E118 under Contaminated Sites; however, it should be noted the non-compliance relates to an administrative error resulting in reports not being submitted to



Key Impact	EIS Predicted Impacts	Audit Findings
	locations where construction works may disturb acid sulfate soils) • Issues associated with naturally occurring radioactive material at the former mineral sands processing facility located in Tomago.	the Planning Secretary within the allotted timeframe. This non-compliance is not considered to result in variation between predicted and actual impacts.
Site Boundary	The site boundary as observed during the site inspection appeared to be as identified in the EIS and any relevant updates.	

In general, the predicted impacts of the CSSI EIS are in line with the audit findings at the time of this audit.

3.13 Site Interviews and Inspection

Information gathered during the site interviews and site inspections has been tabulated in the Independent Audit Table (refer to **Appendix E**) and considered in the context of this audit.

During the site inspections, photos were taken and have been provided in **Appendix F** of this report. These photos provide a representation of the state of the sites on the inspection days, being 17th and 19th September 2024.

3.14 Improvement Opportunities

As a result of this audit, there have been four non-compliances raised. One of these is considered an environmental impact, though no impact to vegetation occurred as a result of the non-compliance. The remaining three non-compliances have all had no material impact, rather they are administrative. Therefore, there has been no additional impacts or issues that the environment has suffered as a result of this Project.

Consequently, improvement opportunities would relate to ensuring the project boundary is clearly communicated and identified and the administrative tasks are managed pursuant to the MCoA.

3.15 Key Strengths

The two environmental teams on this project appeared knowledgeable, resourceful and genuinely committed to managing the environment to minimise impacts and enhance outcomes. Notwithstanding the administrative non-compliances, it was the auditor's observation that the project was being managed well and the personal involved were loyal to their responsibilities.



4. Conclusion

This Audit Report presents the findings for the M1 Pacific Motorway to Raymond Terrace IEA No. 2, covering the period 28 February 2024 to 27 September 2024.

The overall outcome of the IEA was positive. Site construction, work practices, and relevant environmental and compliance monitoring records were found to be generally in compliance with the Conditions of Approval.

The M1 Pacific Motorway extension to Raymond Terrace Conditions of Approval contains a total of 238 Conditions for the CSSI. Of these, 159 were found to be compliant and 75 were not triggered. There were four non-compliances; however, these were all considered to have had no material impact, rather were predominantly administrative. Therefore, there has been no additional impacts or issues that the environment has suffered as a result of this Project.

In relation to the previous audit (IEA No. 1) prepared by New State Environment and Heritage dated April 2024, the five non-compliances were considered to be closed out and no additional follow-up is required as part of this audit.

The audit concludes that the M1 Pacific Motorway to Raymond Terrace Project is generally being constructed in accordance with the Conditions of Approval.



References

New State Environment and Heritage, (2024). *IM1 Pacific Motorway to Raymond Terrace Independent Environmental Audit 1 (SSI 7319)*. Report prepared for Transport for NSW (Rev 2.1, 19/04/2024).

NSW Department of Planning, Industry and Environment, (2020). *Independent Audit: Post Approval Requirements (May 2020)*. Available <https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf> [Accessed August 2024].

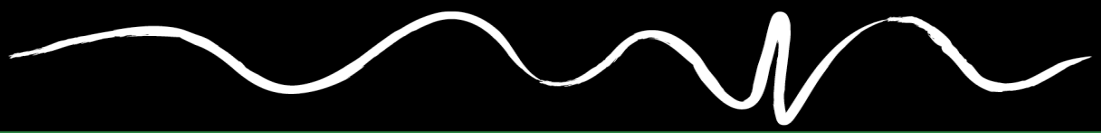


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Appendix A

Planning Secretary Audit Team Agreement

NSW Planning ref: SSI-7319-PA-149

Lincoln Carter
Environment and Sustainability Manager
ROADS AND MARITIME SERVICES
6 Stewart Avenue
Newcastle West New South Wales 2302
15/08/2024

Sent via the Major Projects Portal only

Subject: M1 Pacific Motorway to Raymond Terrace - No.2 IEA Auditor Nomination

Dear Mr Carter,

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct the next Independent Environmental Audit (IEA) as required by Schedule 2, Condition A33 of SSI-7319 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning), submitted on 12 August 2024

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Mr Simon Williams – Lead Auditor
- Mr Duncan Thomson – Alternate Lead Auditor
- Lauren Buchanan – Assistant (Trainee) Auditor
- Michelle Campion-Van Zetten – Assistant (Trainee) Auditor

The Lead Auditor or Alternate Lead Auditor is required to conduct the IEA Site Inspection/s.

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

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of the approval and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

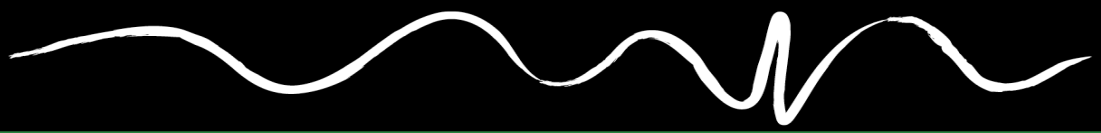
Should you wish to discuss the matter further, please contact Laura Gothard, Senior Compliance Officer on 0484269988 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary



Appendix B

Independent Audit Declaration Form

Declaration of Independence - Auditor

Project Name	M1 Pacific Motorway Extension to Raymond Terrace
Consent Number	SSI-7319
Description of Project	The project includes 15 kilometres of dual carriageway and provides motorway access from the existing road network from four new interchanges at Black Hill, Tarro, Tomago and Raymond Terrace.
Project Address	Land between the M1 Pacific Motorway at Black Hill and the A1 Pacific Highway at Raymond Terrace.
Proponent	Transport for NSW
Date	8/11/2022

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow 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 aspect. The proponent of and 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 a 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 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Simon Williams
Signature	
Qualification	BEnvP, MEnvLaw, CEnvP, Lead Environmental Auditor (IEMA)
Position	Lead Auditor / Director / Principal Environmental Planner
Company	GeoLINK
Address	2/119 Rusden Street, Armidale
Email Address	swilliams@geolink.net.au

Declaration of Independence - Auditor

Project Name	M1 Pacific Motorway Extension to Raymond Terrace
Consent Number	SSI-7319
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Proponent	Transport for NSW
Date	8/11/2022

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- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow 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 aspect. The proponent of and 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 a 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 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Duncan Thomson
Signature	
Qualification	BE (Env) (Hons), Dip. Quality Auditing
Position	Provisional Auditor / Director / Principal Environmental Engineer
Company	GeoLINK
Address	Level 1, 64 Ballina St, Lennox Head NSW 2478
Email Address	duncan@geolink.net.au

Declaration of Independence - Auditor

Project Name	M1 Pacific Motorway Extension to Raymond Terrace
Consent Number	SSI-7319
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Proponent	Transport for NSW
Date	8/11/2022

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
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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 aspect. The proponent of and 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 a 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 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Lauren Buchanan
Signature	
Qualification	BA Environ. Sci., GradDip Environ. Health.
Position	Associate Auditor (Trainee) / Senior Environmental Scientist
Company	GeoLINK
Address	2/119 Rusden Street, Armidale
Email Address	lbuchanan@geolink.net.au

Declaration of Independence - Auditor

Project Name	M1 Pacific Motorway Extension to Raymond Terrace
Consent Number	SSI-7319
Description of Project	The project includes 15 kilometres of dual carriageway and provides motorway access from the existing road network from four new interchanges at Black Hill, Tarro, Tomago and Raymond Terrace.
Project Address	Land between the M1 Pacific Motorway at Black Hill and the A1 Pacific Highway at Raymond Terrace.
Proponent	Transport for NSW
Date	8/11/2022

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow 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 aspect. The proponent of and 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 a 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 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Michelle Campione-van Zetten
Signature	
Qualification	BAAID, PIA (Assoc.)
Position	Associate Auditor (Trainee) / Environmental Planner
Company	GeoLINK
Address	2/119 Rusden Street, Armidale
Email Address	mcampione-vanzetten@geolink.net.au



Appendix C

Consultation

27 August 2024
Ref No: 5003-1006

Senior Compliance Officer
Development Assessment and Sustainability
Department of Planning, Housing and Infrastructure

Attention: Laura Gothard

Dear Laura

M1 Pacific Motorway extension to Raymond Terrace (SSI-7319)

GeoLINK has been engaged by Transport for NSW to undertake an Independent Environmental Audit of the M1 Pacific Motorway extension to Raymond Terrace project according to MCoA Part A, Condition A34.

Pursuant to the Independent Audit Post Approval Requirements 2020 (NSW Department of Planning, Industry and Environment), we kindly request your feedback and ask that you draw our attention to any key issues to be included in the scope of the Independent Environmental Audit.

Information on the background, current works and environmental considerations of the site can be found here:

<https://www.transport.nsw.gov.au/projects/current-projects/m1-pacific-motorway-extension-to-raymond-terrace>

If you could please provide your comments or feedback by Wednesday 11 September 2024, it would be greatly appreciated.

In the meantime, if you have any queries, please contact me on 02 6772 0454.

Yours sincerely

GeoLINK



Simon Williams

Director
Principal Environmental Planner

Michelle Campione-van Zetten

From: Laura Gothard <laura.gothard@dpie.nsw.gov.au>
Sent: Wednesday, 28 August 2024 8:00 AM
To: Michelle Campione-van Zetten
Subject: Re: 5003 M1 Pacific Motorway extension to Raymond Terrace - DPHI consultation letter

Hi Michelle,

Thank you for your email regarding the upcoming IEA for the M1 Extension to Raymond Terrace.

Please carry out the Audit in accordance with the Conditions of Approval and Independent Audit Post Approval Requirement Guidelines 2020.

I do not require to you look into anything specific at the site outside what is required under the Approval and Guidelines.

Kind Regards,

Laura Gothard
Senior Compliance Officer

Development Assessment | Department of Planning, Housing and Infrastructure
T 02 6575 3403 | **M** 0484 269 988 | **E** laura.gothard@dpie.nsw.gov.au

From: Michelle Campione-van Zetten <mcampione-vanzetten@geolink.net.au>
Sent: Tuesday, 27 August 2024 3:47 PM
To: Laura Gothard <laura.gothard@dpie.nsw.gov.au>
Cc: Simon Williams <SWilliams@geolink.net.au>
Subject: 5003 M1 Pacific Motorway extension to Raymond Terrace - DPHI consultation letter

Dear Laura Gothard,

GeoLINK has been engaged for an Independent Audit of the M1 Pacific Motorway extension to Raymond Terrace (SSI-7319) project. Please find attached a consultation letter pertaining to the audit, as required according to the Minister's Condition of Approval Part A, Condition A34.

Please do not hesitate to reach out if you require further information.

King Regards,

Michelle Campione-van Zetten
Environmental Planner

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W www.geolink.net.au



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Our ref: C24/73
22 October 2024

GeoLINK
Attn: Simon Williams

Re: DPIRD Fisheries input to Independent Environmental Audit of the M1 Pacific Motorway extension to Raymond Terrace project

Dear Simon,

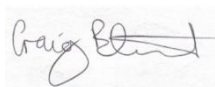
Thank you for your referral to DPIRD Fisheries, a division of NSW Department of Primary Industries and Regional Development, to obtain feedback in relation to key issues to be included in the scope of the Independent Environmental Audit for the above project.

DPIRD Fisheries is responsible for ensuring that fish stocks are conserved and that there is no net loss of key fish habitats upon which they depend. To achieve this, DPIRD Fisheries ensures that developments comply with the requirements of the Fisheries Management Act 1994 (FM Act) (namely the aquatic habitat protection and threatened species conservation provisions in Parts 7 and 7A of the FM Act, respectively), and the associated *Policy and Guidelines for Fish Habitat Conservation and Management (2013)*. DPI Fisheries is also responsible for ensuring the sustainable management of commercial, recreational, and Aboriginal cultural fishing, aquaculture, marine parks, and aquatic reserves in NSW.

DPIRD Fisheries can advise that during the construction phase for this project, DPIRD Fisheries has been consulted regularly by Transport for NSW, its contractors and the Department of Planning, Housing and Infrastructure regarding Fisheries matters. DPIRD Fisheries is satisfied that the project, and its Modification, is progressing in accordance with the Conditions of Consent that relate to Fisheries matters.

For further information, please contact me on craig.blount@dpi.nsw.gov.au.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Blount".

Craig Blount Senior Fisheries Manager, Coastal Systems



Your ref: 5003-1007
Our ref: DOC24/702754-1

Mr Simon Williams
Director / Principal Environmental Planner
GeoLINK
PO Box 1267
Armidale NSW 2350

By email: swilliams@geolink.net.au

12 September 2024

Dear Mr Williams

**M1 Pacific Motorway extension to Raymond Terrace (SSI-7319)
Independent Environmental Audit**

Thank you for your correspondence on 27 August 2024 seeking comment from the NSW Environment Protection Authority (EPA) regarding the Independent Environmental Audit to be carried out by GeoLINK for the M1 Pacific Motorway extension to Raymond Terrace (SSI-7319).

The EPA regulates the M1 Pacific Motorway extension to Raymond Terrace under Environment Protection Licence 21808, issued to John Holland Pty Ltd and Environment Protection Licence 21819, issued Seymour Whyte Constructions Pty Ltd.

The EPA encourages the preparation of audits as useful tools for industry to determine how to meet statutory obligations and identify potential or actual risks towards achieving these obligations.

As a regulatory authority, the EPA administers and regulates statutes for environmental management and protection. As such the EPA is not directly involved in the carrying out of audits to achieve those objectives and does not review or comment on such documents.

As a result, the EPA has no comment to provide for this request but directs you to the EPA's public register at <https://apps.epa.nsw.gov.au/prpoeoapp/> to view the Licence's associated notices.

If you have any further questions about this matter, please contact Geovani Lapina on 02 4908 6873 or at info@epa.nsw.gov.au.

Yours sincerely

KAREN GALLAGHER
Unit Head - Operations
Environment Protection Authority

cc: Michelle Campione-van Zetten, mcampione-vanzetten@geolink.net.au

Phone 131 555
Phone 02 9995 5555
(from outside NSW)

TTY 133 677, then
ask for 131 155

Locked Bag 5022
PARRAMATTA
NSW 2124

6&8 Parramatta
Square 10 Darcy
Street
PARRAMATTA NSW
2150

info@epa.nsw.gov.au
www.epa.nsw.gov.au
ABN 43 692 285 758

Michelle Campione-van Zetten

From: Kate Drinan <Kate.Drinan@portstephens.nsw.gov.au>
Sent: Monday, 9 September 2024 3:58 PM
To: Michelle Campione-van Zetten
Cc: Simon Williams; John Maretich
Subject: RE: 5003 M1 Pacific Motorway extension to Raymond Terrace - Port Stephens Council consultation letter

Dear Michelle,

Thank you for the opportunity to provide input to the scope of the M1 to Raymond Terrace Project Audit.

With regards to specific measures to audit, it would be good to understand whether measures such as those detailed in Section 6.8 and 6.9 of the Flora and Fauna Management Plans (FFMP) were implemented including:

1. The re-use of timber and bushrock as detailed in Section 6.8 of the FFMP and as required in accordance with E17 of the conditions of approval for the project, including consulting with relevant government agencies on donation of materials where appropriate.
2. The relocation of threatened flora as detailed in Section 6.9 of the FFMP. It was proposed to liaise with the Hunter Region Botanic Gardens prior to disturbance to confirm whether translocation of *Diuris arenaria* and *Persicaria elatior* was viable, and if so, opportunistic salvage of these species prior to clearance was to occur.

Please let me know if you would like any further information.

Kind regards,

Kate Drinan



Kate Drinan
Natural Systems Coordinator

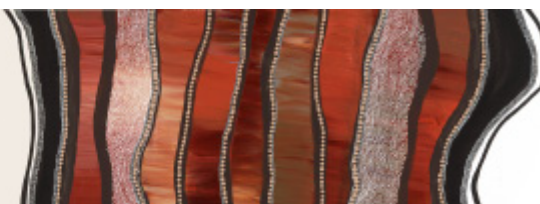
p 02 4988 0214 | m 0427 964 534
w portstephens.nsw.gov.au



Working days: Monday to Thursday



We acknowledge the Worimi people as the original Custodians and inhabitants of Port Stephens.
We acknowledge and pay respects to Worimi elders past and present. May we walk the road to tomorrow with mutual respect and admiration as we care for the beautiful land and waterways together.
Artwork by Adam Manning.



From: Michelle Campione-van Zetten <mcampione-vanzetten@geolink.net.au>
Sent: Tuesday, 27 August 2024 4:47 PM
To: John Maretich <John.Maretich@portstephens.nsw.gov.au>
Cc: Simon Williams <SWilliams@geolink.net.au>
Subject: 5003 M1 Pacific Motorway extension to Raymond Terrace - Port Stephens Council consultation letter

Dear John Maretich,

GeoLINK has been engaged for an Independent Audit of the M1 Pacific Motorway extension to Raymond Terrace (SSI-7319) project. Please find attached a consultation letter pertaining to the audit, as required according to the Minister's Condition of Approval Part A, Condition A34.

Please do not hesitate to reach out if you require further information.

King Regards,

Michelle Campione-van Zetten
Environmental Planner

GeoLINK

Quality solutions. Sustainable future.

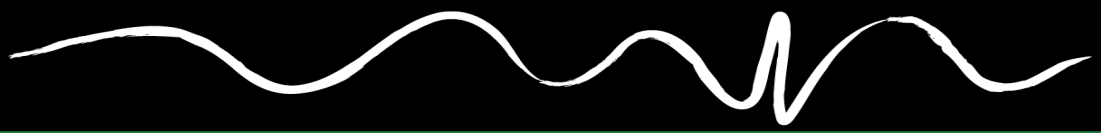
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Appendix D

Audit Agenda and Attendance Register



Project 5003 **Date** Tues 17 Sep 2024
TfNSW M12RT Transport
Independent Audit

Time 8:30am to 4.30pm **Ref No** 5003-1013

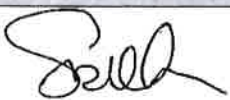
Subject Agenda for Independent Environmental Audit

Attendees:

Simon Williams (Lead Auditor, GeoLINK)
Michelle Campion-van Zetten (Trainee Auditor, GeoLINK; Teams meetings only)
Lincoln Carter (Environment and Sustainability Manager)
Brad Whittard (Environment Officer)
Contractor's Representative/s

Time	Topic/Discussion Item	Personnel Required
8:30	Site induction and intros.	Auditor
9.00 – 9.15	Opening meeting – discuss purpose, scope etc.	All
9.15 – 11.00	On-site interviews and audit. The purpose is to discuss the key environmental management Conditions of Approval, view relevant records and assess compliance with the documents.	TfNSW Environmental Staff Contractor Environmental Staff
11.00 – 1.00	Site Inspection BH2T IEA Site Inspection - Northside of NEH General drive and walk through of all areas that can be safely accessed.	TfNSW Environmental Staff Contractor Environmental Staff
1.00 – 2.00	Break for lunch.	
2.00 – 4.00	Site inspection – Southern side of NEH General drive and walk through of all areas that can be safely accessed.	TfNSW Environmental Staff Contractor Environmental Staff
4.00 – 4:15	Closing meeting – discuss preliminary findings	All
4:15 – 4:30	Sign-out	Auditor

Register of Attendance

Name	Role	Sign
Simon Williams	Auditor	
Michelle Campione-van Zetten	Trainee Auditor	
Kathryn Lloyd	Environment & Sustainability Lead	
Erin Horder	Environmental Cadet	E. Horder
JAMES STOKES	SEN ENVIRO ADVISOR	
Adrian Dube	Snr Approvals Advisor	

TRENT DOWD SNR - ENV. ADV 

BEN WILLIAMS ETS OFFICER 

BRETT HOAD DEPUTY PD 

KAI NEVILLE SNR ENV SUS OFFICER 

ANDREW CLAWGILL ETS OFFICER 

Lawson Gill ~~At Environment~~ 
Snr Manager Environment & Sustainability

Tara Armstrong TFNSW Enviro Grad 



Project 5003 **Date** Thur 19 Sep 2024
TfNSW M12RT Transport
Independent Audit

Time 8:30am to 3.30pm **Ref No** 5003-1014

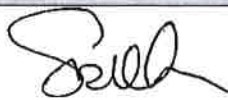
Subject Agenda for Independent Environmental Audit

Attendees:

Simon Williams (Auditor, GeoLINK)
Michelle Campion-van Zetten (Trainee Auditor, GeoLINK; Teams meetings only)
Lincoln Carter (Environment and Sustainability Manager)
Brad Whittard (Environment Officer)
Contractor's Representative/s

Time	Topic/Discussion Item	Personnel Required
8:30	Meet at Heatherbrae Site office and complete visitor inductions.	Auditor
9.00 – 12.00	Site inspection – Northern side of NEH General drive and walk through of all areas that can be safely accessed.	TfNSW Environmental Staff Contractor Environmental Staff
12.00 – 1.00	Break for lunch.	
1.00 – 3.00	On-site interviews and audit. The purpose is to discuss the key environmental management Conditions of Approval, view relevant records and assess compliance with the documents.	Auditor
3.00 – 3:15	Closing meeting – discuss preliminary findings	All
3:15 – 3:30	Sign-out	Auditor

Register of Attendance

Name	Role	Sign
Simon Williams	Auditor	
Michelle Campione-van Zetten	Trainee Auditor	
Lincoln Carter	Env Sust Mgr TfNSW	
Graham Jesser	SWC Enviro Advisor	
Erin Horder	Enviro Cadet + TfNSW	E.Horder
Ben Williams	TfNSW E+S officer	
Brad Whittall	S/Env & S Officer	

Matthew Billings Environmental
Representative



Simon R Williams Environment Manager.
Seymour Whyte





Appendix E

Independent Audit Table

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern)	Previous Audit Compliance Status	Independent Audit Findings and Recommendations	Unique Identification on Non Compliance
Part A - Administrative											
	GENERAL										
A1	The Proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the: (a) M1 Pacific Motorway extension to Raymond Terrace Environmental Impact Statement, prepared by Transport for NSW and dated July 2021; and (b) M1 Pacific Motorway extension to Raymond Terrace Submissions Report, prepared by Transport for NSW and dated June 2022.	Compliant	Yes	Compliant	Audit	Yes	Compliant	Audit	Previously non-compliant due to four other non-compliances found	On the basis of this audit and our inspection of the site, notwithstanding the non-compliances, the construction of the project is generally consistent with the terms of the approval.	
A2	The CSSI must be carried out in accordance with all procedures, commitments, preventative actions, performance outcomes and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	Compliant	Yes	Compliant	Audit interview Site inspections CEMP ER inspection reports	Yes	Compliant	Audit interview Site inspections CEMP ER inspection reports	Previously compliant	The CSSI is generally being carried out in accordance with the requirements of the documents listed in Condition A1. These requirements have been incorporated into the CEMP and sub-plans.	
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.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	No inconsistencies in either stage since the last audit. Not triggered at this time.	
A4	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to: (a) the environmental performance of the CSSI; (b) any document or correspondence in relation to 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 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.	Compliant	Yes	Compliant	RFI response Letter from DPE dated 13/11/2023 providing the directions required to be met for the approved documents. Letter from DPHI dated 20/06/2024 approving requirements being met for direction 1. Letter from DPHI dated 20/06/2024 acknowledging receipt of submission for direction 2.	No	Not Triggered	RFI response	Previously compliant Audit identified DPHI letter containing directions for updating/ amending CEMP elements.	Stage 1 (Southern): The project was provided two directions to comply with when the letter from DPF provided approval for the project documents (during last audit period). The requirements have been submitted and approved/accepted during this audit period, thus closing out the directions. Stage 2 (Northern): No request for update during this audit period.	
A5	This approval lapses five years after the date on which it is granted, unless Work has physically commenced on or before that date.	Compliant	Yes	Compliant	Instrument of Approval dated 08/01/22. Letter from TfNSW dated 22/09/23 stating that nominated date for commencement of Southern Package is 23/10/23.	Yes	Compliant	Instrument of Approval dated 08/01/22. Letter from TfNSW to DPHI dated 03/08/23 stating that nominated date for commencement of Northern Package is 18/09/23.	Previously compliant for northern package	Both stages have commenced within the five year timeframe.	
A6	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.	Compliant	Yes	Compliant	Covered in compliance tables CEMPs and sub-plans	Yes	Compliant	Covered in compliance tables CEMPs and sub-plans	Previously compliant	Noted	
	TIMING										
A7	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.	Compliant	Yes	Compliant	DPHI letter of approval for alternative timeframe in regard to submission of Aboriginal Cultural Heritage Excavation Report. DPHI letter of approval for extension of time to submit 2nd Independent Audit Report.	Yes	Compliant	DPHI letter of approval for alternative timeframe in regard to submission of Aboriginal Cultural Heritage Excavation Report. DPHI letter of approval for extension of time to submit 2nd Independent Audit Report.	Previously compliant References permission to extend timing of initial audit	Transport sought and received permission from DPHI to extend timing of the following: - Aboriginal Cultural Heritage Excavation Report - 2nd Independent Audit Report (this audit)	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern)	Previous Audit Compliance Status	Independent Audit Findings and Recommendations	Unique Identification on Non Compliance
	EVIDENCE OF CONSULTATION										
A8	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 in accordance with the consultation procedures set out in the Communication Strategy required by Condition B1. The evidence must include: (a) documentation of the engagement with the identified party 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. Note: The Communication Strategy required by Condition B1 should be used in conjunction with Condition A8 to determine the level consultation and evidence required that is proportionate to the activity that will be undertaken.	Compliant	Yes	Compliant	RFI response Local Road Traffic and Pedestrian Impact Assessment Report - Woodlands Close (BH2T) Letter from DPHI dated 20/06/2024 approving the Construction Traffic and Transport Access Management Plan Rev 5. Local Road Traffic and Pedestrian Impact Assessment Report - Lenaghans Drive and Black Hill Road (BH2T) Letter from DPHI dated 11/09/2024 approving the Black Hill to Tomago Traffic, Transport and Access Management Plan Rev 6.	Yes	Compliant	RFI response DLP Attachment D - updated PSC Consultation DLP Attachment E - updated Appendix H of DLP Consultation Report	Previously compliant Examples provided in audit interview	Stage 2 (Northern): Consultation associated with Heatherbrae Bypass Design and Landscape Plan has been completed within this audit period. Refer to RFI supporting information.	
	STAGING										
	Staging the delivery of the CSSI										
A9	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 unless considered to be Low Impact Work.	Compliant	Yes	Compliant	Staging Report. Letter from ER dated 6/07/23 endorsing document. Letter from DPE dated 25/07/23 acknowledging submission.	Yes	Compliant	Staging Report. Letter from ER dated 6/07/23 endorsing document. Letter from DPE dated 25/07/23 acknowledging submission.	Previously compliant	The CSSI is being constructed in two stages. Staging report has been prepared, endorsed by ER, and submitted to Planning Secretary.	
A10	The Staging Report must: (a) if staged construction is proposed, set out how the construction of the whole 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 the CSSI will be staged, including details of Work and other 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 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 the project through geographical activities, temporal activities or activity-based contracting and staging.	Compliant	Yes	Compliant	Chapters 2, 3, and 4 of Staging Report	Yes	Compliant	Chapters 2, 3, and 4 of Staging Report	Previously compliant	These requirements are covered in the Staging Report: (a) Section 2.2 (b) Section 2.3 (c) Section 3 (d) Section 4.2	
A11	Where staging is proposed the CSSI must be staged in accordance with the Staging Report .	Compliant	Yes	Compliant	RFI response Section 1.3 of Staging Report	Yes	Compliant	RFI response Section 1.3 of Staging Report	Previously compliant	No deviations from the Staging Report during this reporting period.	
A12	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.	Compliant	Yes	Compliant	Section 2.4, Chapter 3, and Appendix A of Staging Report	Yes	Compliant	Section 2.4, Chapter 3, and Appendix A of Staging Report	Previously compliant	The CSSI is being staged geographically rather than temporally which is covered in the Staging Report.	
A13	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 before the proposed change in the staging.	Compliant	Yes	Compliant	Audit interview. DPHI Approval Letter. ER Endorsement Letter.	Yes	Compliant	Audit interview. DPHI Approval Letter. ER Endorsement Letter.	Previously compliant	No changes.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern)	Previous Audit Compliance Status	Independent Audit Findings and Recommendations	Unique Identification on Non Compliance
A17	Before establishment of any ancillary facility that is required before the approval of a CEMP (excluding minor ancillary facilities established under Condition A20), the Proponent must prepare a Ancillary Facility Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facility(ies). The Ancillary Facility 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 ancillary facility(ies). The Ancillary Facility Site Establishment Management Plan must detail the management of the ancillary facilities and include: (a) a description of activities to be undertaken during establishment of the ancillary facility (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 before 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 noise monitoring during site establishment works. Nothing in this condition prevents the Proponent from preparing individual Ancillary Facility Site Establishment Management Plans for each ancillary facility.	Compliant	Yes	Compliant	BH2T Ancillary Facility Establishment Management Plan. Letter dated 8/08/2023 endorsing Ancillary Facility Site Establishment Management Plan. Letter from DPE dated 14/08/2023 approving Ancillary Facility Site Establishment Management Plan.	Yes	Compliant	HBB Ancillary Facility Establishment Management Plan. Letter dated 16/08/23 endorsing Ancillary Facility Establishment Management Plan. Letter from DPHI dated 24/05/23 approving Ancillary Facility Site Establishment Management Plan.	Previously compliant	Ancillary Facility Site Establishment Plans available and approved for both stages.	
	<i>Note: This plan is only needed before a CEMP is approved. Once a CEMP is approved, an Ancillary Facility Site Establishment Management Plan(s) is not required and ancillary facilities not approved under an Ancillary Facility Site Establishment Management Plan must be included in the CEMP.</i>										
	Use of and Decommissioning of an Ancillary Facility										
A18	An ancillary facility established under Condition A17 must not be used for construction until either the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition C5 and relevant Construction Monitoring Programs required by Condition C12 have been approved by the Planning Secretary.	Not Triggered	No	Not Triggered	Previous audit	No	Not Triggered	Previous audit	Previously not triggered	As per previous audit, none used for construction prior to approval of CEMP.	
A19	Once an ancillary facility is no longer required for the CSSI, the land must be returned to its preexisting or better condition within six months of the site being decommissioned or within two years of operation (whichever is the earliest) or unless otherwise agreed with the Planning Secretary.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	No ancilliary facilities in either package have been decommissioned to date. Not triggered at this time.	

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	Minor Ancillary Facilities										
A20	Minor 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.	Compliant	Yes	Compliant	Minor Ancillary Facility Assessments	Yes	Compliant	Minor Ancillary Facility Assessments	Previously compliant	Assessments have been prepared which outline how compliance with the criteria is achieved and are endorsed by the ER.	
	Boundary screening										
A21	Boundary screening must be erected between ancillary facilities and adjacent to sensitive land use(s) for the duration of the time that the ancillary facility is in use unless otherwise agreed with owner(s) and occupier(s) of the adjacent sensitive land use(s). Boundary screening should minimise visual impacts on adjacent sensitive land use(s).	Compliant	Yes	Compliant	Site inspection	Yes	Compliant	Site inspection	Previously compliant	Confirmed during site inspection.	
	INDEPENDENT APPOINTMENTS										
A22	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) and hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	Compliant	Yes	Compliant	Previous audit Letter from DPHI to Transport dated 11/01/2023 approving appointment of ER and altenate ERs. Independent flood impact advisory panel DPHI approval letter for appointment of independent flood impact advisory panel hydrologist 07/06/2023	Yes	Compliant	Previous audit Letter from DPHI to Transport dated 11/01/2023 approving appointment of ER and altenate ERs. Independent flood impact advisory panel DPHI approval letter for appointment of independent flood impact advisory panel hydrologist 07/06/2023	Previously compliant	As per previous audit, DPHI approval letters reference CVs and experience of independent appointments and state that appropriately skilled, qualified and experienced.	
A23	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	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously compliant Notes that PS had not commissioned any audits	Planning Secretary has not commissioned any audits of how an Independent Appoitment has exercised their functions within this audit period.	
A24	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: <i>Conditions A23 and A24 apply to all Independent Appointments including the ER.</i>	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	No independent appointment approvals under either package have been withdrawn to date. Not triggered at this time.	
	ENVIRONMENTAL REPRESENTATIVE										
A25	Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	Compliant	Yes	Compliant	Previous audit Letter from TfNSW to DPHI dated 16/12/22 nominating Lead ER and alternative ERs. Letter from DPHI to TfNSW dated 11/01/23 approving nominated Lead ER and alternative ERs.	Yes	Compliant	Previous audit Letter from TfNSW to DPHI dated 16/12/22 nominating Lead ER and alternative ERs. Letter from DPHI to TfNSW dated 11/01/23 approving nominated Lead ER and alternative ERs.	Previously compliant	As per previous audit, archaeological salvage excavations were first works undertaken on site. Work commenced on 11 April 2023. Lead ER and alternate ERs nominated and approved before this date.	

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A26	The Planning Secretary's approval of an ER must be sought no later than one month before the commencement of Work.	Compliant	Yes	Compliant	Previous audit Letter from TfNSW to DPHI dated 16/12/22 nominating Lead ER and alternative ERs. Letter from DPHI to TfNSW dated 11/01/23 approving nominated Lead ER and alternative ERs.	Yes	Compliant	Previous audit Letter from TfNSW to DPHI dated 16/12/22 nominating Lead ER and alternative ERs. Letter from DPHI to TfNSW dated 11/01/23 approving nominated Lead ER and alternative ERs.	Previously compliant	As per previous audit, work commenced on site 11/04/23. Lead ER and alternate ERs nominated and approved more than one month prior to commencement of work.	
A27	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.	Compliant	Yes	Compliant	ER approval letter	Yes	Compliant	ER approval letter	Previously compliant	DPHI Letter states that nominees meet the requirements set out in the Environmental Representative Protocol (DPE, October 2018)	
A28	More than one ER may be engaged for 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 the CSSI.	Compliant	Yes	Compliant	ER approval letter includes alternatives	Yes	Compliant	ER approval letter includes alternatives	Previously compliant	More than one ER engaged. Approval letter includes list of alternatives.	
A29	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 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 A9, A17, C1, C5 and C12 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 A9, A17, C1, C5 and C12 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 A34 of this approval; (g) as may be requested by the Planning Secretary, assist in the resolution of community complaints;	Compliant	Yes	Compliant	Audit interview Previous audit	Yes	Compliant	Audit interview Previous audit		Items listed under previous audit continuing to occur on the basis of reviewing monthly report and interview: (a) Weekly meetings with DPHI re progress works (b) monthly reports supplied to DPHI for both packages (c) undertakes fortnightly inspection of each package since commencement of works - key issues listed as actions and comments on whether works are being undertaken in accordance with the CEMP (c) achieved via ER inspections and meetings (d) ER has reviewed documents and prepared written statements (e) insepction reports and site inspections and coordination meetings (f) this has not been requested (g) not requested (h) low impact works assessment for utilities investigation and sewer relocation HBB prepared by contractor, reviewed and signed off by Transport and endorsed by ER 06/07/23 BH2T low impact works assessment for geotechnical investigation phase 2 (i) see A20 (j) minor amendment to HBB Ancil Fac mgmt. plan Rev H 16/08/23 Approved amendment to HBB CEMP Rev E on 12/10/23 Rev 5 of CEMP BH2T issued for ER endorsement (k) monthly reports - on website.	

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	(h) review the appropriateness of any activities reliant on the definition of Low Impact Work; (i) consider or assess the impacts of minor ancillary facilities as required by Condition A20; (j) consider any minor amendments to be made to the Ancillary Facility Site Establishment Management Plan, CEMP, CEMP Sub-plans and Construction Monitoring Programs that do no increase impacts to nearby sensitive land use(s) or that comprise updating or are of an administrative nature, and are consistent with the terms of this approval and the Ancillary Facility Site Establishment Management Plan, CEMP, CEMP Sub-plans and Construction Monitoring Programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval; and (k) prepare and submit to the Planning Secretary and other relevant regulatory agencies (where requested by those agencies), for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading “Environmental Representative Monthly Reports.” The Environmental Representative Monthly Report must be submitted within seven days following the end of each month for the duration of the ER’s engagement for the CSSI, or as otherwise agreed by the Planning Secretary.										
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 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: <i>Personal details of the complainant are not to be provided to the ER unless otherwise agreed to or requested by the complainant.</i>	Non-Compliant	Yes	Non-Compliant	Audit interview ER Monthly Report - Sep 2024	Yes	Compliant	Audit interview	Previously compliant	ER advised they have received OoHW permits for both HBB and BH2T. ER also receives environmental event reports such as unexpected, finds and minor spills. ER was provided with the documentation required to perform their function and documentation as requested, with the exception noted below. Stage 1 (Southern): The complaints register for the BH2T was not provided for the week of 23-29 September; therefore, Condition A30(a) was non-compliant. This was documented in the September ER Monthly Report dated 3 October 2024.	NC-02/01
	NOTIFICATION OF COMMENCEMENT										
A31	The Planning Secretary must be notified in writing of the dates of commencement of construction and operation at least one month before those dates.	Compliant	Yes	Compliant	Letter from TfNSW to DPHI dated 22/09/23 notifying commencement date of 23 October 2023 for Stage 1 (southern package).	Yes	Compliant	Letter from TfNSW to DPHI dated 10/10/23 notifying commencement date of 10 October 2023 for Stage 2 (northern package).	Previously compliant	As per previous audit, notification timeframe requirement met for commencement of construction.	
A32	If the construction or operation of the CSSI is to be staged, the Planning Secretary must be notified in writing at least one month before the proposed commencement of each stage, of the date of the commencement of the relevant works, construction and operation.	Compliant	Yes	Compliant	Letter from DPE dated 25/07/23 acknowledging submission of Staging Report. Letter from TfNSW to DPHI dated 22/09/23 notifying commencement date of 23 October 2023 for Stage 1 (southern package).	Yes	Compliant	Letter from DPE dated 25/07/23 acknowledging submission of Staging Report. Letter from TfNSW to DPHI dated 10/10/23 notifying commencement date of 10 October 2023 for Stage 2 (northern package).	Previously compliant	As per previous audit, notification timeframe requirement met for commencement of staged construction.	
	AUDITING										
A33	Proposed independent auditors must be approved by the Planning Secretary before the commencement of an Independent Audit . This condition does not apply to the engagement of auditors required under Condition E144 .	Compliant	Yes	Compliant	Letter from DPHI dated 15/08/24 approving independent auditors.	Yes	Compliant	Letter from DPHI dated 15/08/24 approving independent auditors.	Previously compliant	This independent audit commenced 15/08/24 when approval was received including the site inspection on the 17/9/24 and 19/9/24	
A34	Independent Audits of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).	Compliant	Yes	Compliant	This audit report	Yes	Compliant	This audit report	Previously compliant	This audit report has been conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements</i> (2020).	

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A41	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), set out the condition/s that is non-compliant, the nature of the breach, the reason for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Compliant	Yes	Compliant	RFI response Letter from Transport dated 10/04/2024 altering non-compliance to Department. Letter from Transport dated 22/05/2024 altering non-compliance to Department.	No	Not Triggered	Audit interview	Previously compliant Non-compliance for heritage photos "P:\GEO05003 TfNSW M12RT Transport Independent Audit\Incoming\Post approval documents\Management plans and strategies\Whole of Project\Oct 2023-M12RT Non-Compliance Warning.pdf"	Non-compliances identified within the audit period were reported within the required timeframe. These include the non-compliances: - Condition C11 (Stage 1): works occurred outside the boundary. - Conditon E118 (Stage 1): SAS and/or Interim Site Audit Advice reviews were not submitted within the required timeframe. Non-compliances that occurred within this audit period but were not identified until after the audit period are to be included in the next audit. These include: - Condition A30 (Stage 1): complaints register was not provided to the ER during the weekly timeframe. - Condition E11 (overall): Credit Retirement Reports were not submitted to the DCCEEW within the month timeframe.	
A42	A non-compliance which has been notified as an incident under Condition A39 does not need to also be notified as a non-compliance.	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	Noted	
	IDENTIFICATION OF ANCILLARY FACILITIES										
A43	The CSSI name, application number, and 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.	Compliant	Yes	Compliant	Site inspection Project website	Yes	Compliant	Site inspection Project website	Previously compliant	Information sited during site inspection and on project website.	

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B12	A website or webpage providing easily accessible information in relation to the CSSI must be established before commencement of Work and be maintained for the duration of Work, and for a minimum of 24 months following the completion of construction unless an alternative timeframe is agreed by the Planning Secretary. The following up-to-date information (excluding confidential, personal, 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 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 the CSSI; (e) a copy of the final 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 website, ordered in a logical sequence and easy to navigate.	Compliant	Yes	Compliant	Project website https://www.transport.nsw.gov.au/projects/current-projects/m1-pacific-motorway-extension-to-raymond-terrace https://caportal.com.au/tfnsw/m1r	Yes	Compliant	Project website https://www.transport.nsw.gov.au/projects/current-projects/m1-pacific-motorway-extension-to-raymond-terrace https://caportal.com.au/tfnsw/m1r	Previously compliant	As noted in the previous audit, information relating to the CSSI has been available on the broader TfNSW website since the planning phase of the Project. The project website is available and enable users to choose the accessibility profile that suits their needs. (a) website has documents and notification page that also includes community updates and fact sheets. (b) EIS and submissions report available on website, no modifications to approval to date. (c) copy of instrument of approval provided. (d) copies of EPLs on project website. (e) final versions of documents uploaded, such as approved CEMPs and sub-plans. (f) copy of previous (first) audit provided.	
B13	Where the agreement of the Planning Secretary is sought to cease providing information via a website or webpage in accordance with Condition B12, the Proponent must demonstrate: (a) operational compliance through independent audits completed in accordance with Condition A38; and (b) how the public can request access to information that will no longer be available through a website or webpage.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	Proponent is not seeking to cease providing information via website. Not triggered at this time.	

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Part C - Construction Environmental Management											
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN											
Construction Environmental Management Plan											
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).	Compliant	Yes	Compliant	Black Hill to Tomago BH2T Construction Environmental Management Plan (CEMP)	Yes	Compliant	Heatherbrae Bypass HBB Construction Environmental Management Plan (CEMP)	Previously compliant	Both CEMPs have been prepared having regard to the Environmental Management Plan Guideline for Infrastructure Projects.	
C2	The CEMP must provide: (a) a description of activities to be undertaken during construction (including the scheduling of construction); (b) details of environmental policies, guidelines and principles to be followed in the construction of the CSSI; (c) a program for ongoing analysis of the key environmental risks arising from the activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of construction 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 (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 C5. Where staged construction 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) include a Worker Code of Conduct for CSSI employees, contractors and subcontractors. The Code of Conduct will include behaviour towards local people and address the gendered impacts of the project personnel; (k) for training and induction for employees, including contractors and sub-contractors, in relation to environmental and compliance obligations under the terms of this approval; and (l) for periodic review and update of the CEMP and all associated plans and programs. <i>Note: CEMP(s) may reflect the staged construction of the project through geographical activities, temporal activities or activity-based contracting and staging.</i>	Compliant	Yes	Compliant	Table 1-1 in CEMP for north contract Table 1-1 in CEMP for south contract	Yes	Compliant	Table 1-1 in CEMP for north contract Table 1-1 in CEMP for south contract	Previously compliant	Northern Package: Covered in Table 1-1 and relevant sections throughout the HBB CEMP and sub-plans. Southern Package: Covered in Table 1-1 and relevant sections throughout the BH2T CEMP and sub-plans.	
C3	CEMP(s) (and relevant CEMP Sub-plans) must be submitted to the Planning Secretary for approval	Compliant	Yes	Compliant	Audit interview Letter from DPE dated 13/11/23 granting approval, subject to directions.	Yes	Compliant	Audit interview CEMP for Northern Package, Revision E October 2023. Letter from DPE dated 09/10/23 granting approval, subject to directions.	Previously compliant	Northern package: Directions from DPE approval letter have been addressed in CEMP Revision E document on 11/10/23. Revision as track changes was sighted during audit interview. Southern package: Direction 2 from the DPE letter granting approval has been completed.	
C4	Where a CEMP (and relevant CEMP Sub-plans) requires Planning Secretary's approval, the CEMP (and relevant CEMP Sub-plans) must be endorsed by the ER . The endorsed CEMP (and relevant sub-plans) must be 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.	Compliant	Yes	Compliant	Letter from DPE dated 13/11/2023 granting approval of CEMP and sub-plans. Letter from Transport dated 13/11/2023 notifying updated date of construction commencement of 14 November 2023 for Southern Package.	Yes	Compliant	Letter from DPE dated 09/10/23 granting approval of CEMP and sub-plans. Letter notifying date of construction commencement for Northern Package.	Previously compliant	Northern Package: Letter from DPHI approval was on 9 October and the commencement of work was on the 10 October 2023. Southern Package: Letter from Transport noted updated construction commencement date of 14 November 2023 for BH2T.	

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C5	The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies and councils 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 A8. <table><tr><th></th><th>Required CEMP Sub-plan</th><th>Relevant government agencies and councils to be consulted for each CEMP Sub-plan</th></tr><tr><td>(a)</td><td>Traffic, transport and access</td><td>Relevant council(s)</td></tr><tr><td>(b)</td><td>Noise and vibration</td><td>Relevant council(s)</td></tr><tr><td>(c)</td><td>Flora and Fauna</td><td>DCCEEV, DPI Fisheries, DPE Water, BCD, and relevant council(s)</td></tr><tr><td>(d)</td><td>Flooding</td><td>BCD (flooding unit), relevant council(s)</td></tr><tr><td>(e)</td><td>Air quality (including odour)</td><td>Relevant council(s)</td></tr><tr><td>(f)</td><td>Soils and surface water (including contaminated lands and acid sulfate soils)</td><td>DPE Water, BCD, Hunter Water (if Hunter Water's assets are affected) and relevant council(s)</td></tr><tr><td>(g)</td><td>Groundwater</td><td>DPE Water, BCD, Hunter Water (where it is proposed to discharge groundwater into Hunter Water's assets) and relevant council(s)</td></tr><tr><td>(h)</td><td>Aboriginal Heritage</td><td>Heritage NSW, RAPs, Local Aboriginal Land Council, relevant council(s)</td></tr><tr><td>(i)</td><td>Non-Aboriginal heritage</td><td>Relevant council(s)</td></tr><tr><td>(j)</td><td>Dredging and Disposal</td><td>DPI Fisheries, EPA</td></tr></table>		Required CEMP Sub-plan	Relevant government agencies and councils to be consulted for each CEMP Sub-plan	(a)	Traffic, transport and access	Relevant council(s)	(b)	Noise and vibration	Relevant council(s)	(c)	Flora and Fauna	DCCEEV, DPI Fisheries, DPE Water, BCD, and relevant council(s)	(d)	Flooding	BCD (flooding unit), relevant council(s)	(e)	Air quality (including odour)	Relevant council(s)	(f)	Soils and surface water (including contaminated lands and acid sulfate soils)	DPE Water, BCD, Hunter Water (if Hunter Water's assets are affected) and relevant council(s)	(g)	Groundwater	DPE Water, BCD, Hunter Water (where it is proposed to discharge groundwater into Hunter Water's assets) and relevant council(s)	(h)	Aboriginal Heritage	Heritage NSW, RAPs, Local Aboriginal Land Council, relevant council(s)	(i)	Non-Aboriginal heritage	Relevant council(s)	(j)	Dredging and Disposal	DPI Fisheries, EPA	Compliant	Yes	Compliant	Consultation outlined in Construction Management Sub-plans. Sub-plans were prepared to be consistent with note 4.	Yes	Compliant	Consultation outlined in Construction Management Sub-plans. Sub-plans were prepared to be consistent with note 4.	Previously compliant	DPHI and the ER reviewed and approved these which were assessed against the MCoA for compliance regarding consultation.	
		Required CEMP Sub-plan	Relevant government agencies and councils to be consulted for each CEMP Sub-plan																																									
(a)	Traffic, transport and access	Relevant council(s)																																										
(b)	Noise and vibration	Relevant council(s)																																										
(c)	Flora and Fauna	DCCEEV, DPI Fisheries, DPE Water, BCD, and relevant council(s)																																										
(d)	Flooding	BCD (flooding unit), relevant council(s)																																										
(e)	Air quality (including odour)	Relevant council(s)																																										
(f)	Soils and surface water (including contaminated lands and acid sulfate soils)	DPE Water, BCD, Hunter Water (if Hunter Water's assets are affected) and relevant council(s)																																										
(g)	Groundwater	DPE Water, BCD, Hunter Water (where it is proposed to discharge groundwater into Hunter Water's assets) and relevant council(s)																																										
(h)	Aboriginal Heritage	Heritage NSW, RAPs, Local Aboriginal Land Council, relevant council(s)																																										
(i)	Non-Aboriginal heritage	Relevant council(s)																																										
(j)	Dredging and Disposal	DPI Fisheries, EPA																																										
	Notes: 1. CEMP Sub-plan(s) may reflect the staged construction of the project through geographical activities, temporal activities or activity-based contracting and staging. 2. Nothing in this condition prevents the Proponent from combining any of the above CEMP Sub-plans. 3. Where reviewed by an EPA accredited Site Auditor, the Planning Secretary will consider Interim Audit Advice or a Section B Site Audit Statement provided with CEMP sub-plans for approval. 4. The Flora and Fauna CEMP Sub-Plan must be consistent with goals and objectives, mitigation measures and monitoring requirements of the Commonwealth approved conservation advice and any Recovery Plans for all Matters of National Environmental Significance.																																											
C6	The CEMP Sub-plans must state how: (a) the environmental performance outcomes identified in the documents listed as 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 any trigger levels and cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART principles.	Compliant	Yes	Compliant	CEMP sub-plans	Yes	Compliant	CEMP sub-plans	Previously compliant	Northern Package: Addressed in Table 3-1 or 3-2 and corresponding sections of each CEMP sub-plan for HBB. Southern Package: Addressed in Table 3-2 and corresponding sections of each CEMP sub-plan for BH2T.																																		
C7	The Dredging and Disposal CEMP Sub-Plan must include, but not limited to: (a) dredging design; (b) dredge soil information, including contaminated sediments and acid sulfate soils; (c) anticipated dredging quantities according to material type; (d) proposed dredging equipment; (e) work methods for dredging and disposal; (f) sequence of the works; (g) dredge positioning, control and calibration; (h) storage and disposal areas for dredged material; (i) environmental control and mitigation measures to be implementated to reduce potential noise, water quality, odour and aquatic ecological impacts; (j) specific and measurable reporting triggers levels that once exceeded require investigative works and the implementation of reactive measures to be undertaken; (k) specific contingency mitigation measures that can be deployed rapidly and effectively in the event offensive odour is detected at sensitive receptors; (l) a trigger action response protocol setting out the monitoring methods, management action and mitigation measures to be implemented to ensure that suspended sediment concentrations do not extend beyond the immediate vicinity of dredging activities. The approach must specify when dredging will cease based on the results of real-time and visual monitoring; (m) unexpected find protocol(s); (n) methods for rehabilitation of subtidal and intertidal areas impacted in the Hunter River and	Not Triggered	No	Not Triggered	Audit interview. Staging report letter - notification for no dredging.	No	Not Triggered	Audit interview Staging report letter - notification for no dredging.	Previously not triggered	No dredging proposed so sub-plan is not required. Not triggered at this time.																																		

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	(o) evidence that an EPA accredited Site Auditor has reviewed the contamination management component of the Dredging and Disposal CEMP Sub-plan and has issued an Interim Audit Advice or a Section B Site Audit Statement certifying that the contamination management component of the Sub-plan is appropriate to manage contaminated sediments, water and other material to complete dredging and disposal in an environmentally acceptable manner, including consideration of the potential for off-site impacts. The Dredging and Disposal CEMP Sub-plan must be submitted to the Planning Secretary for approval as part of the CEMP once the Interim Audit Advice or a Section B Site Audit Statement has been issued. The Interim Audit Advice /Section B Audit Statement must be submitted to the Planning Secretary for information with the sub-plan. Note: <i>If dredging is not proposed, the requirements of Conditions C5(j), C6 and C7 do not apply.</i>										
C8	The Noise and Vibration CEMP Sub-plan must include, but not be limited to: (a) details of all sensitive land use(s) (including noise and or vibration sensitive working areas such as operating theatres and precision laboratories) that are potentially exposed to construction noise and vibration; (b) Noise Catchment Areas (NCAs) identified in the EIS – these must be reviewed (and refined where required) to ensure that each catchment represents a similar acoustic environment. Additional noise monitoring must be carried out to confirm rating background levels, NMLs and existing traffic noise levels for the NCAs. (c) construction noise and vibration performance criteria for the CSSI; (d) details of mitigation and management measures and procedures that will be implemented to manage construction noise and vibration impacts; (e) construction timetabling, in particular construction activities outside of standard hours; and (f) measures to minimise cumulative construction impacts and the likelihood for construction fatigue from both concurrent activities and other projects in the area.	Compliant	Yes	Compliant	CEMP Appendix - Noise and Vibration Management Sub-plan.	Yes	Compliant	CEMP Appendix - Noise and Vibration Management Sub-plan.	Previously compliant	Northern Package: Addressed in Table 3-1 and the following sections of the HBB NVMSPP (a) Section 4.1 (b) Sections 4.2 and 4.3 (c) Section 5 (d) Section 8 (e) Section 5.3 (f) Sections 6.3 and 8 Southern Package: Addressed in Table 3-2 and the following sections of the BH2T NVMSPP (a) Sections 4, 6 and Appendix B (b) Sections 4.2, 4.4 and Appendices B and F (c) Section 6 (d) Section 8, 9 .4 and Appendix C (e) Sections 8.2 and 8.3 (f) Sections 7.3 and 8.3.1	
C9	The Soil and Water CEMP Sub-Plan must include and not be limited to: (a) monitoring requirements, management criteria and mitigation measures for managing water pollution risks associated with work in areas of potential and actual contamination, saline groundwaters, temporary construction dewatering and acid sulfate soils; (b) at source controls (e.g. covering of stockpiles, bunding, flow diversions); (c) options to avoid contaminated stormwater discharges (e.g. full capture and reuse where appropriate, tankering offsite, diverting contaminated stormwater to wastewater treatment plants); (d) additional or alternative treatment measures (e.g. increased sediment basin sizing); (e) predicted incidental groundwater take due to temporary construction dewatering activities, including any potential cumulative impacts; and (f) evidence that an EPA accredited Site Auditor has reviewed the contamination management component of the Soil and Water CEMP Sub-plan and has issued an interim audit advice or a Section B Site Audit Statement certifying that the contamination management component of the Sub-plan is appropriate to manage contaminated sediments, water and other material in an environmentally acceptable manner, including consideration of the potential for offsite impacts. The Soil and Water CEMP Sub-plan must be submitted to the Planning Secretary for approval as part of the CEMP, once the Interim Audit Advice or a Section B Site Audit Statement has been issued. The Interim Audit Advice /Section B Audit Statement must be submitted for information to the Planning Secretary with the Sub-plan. A copy of the Sub-plan and Interim Audit Advice /Section B Audit Statement must be provided to the relevant council(s) for information.	Compliant	Yes	Compliant	CEMP Appendix - Construction Soil and Water Management Sub-plan	Yes	Compliant	CEMP Appendix - Construction Soil and Water Management Sub-plan Interim site audit advice for CCLMSP, Cavvanba Consulting 24/07/23 Email dated 08/09/23 from Seymour Whyte submitting HBB SWMP and interim site audit advice to Port Stephens Council	Previously compliant	As per previous audit. Northern Package: Addressed in Table 3-1 and the following sections of the HBB SWMSP (a) Section 6 (b) Sections 6.1 and 6.5 (c) Sections 6.1, 6.2 and 6.8 (d) Section 8 (e) Sections 6.1 and 6.2 (f) Appendix H plus interim site audit advice by Cavvanba Consulting. Southern Package: Addressed in Table 3-2 and the following sections of the BH2T SSWMSP (a) Section 6.1 and 7.4 SWGQCMP (b) Table 6-1 (SSWMP02-SSWMP18) and Section 6.1.2, Appendix C (c) Sections 6 and 7, Appendix F (d) Section 6.1 and Appendix C (e) GMP Section 5.2.9 (f) Appendix B	

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C10	Construction must not commence until the relevant CEMP(s) and CEMP Sub-plans applying to the construction activities to be undertaken have been approved by the Planning Secretary.	Compliant	Yes	Compliant	Letter from DPE dated 13/11/2023 granting approval of CEMP and sub-plans. Letter from Transport dated 13/11/2023 notifying updated date of construction commencement of 14 November 2023 for Southern Package.	Yes	Compliant	Letter notifying date of construction commencement for Northern Package. Letter from DPE dated 9/10/23 granting approval of CEMP and sub-plans.	Previously compliant	CEMP and sub plans for HBB submitted progressively between 20/06/23 and 18/08/23 and approval of CEMP granted on 09/10/23. HBB package commenced construction 10/10/23. CEMP and sub plans for Southern Package submitted progressively between 14/08/23 and 03/10/23 and approval of CEMP granted on 13/11/23. Commencement of works for the Southern Package was 14/11/23.	
C11	The CEMP(s) and CEMP Sub-plans as approved, including any minor amendments approved by the ER , must be implemented for the duration of construction.	Non-Compliant	Yes	Non-Compliant	RFI response Letter from Transport dated 22/05/2024 alerting non-compliance to Department.	Yes	Compliant	RFI response	Previously non-compliant	Northern Package: During this audit period Construction Traffic, Transport and Access Management Sub-plan (April 2024) had a minor amendment to include a 6 monthly extension to utilise Camfield Drive Heatherbrae. The amended document is located under 'Northern contract: Heatherbrae Bypass (HBB) - CEMP'. Southern Package: On 15 May 2024 there was a non-compliance associated with the new west bound New England Hwy/ John Renshaw Slip Lane, involving the horizontal grinder machine to be taken outside the construction boundary for refueling 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. For information, the CEMP and following sub-plans have been submitted to the ER/DPHI for approval in the audit period: -CTTAMP sub- plan Rev.6 dated 27/06/24 (DPHI approval 12/09/24) -AQMP sub-plan Rev.04 dated 04/07/24 (DPHI Approval 02/08/24)	NC-02/02

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										Minor amendments endorsed by ER as part of 6-monthly review: -CEMP Rev.5 dated 12/07/24 (ER Approval 19/07/24 sent to DPHI for information on 19/07/24. No comments received) -NAHSMP sub-plan Rev.01 dated 20/06/24 (ER endorsement 22/08/24) -AHMP sub-plan Rev 01 dated 20/06/24 (ER endorsement 22/08/24) -FMP sub-plan Rev.01 dated 20/06/24 (ER endorsement 22/08/24) -FFMP sub-plan Rev.01 dated 11/03/24 (ER Approval 11/03/24) -NVMP sub-plan Rev.02 dated 20/08/24 (ER Approval 16/09/24) RECOMMENDATION: Action has been undertaken to rectify all weather access within the previously approved boundary and 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.																
CONSTRUCTION MONITORING PROGRAMS																										
C12	The following Construction Monitoring Programs (CMPs) must be prepared in consultation with the relevant government agencies and council(s) identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP: <table><tr><th></th><th>Required Construction Monitoring Programs</th><th>Relevant government agencies and councils to be consulted for each Construction Monitoring Program</th></tr><tr><td>(a)</td><td>Noise and Vibration</td><td>EPA and relevant council(s)</td></tr><tr><td>(b)</td><td>Surface Water</td><td>DPE Water, EPA, (Hunter Water if any Hunter Water assets are impacted)</td></tr><tr><td>(c)</td><td>Dredging</td><td>DPI Fisheries, EPA</td></tr><tr><td>(d)</td><td>Fauna and Flora</td><td>BCD, DCCEEW and relevant council(s)</td></tr></table> Note: The Flora and Fauna Monitoring Program must be consistent with goals and objectives, mitigation measures and monitoring requirements of the Commonwealth approved conservation advice and any Recovery Plans for all Matters of Environmental Significance.		Required Construction Monitoring Programs	Relevant government agencies and councils to be consulted for each Construction Monitoring Program	(a)	Noise and Vibration	EPA and relevant council(s)	(b)	Surface Water	DPE Water, EPA, (Hunter Water if any Hunter Water assets are impacted)	(c)	Dredging	DPI Fisheries, EPA	(d)	Fauna and Flora	BCD, DCCEEW and relevant council(s)	Compliant	Yes	Compliant	Appendix C (CMP) of Noise and Vibration Mangement Sub-plan. Surface Water and Groundwater Quality Construction Monitoring Program. Appendix G (CMP) of Flora and Fauna Management Sub-plan.	Yes	Compliant	Appendix B (CMP) of Construction Noise and Vibration Management Sub-plan. Appendix B (CMP) of Construction Soil and Water Management Sub-plan. Appendix B (CMP) of Construction Flora and Fauna Management Sub-plan.	Previously compliant	Construction Monitoring Programs have been prepared with the relevant consultation as identified in the respective reports.	
	Required Construction Monitoring Programs	Relevant government agencies and councils to be consulted for each Construction Monitoring Program																								
(a)	Noise and Vibration	EPA and relevant council(s)																								
(b)	Surface Water	DPE Water, EPA, (Hunter Water if any Hunter Water assets are impacted)																								
(c)	Dredging	DPI Fisheries, EPA																								
(d)	Fauna and Flora	BCD, DCCEEW and relevant council(s)																								
C13	Each CMP must 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 of 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; (j) a consideration of SMART principles; and (k)any consultation to be undertaken in relation to the monitoring programs.	Compliant	Yes	Compliant	Appendix C (CMP) of Noise and Vibration Management Sub-plan. Surface Water and Groundwater Quality Construction Monitoring Program. Appendix G (CMP) of Flora and Fauna Management Sub-plan.	Yes	Compliant	Appendix B (CMP) of Construction Noise and Vibration Management Sub-plan. Appendix B (CMP) of Construction Soil and Water Management Sub-plan. Appendix B (CMP) of Construction Flora and Fauna Management Sub-plan.	Previously compliant	The CMPs addressed the criteria within the sections listed in the following tables in their respective reports: - Table 2-1 in Appendix B (CMP) of Construction Noise and Vibration Management Sub-plan. - Table 2-1 in Appendix B (CMP) of Construction Soil and Water Management Sub-plan. - Table 2-1 in Appendix B (CMP) of Construction Flora and Fauna Management Sub-plan. - Appendix A table in Appendix C (CMP) of Noise and Vibration Management Sub-plan. - Appendix C table in Surface Water and Groundwater Quality Construction Monitoring Program. - Table 2-1 in Appendix G (CMP) of Flora and Fauna Management Sub-plan.																

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C14	The Dredging Monitoring Program must include, but not be limited to: (a) the locations of sensitive aquatic habitats in the vicinity of dredging locations that are potentially sensitive to elevated suspended sediment concentrations (potential impact sites); (b) proposed monitoring locations for impact sites and upstream and downstream of dredging operations; (c) monitoring at a minimum of two locations 50 metres downstream and two locations 50 metres upstream of the dredging working area; (d) proposed representative background monitoring locations; (e) a protocol for developing a scientifically rigorous correlation between turbidity (Nephelometric Turbidity Units - NTU) and total suspended solids (mg/L) to allow for rapid and accurate confirmation of suspended sediment levels in the field to identify any differences between turbidity from dredging and local background turbidity levels; (f) a program for carrying out real-time turbidity monitoring (continuous logging) at the proposed monitoring locations to confirm contributions to total suspended sediment concentrations from dredging; (g) a protocol for visual monitoring to ensure that visual surveillance for turbidity plumes occurs at all times during dredging by a person experienced in identifying turbidity plumes; and (h) evidence that an EPA accredited Site Auditor has reviewed the contamination monitoring aspect of the Dredging Monitoring Program and has issued an Interim Audit Advice advising the Monitoring Program is appropriate should contaminated sediments potentially be extracted or disturbed. Note: If dredging is not proposed, the requirements of Conditions C12(c), C13 and C14 do not apply.	Not Triggered	No	Not Triggered	Audit interview Staging report letter - notification for no dredging.	No	Not Triggered	Audit interview Staging report letter - notification for no dredging.	Previously not triggered	No dredging proposed. Not triggered at this time.	
C15	The CMP must be endorsed by the ER . The endorsed CMP must be 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.	Compliant	Yes	Compliant	Section 1.5 of Appendix C (CMP) of Noise and Vibration Management Sub-Plan. Section 1.4 of Surface Water and Groundwater Quality Construction Monitoring Program. Section 1.4 and Appendix G (CMP) of Flora and Fauna Management Sub-Plan.	Yes	Compliant	Section 1.4 of Appendix B (CMP) of Construction Noise and Vibration Management Sub-plan. Section 1.4 of Appendix B (CMP) of Construction Soil and Water Management Sub-plan. Section 1.4.1 and Appendix B (CMP) of Construction Flora and Fauna Management Sub-plan.	Previously compliant	Construction Monitoring Programs (CMPs) confirm ER endorsement. CMPs submitted with CEMP Sub-plans to Planning Secretary and approved on 09/10/2023 for Northern Package and 13/11/2023 for Southern Package.	
C16	Construction must not commence until the relevant CMPs have been approved by the Planning Secretary and all relevant baseline data for the specific construction activity has been collected.	Compliant	Yes	Compliant	Letter from DPE dated 13/11/2023 granting approval of CEMP and sub-plans. Letter from Transport dated 13/11/2023 notifying updated date of construction commencement of 14 November 2023 for Southern Package. Section 1.4 of Surface Water and Groundwater Quality Construction Monitoring Program. Section 1.4 and Appendix G (CMP) of Flora and Fauna Management Sub-Plan.	Yes	Compliant	Letter notifying date of construction commencement for Northern Package. Letter from DPE dated 9/10/23 granting approval of CEMP and sub-plans. Section 1.4 of Appendix B (CMP) of Construction Noise and Vibration Management Sub-plan. Section 1.4 and section 5 of Appendix B (CMP) of Construction Soil and Water Management Sub-plan. Section 1.4.1 and Appendix B (CMP) of Construction Flora and Fauna Management Sub-plan.	Previously compliant	CEMP and sub plans for Northern Package approval granted on 09/10/23. Northern Package commenced construction 10/10/23. CEMP and sub plans for Southern Package approval granted on 13/11/23. Southern Package commenced construction 14/11/23.	

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C17	The CMPs , 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.	Compliant	Yes	Compliant	Audit interviews Site inspection ER Montly Reports Appendix C (CMP) of Noise and Vibration Management Sub-plan. Appendix G (CMP) of Flora and Fauna Management Sub-plan.	Yes	Compliant	Audit interviews Site inspection ER Monthly Reports Appendix B of Construction Noise and Vibration Management Sub-plan. Appendix B of Construction Soil and Water Management Sub-plan. Appendix B of Construction Flora and Fauna Management Sub-plan.	Previously compliant	On the basis of this audit and the site inspection, CMPs for both packages are being implemented. During the interviews and site visits, there was nothiing raised and no internal non-compliance has been raised in relation to the CMPs.	
C18	The results of the CMPs 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. The Construction Monitoring Report(s) must include an analysis of the results including, but not limited to, exceedances of relevant criteria/targets/goals, reasons for any exceedances, trends in the data, and maximum, minimum and average data results for all monitored parameters. The report must also detail any management and mitigation measures that were implemented to address exceedances during the reporting period. Note : Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be ncorporated into that CEMP Sub-plan .	Compliant	Yes	Compliant	Audit interview Appendix C (CMP) of Noise and Vibration Mangement Sub-plan notes requirement of six-monthly monitoring reports. Surface Water and Groundwater Quality Construction Monitoring Program. CMP notes requirement of six-monthly monitoring reports. Appendix G (CMP) of Flora and Fauna Management Sub-plan. CEMP and CMP note requirement of annual Flora and Fauna Construction Monitoring Report.	Yes	Compliant	Audit interview Construction Noise & Vibration Monitoring Report. CMP notes requirement of six-monthly monitoring reports. Report covers October 2023 - March 2024. Construction Surface Water & Groundwater Monitoring Report. CMP notes requirement of six-monthly monitoring reports.Report covers October 2023 - March 2024. Flora and Fauna CMP (Appendix B of Construction Flora and Fauna Management Sub-plan) notes a requirement for annual monitoring. Report covers October 2023 - September 2024.	Previously not triggered	The Flora and Fauna CMP requires an annual report. The HBB (northern) package commenced construction 10/10/23 and the BH2T (southern) package commenced construction on 23/10/23, so at the time of this audit a full year has not yet passed for the either package. Therefore, the first Construction Monitoring Report is not yet triggered to be issued. Northern package: Construction Noise & Vibration Monitoring Report and Construction Surface Water & Groundwater Monitoring Report have been submitted on the 13 June. Southern package: Noise and Vibration management plans have been submitted. Soil and Water management plans are almost complete and soon to be lodged at the time of the interview. They are included in this audit.	

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Part D - Operational Environmental Management											
OPERATIONAL ENVIRONMENTAL MANAGEMENT											
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.	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	This stage of the project has not yet been reached.	
D2	An OEMP is not required for 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.	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	This stage of the project has not yet been reached.	
D3	The OEMP or evidence of ISO 14000 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.	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	This stage of the project has not yet been reached.	
D4	The OEMP as submitted to the Planning Secretary and amended from time to time or certified EMS or equivalent as agreed with the Planning Secretary, must be implemented for the duration of operation and the OEMP or EMS certification or equivalent as agreed with the Planning Secretary must be made publicly available before the commencement of operation.	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	This stage of the project has not yet been reached.	

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Part E - Key Issue Conditions											
	AIR QUALITY										
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 the CSSI.	Compliant	Yes	Compliant	Site inspection Additional information	Yes	Compliant	Site inspection Addional information	Previously non-compliant	A small amount of dust generation was observed during the site inspections (Northern Package on 19/09/2024 and Southern Package on 17/09/2024) as would be expected given the nature of the site however, the amount of dust was considered to be within an acceptable range given the size, location, and nature of the CSSI. Additional information regarding measures put in place resulting from the previous audit's recommendations have been provided and are considered reasonable and practicable.	
	BIODIVERSITY										
	Unexpected Finds Protocol										
E2	An Unexpected Finds Protocol must be developed for threatened species and threatened ecological communities before the commencement of Work. The Unexpected Finds Protocol must be submitted to the Planning Secretary for approval at least one month before the commencement of Work. Work cannot commence until the unexpected finds protocol is approved by the Planning Secretary. The Unexpected Finds Protocol must be implemented throughout the duration of Work.	Compliant	Yes	Compliant	Audit interview Unexpected Finds Protocol. Letter from DPE granting approval for Unexpected Finds Protocol.	Yes	Compliant	Audit interview Unexpected Finds Protocol. Letter from DPE granting approval for Unexpected Finds Protocol.	Previously compliant	Unexpected Finds Protocol is in place and is being implemented for both packages.	
E3	On the discovery of potential or actual impacts to any threatened species or ecological communities not listed in Condition E7 , all work in the associated location must stop to prevent further impact and the Planning Secretary and BCD notified. Work in the associated location is not to recommence until approval to recommence work in the associated location has been issued by the Planning Secretary in consultation with BCD.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	No biodiversity unexpected finds have occurred in either package. Not triggered at this time.	
	Biodiversity Credits										
E4	Impacts to threatened species and threatened ecological communities exceeding those identified as impacted in the documents listed in Condition A1 must not occur.	Compliant	Yes	Compliant	RFI response Condition E6 Clearing Report, October 2024	Yes	Compliant	RFI response Condition E6 Clearing Report, October 2024	Previously not triggered	No exceedance of threatened species and threatened ecological communities has occurred. Condition E6 Clearing Report demonstrated minimisation of clearing of native vegetation. Particular attention payed to minimisation of clearing of koala habitat and mangroves.	
E5	The clearing of native vegetation, in particular Koala habitat and mangroves, must be minimised with the objective of reducing impacts to threatened species and ecological communities and threatened species habitat.	Compliant	Yes	Compliant	RFI response Condition E6 Clearing Report, October 2024	Yes	Compliant	RFI response Condition E6 Clearing Report, October 2024	Previously compliant	Minimised during preparation of EIS , the concept design, recently finalised detailed design, and implementation of FFMP's. This is demonstrated in the Condition E6 Clearing Report footprint.	
E6	A report on the final construction footprint demonstrating how clearing of native vegetation has been minimised, in particular Koala habitat and mangroves, must be provided to the Planning Secretary, BCD and DCCEEW for information, within 12 months of the commencement of construction.	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	As the construction for the HBB package commenced on 10/10/23, the 12 months since the commencement of construction has not yet lapsed within this audit period.	

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	Table 4: Species Credits to be Retired <table><tr><th>Species</th><th>Loss of habitat (ha) or individuals</th><th>Number of Credits</th></tr><tr><td><i>Eucalyptus parramattensis</i> subsp. <i>decadens</i></td><td>34 plants</td><td>476</td></tr><tr><td><i>Diuris arenaria</i></td><td>206 plants</td><td>15,862</td></tr><tr><td><i>Callistemon linearifolius</i></td><td>159 plants</td><td>2,226</td></tr><tr><td><i>Persicaria elatior</i></td><td>3 plants</td><td>39</td></tr><tr><td>Australasian Bittern</td><td>43.74 ha</td><td>569</td></tr><tr><td>Black Bittern</td><td>51.74 ha</td><td>673</td></tr><tr><td>Koala</td><td>89.1 ha</td><td>2,317</td></tr><tr><td>Wallum Froglet</td><td>3.1 ha</td><td>40</td></tr><tr><td>Mahony's Toadlet</td><td>3.1 ha</td><td>40</td></tr><tr><td colspan="2">TOTAL SPECIES CREDITS</td><td>22,242</td></tr></table> Notes: 1. Credits have been calculated using the Framework for Biodiversity Assessment. 2. Includes credits required under the Environment Protection and Biodiversity Conservation Act 1999.	Species	Loss of habitat (ha) or individuals	Number of Credits	<i>Eucalyptus parramattensis</i> subsp. <i>decadens</i>	34 plants	476	<i>Diuris arenaria</i>	206 plants	15,862	<i>Callistemon linearifolius</i>	159 plants	2,226	<i>Persicaria elatior</i>	3 plants	39	Australasian Bittern	43.74 ha	569	Black Bittern	51.74 ha	673	Koala	89.1 ha	2,317	Wallum Froglet	3.1 ha	40	Mahony's Toadlet	3.1 ha	40	TOTAL SPECIES CREDITS		22,242									
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E8	The Proponent may review and update the ecosystem and species credit requirements in Table 3 and Table 4 to reflect the final construction footprint and resulting extent and type of plant community types to be cleared and the extent of threatened species habitat impacted by the construction of the CSSI. Amendments to the ecosystem and species credit requirements must be undertaken in consultation with and endorsed by BCD and DCCEEW and submitted to the Planning Secretary for approval within six months of determining the final construction footprint. Note: Any changes or updates of the Biodiversity Assessment Report or credit calculator must be undertaken in accordance with the Framework for Biodiversity, the Biobanking Assessment Methodology and any guidelines pertaining to surveying threatened species, including the Threatened Biodiversity Data Collection database.	Not Triggered	No	Not Triggered	RFI response	No	Not Triggered	RFI response	Previously not triggered	At the time of this audit, an application under Condition E8 has not been submitted. It is noted that an application is being prepared in relation to the credit requirements for <i>Callistemon Linearifolius</i> and the next step is to undergo consultation with BCD and DCCEEW on the ammendment to the ecosystem credit requirements. As submission for approval has not yet occurred, this matter is not considered under this audit and Condition E8 is not triggered at this time.																																	
E9	The review and update of credit requirements must be undertaken by: (a)using the vegetation mapping in the M1 Pacific Motorway extension to Raymond Terrace Submissions Report - Appendix E- Revised biodiversity assessment report June 2022; and/or (b)completing verification surveys to confirm the extent, type and condition of threatened species and threatened ecological communities to be impacted.	Not Triggered	No	Not Triggered	RFI response	No	Not Triggered	RFI response	Previously not triggered	Not triggered at this time.																																	
E10	Where verification surveys are required, they must be undertaken in consultation with BCD. Any additional surveys must be undertaken at the time of year when groundcover is most likely to be predominantly native. If verification surveys are not possible at a time when groundcover is most likely to be native, the assumed presence of any relevant species and ecosystems may be applied to conservatively evaluate impacts and associated credit requirements. Note: Any changes or updates of the Biodiversity Assessment Report or credit calculator must be undertaken in accordance with the Framework for Biodiversity, the Biobanking Assessment Methodology and any guidelines pertaining to surveying threatened species, including the Threatened Biodiversity Data Collection database.	Not Triggered	No	Not Triggered	RFI response	No	Not Triggered	RFI response	Previously not triggered	Not triggered at this time.																																	

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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 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.	Non-Compliant	Yes	Non-Compliant	RFI response Letter to DPHI dated 22/04/24 submitting listed items. BioBanking Credit Retirement Report 202404-RT-939, 04 April 2024 BioBanking Credit Retirement Report 202404-RT-940, 09 April 2024	Yes	Non-Compliant	RFI response Letter to DPHI dated 22/04/24 submitting listed items. BioBanking Credit Retirement Report 202404-RT-939, 04 April 2024 BioBanking Credit Retirement Report 202404-RT-940, 09 April 2024	Previously not triggered	The Credit Retirement Reports were submitted to DPHI on 22 April 2024. Copies of the reports were not provided to DCCEEW for information within the one month of receiving them and therefore this condition is non-compliant. The non-compliance was discovered after this audit period and an internal non-compliance (NCR) was raised for this omission on 22/10/2024. Copies of the reports were sent to DCCEEW on 22/10/2024. Recommendation: Reports have been submitted. No further action recommended.	NC-02/03
	Key Fish Habitat										
E12	The Proponent must minimise impacts to Key Fish Habitat (KFH) as defined in the Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update). Residual impacts to KFH must be offset at a ratio of 2:1 habitat offset requirement in accordance with the Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update) and in consultation with DPI Fisheries.	Compliant	Yes	Compliant	RFI response Appendix D Flora and Fauna Protection Procedure Section 7.1.1, within Appendix D Flora and Fauna Management Sub-Plan	No	Not Triggered	Not relevant to Northern Package.	Previously not triggered	Southern Package: The policy and guidelines outlines the mechanism for providing these offsets via either on-ground options or via payment into the fund. Transport are currently pursuing fulfilling all Key Fish Habitat offsets via on-ground offsets and have been in ongoing consultation with DPI Fisheries and DPHI. Management measures to minimise impacts to KFH have been adopted in accordance with condition E16 in consultation with DPI Fisheries and incorporated into the BH2T FFMP CEMP sub-plan. See Appendix D of sub-plan, Flora and Fauna Protection Procedure Section 7.1.1 for the inclusion of these management measures.	
E13	Payment of the habitat offset requirement must be made to the DPI Fish Conservation Trust Fund prior to the commencement of Work that impacts KFH in Hunter River and Purgatory Creek. Note: <i>The monetary offset (i.e. contribution to the Biodiversity Offset Fund for fish habitat) should be the last alternative and only be pursued if all on-ground offset opportunities have been investigated at length and determined to be unachievable.</i>	Not Triggered	No	Not Triggered	RFI response	No	Not Triggered	Not relevant to Northern Package.	Previously not triggered	No payment is required due to negotiations under Condition E12 for on-ground offsets. Therefore, Condition E13 is not triggered at this time.	
E14	The Proponent must submit to the Planning Secretary a receipt confirming payment to the DPI Fish Conservation Trust Fund within one month of making the payment.	Not Triggered	No	Not Triggered	RFI response	No	Not Triggered	Not relevant to Northern Package.	Previously not triggered	Not triggered at this time as per the above.	
	Protection of Estuary Cod in Hunter River										
E15	An inspection must be undertaken by an appropriately qualified and experienced ecologist (and diver) in the 24-hour period prior to the start of Work that may impact potential habitat for Estuary Cod (<i>Epinephelus coioides</i>) to detect for presence of the species. The inspection must be undertaken within the construction footprint and surrounding 100 metres, including in areas of mangroves.	Compliant	Yes	Compliant	RFI response	No	Not Triggered	Not relevant to Northern Package.	Previously not triggered	Southern Package: Prior to the commencement of construction, DPI Fisheries advised that they did not consider that this condition was appropriate due to the low visibility within the Hunter River and Prescence should be assumed for Estuary Cod. See Appendix D Flora and Fauna Protection Procedure Section 7.1.1 where this detail has been included in the FFMP CEMP sub-plan. This plan was initially approved 13 November 2023 prior to the commencement of construction. Please note that this correspondence took place outside of the audit reporting period.	

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E21	The design and landscape outcomes of the CSSI must be: (a)informed by Appendix O of the Environmental Impact Statement as listed in Condition A1(a) , including but not limited to the objectives and design principles, requirements, and opportunities; (b)prepared in consultation with the community (including the landowners whose visual amenity is directly or indirectly impacted and businesses or a representative of the businesses), LALCs, RAPs and relevant council(s); and (c)reviewed by TfNSW's Centre for Urban Design, with a focus on maximising the aesthetics of the viaduct / bridge over the Hunter River and floodplain;	Compliant	Yes	Compliant	Design and Landscape Plan.	Yes	Compliant	Chapter 3.2 and Chapter 1.6 of Design and Landscape Plan.	Previously compliant	(a) Requirements incorporated into Design and Landscape Plans. (b) Consultation with community completed and is documented in the respective Design and Landscape Plans. (c) Document reviewed by TfNSW Centre for Urban Design (as noted in previous audit).	
E22	Operational noise barriers must be designed to minimise visual and amenity impacts. Opportunities should be explored to incorporate aesthetics, wayfinding and public art into the design of the noise barriers.	Compliant	Yes	Compliant	Chapter 4.4 and Chapter 6.7 of Design and Landscape Plan.	No	Not Triggered	Design and Landscape Plan notes that noise barriers are not applicable to the Northern Package.	Previously not triggered	Not applicable to Northern Package. Noise barriers addressed in Design and Landscape Plan of Southern Package.	
	Design and Landscape Plan										
E23	A Design and Landscape Plan (DLP) must be prepared to document and illustrate the permanent built works and landscape design of the CSSI and how these works are to be maintained. The DLP must inform the final design of the CSSI and give effect to the outcomes and commitments documented in by Condition A1 . The Plan does not apply to work which, for technical, engineering, or ecological requirements, or other requirements as agreed by the Planning Secretary, does not allow for alternative design outcomes.	Compliant	Yes	Compliant	Design and Landscape Plan	Yes	Compliant	Design and Landscape Plan	Previously not triggered	Design and Landscape plans of the respective packages meet this condition and has been approved by DPHI.	
E24	The DLP must be: (a)prepared by a suitably qualified and experienced person(s) in urban and landscape design and (where required) bush regeneration; (b)prepared in consultation with relevant councils 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 DLP applies; and (d)implemented during construction and operation of the CSSI unless that asset has been transferred to the relevant authority, or equivalent and they have agreed that implementation of the DLP is not required for that asset. Note: The DLP 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	Compliant	Yes	Compliant	Audit interview Appoval letter from DPHI dated 14/05/2024. (a) Chapter 1.3 of Design and Landscape Plan. (b) Chapter 1.6 of Design and Landscape Plan. (c) Approval letter from Planning Secretary. (d) Chapter 1.6 of Design and Landscape Plan.	Yes	Compliant	Audit interview Appoval letter from DPHI dated 10/07/2024. (a) Chapter 1.3 of Design and Landscape Plan. (b) Chapter 1.6 of Design and Landscape Plan. (c) Approval letter from Planning Secretary. (d) Chapter 1.6 of Design and Landscape Plan.	Previously not triggered	Northern Package: Approval received from DPHI dated 11 July 2024. Southern Package: Approval received from DPHI dated 14 May 2024.	
E25	The DLP must document how the following matters have been considered in the design and landscaping of the project: (a)the requirements of Conditions E20 to E22 ; (b)demonstrate compliance with Bridge Aesthetics: Design Guidelines to improve appearance of bridges in NSW (Transport for NSW, 2019); (c)demonstrated integration of Crime Prevention Through Environmental Design principles; and (d)Designing with Country and the principles and objectives of the draft Connecting with Country Framework.	Compliant	Yes	Compliant	Design and Landscape Plan (a) Chapters 1.6, 3.2 , and 6.7 (b) Chapter 6.4 (c) Chapter 6.14 (d) Chapter 4.2	Yes	Compliant	Design and Landscape Plan (a) Chapter 1.6 and 3.2, E20 and E22 N/A (b) Chapter 6.3 (c) Chapter 6.7 (d) Chapter 4.2	Previously not triggered	Design and Landscape Plans for respective packages address condition and has been approved by DPHI. .	

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E36	Updated flood modelling must be undertaken for a range of flood events (including the 20%, 10%, 5% AEP and 1% AEP) for the CSSI and include the upstream direction along the Hunter River, Paterson River and Williams River to define the full extent of afflux levels. The updated assessment must be consistent with the Australian Rainfall and Runoff – A Guide to Flood Estimation (GeoScience Australia, 2019). <i>Note: The intent of this condition is to ensure the modelling and results of the CSSI are updated to include the Paterson River and Williams River to understand the full extent of the CSSI's afflux impacts.</i>	Compliant	Yes	Compliant	Section 2 and 3 of Flood Design Report, M1 Pacific Motorway extension to Raymond Terrace, June 2024	Yes	Compliant	Section 2 and 3 of Flood Design Report, M1 Pacific Motorway extension to Raymond Terrace, June 2024	Previously not triggered	As per Flood Design Report, the M1 Pacific Motorway extension to Raymond Terrace updated flood model was developed for the Project which extended upstream of the previous modelling on the Hunter River, Paterson River, and Williams River such that the afflux is contained within the new model extents.	
E37	The results of the updated flood modelling must be detailed in a Flood Design Report . The Report must be reviewed and endorsed by a suitably qualified and experienced hydrologist, who is independent of the CSSI's design and construction and the persons/organisation who prepared the Flood Design Report .	Compliant	Yes	Compliant	Flood Design Report, M1 Pacific Motorway extension to Raymond Terrace, June 2024 "P:\GEO05003 TfNSW M12RT Transport Independent Audit\Incoming\Data transfer 20240911\M12RT Flood Design Report_Final_240628.pdf"	Yes	Compliant	Flood Design Report, M1 Pacific Motorway extension to Raymond Terrace, June 2024 "P:\GEO05003 TfNSW M12RT Transport Independent Audit\Incoming\Data transfer 20240911\M12RT Flood Design Report_Final_240628.pdf"	Previously not triggered	Results contained in Flood Design Report. Flood Design Report notes the report was reviewed by an independent suitably qualified and experienced hydrologist.	
E38	The Flood Design Report must be submitted to the Planning Secretary for information within 6 months from the commencement of construction. The independent reviewer's endorsement must be submitted with the report.	Compliant	Yes	Compliant	Letter from TfNSW dated 28/06/2024 submitting the Flood Design Report in accordance with Condition E38 and previously approved extensions of time. Letter from DPHI dated 19/07/2024 acknowledging receipt of the Flood Design Report.	Yes	Compliant	Letter from TfNSW dated 28/06/2024 submitting the Flood Design Report in accordance with Condition E38 and previously approved extensions of time. Letter from DPHI dated 19/07/2024 acknowledging receipt of the Flood Design Report.	Previously not triggered	Letter from DPHI acknowledges receipt of the Flood Design Report and the letter from TfNSW notes the extensions of time approved to meet this condition.	
	Information Sharing										
E39	The relevant councils, BCD, DPE Water and the SES must be notified in writing by the Proponent that flood information (including flood reports, models and geographic information system outputs, and work as executed information from a qualified surveyor certifying finished ground levels and the floor levels of all buildings surveyed in accordance with Condition E35) is available for their request. The notification must occur no later than one month following the commencement of operation. Information requested by a relevant council, BCD, DPE Water or the SES must be provided within three months of the request. <i>Note: Flood information must be shared at no cost and by way of a perpetual, irrevocable, non-exclusive license.</i>	Not Triggered	No	Not Triggered	Email dated 11/09/24 from Transport to GeoLINK responding to information request.	No	Not Triggered	Email dated 11/09/24 from Transport to GeoLINK responding to information request.	Previously not triggered	Email from Transport dated 11/09/2024 stated that flood model information will be provided closer to operation. Therefore, this condition is not triggered at this time.	
	Flood Mitigation Report										
E40	A Flood Mitigation Report must be prepared which: (a)sets out the agreed mitigation measures at properties where the QDLs set out in Condition E33 (a), (b), (c), (d) and (e) cannot be met, including a schedule for implementing the agreed measures at each impacted property; and (b)addresses how the QDL(s) set out in Condition E33 (f) and (g) have been addressed. The Report must be prepared within three months following agreement having been reached with all affected landowners or prior to operation of the CSSI, which ever is the earliest. The Report must be provided to the Planning Secretary and relevant council(s) upon request, and within two weeks of receiving the request.	Not Triggered	No	Not Triggered	Email dated 11/09/24 from Transport to GeoLINK responding to information request.	No	Not Triggered	Email dated 11/09/24 from Transport to GeoLINK responding to information request.	Previously not triggered	Email from Transport dated 11/09/2024 stated that consultation on operational impact is expected to commence before February 2025, which is required prior to the preparation of the Flood Mitigation Report. Therefore, this condition is not triggered at this time.	
	Independent Flood Impact Advisory Panel										
E41	Should an agreement not be reached in accordance with Condition E34 , either the affected landowner or the Proponent may, at any time, refer unresolved matters on material property impacts resulting from flooding exceeding the QDLs in Condition E33 , to an Independent Flood Impact Advisory Panel (IFIAP) for expert advice and recommendations to address the impacts.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	No disagreements during the period since the last audit. Not triggered at this time.	

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E42	The Proponent must establish an IFIAP before undertaking work that has the potential to not meet the QDL(s) in Condition E33 . The IFIAP must comprise of: (a)an independent chairperson who is experienced in facilitation or mediation and understands regulatory requirements for State significant projects; and (b)independent hydrological, engineering and agricultural experts as relevant. In selecting the appointments of the IFIAP the Proponent must have regard to the Post Approval Guidance for Infrastructure Projects: Seeking Approval from the Department for the Appointment of Independent Experts (DPIE, 2020). The individuals on the IFIAP must be approved by the Planning Secretary in accordance with Condition E44 . All costs incurred in establishing and implementing the IFIAP must be borne by the Proponent regardless of which party makes a referral to the IFIAP .	Compliant	Yes	Compliant	Previous audit (a) Letter from DPHI dated 25/05/23 approving Tim O'Hearn as Independent Chair of IFIAP. (b) Letter from DPHI dated 07/06/23 re conditions E42(b) and E44.	Yes	Compliant	Previous audit (a) Letter from DPHI dated 25/05/23 approving Tim O'Hearn as Independent Chair of IFIAP. (b) Letter from DPHI dated 07/06/23 re conditions E42(b) and E44.	Previously compliant	As per the previous audit, it was noted that: (a) Tim O'Hearn approved as Independent Chair of IFAP under this condition and E44. (b) Grantley Smith approved as Independent Flood Impact Hydrologist under this condition and E44.	
E43	The Proponent must prepare Terms of Reference for the IFIAP which address the following: (a)details of the panel membership; (b)role of chair; (c)panel management; (d)frequency of meetings and timely provision of expert advice and recommendations; and (e)cessation arrangements.	Compliant	Yes	Compliant	Independent Flood Impact Advisory Panel Terms of Reference report prepared by TfNSW December 2023	Yes	Compliant	Independent Flood Impact Advisory Panel Terms of Reference report prepared by TfNSW December 2023	Previously compliant	As noted in previous audit: Terms of Reference for the IFIAP covering (a) to (e) submitted to DPHI on 08/11/23 Transport received a request for information from DPHI on 30/11/23 and responded on 12/12/23 with minor updates	
E44	The members and Terms of Reference of the IFIAP must be approved by the Planning Secretary prior to the commencement of Work that has the potential to not meet the QDL(s). The approved Terms of Reference for the IFIAP must be endorsed by the IFIAP following the first meeting. The Terms of Reference must be made publicly available on the website required by Condition B12 within one month of the establishment of the IFIAP .	Compliant	Yes	Compliant	Audit interview Project website. Letter from DPHI dated 25/05/23. Letter from DPHI dated 07/06/23.	Yes	Compliant	Audit interview Project website. Letter from DPHI dated 25/05/23. Letter from DPHI dated 07/06/23.	Previously compliant	Tim O'Hearn approved as Independent Chair of IFAP under this condition and Condition E42(a). Grantley Smith approved as Independent Flood Impact Hydrologist under this condition and Condition E42(b). Remains compliant.	
E45	Any changes requested by the IFIAP to the approved Terms of Reference must be submitted to the Planning Secretary for approval within two weeks of drafting the changes.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	No changes requested. Not triggered at this time.	
E46	The IFIAP will be responsible for independently: (a)investigating landowner concerns; (b)considering supporting documentation / information provided by the Proponent and landowner; (c)considering the appropriateness of modelling used to estimate material impacts associated with the QDL(s) identified under Condition E33 not being met and floor level survey(s) results; (d)considering whether reasonable and practical steps have been taken to mitigate flood impacts; (e)considering if agreed measures (between the Proponent and landowners) have been implemented to an appropriate standard; (f)making recommendations about the material impact from not meeting the QDLs identified under Condition E33 on the use of affected land; and (g)preparing a report which contains reasonable recommendations about practicable design changes and/or mitigation and management measures to resolve material flooding impacts.	Compliant	Yes	Compliant	Independent Flood Impact Advisory Panel Terms of Reference report dated December 2023.	Yes	Compliant	Independent Flood Impact Advisory Panel Terms of Reference report dated December 2023.	Previously compliant	Independent Flood Impact Advisory Panel Terms of Reference report dated December 2023 covers items (a) to (g)	
E47	The Proponent must consider the IFIAP recommendations under Condition E46 and document which recommendation(s) will be implemented. Where the Proponent does not implement a particular recommendation(s) and the landowner is not in agreement of the final mitigation measure(s), the Proponent must justify why the recommendation(s) is not being implemented. This justification must be made publicly available by the Proponent on the website required under Condition B12 .	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	Not triggered.	
E48	A copy of any recommendation provided by the IFIAP under Condition E46 and evidence of the Proponent's implementation of this recommendation or other agreement reached with the landowner following the recommendations of the IFIAP must be provided to the Planning Secretary upon request and within one week of receiving the request.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	Not triggered.	

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E49	The flood mitigation measures identified in Condition E40 or as amended by Conditions E46(g) and E47 , must be implemented.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	Not triggered.	
	Ancillary Facilities										
E50	The location, size and height of AS6 must be redesigned to minimise flood afflux impacts to the Main North Rail Line in consultation with the operator of the rail track. Note : A change in the location of the ancillary facility may require further assessment and approval under the EP&A Act.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	N/A to Northern Package	Previously not triggered	AS6 ancillary site was not used and removed from the project scope. Not triggered.	
	HERITAGE										
	Aboriginal Cultural Heritage										
E51	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.	Compliant	Yes	Compliant	Audit interview Site inspection Section 6.1.2 of Aboriginal Heritage Management Sub-plan.	Yes	Compliant	Audit interview Site inspection Section 6.3 of Construction Cultural Heritage Management Sub-plan.	Previously compliant	AHMP outlines the correct methods to handle ACH. Works have been consistent with these plans. Reasonable steps are being taken to not harm, modify or otherwise impact Aboriginal objects or places of cultural significance.	
E52	Aboriginal Cultural Heritage Awareness Training/induction must be developed in conjunction with RAPs and an appropriately qualified archaeologist who is experienced in Aboriginal cultural heritage. The training must be implemented during site inductions.	Compliant	Yes	Compliant	Audit interview Aboriginal Heritage Management Sub-plan	Yes	Compliant	Audit interview Construction Cultural Heritage Management Sub-plan	Previously compliant	As noted in the previous audit, Aboriginal Cultural Heritage Awareness Training/Induction developed by TfNSW in consultation with the RAPs Aboriginal Cultural Heritage Awareness training/induction for Northern Package mentioned in Section 7.2.1 of HBB Construction Cultural Heritage Management Sub-plan. Aboriginal Cultural Heritage Awareness training/induction for the Southern Package mentioned in Section 6.1.2 of HB2T Aboriginal Heritage Management Sub-plan.	
E53	RAPs must be kept regularly informed about the CSSI. The RAPs must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the CSSI. Note : Details regarding ongoing engagement with RAP's must be provided in the Communication Strategy required under Condition B1 .	Compliant	Yes	Compliant	Sept 2024-M12RT Project Update (posted on website) Audit interview Project website https://media.caapp.com.au/pdf/319hqy/9a77bc0f-903f-465b-b40c-3a4c63080f83/Sept%202024%20-%20M12RT%20Project%20Update.pdf Section 6.1.2 of Aboriginal Heritage Management Sub-plan. Communication Strategy.	Yes	Compliant	Sept 2024-M12RT Project Update (posted on website) Audit interview Project website https://media.caapp.com.au/pdf/319hqy/9a77bc0f-903f-465b-b40c-3a4c63080f83/Sept%202024%20-%20M12RT%20Project%20Update.pdf Section 6.3 of Construction Cultural Heritage Management Sub-plan. Communication Strategy.	Previously compliant	The September 2024 project updated posted on the website was sighted as an example showing information being provided on the Aboriginal Heritage of the project and provides information on contacting the project. RAPs are all on a community list which is emailed out, consultation manager to be sent to us.	

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E54	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 and experienced 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 provided with a copy of the report(s) and given a minimum of 60 days to consider the report(s) and provide comments before the report(s) is finalised. The final report(s) must be provided to the Planning Secretary, Heritage NSW, relevant councils, the RAPs and local libraries within 12 months of the completion of the Aboriginal archaeological excavations (both test and salvage). <i>Note: To ensure cultural knowledge is protected a redacted Aboriginal Cultural Heritage Excavation Report(s) may be provided subject to the agreement of RAPs to publicly share cultural knowledge.</i>	Not Triggered	No	Not Triggered	Letter from DPHI dated 13/06/24 granting extension for submission of the Aboriginal Cultural Heritage Excavation Report.	No	Not Triggered	Letter from DPHI dated 13/06/24 granting extension for submission of the Aboriginal Cultural Heritage Excavation Report.	Previously not triggered	A request for a time extension was submitted and approved to postpone the required date to 29 May 2026 for the submission.	
E55	Where previously unidentified Aboriginal objects or places of cultural significance are discovered, all work must immediately stop in the vicinity of the affected area.	Compliant	Yes	Compliant	Section 4 of Unexpected Heritage Finds and Human Remains Procedure	Yes	Compliant	Section 4 of Unexpected Heritage Finds and Human Remains Procedure	Previously not triggered	Stop works included in Unexpected Heritage Finds and Human Remains Procedure.	
E56	Work potentially affecting the previously unidentified objects and places must not recommence until: (a) Heritage NSW and each of the RAPs have been consulted on the proposed management of the Aboriginal objects or places of cultural significance that are identified; and (b) Heritage NSW has advised that works can resume. As part of the consultation with the RAPs, the RAPs must be given the opportunity for further site investigations and cultural salvage. The measures to consider and manage this process must be specified in the Unexpected Heritage Finds and Human Remains Procedure required by Condition E61 and include registration in the Aboriginal Heritage Information Management System (AHIMS).	Not Triggered	No	Not Triggered	RFI response Section 4 and 5 of Unexpected Heritage Finds and Human Remains Procedure.	No	Not Triggered	RFI response Section 4 and 5 of Unexpected Heritage Finds and Human Remains Procedure.	Previously not triggered	Northern Package: No unidentified objects or places have been discovered within this audit period. Southern Package: No unidentified objects or places have been discovered within this audit period.	
	Non-Aboriginal Heritage										
E57	Archival photographic digital recording must be undertaken for all listed heritage items and sites assessed to have heritage significance which will be affected by the CSSI. The recording must be undertaken prior to the commencement of Work which may impact the items and sites. The 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). The recordings must include buildings, structures and landscape features and detailed maps showing their location. A copy must be provided to Heritage NSW and the relevant council(s) and submitted as part of the Heritage Report required by Condition E59 .	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously non-compliant	No archival photographic recording required in the period since the last audit. Not triggered.	
E58	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.	Compliant	Yes	Compliant	Previous audit director.	Yes	Compliant	Previous audit	Previously compliant	Compliant as per previous audit.	

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E67	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 Condition E64, and is not subject to an EPL. The Protocol must be prepared in consultation with the ER. The Protocol must provide: (a) identification of low, medium and high risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: (i) the ER reviews all proposed out-of-hours activities and confirms their risk levels, (ii) low and medium risk activities can be approved by the ER, and (iii) high risk activities 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 E77. 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 all approved out-of-hours work and notification to the Planning Secretary of approved low risk out-of-hours works.	Compliant	Yes	Compliant	M12RT Out of Hours Work Protocol for Works not subject to an EPL, Rev 5 June 2023 Letter from DPHI dated 18/07/23 approving Out of Hours Work Protocol for Works not subject to an EPL.	Yes	Compliant	M12RT Out of Hours Work Protocol for Works not subject to an EPL, Rev 5 June 2023 Letter from DPHI dated 18/07/23 approving Out of Hours Work Protocol for Works not subject to an EPL.	Previously compliant	(a) Covered in Section 4.4 (b) Covered in Section 4 (c) Covered in Section 5 (d) Section 5.4 and 5.5 (e) Section 6 No OOHWs have occurred outside of EPL.	
	The Protocol must be submitted to and approved by the Planning Secretary before commencement of the out-of-hours work and implemented during Work which is outside the hours defined in Condition E64 and not subject to an EPL. Adherence to the Protocol does not apply if the requirements of Condition E66 (a) or (b) are met. Notes: 1. <i>Conditions E78 and E79 provide additional parameters to be considered.</i> 2. <i>If the Work is subject to an EPL and the EPA does not endorse extended hours as part of the EPL, the extended hours cannot be considered under this Protocol.</i>										
	Noise Management Levels and Vibration Criteria										
E68	Mitigation measures must be implemented with the aim of achieving the following 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 Ancillary Site Establishment Management Plan required by Condition A17 or Noise and Vibration CEMP Sub-plan required by Condition C5, as applicable. Note: <i>The ICNG identifies ‘particularly annoying’ activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction NML.</i>	Compliant	Yes	Compliant	Audit interview Noise and Vibration Management Sub-plan. Appendix C (Noise and Vibration Construction Monitoring Program) of Noise and Vibration Management Sub-plan.	Yes	Compliant	Audit interview Construction Noise and Vibration Management Sub-plan. Appendix B (Construction Noise and Vibration Monitoring Program) of Construction Noise and Vibration Management Sub-plan. 2 x Monitoring data for OoHW for HBB - Asphaltting at Gate 8 06/02/2024	Previously compliant	(a) to (e) identified and provided in CVMPs for both packages. Northern Package: No events required to use repsite, no incidents where the noise mitigaition measures where not implemented. Main one was the traffic switch OOHW approval. Southern Package: No events or incidents of not implementing the mitigation measures outlined in the OOHW and Sub-plan for noise and vibration. No NCRs issued for noise or vibration.	
E69	Mitigation measures must be applied when either of 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 as required by Condition E67.	Compliant	Yes	Compliant	Out of Hours Work Protocol Black Hill to Tomago Noise and Vibration Management Sub-plan.	Yes	Compliant	Out of Hours Work Protocol Heatherbrae Bypass Construction Noise and Vibration Management Sub-plan	Previously compliant	Northern Package: Section 4.1 of the Out of Hours Work Protocol and Section 8 of Construction Noise and Vibration Management Sub-plan Southern Package: Section 4.1 of the Out of Hours Work Protocol and Section 7.2 of Noise and Vibration Management Sub-plan.	

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E89	An ONR must be prepared to confirm noise control measures that would be implemented for the operation of the CSSI. The ONR must be prepared in consultation with relevant council(s) and the EPA and must: (a) include the data collected in Condition E87 or E88; (b) confirm the appropriate operational noise objectives and levels for surrounding development, including existing sensitive land use(s); (c) 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, based on noise monitoring undertaken at appropriately identified noise catchment areas surrounding the facilities; (d) confirm traffic inputs, including consideration of current traffic forecasting model data (including data obtained from the relevant local councils on adjacent traffic-generating developments (such as the Black Hill development area)); (e) confirm the operational noise impacts at sensitive land use(s) based on the final design of the CSSI. Confirmation must be based on an appropriately calibrated noise model and include operational daytime LAeq,15 hour and night-time LAeq, 9-hour traffic noise contours and address the following - (i) impacts arising from traffic control devices, (ii) impacts arising from specific road design features such as but not limited to an interchange, ramps, horizontal and vertical alignment of the road, and (iii) the ranking of maximum noise level impacts on sensitive land use(s) affected by (i) and (ii) above for the prioritisation of noise mitigation measures; (f) identify sensitive land use(s) where noise levels are predicted to exceed the requirements of the NSW Road Noise Policy (DECCW, 2011);	Compliant	Yes	Compliant	Operational Noise Review.	No	Not Triggered	Audit interview Letter from DPHI dated 22/04/24 granting alternative timeframes for Heatherbrae Bypass Operational Noise Review.	Previously not triggered	Northern Package: Has not yet been submitted. DPHI approved alternative timeframes. Southern Package: Approved 22 May 2024.	
	(g) identify all operational noise mitigation measures to be implemented including location, type and timing of mitigation measures and how the final suite of mitigation measures will achieve the requirements of E89(b) with a focus on - (i) road design and traffic management, (ii) source control and design, (iii) in-corridor noise barriers/mounds (contingency factors need to adopt safety factors), (iv) at-property acoustic treatments or localised barriers/mounds (if relevant), and (v) 'best practice' achievable noise and vibration outcomes; (h) include a consultation strategy to seek feedback from directly affected landowners on the noise measures; and (i) procedures for the management of operational noise complaints, including investigation and monitoring (subject to complainant agreement). The ONR must be submitted to the Planning Secretary for information prior to implementing at property acoustic treatments, unless an alternate timeframe is agreed with the Planning Secretary. The identified noise control measures must be implemented and the ONR must be made publicly available following its submission to the Planning Secretary for information. Note: The design of noise barriers and the like must be undertaken in consultation with the community as part of the DLP required under Conditions E23 to E27.										
E90	The ONR required by Condition E89 must be prepared within 12 months of the commencement of construction, unless otherwise agreed with the Planning Secretary.	Compliant	Yes	Compliant	Operational Noise Review.	No	Not Triggered	Audit interview Letter from DPHI dated 22/04/24 granting alternative timeframes for Heatherbrae Bypass Operational Noise Review.	Previously not triggered	Northern Package had alternative timeframes approved by DPHI. Prior to operation rather than within 12 months of construction start. Operational Noise Review has been prepared for Southern Package.	

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E98	An ONCR must be prepared to document the findings of the operational noise monitoring carried out under Condition E96. The ONCR must include the following: (a) an assessment of compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under Condition E89; (b) an assessment of compliance with the operational noise levels in terms of criteria, noise goals and trigger levels established in the NSW Road Noise Policy (DECCW, 2011), (c) details of any complaints (and the resolution of these complaints) and enquiries received in relation to operational noise generated by the CSSI between the date of commencement of operation and the date the report was prepared; (d) an assessment of noise mitigation trigger levels based on the measured change in noise between the without project and with project scenarios and if necessary, reassessment of the eligibility of impacted sensitive receivers for noise mitigation; (e) an assessment of the performance and effectiveness of applied noise mitigation measures together with a review and if necessary, reassessment of mitigation measures; (f) identification of additional measures to those identified in the review of noise mitigation measures required by Condition E89, that are to be implemented with the objective of meeting the operational noise levels in terms of noise assessment criteria set out in the NSW Road Noise Policy (DECCW, 2011); and (g) identification of when these additional measures are to be implemented and how their effectiveness is to be measured and reported to the Planning Secretary and the EPA.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	Not triggered.	
	The ONCR must be prepared in accordance with the Model Validation Guideline (RMS, 16 May 2018 Version 1.1). The ONCR must be submitted to the Planning Secretary and the EPA for information within 90 days of completing the operational noise monitoring and made publicly available in accordance with Condition B12 upon submission to the Planning Secretary. The ONCR must be reviewed and verified by the independent and experienced noise specialist engaged under Condition E86. The verification must be submitted to the Planning Secretary and EPA with the report.										
E99	Where the actual or verified operational traffic data (including the average daily traffic volume, vehicle composition and speed) exceeds the predictions in the documents listed in Condition A1 and triggers increases in operational traffic noise levels and the number of properties eligible for noise mitigation measures, the ONR required in Condition E89 must be re-evaluated and revised. The independent and experienced noise specialist must review and verify the updated ONR. The updated ONR must be provided to the Planning Secretary for information within three months of completion of the 12 month operational noise validation required under Condition E95. A copy of the noise specialist's verification must be submitted with the updated ONR. Additional mitigation measures identified in the updated ONR must be implemented within 12 months of completion of the 12-month operational noise validation required under Condition E95, unless an alternative timeframe for implementation is agreed with the impacted residences.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	Not triggered.	
	Maintenance of Low Noise Road Pavements										
E100	Low noise road pavements must be maintained to ensure that they continue to contribute to the compliance of mitigated noise levels identified in the ONR (Condition E89) throughout the life of the project.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	Not triggered.	
	PROPERTY AND LANDUSE										
E101	The Proponent must identify the utilities and services (hereafter “services”) potentially affected by Work 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 the CSSI are avoided where practical and where unavoidable, customers are advised in accordance with the Communication Strategy required under Condition B1.	Compliant	Yes	Compliant	Previous audit Communication Strategy.	Yes	Compliant	Previous audit Communication Strategy.	Previously compliant	As per the previous audit, the communication strategy addresses consultation with utilities and services providers.	

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E102	The Proponent must liaise with DPI Fisheries, Local Land Services and DPE Water (Hunter Valley Flood Mitigation Scheme team) six months prior to the disposal of the surplus land identified in Appendix B , to ascertain whether these agencies have interest in purchasing the land. <i>Note : DPI Fisheries, Local Land Services and DPE Water (Hunter Valley Flood Mitigation Scheme team) have all demonstrated an interest in restoring tidal flows and rehabilitating floodplain land in this area resulting in rehabilitation of saltmarsh and the restoration of a gradational wetland.</i>	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	Not triggered.	
	Condition Surveys										
E103	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.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previoulsy not triggered	Not triggered.	
E104	Where pre-construction surveys have been undertaken in accordance with Condition E103 , 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.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview		Not triggered.	
E105	Where damage has been determined to occur as a result 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.	Not Triggered	No	Not Triggered	Audit interview	No	Not Triggered	Audit interview	Previously not triggered	Not triggered.	
	Property Access										
E106	Access to all utilities must be maintained during Work, unless otherwise agreed with the relevant utility owner.	Compliant	Yes	Compliant	Audit interview	Yes	Compliant	Audit interview	Previously compliant	Northern Package: Access has been maintained. There have been no complaints or letters issuing from utilities. Hunter Water has been able to access their infrastructure Southern Package: All access has been maintained. No complaints, incidents or events has been recorded.	
E107	The Proponent must maintain access to properties during the entirety of Work unless an alternative access is agreed in writing with the landowner(s) whose access is impacted by the CSSI works.	Compliant	Yes	Compliant	Audit interview	Yes	Compliant	Audit interview	Previously compliant	Northern Package: No surrounding properties need to access through the project for access. IE: Wethertex has been able to access their land and property. Southern Package: Some alternative access has been provided and interview confirmed there is a signed agreement where relevant.	
E108	Where construction of the CSSI restricts a property's access to a public road, the Proponent must, until their primary access is reinstated, provide the property with temporary alternate access to an agreed road decided through consultation with the landowner, unless otherwise agreed with the landowner.	Compliant	Yes	Compliant	Audit interview	Yes	Compliant	Audit interview	Previously compliant	No restrictions during this audit period.	

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E109	Any property access physically affected by the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner. Property access must be reinstated within one month of the work that physically affected the access is completed or in any other timeframe agreed with the landowner.	Compliant	Yes	Compliant	Audit interview	Yes	Compliant	Audit interview	Previously compliant	No affected property access during this audit period.	
E110	During construction, all reasonably practicable measures must be implemented to maintain pedestrian, cyclist 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 avoided, alternative pedestrian, cyclist and vehicular access, and parking arrangements must be developed in consultation with affected businesses and landowners and implemented before the disruption. Adequate signage and directions to businesses must be provided before, and for the duration of, any disruption.	Compliant	Yes	Compliant	RFI response	Yes	Compliant	Audit interview	Previously compliant	Northern Package: SW has consulted with cycle groups. Cycling may be restricted as the project progresses, with a potential detour being set up. Nothing has occurred during this audit period. Southern Package: Access has been maintained at all times for properties and businesses during the audit period. During the short term closure of Woodlands Close, an alternative access to link the Aurizon Access Road to Woodlands Close was constructed.	
	Agricultural Operations										
E111	The CSSI must be delivered in a manner that minimises intrusion, as far as reasonably practicable, and disruption to agricultural operations/activities in surrounding properties (including the Evergreen Stud Farm), unless otherwise agreed by the landowner.	Compliant	Yes	Compliant	RFI response Communication Strategy, January 2023	No	Not Triggered	Audit interview	Previously compliant	Northern Package: No agricultural operations in the northern package area. Not triggered. Southern Package: Works are completed as far as reasonably practical to minimise intrusion. No issues have occurred to date. See Section 6 of M12RT Communications Strategy for consultation approach with affected landowners (if triggered).	
E112	Where the viability of existing agricultural operations will be impacted by the CSSI and has not been redressed through the Land Acquisition (Just Terms Compensation) Act 1991, the Proponent must, at the request of the landowner, employ a suitably qualified and experienced independent agricultural expert to assist in identifying management measures to address the identified impacts. Where the Proponent has commenced the requirements of this condition, prior to determination of the CSSI, the Proponent may rely on these activities to fulfil this requirement.	Not Triggered	No	Not Triggered	RFI response	No	Not Triggered	Audit interview	Previously not triggered	Northern Package: Not applicable. Not triggered. Southern Package: Not triggered during this audit period.	
	SOCIAL										
E113	Commitments, programs, timings and the effectiveness for achieving the following matters must be publicly reported prior to commencing construction and updated and publicly reported on a three-monthly basis consistent with the requirements of Condition B12 : (a)the objectives for economic participation and capacity building of Aboriginal people through training, apprenticeships, employment, and business participation consistent with the Aboriginal Procurement Policy (NSW Treasury, 2021); (b) diversity and gender equity in the construction workforce, including consistency with the NSW Women’s Strategy 2018-2022 Advancing economic and social equality in NSW (NSW Government, 2018); and (c) improvements in community wellbeing (e.g. sponsorships and donations programs).	Compliant	Yes	Compliant	Project website M1 Pacific Motorway extension to Raymond Terrace Workforce development, Aboriginal participation and community improvement reports - May 2024 and Aug 2024	Yes	Compliant	Project website M1 Pacific Motorway extension to Raymond Terrace Workforce development, Aboriginal participation and community improvement reports - May 2024 and Aug 2024	Previously compliant	Aboriginal participation and community improvement reports for May 2024 and Aug 2024 are available on the project website, meeting the three-monthly basis reporting requirement.	
E114	All reasonable measures must be taken to avoid impacts to the Giant Fig Tree on the western bank of the Hunter River near AHIMS ID: 38-4-1810 site (as shown in the documents listed in Condition A1 . If impact to the tree cannot be avoided, the removal of the tree must be undertaken in accordance with the Transport Roadside Tribute Policy (Roads and Maritime, 2016).	Compliant	Yes	Compliant	Previous audit CEMP Appendix I BH2T Aboriginal Heritage Management Sub-plan, Rev 0 November 2023, Section 6.2	No	Not Triggered	N/A to Northern Package	Previously compliant	As per the previous audit, design for this section taking into account the need to avoid impacts where possible on the fig tree.	
	SOILS										
E115	Before the commencement of any Work, erosion and sediment controls must be installed and maintained. When implementing such controls, any relevant guidance in the Managing Urban Stormwater, Soils and Construction Vol.1 (Landcom, 2004) and Vol. 2D Main Road Construction (DECC, 2008) must be considered.	Compliant	Yes	Compliant	Site inspection	Yes	Compliant	Site inspection	Previously compliant	SED controls were checked during site inspection and appeared consistent with the BlueBook.	

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E116	Scour protection must be provided around piers in close proximity to the Hunter River levee(s) to minimise erosion during flood events.	Not Triggered	No	Not Triggered	RFI response	No	Not Triggered	N/A to Northern Package	Previously not triggered	Southern Package: Bridge piles have not yet been installed at the high water make of the Hunter River. Not triggered during this audit period.	
	Contaminated sites										
E117	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 C7, C9, C14 including any updates or amendments to those plans; (b) Sampling and Analysis Quality Plan in Condition E119 ; (c) Detailed Site Investigation Report(s) in Condition E123 ; (d) Remedial Action Plans in Condition E127 ; (e) Unexpected Finds Procedure for Contamination in Condition E132 ; and (f) Post-remediation validation reports .	Compliant	Yes	Compliant	Previous audit Professional Services Contract between TfNSW and AECOM for RZM site dated 08/01/2019 Interim Site Audit Advice 02 - 1508-2301 Sampling Analysis and Quality Plan for AOPCR3, AOPCR10 and AOPCR19 M12RT Southern Portion: Black Hill to Tomago prepared by Cavvanba Consulting 25/07/2023	Yes	Compliant	Previous audit Professional Services Contract between TfNSW and AECOM for RZM site dated 08/01/2019 Interim Site Audit Advice 01 - 1508-2302 Sampling Analysis and Quality Plan for Heatherbrae Ancillary Compound M12RT Northern Portion: Heatherbrae Bypass prepared by Cavvanba Consulting 24/10/2023	Previously compliant	Compliant under previous audit and no changes or new reports in this audit period.	
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 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. 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.	Non-Compliant	Yes	Non-Compliant	RFI response	Yes	Compliant	Previous audit Site interview	Previously compliant	Northern Package: No new reports during this audit period. Southern Package: No new reports during this audit period. An administrative error resulted in four SAS and/or Interim Site Audit Advice reviews from the last audit period 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 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 within this audit period on 8 April 2024.	NC-02/04
										The non-compliance was identified on the 3 April and submitted to DPHI on 10 April. Recommendations: 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 meetings. No further action recommended.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern)	Previous Audit Compliance Status	Independent Audit Findings and Recommendations	Unique Identification on Non Compliance
E119	A Sampling and Analysis Quality Plan must be prepared in accordance with the relevant guidelines made or approved by the EPA under s105 of the Contaminated Land Management Act 1997 (CLM Act), 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 (where applicable) the relevant site characterisation requirements of the detailed or targeted site investigations. The Sampling and Analysis Quality Plan must be completed before Detailed Site Investigations are undertaken.	Compliant	Yes	Compliant	Previous audit M1 Tomago- Sampling and Analysis Quality Plan M1 Raymond Terrace Extension - Black Hill to Tomago Project, Epic Environmental, July 2023 Interim Site Audit Advice 02 - 1508-2301 Sampling Analysis and Quality Plan for AOPCR3, AOPCR10 and AOPCR19 M12RT Southern Portion: Black Hill to Tomago prepared by Cavvanba Consulting 25/07/2023	Yes	Compliant	Previous audit Heatherbrae Ancillary Compound Sample Analysis and Quality Plan, M1 to Raymond Terrace, Ade Consulting Group, October 2023	Previously compliant	As per previous audit, SAQPs prepared for both packages.	
E120	All documents identified in Condition E117 to E119 inclusive must be made publicly available in accordance with Condition B12 .	Compliant	Yes	Compliant	RFI response Project website	Yes	Compliant	RFI response Project website		Northern Package: No RAP and validation reports have been required to date. All other relevant reports available on project website. Southern Package: All relevant reports are available on the project website. No additional validation reports have been completed during this audit period.	
E121	Detailed Site Investigations must be undertaken before the commencement of Work that would result in any disturbance to land identified as a moderate to high risk areas of potential contamination in Table 4-1 of Appendix J of the Submissions Report listed in Condition A1(b) or as updated by Condition E118(b). This condition does not prevent disturbance to land that is required to complete the Detailed Site Investigations.	Compliant	Yes	Compliant	Previous audit AOPCR10 - Detailed Site Investigation John Black Hill to Tomago 1907 Pacific Highway, Tomago, October 2023 AOPCR3 - Detailed Site Investigation Black Hill to Tomago Woodlands CI Tarro, September 2023	Yes	Compliant	Previous audit Detailed Site investigation - Heatherbrae Ancillary Compound M1 To Raymond Terrace - 2206-2212 Pacific Highway, Heatherbrae 28/11/23	Previously compliant	As per previous audit, DSIs undertaken as per the requirements of this condition.	
E122	The Detailed Site Investigations must: (a) be undertaken by a Contaminated Land Consultant certified under either the Environment Institute of Australia or 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) determine the nature and extent of contamination and to assess whether the contamination has the potential to pose an unacceptable risk to human health or the environment on or offsite.	Compliant	Yes	Compliant	Sampling and Analysis Quality Plan. Detailed Site Investigations (AOPCR3, AOPCR10, AOPCR19).	No	Not Triggered	Audit interview	Previously compliant	Northern Package: Not applicable. Southern Package: DSIs for Southern Package- (a) Reviewed and approved by a CEnvP SC (b) Section 10.1	

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E123	A Detailed Site Investigation Report must be submitted to the Planning Secretary upon request following the completion of the Detailed Site Investigations required by Condition E121. The Report must be provided within two weeks of receiving the request. 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 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 (NSW EPA 2020). The report must be prepared by a Contaminated Land Consultant certified under either the Environment Institute of Australia or 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. Note: <i>Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports for separate contaminated sites.</i>	Compliant	Yes	Compliant	Detailed Site Investigations (AOPCR3, AOPCR10, AOPCR19).	No	Not Triggered	Audit interview	Previously not triggered	Northern Package: Not applicable. Southern Package: DSIs for Southern Package- (a) Refer to Section 6 (AOPCR3 and AOPCR10), AOPCR19 proposed final land use is commercial/industrial (b) Section 1.4	
E124	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 capping(s)); and (i) whether the land is suitable (for the intended final land use) or can be made suitable through remediation.	Compliant	Yes	Compliant	Detailed Site Investigations (AOPCR3, AOPCR10, AOPCR19).	No	Not Triggered	Audit interview	Previously not triggered	Northern Package: Not applicable. Southern Package: DSIs for Southern Package- (a) Section 4.1 (b) Section 4.2 (c) Section 4.2 (d) Section 4.3 (e) Section 4.3 (f) Section 4.4 and Section 10.2 (g) Section 10.3 (h) Section 10 (i) Section 10	
E125	Detailed Site Investigation Reports must be reviewed by the Site Auditor in accordance with Condition E117 and all recommendations made by the Site Auditor implemented before Work commencing that could result in any disturbance of any land identified as a moderate to high risk areas of potential contamination in Table 4-1 of Appendix J of the Submissions Report listed in Condition A1(b) or as updated by Condition E118(b). Notes: 1. The intention of this condition is to require Detailed Site Investigations of locations identified as an area of potential contamination to be completed before any form of excavation, including the use of hand tools, exposes soil. This will minimise risks to human health and/or the environment. 2. This condition does not prevent disturbance required to complete the Detailed Site Investigations. 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 A29(h).	Compliant	Yes	Compliant	RFI response	No	Not Triggered	Audit interview	Previously not triggered	Northern Package: Not applicable. Southern Package: No DSIs for moderate or high risk sites were developed or reviewed during this audit period. All DSIs for the project thus far were completed and reviewed during the previous audit period.	

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E126	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 C5 , unless otherwise approved by the Planning Secretary.	Not Triggered	No	Not Triggered	RFI response	No	Not Triggered	Audit interview	Previously not triggered	Northern Package: Not applicable. Southern Package: No recommendations during this audit period. Not triggered at this time.	
E127	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. Nothing in this condition prevents the preparation of individual Remediation Action Plans for separate contaminated sites.	Compliant	Yes	Compliant	Remedial Action Plan AOPCR03, January 2024. Remedial Action Plan AOPCR10, January 2024. Remedial Action Plan Former RZM Site Tomago, September 2023.	No	Not Triggered	Audit interview	Previously compliant	Northern Package: Not applicable. Southern Package: As per previous audit, RAPs (Southern Package) prepared in accordance with the requirements of this condition.	
E128	Before commencing remediation, a Section B Site Audit Statement(s) must be prepared by an NSW EPA-accredited Site Auditor that certifies that the Remedial Action Plan is appropriate and that the site can be made suitable for the proposed 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. Nothing in this condition prevents the Proponent from engaging the Site Auditor to prepare Site Audit Statements for separate contaminated sites.	Compliant	Yes	Compliant	Previous audit. Detailed Site Investigation AOPCR03, September 2023. Detailed Site Investigation AOPCR10, December 2023. Detailed Site Investigation AOPCR19, March 2024.	No	Not Triggered	Audit interview	Previously compliant	Not applicable to Northern package. As per previous audit, site audit statements prepared prior to commencement of remediation.	
E129	For any land identified as a moderate to high risk area of potential contamination in table 4-1 of Appendix J of the Submissions Report listed in Condition A1(b) or as updated by Condition E118(b) , 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 after remediation and no later than before the commencement of operation of the CSSI. Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	Project is not at this stage. Not triggered at this time.	
E130	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.	Compliant	Yes	Compliant	RFI response Jul-2024 BH2T SASA SAR Validation Report AOPCR 10 Jul-2024 BH2T SASA SAR Validation Report AOPCR 03 Jul-2024 BH2T SASA SAR Validation Report AOPCR 19	No	Not Triggered	N/A	Previously not triggered	Southern Package: Three SAS were developed during this audit period.	

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E131	Any recommendations to minimise risk to human health or the environment or for the management or further investigation of contamination arising, as detailed in the EPA accredited Site Auditor reviews, advices or audit statements must be incorporated into the relevant CEMP Sub-plan(s) and implemented.	Compliant	Yes	Compliant	Previous audit. CEMP Appendix G BH2T Soil and Surface Water Management Sub-plan, Rev 0 November 2023 M1 Pacific Motorway Extension to Raymond Terrace SSWMP Appendix I - BH2T Contaminated Land Management Plan Revision 0 November 2023	Yes	Compliant	Previous audit. CEMP Appendix B6 Construction Soil and Water Management Sub-plan, Heatherbrae Bypass Rev G September 2023 Appendix H Construction Contaminated Land Management Sub-plan Heatherbrae Bypass September 2023	Previously compliant	Compliant as per previous audit. Northern Package: - Table A1 of CEMP Appendix B6 Construction Soil and Water Management Sub-plan - Section 6 of Appendix H Construction Contaminated Land Management Sub-plan Southern Package: - Table 3-2 of CEMP Appendix G BH2T Soil and Surface Water Management Sub-plan - Section 4 of Appendix I - BH2T Contaminated Land Management Plan	
E132	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.	Compliant	Yes	Compliant	Previous audit. Unexpected Finds Procedure for Contamination M1 Pacific Motorway Extension to Raymond Terrace, V2.2 February 2023. Letter from DPHI to TfNSW dated 27/03/23 approving the procedure.	Yes	Compliant	Previous audit. Unexpected Finds Procedure for Contamination M1 Pacific Motorway Extension to Raymond Terrace, V2.2 February 2023. Letter from DPHI to TfNSW dated 27/03/23 approving the procedure.	Previously compliant	As per previous audit, procedure completed and approved more than one month prior to commencement of work.	
	SUSTAINABILITY										
E133	A Sustainability Strategy must be prepared to achieve a minimum “Excellent” ‘Design’ and ‘As built’ rating under the Infrastructure Sustainability Council infrastructure 1.2 rating tool. Evidence that the ‘Excellent’ ratings has been achieved must be provided to the Planning Secretary for information: (a) within 12 months of commencing construction for the 'Design' rating; and (b) within 12 months of commencing of operation of the CSSI for the 'As built' rating.	Compliant	Yes	Compliant	Audit interview Sustainability Strategy for M1 Pacific Motorway Extension to Raymond Terrace Stage 1 Black Hill to Tomago (Heatherbrae Bypass), Rev 0 08/11/23	Yes	Compliant	Audit interview Sustainability Strategy for M1 Pacific Motorway to Raymond Terrace (Heathebrae Bypass), Rev B, December 2023.	Previously compliant	Round 1 comments were recived 16/9/24 . Currently compliant however both packages will be appying for an extention of time.	
E134	The Sustainability Strategy must be implemented throughout construction and operation.	Compliant	Yes	Compliant	Sustainability Strategy for M1 Pacific Motorway Extension to Raymond Terrace Stage 1 Black Hill to Tomago (Heatherbrae Bypass), Rev 0 08/11/23	Yes	Compliant	Sustainability Strategy for M1 Pacific Motorway to Raymond Terrace (Heathebrae Bypass), Rev B, December 2023.		Northern Package: Section 1.2 of the Heatherbrae Bypass Sustainability Strategy. Southern Package: Noted in document that the Sustainability Strategy will be implemented for the duration of construction.	

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E135	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 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 recycled water as potable water; (d) consideration of the public health risks from water recycling; and (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 in accordance with Condition B12 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: <i>Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational phases of the CSSI.</i>	Compliant	Yes	Compliant	Previous audit M1 Motorway Extension to Raymond Terrace - Stage 1 Black Hill to Tomago Appendix E - Water Reuse Strategy, Rev 1, November 2023	Yes	Compliant	Previous audit Construction Water Reuse Strategy, Heatherbrae Bypass, September 2023, Rev C	Previously compliant	Found to be compliant under previous audit.	
	TRAFFIC AND TRANSPORT										
	Construction traffic management										
E136	Local roads proposed to be used by heavy vehicles to directly access the construction boundary and ancillary facilities that are not shown in Figure 5-2 of Appendix G of the Environmental Impact Statement as listed in Condition A1(a) must be approved by the Planning Secretary and included in the Traffic, Transport and Access Management CEMP Sub-plan.	Compliant	Yes	Compliant	Previous audit M1 Pacific Motorway Extension to Raymond Terrace - Stage 1 - Black Hill to Tomago Appendix B - Traffic, Transport and Access Management Sub-plan, November 2023	Yes	Compliant	Previous audit Construction Traffic, Transport and Access Management Sub-plan Heatherbrae Bypass September 2023 Letter from DPHI to Transport re HBB CEMP dated 09/10/2023	Previously compliant	Northern Package: HBB Appendix A Table A1 and Section 5.2 Southern Package: BH2T Table 6-1 As noted in previous audit, letter from DPHI 09/10/2023 agrees to use of Camfield Dr by heavy vehicles for 6 months from commencement of construction.	
E137	Heavy vehicle movements proposed along Adelaide Street for haulage of quarry materials, plant and equipment must be modelled and included in the Traffic, Transport and Access Management CEMP Sub-plan.	Compliant	No	Not Triggered	N/A to Southern Package	Yes	Compliant	Construction Traffic, Transport and Access Management Sub-plan Heatherbrae Bypass September 2023	Previously compliant	Appendix B of Construction Traffic, Transport and Access Management Sub-plan	
E138	All requests to the Planning Secretary under Condition E136 must include a traffic and pedestrian impact assessment and be prepared in consultation with the relevant council(s). The assessment must be undertaken by an appropriately qualified and experienced person and must include a swept path analysis if required by the Department. The traffic and pedestrian impact assessment must: (a) demonstrate that the use of local roads will not compromise the safety of the public and have no more than minimal amenity impacts; (b) provide details as to the date of completion of road dilapidation surveys for the subject local roads; and (c) describe the measures that will be implemented to avoid where practicable the use of local roads past schools, aged care facilities and childcare facilities during peak times for operation. The outcomes and recommendations of the traffic and pedestrian impact assessment must be incorporated into the Ancillary Facility Site Establishment Management Plan or Traffic Management CEMP Sub-plan as relevant.	Compliant	Yes	Compliant	RFI response Local Road Traffic and Pedestrian Impact Assessment Report - Woodlands Close, 7/05/2024 Local Road Traffic and Pedestrian Impact Assessment Report - Lenaghans Drive and Black Hill Road, 28/08/2024	No	Not Triggered	Audit interview	Previously compliant	Northern Package: No requests during this audit period. Southern Package: Traffic and pedestrian impact assessments were completed and meets the criteria for this condition (refer to Table 2-1 in Local Road Traffic and Pedestrian Impact Assessment Reports).	

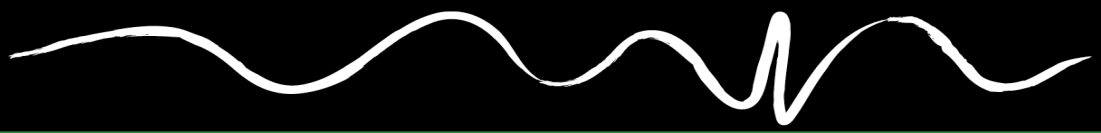
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E149	The CSSI must be designed, constructed and operated so as to maintain the NSW Water Quality Objectives where they are being achieved as at the date of this approval, and contribute towards achievement of the NSW Water Quality Objectives over time where they are not being achieved as at the date of this approval, unless an EPL in force in respect of the CSSI contains different requirements in relation to the NSW Water Quality Objectives, in which case those requirements must be complied with. Note: <i>If it is proposed to discharge construction stormwater to waterways, 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 the level of detail commensurate with the potential water pollution risk.</i>	Compliant	Yes	Compliant	RFI response BH2T Drainage Design Zone 1 Package SD-02, Issued for Construction Independent Certifier's Certificate - Design Documentation, Design Lot: SD-02 Drainage Design Zone 1 BH2T Drainage Design Zone 2 Package SD-03, Issued for Construction Independent Certifier's Certificate - Design Documentation, Design Lot: SD-03 Drainage Design Zone 2	Yes	Compliant	RFI response	Previously not triggered	Northern Package: Discharge impact assessment prepared for construction phase discharge. Detailed Design has been completed and Longitudinal Drainage, Standard Details and Water Quality Report considers the NSW WQO. Section 5.1.9.5 concludes: " <i>Overall, the water quality achieve the project objectives in relation to ambient water quality and provide improvements from what was considered in the EIS. Modelling results indicate that discharges from project would improve the ambient water quality for all key pollutant indicators at the receiving environment. While the SW WQO are not achieved, the discharge from water quality controls is expected to contribute towards achieving these objectives over time. Based on this and on the fact Hunter agreed on the assessment criteria and accepted that NorBE is impractical to achieve, the proposed water quality assessment demonstrates that the project requirement are addressed in relation to water quality targets ."</i> Southern Package: Design reports have been completed and design meets or contributes towards Water Quality Objectives.	
Construction Requirements											
E150	Works on waterfront land and within watercourses must have regard to Guidelines for controlled activities on waterfront land (NRAR, 2018). This includes outlets and watercourse crossings.	Compliant	Yes	Compliant	RFI response BH2T Appendix E Flooding Management Sub-Plan, 08/11/2023	No	Not Triggered	Audit interview	Previously not triggered	Northern Package: Not applicable. Southern Package: Listed as being regarded in Table 3-1 of the Flooding Management Sub-Plan.	
E151	Proposed revegetation within riparian zones should have regard to NRARs guidelines for Vegetation Management Plans and accommodate a fully structured vegetated riparian zone using indigenous species. Note: <i>Revegetation must include a maintenance component identified in the DLP as required by Condition E26 and the operational maintenance requirements of Conditions E28 and E30.</i>	Compliant	Yes	Compliant	Chapter 6.16 of Design and Landscape Plan.	Yes	Compliant	Chapter 6.12.3 of Design and Landscape Plan.	Previously not triggered	Northern Package: Revegetation strategy is addressed in Section 6.12.3 of the Design and Landscape Plan. NRAR guidelines and native vegetation communities referenced in report. Southern Package: Revegetation strategy is addressed in Section 6.16.3 of the Design and Landscape Plan. NRAR guidelines and native vegetation communities referenced in report.	
E152	The realignment of Purgatory Creek must: (a) mimic natural stream design by incorporating natural hydrological function and not include 90 degree sharp meanders; and (b) tie into upstream and downstream sections of the watercourse and not limit any connectivity in the area.	Compliant	Yes	Compliant	Design and Landscape Plan (a) Chapter 6.16 (b) Chapter 6.16	No	Not Triggered	N/A to Northern Package	Previously not triggered	Southern Package:	
E153	Make good provisions for groundwater users must be provided in the event of a material decline in water supply levels, quality or quantity from registered existing bores, associated with groundwater changes from either construction and/or ongoing operational dewatering caused by the CSSI.	Not Triggered	No	Not Triggered	RFI response	No	Not Triggered	Audit interview RFI response Six Monthly Construction Surface Water & Groundwater Monitoring Report October 2023 - March 2024, June 2024 Seymour Whyte	Previously not triggered	Northern Package: Groundwater monitoring levels have not changed. Not triggered at this time. Southern Package: No significant drops in groundwater levels - generally there has been an increase. Not triggered at this time.	

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E154	Impacts to the Hunter Valley Flood Mitigation Scheme infrastructure should be avoided. Where impact is not avoidable, consultation with DPE Water (Hunter Valley Flood Mitigation team) during the detailed design process must be undertaken to mitigate the impacts and any agreed measures implemented during construction.	Compliant	Yes	Compliant	RFI response Letter from DCCEEW dated 13 September 2024 providing consent for the temporary works.	No	Not Triggered	Audit interview	Previously not triggered	Northern Package: Not applicable. Southern Package: Consultation undertaken during the preparation of EIS, CEMP and associated documents. A member of the HVMS Water Operations are an attendee of the ERG undertaken on a bi-monthly basis. Generally, impacts have been avoided were practical and there are no impacts to infrastructure In May 2022, an in-principle agreement for temporary works was provided. On 13 September 2024, a s256 approval was issued for temporary works and operational impacts.	
	Stormwater Drainage										
E155	The Proponent must undertake further hydrological and hydraulic modelling based on the detailed design of the CSSI to determine the ability of the receiving stormwater drainage systems to effectively convey pavement drainage from the CSSI. The modelling must be undertaken in consultation with the relevant council(s) and Hunter Water where it is proposed to discharge these flows to their receiving stormwater drainage systems and the outcomes documented in the Stormwater Drainage Report required under Condition E156 .	Not Triggered	No	Not Triggered	Email dated 11/09/2024 from Transport to GeoLINK noting drainage works for Southern Package have not resulted in discharges to existing stormwater drainage systems.	No	Not Triggered	Stormwater Drainage Report, March 2024.	Previously not triggered	Northern Package: As detailed in the Stormwater Drainage Report, there are no Port Stephens Council or Hunter Water stormwater drainage assets within the Heatherbrae Bypass footprint. Southern Package: Drainage works have not currently resulted in discharges into Hunter Water or Council storwater systems.	
E156	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 stormwater drainage systems. The Stormwater Drainage Report must: (a) assess the potential impacts of pavement drainage discharges from the CSSI drainage systems on the receiving environment and capacity of council or Hunter Water drainage infrastructure; (b) identify all mitigation measures to be implemented where pavement drainage from the CSSI drainage systems are predicted to adversely impact on the receiving environment or capacity of council or Hunter 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.	Not Triggered	No	Not Triggered	Email dated 11/09/2024 from Transport to GeoLINK noting drainage works for Southern Package have not resulted in discharges to existing stormwater drainage systems.	No	Not Triggered	Audit interview Stormwater Drainage Report, March 2024.	Previously not triggered	Northern Package: SDR is on the project website. No work has begun on council infrastructure. Not triggered at this time. Southern Package: Drainage works have not currently resulted in discharges into Hunter Water or Council storwater systems.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern)	Previous Audit Compliance Status	Independent Audit Findings and Recommendations	Unique Identification on Non Compliance
E157	All new or modified drainage systems associated with the CSSI must be designed to: (a) meet the capacity constraints of any council's or Hunter Water drainage system to receive and convey the proposed flows from the CSSI, or otherwise upgrade council's 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); (c) ensure mitigation measures are implemented where increased flows through cross drainage systems adversely impact on council or Hunter Water drainage infrastructure and the receiving environment; and (d) maintenance ease and accessibility of outlet.	Compliant	Yes	Compliant	RFI response BH2T Drainage Design Zone 1 Revision D, January 2023 BH2T Drainage Design Zone 2 Revision D, February 2024	Yes	Compliant	RFI response M1 Pacific Motorway to Raymond Terrace - Heatherbrae Bypass Longitudinal Drainage, Standard Details and Water Quality, May 2024	Previously not triggered	Northern Package: Detailed Design has been completed and Longitudinal Drainage, Standard Details and Water Quality Report considers the details of this condition: a) no Hunter Water or Council drainage systems are impacted by project. b) Section 5 of the report includes details for pre/post development catchment assessment and discussion. c) Section 5 of the report includes details for pre/post development catchment assessment and discussion. d) Section 7.2.2 of the report considers the maintenance ease and accessibility of the outlets. Southern Package: As detailed in the Drainage Design Zone 1 and Drainage Design Zone 2 report, the Southern Package meets the details of this condition.	
E158	The drainage design for the section of CSSI that traverses the Tomago Sandbeds Catchment Area must comply with the Neutral or Beneficial Effect principles for construction and operation or as agreed with by Hunter Water Corporation to ensure that road pavement run-off will not impact on water quality in the aquifer.	Compliant	No	Not Triggered	N/A to Southern Package	Yes	Compliant	RFI response M1 Pacific Motorway to Raymond Terrace - Heatherbrae Bypass Longitudinal Drainage, Standard Details and Water Quality, May 2024	Previously not triggered	Northern Package: Detailed Design has been completed and Longitudinal Drainage, Standard Details and Water Quality Report considers the details of this condition. Hunter Water general target criteria for development within the TSCA is a NorBE on water quality. In a letter 11 May 2023 addressed to TfNSW (Appendix K-2), Hunter Water has acknowledge that it is not practical to achieve a NorBE for a project to this scale within a generally undisturbed catchment area and has agreed that the alternative approach referred by Hunter Water relates to adopting ambient water quality data for Windeyers Creek as the target criteria. The results of the MUSIC modelling show that discharge from operational stormwater basins will be lower than the ambient water quality (AWQ) at location for the only surface water location at R4 for Windeyers Creek identified within the EIS.	
	Detention Basin										
E159	Unless approved by an EPL, all sediments basins that intercept saline or groundwater or that are within the Tomago Sandbeds drinking water catchment must be lined.	Not Triggered	No	Not Triggered	RFI response Site inspection. CEMP Appendix G BH2T Soil and Surface Water Management Sub-plan, Rev 0 November 2023	No	Not Triggered	RFI response M1 Pacific Motorway to Raymond Terrace - Heatherbrae Bypass Longitudinal Drainage, Standard Details and Water Quality, May 2024 Site inspection. CEMP Appendix B6 Construction Soil and Water Management Sub-plan, Heatherbrae Bypass Rev G .September 2023	Previously not triggered	Northern Package: Detailed Design has been completed and Longitudinal Drainage, Standard Details and Water Quality Report considers the details of this condition. No sediment basins during construction are proposed to intercept groundwaters- this is based on assessment undertaken by Project Soil Conservationist based on catchment sizes, R factor and sandy soils. Operational water waster basins that are in the TSCA are concrete lined as outlined in Table 16 of the report. Southern Package: There are no sediment basins proposed in the Tomago Sandbeds catchment in the southern package.	
	Dredging within the Hunter River										
E160	A floating boom and silt curtain system must be installed around dredging activities and any nearby sensitive aquatic environments prior to dredging in the Hunter River. The boom and curtain system must be retained after completion of dredging until the turbidity within the system returns to background levels.	Not Triggered	No	Not Triggered	N/A to Southern Package	No	Not Triggered	N/A to Northern Package	Previously not triggered	No dredging planned to occur in the project at this time.	



Appendix F

Site Inspection Photographs

1. Southern Package Site Inspection – 17/09/2024



Plate 1.1



Plate 1.2



Plate 1.3



Plate 1.4



Plate 1.5



Plate 1.6



Plate 1.7



Plate 1.8



Plate 1.9



Plate 1.10



Plate 1.11



Plate 1.12



Plate 1.13



Plate 1.14



Plate 1.15



Plate 1.16



Plate 1.17



Plate 1.18



Plate 1.19



Plate 1.20



Plate 1.21



Plate 1.22



Plate 1.23



Plate 1.24



Plate 1.25



Plate 1.26



Plate 1.27



Plate 1.28



Plate 1.29



Plate 1.30



Plate 1.31



Plate 1.32



Plate 1.33



Plate 1.34



Plate 1.35



Plate 1.36



Plate 1.37



Plate 1.38



Plate 1.39

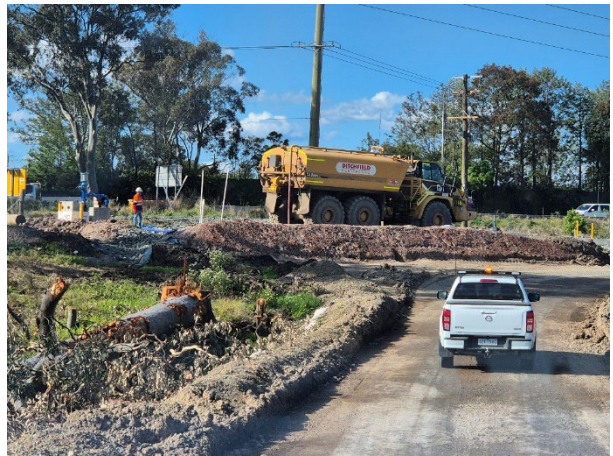


Plate 1.40



Plate 1.41



Plate 1.42



Plate 1.43



Plate 1.44



Plate 1.45

2. Northern Package Site Inspection – 19/09/2024



Plate 2.1



Plate 2.2



Plate 2.3



Plate 2.4



Plate 2.5



Plate 2.6



Plate 2.7



Plate 2.8



Plate 2.9



Plate 2.10



Plate 2.11



Plate 2.12



Plate 2.13



Plate 2.14



Plate 2.15



Plate 2.16



Plate 2.17



Plate 2.18



Plate 2.19



Plate 2.20



Plate 2.21



Plate 2.22



Plate 2.23



Plate 2.24



Plate 2.25



Plate 2.26



Plate 2.27



Plate 2.28



Plate 2.29



Plate 2.30



Plate 2.31



Plate 2.32



Plate 2.33



Plate 2.34



Plate 2.35



Plate 2.36



Plate 2.37



Plate 2.38



Plate 2.39



Plate 2.40



Plate 2.41



Plate 2.42



Plate 2.43



Plate 2.44



Plate 2.45



Plate 2.46



Plate 2.47

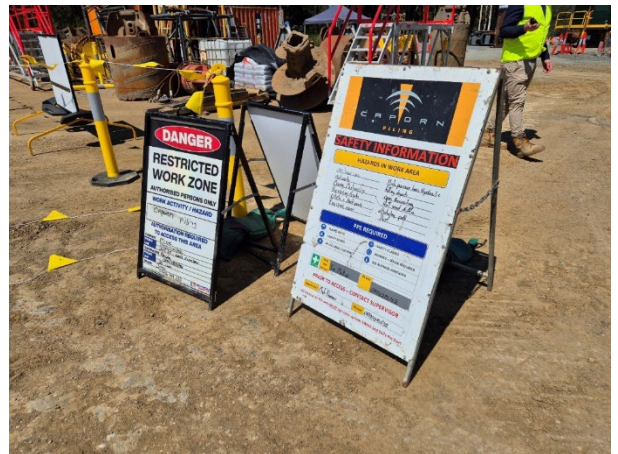


Plate 2.48



Plate 2.49



Plate 2.50



Plate 2.51

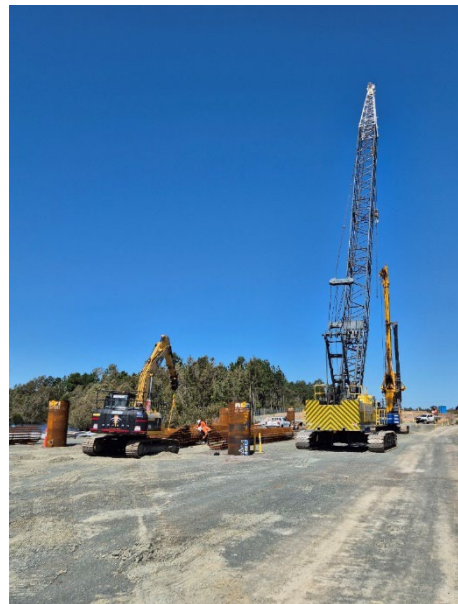


Plate 2.52



Plate 2.53



Plate 2.54



Plate 2.55



Plate 2.56



Plate 2.57



Plate 2.58



Plate 2.59