

Independent Environmental Audit No. 4

M1 Pacific Motorway extension to Raymond Terrace



Quality solutions. Sustainable future.



GeoLINK Consulting Pty Ltd

PO Box 119
Lennox Head NSW 2478
T 02 6687 7666

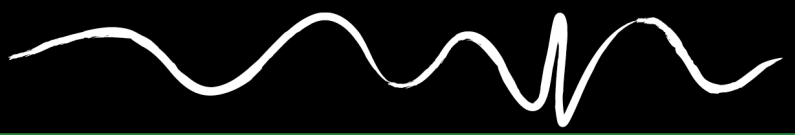
PO Box 1446
Coffs Harbour NSW 2450
T 02 6651 7666

PO Box 1267
Armidale NSW 2350
T 02 6772 0454

info@geolink.net.au

Prepared for: Transport for NSW
© GeoLINK, 2026





Certification

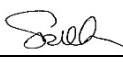
	Name	Signature	Date
Prepared by	Jessica Gilroy		15/04/2026
Reviewed by	Simon Williams		15/04/2026
UPR	Description	Issued By	Date Issued
5003-1051	Version 1	Jessica Gilroy	15/04/2026
5003-1054	Version 2	Jessica Gilroy	15/05/2026



Table of Contents

1.	Introduction	1
1.1	Background	1
1.1.1	Project Overview	1
1.2	Audit Team	3
1.3	Audit Objectives	3
1.4	Audit Scope	3
1.5	Audit Period	4
2.	Methodology	5
2.1	Project Start-up	5
2.2	Consultation	5
2.3	Site Inspection and Interviews	5
2.4	Compliance Descriptors	6
2.5	Audit Findings	7
2.6	Previous Audit Outcomes	7
3.	Findings	8
3.1	Document Review	8
3.2	Compliance Performance	10
3.3	Agency Notices, Orders, Penalty Notices or Prosecutions	11
3.4	Previous Audit	12
3.5	Environmental Management Documentation	18
3.6	EMP, Sub-plans and Compliance Documents	18
3.7	Environmental Performance	18
3.8	Consultation Outcomes	18
3.9	Complaints	19
3.10	Incidents (as defined in the definitions in MCoA)	19
3.11	Actual versus Predicted Environmental Impacts	19
3.12	Site Interviews and Inspection	22
3.13	Improvement Opportunities	23
3.14	Key Strengths	23
4.	Conclusion	24



Tables

<u>Table 3.1</u>	<u>Breakdown of Distribution of Compliance</u>	<u>11</u>
<u>Table 3.2</u>	<u>Non-Compliances from IEA No. 3</u>	<u>13</u>
<u>Table 3.3</u>	<u>Non-Compliances from IEA No. 2</u>	<u>13</u>
<u>Table 3.4</u>	<u>Non-Compliances from IEA No. 1</u>	<u>14</u>
<u>Table 3.5</u>	<u>Consultation Outcomes</u>	<u>18</u>
<u>Table 3.6</u>	<u>Key Potential Impacts of EIS compared to Audit Findings</u>	<u>19</u>

Figures

<u>Figure 1.1</u>	<u>Regional context of the project (Source: Transport Staging Report)</u>	<u>2</u>
<u>Figure 1.2</u>	<u>Project key features (Source: Transport)</u>	<u>3</u>

Appendices

<u>Appendix A Planning Secretary Audit Team Agreement</u>
<u>Appendix B Independent Audit Declaration Form</u>
<u>Appendix C Consultation</u>
<u>Appendix D Audit Agenda and Attendance Register</u>
<u>Appendix E Independent Audit Table</u>
<u>Appendix F Site Inspection Photographs</u>



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.

Three previous IEAs have been undertaken. The Independent Environmental Audit No.1 was for the period from 10 October 2023 to 27 February 2024 during the construction phase and was submitted on 19 April 2024. The Independent Environmental Audit No. 2 was for the period 28 February 2024 to 27 September 2024 during the construction phase and was submitted on 19 November 2024. The Independent Environmental Audit No. 3 was for the period 28 September 2024 to 27 March 2025.

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 ten-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). A modification was granted on 18 November 2024.

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, 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.

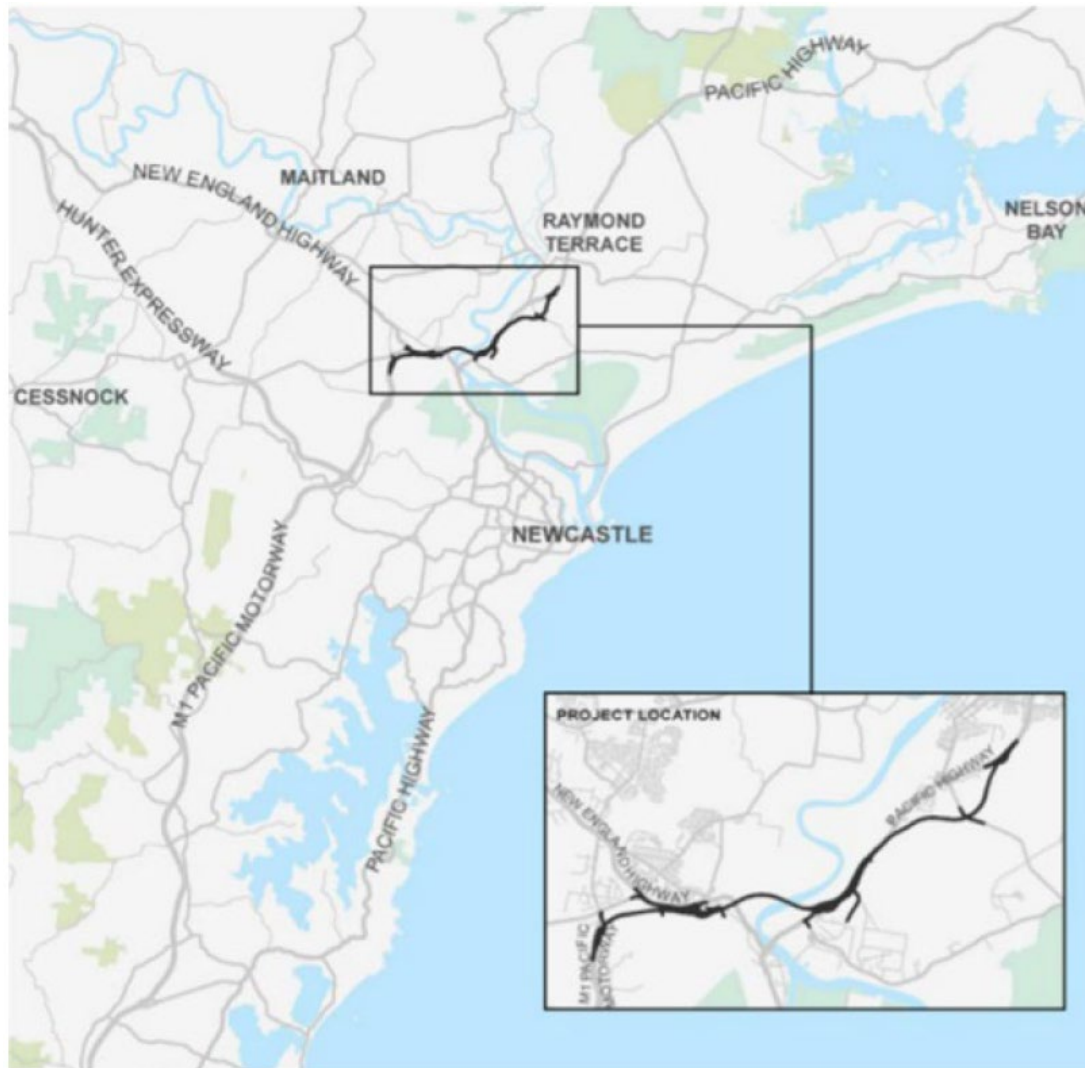


Figure 1.1 Regional context of the project (Source: Transport Staging Report)

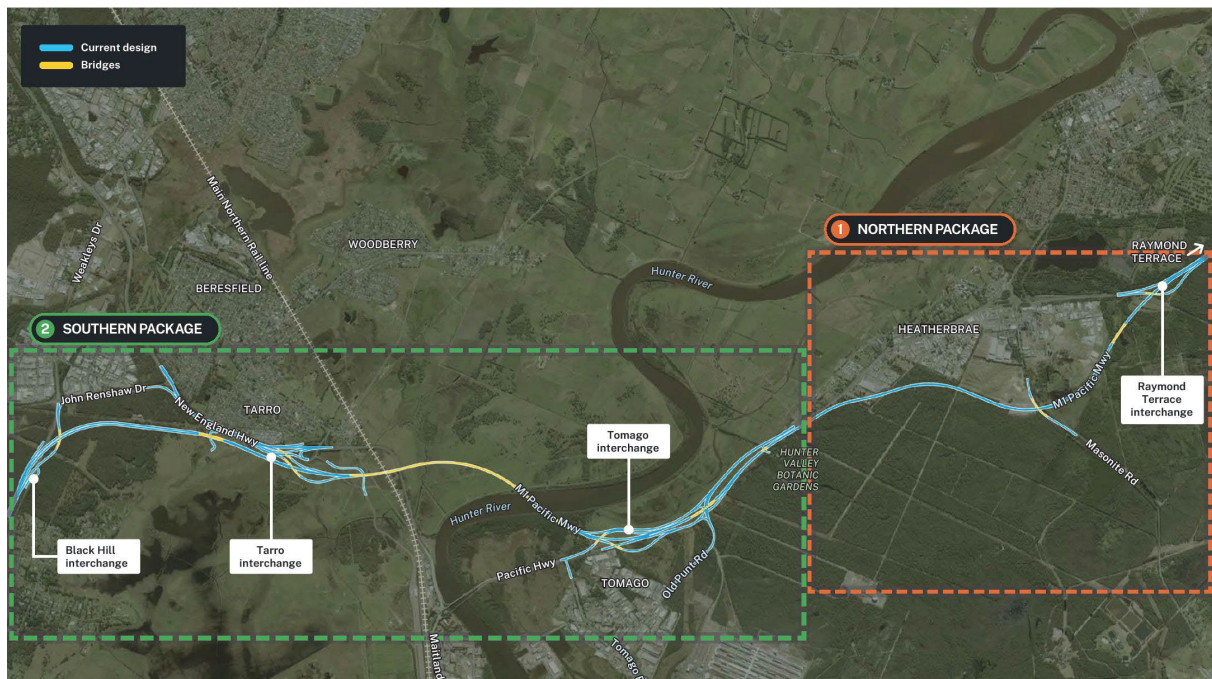


Figure 1.2 Project key features (Source: Transport)

1.2 Audit Team

The audit team comprised of Simon Williams, with assistance from Jessica Gilroy. Simon Williams has extensive experience in environmental auditing of large construction and commercial operations, 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. Jessica Gilroy 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 27 March 2025 to 27 March 2026.



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 the 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.
- Healthy Buildings International – Environmental Representative of the project
- Hunter Water Corporation.

Outcomes of the consultation is discussed in **Section 3.8** of this report.

2.3 Site Inspection and Interviews

A site visit was undertaken on the 19 and 20 of March 2026 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 Stage 2 (Northern) were held on different days, with the Stage 1 (Southern) meeting on the 20 March and the Stage 2 (Northern) meeting on the 19 March. 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 2 (Northern) – 19 March 2026:

- Simon D Williams (Lead Auditor, GeoLINK).
- Jessica Gilroy (Trainee Auditor, GeoLINK).
- Lincoln Carter (Environment and Sustainability Manager, Transport for NSW).
- Kai Neville (Senior Environment and Sustainability Officer, Transport for NSW).

- Keira Sullivan (Graduate Environment and Sustainability Officer, Transport for NSW).
- Simon R Williams (Environment Manager, Seymour Whyte).
- Emmalee Jesser (Senior Environmental Advisor, Seymour Whyte).
- Mathew Billings (Environmental Representative, Healthy Buildings International).

Stage 1 (Southern) – 20 March 2026:

- Simon D Williams (Lead Auditor, GeoLINK).
- Jessica Gilroy (Trainee Auditor, GeoLINK).
- Lincoln Carter (Environment and Sustainability Manager, Transport for NSW).
- Andrew Grainger (Environment and Sustainability Officer, Transport for NSW).
- Keira Sullivan (Graduate Environment and Sustainability Officer, Transport for NSW).
- Kathy Lloyd (Environment and Sustainability Manager, John Holland Gamuda Australia Joint Venture).
- Pat Bergin (Environmental Advisor, John Holland Gamuda Australia Joint Venture).
- Evvey Thomas (Environment and Sustainability Coordinator, John Holland Gamuda Australia Joint Venture).
- Elianan Gilbert (Environmental Coordinator, John Holland Gamuda Australia Joint Venture).
- India Aspinall (Environmental Coordinator, John Holland Gamuda Australia Joint Venture).
- James Stoges (Senior Environmental Advisor, John Holland Gamuda Australia Joint Venture).

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 provided by email before and after the site visit to address particular items that were discussed.

A site inspection of Stage 1 (Southern) was undertaken on the afternoon of 20 March after the site meeting. A site inspection of Stage 2 (Northern) was undertaken on the morning of 19 March 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 (D) Williams from GeoLINK acting as auditor for this independent audit and a Simon (R) 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 (Independent Environmental Audit No. 3). 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 the entire CSSI:

- M1 Motorway Extension to Raymond Terrace Compliance Report 2 Rev 1 May 2025.
- M1 Pacific Motorway extension to Raymond Terrace (SSI 7319) Infrastructure Approval Condition E8 – Review and update of biodiversity offset obligations July 2025 Transport for NSW.
- M1 Pacific Motorway extension to Raymond Terrace Communication Strategy V3.0 January 2024, Transport for NSW.
- M1 Pacific Motorway extension to Raymond Terrace Flood Design Report V 3.3 April 2025.
- M1 Pacific Motorway extension to Raymond Terrace Staging Report V 5-0 July 2023, Transport for NSW.
- M1 Pacific Motorway extension to Raymond Terrace Traffic Noise Monitoring program Rev 1 24 November 2022, Arup.
- M1 Pacific Motorway Extension to Raymond Terrace Unexpected Finds Procedure for Contamination V2.2 January 2025, Transport for NSW.
- M1 Pacific Motorway extension to Raymond Terrace Unexpected Heritage Finds and Human Remains Procedure V3.0 July 2024, 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 Transport for NSW extension to Raymond Terrace Condition E6 Clearing Report V 4 July 2025, Transport for NSW.
- Post Approval Requirements Audit Report May 2025 Transport for NSW.
- Update of biodiversity offset obligations August 2025 Transport for NSW.

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

- Black Hill to Tomago CEMP Appendix B Traffic, Transport and Access Management Sub-plan Rev 11 July 2025, John Holland Gamuda Australia Joint Venture.
- Black Hill to Tomago CEMP Appendix C Noise and Vibration Management Sub-plan Rev 2 August 2024, John Holland Gamuda Australia Joint Venture.
- Black Hill to Tomago CEMP Appendix D Flora and Fauna Management Sub-plan Rev 05 July 2025, John Holland Gamuda Australia Joint Venture.
- Black Hill to Tomago CEMP Appendix E Flooding Management Sub-plan Rev 02 December 2025, John Holland Gamuda Australia Joint Venture.
- Black Hill to Tomago CEMP Appendix F Air Quality Management Sub-plan Rev 06 December 2025, John Holland Gamuda Australia Joint Venture.
- Black Hill to Tomago CEMP Appendix G Soil and Surface Water Management Sub-plan Rev 3 January 2025, John Holland Gamuda Australia Joint Venture.
- Black Hill to Tomago CEMP Appendix H Groundwater Management Sub-plan Rev 5 December 2025, John Holland Gamuda Australia Joint Venture.
- Black Hill to Tomago CEMP Appendix I Aboriginal Heritage Management Sub-plan Rev 01 June 2024, John Holland Gamuda Australia Joint Venture.
- Black Hill to Tomago CEMP Appendix J BH2T Non-Aboriginal Heritage Management Sub-Plan Rev 2 February 2026.
- Black Hill to Tomago CEMP Appendix K Surface Water and Groundwater Quality Construction Monitoring Program Rev 5 September 2025, John Holland Gamuda Australia Joint Venture.

- 
- Black Hill to Tomago CEMP Appendix L - Bushfire Management Sub-Plan Rev 2 February 2026.
 - Black Hill to Tomago CEMP Appendix M Waste and Resource Management Sub-plan Rev 01 June 2024, John Holland Gamuda Australia Joint Venture.
 - Black Hill to Tomago CEMP Rev 5 July 2024, John Holland Gamuda Australia Joint Venture.
 - Black Hill to Tomago Environment Protection Licence 21808 July 2025 Environment Protection Authority NSW.
 - 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 Motorway Extension to Raymond Terrace (Black Hill to Tomago) SuMP Appendix E Water
 - M1 Motorway Extension to Raymond Terrace (Black Hill to Tomago) Sampling and Analysis Quality Plan Rev 0 July 2023, Epic Environmental.
 - 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 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) E77 Consultation Report Rev 02 February 2025, 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 2024 – May 2025) Rev 1 June 2025, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Six Monthly Construction Surface Water & Groundwater Monitoring Report (November 2024 – May 2025) Rev 5 December 2025, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Six Monthly Construction Surface Water & Groundwater Monitoring Report (May 2025 - November 2025) Rev C April 2026, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Six Monthly Construction Noise & Vibration Monitoring Report (May 2025 – November 2025) Rev 0 November 2025, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Six Monthly Construction Depositional Dust Monitoring Report (February 2025 – August 2025) Rev 0 September 2025, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Six Monthly Construction Depositional Dust Monitoring Report (August 2025 – February 2026) Rev 0 March 2026, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Six Monthly Construction Flora and Fauna Monitoring Report (November 2024 – May 2025) Rev 0 November 2025, John Holland Gamuda Australia Joint Venture
 - M1 Pacific Motorway to Raymond Terrace (Black Hill to Tomago) Waste and Resource Recovery Reporting, John Holland Gamuda Australia Joint Venture.
 - NSW EPA Licence 21808 for M1 Pacific Motorway Extension to the Pacific Highway to Raymond Terrace – Black Hill to Tomago variations include:
 - Notice number: 1647014, dated 22/04/2025
 - Notice number: 1649536, dated 11/07/2025
 - Reuse Strategy Rev 4 January 2025, John Holland Gamuda Australia Joint Venture.



Documents covering Stage 2 (Northern - Heatherbrae Bypass):

- Construction Water Reuse Strategy, Heatherbrae Bypass Rev C September 2023.
- Heatherbrae Bypass – Seymour Whyte (internal) Out of Hours Work (OOHW) Permit M12RT-OOHW-52a January 2026.
- Heatherbrae Bypass – Seymour Whyte (internal) Out of Hours Work (OOHW) Permit M12RT-OOHW-57 March 2026.
- Heatherbrae Bypass CEMP Appendix B1 Construction Traffic, Transport and Access Management Sub-plan Rev 04
- Heatherbrae Bypass CEMP Appendix B2 Construction Noise and Vibration Management Sub-plan Rev 02 October 2025, Seymour Whyte Pty Ltd.
- Heatherbrae Bypass CEMP Appendix B3 Construction Flora and Fauna Management Sub-plan Rev 02 October 2025, Seymour Whyte Pty Ltd.
- Heatherbrae Bypass CEMP Appendix B4 Construction Flood Management Subplan Rev 02 October 2025, Seymour Whyte Pty Ltd.
- Heatherbrae Bypass CEMP Appendix B5 Construction Air Quality Management Sub-plan Rev 02 October 2025, Seymour Whyte Pty Ltd.
- Heatherbrae Bypass CEMP Appendix B6 Construction Soil and Water Management Sub-plan Rev 02 October 2025, Seymour Whyte Pty Ltd.
- Heatherbrae Bypass CEMP Appendix B7 Construction Cultural Heritage Management Sub-plan Rev 02 October 2025, Seymour Whyte Pty Ltd.
- Heatherbrae Bypass CEMP Appendix B8 Bushfire Management Plan Rev 02 October 2025, Seymour Whyte Pty Ltd.
- Heatherbrae Bypass CEMP Appendix B9 Construction Waste Management Sub-plan Rev 02 October 2025, Seymour Whyte Pty Ltd.
- Heatherbrae Bypass CEMP Rev E October 2023, Seymour Whyte Pty Ltd.
- Heatherbrae Bypass Construction Flora and Fauna Monitoring – Year 2 Lewis Ecological.
- M1 Motorway Extension to Raymond Terrace – Heatherbrae Bypass Construction Environmental Management Plan Rev 03 October 2025, Seymour Whyte Pty Ltd.
- M1 Motorway Extension to Raymond Terrace – Heatherbrae Bypass E77 Community Consultation on Respite Report March 2025, Seymour Whyte Pty Ltd.
- 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) Ancillary Facility Site Establishment Management Plan Consultation Report Rev A April 2023, Transport for NSW.
- M1 Pacific Motorway to Raymond Terrace (Heatherbrae Bypass) Sustainability Strategy Rev B December 2023, Seymour Whyte Pty Ltd.
- M1 Pacific Motorway to Raymond Terrace Heatherbrae Ancillary Compound Sample Analysis and Quality Plan v1f October 2023, ADE Consulting Group.
- NSW EPA Licence 21819 for M1 Pacific Motorway Extension to the Pacific Highway to Raymond Terrace – Heatherbrae Bypass variations include:
 - Notice number: 1647444, dated 04/04/2025
 - Notice number: 1654745, dated 26/11/2025

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, 170 were found to be compliant, 68 were not triggered, and 0 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	32	0	11
Part B – Community Information and Reporting	13	11	0	2
Part C – Construction Environmental Management	18	16	0	2
Part D – Operational Environmental Management	4	0	0	4
Part E – Key Issue Conditions	160	111	0	49
Total	238	170	0	68

3.3 Agency Notices, Orders, Penalty Notices or Prosecutions

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

Despite there being no non-compliances found during this audit period, concerns regarding the development of site-specific trigger values in the Stage 1 (BH2T) Surface and Ground Water Monitoring was expressed by the Environmental Representative in relation to CoA A1, C12, C13 and C18. This concern was discussed during the audit interview and supporting documents were later provided by JHGV, closing out the potential non-compliance:

- Assessment methods generally followed Section 4.2.4 of the Surface Water and Ground Water Quality Monitoring Program, noting limitations due to timing and pre-construction data constraints. Historical data did not fully meet ANZG (2018) guidelines, which recommend two years of monthly sampling; instead, sampling ranged from zero to twelve events over six months. During construction, monitoring was conducted quarterly and following rainfall events >20 mm in 24 hours.
- Before SSTVs were established, results were compared against ANZG default trigger values, or where data was limited, assessed using a 3-month rolling average (+20%). This adaptive approach incorporated recent conditions and historical data to provide context and maintain consistent application of TARP Stage 2 and 3 criteria, although only sites with historical data could trigger Stage 3. Following SSTV implementation, TARP criteria were applied in accordance with the Surface Water Ground Water Quality Management Plan.
- In the May to November 2025 Six Monthly Construction Surface Water and Groundwater Monitoring Report, Site-Specific Trigger Values (SSTVs) were applied to all surface water monitoring locations for the final two monitoring rounds. These SSTVs will be adopted as the primary criteria for future surface water quality assessment.
 - The application of SSTVs concluded at each surface water location that - *“Based on the investigations undertaken, including comparison with baseline data, upstream and downstream monitoring results, and consideration of rainfall conditions and catchment land use, the exceedances recorded at this location are not considered to be caused by project construction activities”*



On balance, the information provided by TfNSW and JHGJV indicates that the absence of SSTV data occurred early in the project, with implications for subsequent monitoring reports. The intent of the program was to establish criteria against which water quality data could be assessed, and this intent was met through the application and discussion of comparable standards within the monitoring programs. Once SSTV data became available later in the project, it was incorporated into the reporting. For these reasons, it is considered that the project demonstrated an intention to comply with the overarching objectives of the SGWMP and, accordingly, is not regarded as a non-compliance.

3.4 Previous Audit

Three previous IEA have been undertaken for this project. The more recent IEA (IEA No. 3) was for the period 28/09/2024 to 27/03/2025. One non-compliance was identified in IEA No.3 associated with the Conditions of Consent. **Table 3.2** outlines the outcomes of IEA No. 3, recommended actions, action taken, and status of the non-compliance. The first IEA (IEA No. 1) was undertaken for the period of 10/10/2023 to 27/02/2024, where five non-compliances were identified associated with the Conditions of Consent and have been outlined in **Table 3.3** for reference. The second IEA (IEA No. 2) was undertaken for the period of 28/02/2024 to 27/09/2024, where four non-compliances were identified in IEA No.2 associated with the Conditions of Consent and have been outlined in **Table 3.4** for reference.

Table 3.2 Non-Compliances from IEA No. 3

	Previous Audit Recommendation	Action	Completion date	Status
C11	Action has been taken to review approved routes with suppliers for drop off of materials. In the instance of the non-compliance, the delivery was from a one-off supplier and was a one-off delivery.	Actions have been taken to review the process of induction for new drivers to ensure approved routes are communicated; communication to relevant sub-contractors; and unannounced audit by JHGJV staff.	Completed on 14 th March 2025	Completed/ closed

Table 3.3 Non-Compliances from IEA No. 2

	Previous Audit Recommendation	Action	Completion date	Status
A30	The complaints register for the missing week has been provided to the ER. No further actions recommended.	A non-compliance related to the ER not receiving the complaints register for the week of 23-29 September 2024 for the Southern Package was notified by the ER to Transport on 02/10/2024. Action was taken to provide the missing complaints register. Process for reminding to send complaints register has been reviewed and improved. No further action required.	Completed first week of October 2024.	Completed/ closed
C11	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 the project boundary is considered to be required. No further actions recommended.	No further action required.	Completed on 17 May 2024.	Completed/ closed
E11	Reports have been submitted. No further action is recommended.	No further action required.	Copies of the reports were sent to DCCEEW on 22/10/2024.	Completed/ closed



	Previous Audit Recommendation	Action	Completion date	Status
E118	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.	The documents were submitted, and a review of administrative processes was undertaken. No further action required.		Complete/ closed

Table 3.4 Non-Compliances from IEA No. 1

	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. 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.	Completed as noted.	Completed/ closed



	Previous Audit Recommendation	Action	Completion date	Status
		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 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	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
	on 11 February 2024. The finding of the review is 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. 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 the 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.	Completed as noted.	Complete/ closed



Previous Audit Recommendation	Action	Completion date	Status
	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.		
E64	Undertake awareness training via a site-wide “toolbox talk” regarding requirement to complete works within standard construction hours unless OOHW permit sought and obtained prior. 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 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.	Completed on dates noted.	Complete/ closed. Actions taken considered to be appropriate to meet the previous audit requirements.

3.5 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.

3.6 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.

3.7 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 generally be of a high standard 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.

During the site inspection, it was observed that construction materials, including rock and steel bars, had been left within Windeyer's Creek. Accordingly, discussions were held on the day of the site inspection between Seymour Whyte and TfNSW regarding the removal of these materials.

3.8 Consultation Outcomes

Feedback received as a result of the consultation undertaken for this audit is presented in **Table 3.5**.

Table 3.5 Consultation Outcomes

Requested from	Response received
Department of Planning, Housing and Infrastructure	Response received 12/01/2026. No comment on the project.
NSW Environmental Protection Agency	Response received 19/01/2026. No comment on the project.
Port Stephens Council	Response received 12/01/2026. No comment on the project.
City of Newcastle	Response received 15/01/2026. No comment on the project.
Hunter Water Corporation	Response received 04/02/2026. No comment on the project.
Maitland City Council	No response.
DPI NSW - Fisheries	Response received 24/02/2026.

Requested from	Response received
	DPIRD Fisheries is satisfied that the project, and its Modification, is progressing in accordance with the Conditions of Consent that relate to Fisheries matters.
Environmental Representative	Response received on 09/02/2026. Feedback regarding the CoA applicable to the ER (A20, A25 to 28, A29a to A29k, A30, A30a to A30b, E66, E71, E76 and E77. These are noted in The Independent Audit Table, found in Appendix E . Concerns regarding the development of site-specific trigger values in the Stage 1 (BH2T) Surface and Ground Water Monitoring was expressed in relation to CoA A1, C12, C13 and C18.

3.9 Complaints

The complaints registers for this audit period were sited during the audit interviews.

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

3.10 Incidents (as defined in the definitions in MCoA)

No incidents occurred during this audit period.

Two precautionary incidents were reported to DPHI with no material harm resulted from the event. The HRBG Two Cell Culvert Sediment Discharge Event occurred on 14 May 2025 and reported to DPHI on 15 May 2025. The Turkey Nest localised wall failure occurred on 24 September 2025 and reported to DPHI on 25 September 2025. No further enforcement action was proposed for these precautionary incidents.

3.11 Actual versus 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 3.6 provides a comparison between the predicted impacts of the key impacts identified in the EIS with the audit findings.

Table 3.6 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 <i>Threatened Species Conservation Act 1999</i> (TSC Act).	This audit, alongside the previous audit has found that the Condition E6 Clearing Report shows how clearing of native vegetation has been minimised. 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.

Key Impact	EIS Predicted Impacts	Audit Findings
	- 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 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.	The complaints register was sighted during the audit interviews and provided. Complaints about noise and vibration were discussed and were noted to be minimal (only one operational noise complaint in the Southern Package dated 13 October 2025) during this audit period and all complaints have been investigated and addressed appropriately. This audit found that noise and vibration conditions are being met, and Out-Of-Hours Work permits or an EPL 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 2 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).	Managing the impacts of flooding on the residents appears to be ongoing and discussed during the audit interview. The Flood Design Report was issued during this audit period (April 2025).

Key Impact	EIS Predicted Impacts	Audit Findings
	- 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).	Measures outlined in the approval documents are being followed, and no non-compliance was observed. On this basis, it is considered the project is consistent with the MCoA and approval documentation.
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. The ER expressed concern regarding SSTV in the Southern Package. Baseline surface water quality data was collected to support the Environmental Impact Statement and develop Site-Specific Trigger Values (SSTVs), with additional pre-construction monitoring undertaken up to July 2023. During the reporting period, initial monitoring used a combination of rolling averages, upstream/ downstream comparisons, and historical data to establish SSTVs, after which SSTVs became the primary assessment criteria. Due to limited pre-construction data and deviations from ANZG guideline recommendations, an adaptive approach using rolling averages and historical context was applied to assess water quality and trigger levels, though this was limited where historical data was unavailable. The two final surface water monitoring rounds applied SSTV at all locations and will serve as primary criteria moving forward. This was previously discussed in Section 3.4. There are no non-compliances related to the Water section of Part E of the Conditions of Approval within this audit period.



Key Impact	EIS Predicted Impacts	Audit Findings
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. The Workforce development, Aboriginal participation and community improvement report FY24/25 was issued during the Audit Period (September 2025). 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 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 site inspection for this audit observed erosion and sediment controls were generally in place and being maintained. No contamination had been found during this audit period. An unexpected find procedure for contamination is in place for the CSSI.
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.

3.12 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 19 and 20 March 2026.



3.13 Improvement Opportunities

As a result of this audit, there has been no non-compliance raised.

The concern raised by the ER regarding SSTV in the Southern Package has not been defined as a non-compliance. The ER, TfNSW and John Holland Gamuda Australia Joint Venture have collaboratively worked together during the audit period to address the concern. As such, the issue regarding SSTV has been addressed in the most recent Six Monthly Construction Surface Water & Groundwater Monitoring Report (May 2025 - November 2025), where SSTV have been adopted for the final two monitoring results and will be used as primary criteria going forward.

3.14 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. 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. 4, covering the period 28 March 2025 to 28 March 2026.

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, 170 were found to be compliant, and 68 were not triggered. A concern regarding the Site-Specific Trigger Values (SSTVs) for the Southern Package was raised by the Environmental Representative (ER) during consultation and the audit interview. JHGV demonstrated an understanding of the issue and provided the necessary information to address the concern and confirm compliance with the relevant Conditions of Approval (CoA). Notwithstanding this, 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. 3) prepared by GeoLINK dated May 2025, the non-compliance was 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].

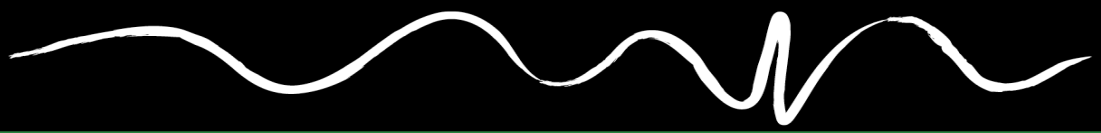


Copyright and Usage

©GeoLINK, 2026

This document, including associated illustrations and drawings, was prepared for the exclusive use of Transport for NSW to address a consent condition for the M1 Pacific Motorway to Raymond Terrace SSI 7319. It is not to be used for any other purpose or by any other person, corporation or organisation without the prior consent of GeoLINK. GeoLINK accepts no responsibility for any loss or damage suffered, howsoever arising to any person or corporation who may use or rely on this document for a purpose other than that described above.

This document, including associated illustrations and drawings, may not be reproduced, stored, or transmitted in any form without the prior consent of GeoLINK. This includes extracts of texts or parts of illustrations and drawings.



Appendix A

Planning Secretary Audit Team Agreement

Department of Planning, Housing and Infrastructure

Reference: SSI-7319-PA-245

Lincoln Carter

Environment and Sustainability Manager M12RT

ROADS AND MARITIME SERVICES

05/03/2026

Sent via the Major Projects Portal only

Subject: Auditor Endorsement Request - Jessica Gilroy

Dear Mr Carter

I refer to your additional request for the Planning Secretary's approval of suitably qualified, experienced, and independent person to conduct an Independent Audit of the M1 Pacific Motorway to Raymond Terrace, submitted as required by Schedule 2, Condition A33 of SSI-7319 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (the Department) on 9 February 2026.

The Department has reviewed the additional independent auditor nomination and based on the information you have provided, is satisfied that the proposed person, is suitably qualified, experienced, and independent to be added to the approved audit team for the project.

Consequently, as nominee of the Planning Secretary, I approve the appointment of Jessica Gilroy, as Assistant Auditor, to be included in the current approved audit team.

For your records, the approved audit team is:

- Simon Williams – Lead Auditor
- Lauren Buchanan – Audit Team Member
- Shannon Waddy – Audit Team Member
- Jessica Gilroy – Assistant Auditor

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of approval and the Department's *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- Construction Audits – The above audit team is approved for the duration of construction and the initial operational audit of the development. However, the Department reserves the right to request an alternate auditor or audit team at any time.

Department of Planning, Housing and Infrastructure

- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.
- Endorsed experts/specialists must attend the site inspection component of the audit unless otherwise agreed by the Planning Secretary.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

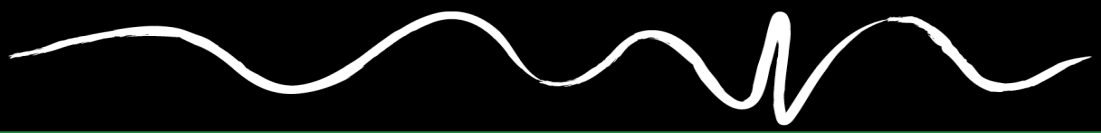
Should you wish to discuss the matter further, please contact Laura Gothard, Senior Compliance Officer on 0484 269 988 or email compliance@planning.nsw.gov.au

Yours sincerely

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

Heidi Watters
Team Leader - Hunter
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	19/01/2026

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 respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to 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	Jessica Gilroy
Signature	
Qualification	BSc, MSc
Position	Environmental Auditor (Trainee) / Environmental Scientist
Company	GeoLINK
Address	1/30A Orlando Street, Coffs Harbour, NSW 2450
Email Address	jgilroy@geolink.net.au

Declaration of Independence - Auditor

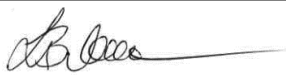
Project Name	M1 Pacific Motorway Extension to Raymond Terrace
Consent Number	SSI-7319
Description of Project	The project includes 15 kilometres of dual carriageway and provides motorway access from the existing road network from four new interchanges at Black Hill, Tarro, Tomago and Raymond Terrace.
Project Address	Land between the M1 Pacific Motorway at Black Hill and the A1 Pacific Highway at Raymond Terrace.
Proponent	Transport for NSW
Date	12/05/2025

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 respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to 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	12/05/2025

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 respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to 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
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	12/05/2025

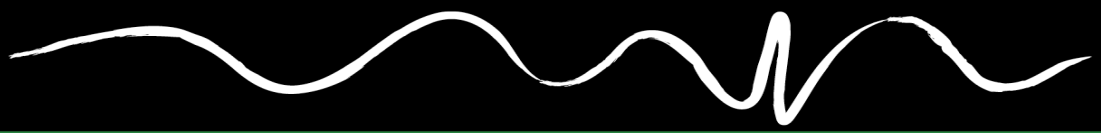
I declare that:

- 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	Shannon Waddy
Signature	
Qualification	BSc
Position	Environmental Auditor (Trainee) / Environmental Scientist
Company	GeoLINK
Address	2/119 Rusden Street, Armidale NSW 2350
Email Address	swaddy@geolink.net.au



Appendix C

Consultation

12 January 2026
Ref No: 5003-1045

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

Via email: laura.gothard@dpie.nsw.gov.au

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 for the period concluding in March 2026 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 Friday, 20 February 2026, it would be greatly appreciated.

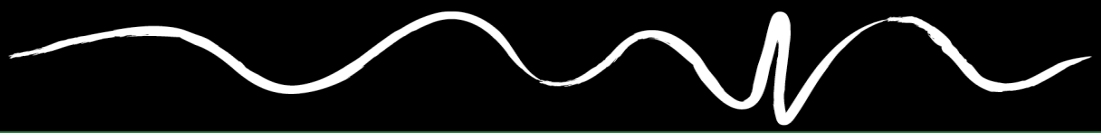
In the meantime, if you have any queries, please contact me on 02 6772 0454.

Yours sincerely

GeoLINK



Simon Williams
Director
Principal/ Environmental Planner



Appendix D

Audit Agenda and Attendance Register

Project 5003 **Date** 16/03/2026
TfNSW M12RT Transport
Independent Audit

Time 8:30am to 3.30pm **Ref No** 5003- 1048

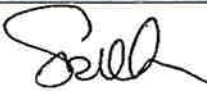
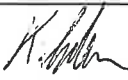
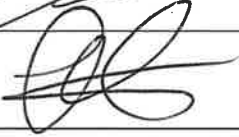
Subject Agenda for Independent Environmental Audit (Heatherbrae Bypass)

Attendees:

Simon Williams (Auditor, GeoLINK)
Jessica Gilroy (Trainee Auditor, GeoLINK)
Lincoln Carter (Environment and Sustainability Manager, TfNSW)
Kai Neville (Senior Environment and Sustainability Officer, TfNSW)
Ben Williams (Environment Officer, TfNSW)
Seymour Whyte Representative/s

Time	Topic/Discussion Item	Personnel Required
8:30	Meet at Heatherbrae Bypass site office and complete visitor inductions. Personnel introductions	Auditor
9.00 – 12.00	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
12.00 – 1.00	Break for lunch.	
1.00 – 3.00	Site inspection Heatherbrae Bypass. General drive and walk through of all areas that can be safely accessed.	TfNSW Environmental Staff Contractor Environmental Staff
3.00 – 3:15	Closing meeting – discuss preliminary findings	All
3:15 – 3:30	Sign-out	Auditor

Register of Attendance – Thursday 19 March 2026

Name	Role	Sign
Simon Williams	Auditor	
Jessica Gilroy	Trainee Auditor	
Simon R Williams	Environment Manager SWS	
KAI NEVILLE	SNR Env + Sus Officer	
Keira Sullivan	Graduate	
Emmalee Jesser	SNR Enviro Advisor	
Luc Conte	Env Mgt TF New	

Project 5003 **Date** 16/03/2026
TfNSW M12RT Transport
Independent Audit

Time 8:30am to 4.30pm **Ref No** 5003-1049

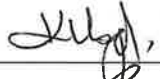
Subject Agenda for Independent Environmental Audit (Black Hill to Tomago)

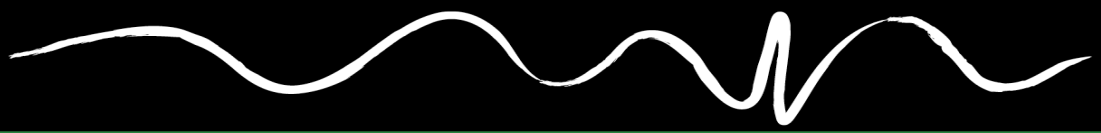
Attendees:

Simon Williams (Auditor, GeoLINK)
Jessica Gilroy (Trainee Auditor, GeoLINK)
Lincoln Carter (Environment and Sustainability Manager, TfNSW)
Kai Neville (Senior Environment and Sustainability Officer, TfNSW)
Ben Williams (Environment Officer)
John Holland / Gamuda JV Representative/s

Time	Topic/Discussion Item	Personnel Required
8:30 – 8.45	Meet at BH2T Site office and complete visitor inductions. Personnel introductions	Auditor
8.45 – 9.00	Opening meeting – discuss purpose, scope etc.	All
9.00 – 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 – Friday 20 March 2026

Name	Role	Sign
Simon Williams	Auditor	
Jessica Gilroy	Trainee Auditor	
Lincoln Carter	Env Mgr TAMSU	
Keira Sullivan	Graduate	
Katmy Lloyd	Env + Sust Mgr	
Pat Bergen	Env Adviser	
Ervey Thomas	Env + Sust Coordinator	
Elianah Gilber	Enviro Coordinator	
India Aspinall	Enviro Coordinator	
JAMES STOKES	SNR ENVIRO	
ANDREW CLAINING	TRANSPORT ENVIRO	



Appendix E

Independent Audit Table

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	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; and (c) Administrative modification of the Conditions of Approval for M1 Pacific Motorway extension to Raymond Terrace dated 29 August 2024.	Compliant	Yes	Compliant	Audit	Yes	Compliant	Audit	Previously compliant	On the basis of this audit and our inspection of the site 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	Site inspections CEMP ER inspection reports	Yes	Compliant	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, including the modification of the Conditions of Approval. These requirements have been incorporated into the CEMP and sub-plans. TfNSW confirmed the project site CEMPs are the most up to date versions.	
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. <i>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.</i>	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no inconsistencies.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no inconsistencies.	Previously not triggered	No inconsistencies in either package 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no additional written directions provided during the audit period.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no additional written directions provided during the audit period.	Stage 1- Previously Compliant Stage 2-Previously not triggered	Northern: No additional written directions provided during the audit period. Previously not-triggered; therefore, remains not-triggered in this period. Southern: No additional written directions provided during the audit period. Previously compliant; therefore, remains compliant in this period with no additional directions.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Both packages 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 dated 26/09/2024 approving extension on Condition E7. DPHI letter dated 27/09/2024 approving extension on Condition E133a.	Yes	Compliant	DPHI letter dated 26/09/2024 approving extension on Condition E7. DPHI letter dated 27/09/2024 approving extension on Condition E133a.	Previously compliant	Transport sought and received permission from DPHI to extend timing of the following: - (Condition E7) secure biodiversity offsets to "within 36 months of commencement of construction" (10/10/2026) - (Condition E133a) extend timeframe to submit evidence of the 'excellent' ISC rating to "within one month of ISC issuing certification of the 'Design Rating", and (Condition E133b) "within one month of ISC issuing certification of the 'As Built' rating" - (Condition E91) extend the timeframe to undertake procurement and installation of all operational noise mitigation measures that are not physically affected during construction at Stage 1 (BH2T) to 30/06/2025 - (Condition E34) second alternate timeframe to commence landowner consultation required by E34 to 30/05/2025.	
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request. Audit interview	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request. Audit interview	Previously compliant	Consultation related to flooding and key fish habitats is still underway from the previous Audit period. The Flood Report has been completed and on the project site. Consultation is still underway.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	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 DPHI (formally DPE) dated 25/07/23 acknowledging submission.	Yes	Compliant	Staging Report. Letter from ER dated 6/07/23 endorsing document. Letter from DPHI (formally 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no deviations. Section 1.3 of Staging Report	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no deviations. 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no deviations to the Staging Reports. DPHI Approval Letter. ER Endorsement Letter - request.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no deviations to the Staging Reports. DPHI Approval Letter. ER Endorsement Letter - request.	Previously compliant	No changes.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	Staging, Combining and Updating Strategies, Plans or Programs										
A14	Strategies, plans or programs required by this approval can be submitted on a progressive basis, with the agreement of the Planning Secretary. With the agreement of the Planning Secretary, the Proponent may prepare the updated strategy, plan or program without undertaking all the consultation required under the applicable condition in this approval. Notes: 1. While any strategy, plan or program may be submitted on a progressive basis, the Proponent must ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times; and 2. If the submission of any strategy, plan or program is to be undertaken in a progressive manner, then the relevant strategy, plan or program must clearly describe the specific stage to which strategy, plan or program applies, the relationship of this stage to future stages, and the trigger for updating the strategy, plan or program.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously not triggered	No progressive submissions under either packaged since last audit. Not triggered at this time.	
	ANCILLARY FACILITIES										
	Additional ancillary facilities										
A15	Ancillary facilities (excluding minor ancillary facilities established under Condition A20) that are not identified by description and location in the documents listed in Condition A1 can only be established and used in each case if: (a) they are located within or immediately adjacent to the construction boundary; and (b) they are not located next to sensitive land use(s) (including where an access road is between the facility and the receiver), unless the landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location; and (c) they have no impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and (d) the establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples of Ancillary Facilities (Bridge 9 and Fill 18).	No	Not Triggered	Audit Interview	Previously not triggered	Northern package: No additional facilities added within audit period; therefore, not triggered at this time. Decommissioning begun - two post deconstruction land assessments. Southern package: Only minor ancillary facilities established within audit period; therefore, not triggered at this time.	
	Locations of Batch Plants										
A16	Asphalt and/or concrete batch plants must not be located within Ancillary Site 4 (AS4) as shown in Figure 5-25 of Appendix A of the Submissions Report as listed in Condition A1(b) .	Not Triggered	No	Not Triggered	Site inspection	No	Not Triggered	N/A to Northern Package	Stage 1- Previously Compliant Stage 2-Previously not triggered	No asphalt or concrete batch plant located across the Southern Package.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	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. Note: Refer to Condition A12 regarding the implementation of condition requirements where operation is staged.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request. Audit Interview - AS1 in process of being decommissioned with the materials have been removed, fences are placed and hydromulching is near completion. Interim inspection by the council approx. 31/03/26.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request. Audit Interview - Two ancillary facilities have commenced decommissioning, this will not be completed during this audit period (approx. July 2026)	Previously not triggered	Northern Package: Not triggered at this time. Southern: Not triggered at this time.	
	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	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples from June 2025 Minor Ancillary Facilities (Fill 18 and Bridge 9). Minor Ancillary Facility Assessments (and endorsed by the ER) for Bridge 9, Gate 3A and 15A sited during the Audit Interview.	Yes	Compliant	Audit Interview - Northern Package has a blanket Ancillary across site (50 m buffer) - approved by ER in the last audit period.	Previously compliant	Minor Ancillary Facility Assessment 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	Boundary Screening was noted during the site inspection between ancillary facilities and adjacent to sensitive land use areas.	
	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 alternate 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 alternate ERs. Independent flood impact advisory panel DPHI approval letter for appointment of independent flood impact advisory panel hydrologist 07/06/2023	Previously compliant	DPHI approval letters reference CVs and experience of independent appointments and state that appropriately skilled, qualified and experienced.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirming no changes since the last audit.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirming no changes since the last audit.	Previously not triggered	Planning Secretary has not commissioned any audits of how an Independent Appointment 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: Conditions A23 and A24 apply to all Independent Appointments including the ER.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirming no changes since the last audit.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirming no changes since the last audit.	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	Archaeological salvage excavations were first works undertaken on site, with work having commenced on 11 April 2023. Lead ER and alternate ERs nominated and approved before this date.	
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	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 received	Yes	Compliant	ER approval received	Previously compliant	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. Email dated 09/02/26 from Mathew Billings to GeoLINK responding to information request confirming the Alternate ER (Alex Gale) performed in the role of Lead ER during the audit period while Mathew was on annual leave in April 2025 and January 2026.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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);	Compliant	Yes	Compliant	Email dated 09/02/26 from the ER responding to information request - confirmed compliance.	Yes	Compliant	Email dated 09/02/26 from the ER responding to information request - confirmed compliance. November 2025 ER report: (e) - Flora and Fauna monitoring report	Previously compliant	Groundwater Management Sub Plan Rev 5, Flood Management Sub Plan Rev 02 and Air Quality Management Sub Plan Rev 6 submitted 24/12/2025 Email dated 09/02/26 from Mathew Billings to GeoLINK responding to information request confirming: (a) No correspondence from the Planning Secretary in the Period. During the period DPHI compliance officers requested information (RFI) from the ER on issues including: -Tree protection. HB, 07/03/2025. (b) No specific notifications. General performance discussed in regular Monthly meeting with ER, Transport DPHI Post approvals and Compliance officers. General performance, including current and emerging issues, also addressed in Monthly meeting between ER and DPHI officers. ER Monthly meeting (c). Recommendations provided during regular coordination meetings and site inspections with Transport and the Stage 1 and Stage 2 Contractors during. (d) Not triggered. Proponent and Stage 1 and Stage 2 contractor documents reviewed in the period addressed under A29 j.	
	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; (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;									Email dated 09/02/26 from Mathew Billings to GeoLINK responding to information request confirming: (e) Implementation monitoring via regular meetings, document reviews, site inspections, review of monitoring reports review of consistency assessments, review and approval of Minor Ancillary Facility Assessment in the period. Records available by request. (f) to (h) Not triggered in the period (i) triggered - see A20	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	(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.				Dec ER monthly report: (j) - 6 monthly Construction Surface water and ground water monitoring report reviewed by ER. (j) - 6 monthly construction noise and vibration monitoring report closed out on 27/11/2025. (j) - Appendix H - ER approval 16/12/2025 (j) - Appendix D, J, L - ER approval 17/12/2025 (j) - Appendix E - ER approval 18/12/2025				ER approval letters Email dated 09/02/26 from Mathew Billings to GeoLINK responding to information request confirming: (j) Triggered. Minor amendments to Stage 1 and Stage 2 Contractor CEMPs, CEMP Sub-Plans and monitoring programs approved in the period. Records of approval published on the project website. (k) published on project website. Submission records available by request.		
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>	Compliant	Yes	Compliant	Email dated 09/02/26 from the ER responding to information request - confirmed compliance.	Yes	Compliant	Email dated 09/02/26 from the ER responding to information request - confirmed compliance.	Previously non-compliant	Email dated 09/02/26 from Mathew Billings to GeoLINK responding to information request confirming all documentation had been provided to the ER within this audit period: (a) Stage 1 complaint register received weekly. Stage 2 complaints register received following receipt of complaint (ad -hoc). (b) Stage 1 and stage 2 assessments "consistency assessment" provided to the ER in the period. Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples of the Complaint register and email providing these to the ER.	
	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 DPHI (formally 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 DPHI (formally 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	Notification timeframe requirement met for commencement of staged construction.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	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 and 05/03/2026 approving independent auditors.	Yes	Compliant	Letter from DPHI dated 15/08/24 and 05/03/2026 approving independent auditors.	Previously compliant	Approval was received on 15/08/24 for the previous audit and 05/03/2026 for this audit.	
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 (2020)</i> .	
A35	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least four weeks' notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.	Compliant	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request - confirmed audit dates.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request - confirmed audit dates.	Previously compliant	DPHI confirmed the dates for the No. 3 Construction IEA for the M1 Bypass BH2RT as the 27 March 2025 until 27 March 2026.	
A36	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (DPIE, 2020), the Proponent must: (a) review and respond to each Independent Audit Report prepared under Condition A34 or Condition A35 ; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report and response to it publicly available two months after submission to the Planning Secretary, or as otherwise agreed by the Planning Secretary.	Compliant	Yes	Compliant	Independent Environmental Audit Report and Response for audit period March 2025 to March 2026. Letter from DPHI dated 7 July 2025 stating acceptance of the Independent Audit Report for March 2025 to March 2026. Project website	Yes	Compliant	Independent Environmental Audit Report and Response for audit period March 2025 to March 2026. Letter from DPHI dated 7 July 2025 stating acceptance of the Independent Audit Report for March 2025 to March 2026. Project website	Previously compliant	(a) Proponent reviewed and responded to the previous Independent Audit Report (October 2023 to February 2024). (b) The report and response was submitted on 20/05/2025. (c) The report and response was accepted by DPHI on the 7 July 2025 and is available on the project website.	
A37	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (DPIE, 2020).	Compliant	Yes	Compliant	Independent Environmental Audit Report and Response for audit period March 2025 to March 2026. Letter from DPHI dated 7 July 2025 stating acceptance of the Independent Audit Report for March 2025 to March 2026. Project website	Yes	Compliant	Independent Environmental Audit Report and Response for audit period March 2025 to March 2026. Letter from DPHI dated 7 July 2025 stating acceptance of the Independent Audit Report for March 2025 to March 2026. Project website	Previously compliant	The IEA response was submitted to the Planning Secretary on 20/05/2025. NSW planning approved the IEAs to be conducted annually, dated 07/08/2025.	
A38	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (DPIE, 2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request - confirmed this is not triggered.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request - confirmed this is not triggered.	Previously not triggered	Independent operational audits have not yet commenced at the time of this report.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	INCIDENT AND NON-COMPLIANCE NOTIFICATION AND REPORTING										
	Incident Notification, Reporting and Response										
A39	The Planning Secretary must be notified via the Major Projects Website immediately or within 24 hours after the Proponent becomes aware of an incident. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the date, time, location and nature of the incident.	Compliant	Yes	Compliant	Monthly ER reports. Audit Interview sited the two precautionary incident notifications previously emailed to GeoLINK. Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples for the HRBG Two Cell Culvert Sediment Discharge Event on 14/05/2025 and Failure of turkey nest wall on 24/09/2025. No further action was required by DPHI.	No	Not Triggered	Audit interview Monthly ER reports.	Previously not triggered	Southern Package: The two precautionary incident notifications were sited during the audit interview. Northern Package: Not Triggered.	
A40	Subsequent written notification must be given and reports submitted in accordance with the requirements set out in Appendix A of this approval.	Compliant	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples for the HRBG Two Cell Culvert Sediment Discharge Event on 14/05/2025.	No	Not Triggered	Audit Interview - not triggered.	Previously not triggered	Northern Package: Not triggered at this time. Southern Package: Written notification and report submitted for the HRBG Two Cell Culvert Sediment Discharge Event.	
	Non-Compliance Notification										
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.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples of any non-compliances/ precautionary examples. ER monthly reports	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples of any non-compliances/ precautionary examples. ER monthly reports	Stage 1- Previously Compliant Stage 2-Previously not triggered	Northern package: No non-compliances since the 2024 audit. Southern package: No non-compliances since the last audit.	
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.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
Part B - Community Information and Reporting											
	COMMUNITY INFORMATION , CONSULTATION AND INVOLVEMENT										
	Communication Strategy										
B1	A Communication Strategy must be prepared to provide mechanisms to facilitate communication about construction and operation of the CSSI with: (a) the community (including adjoining affected landowners and businesses, and others directly impacted by the CSSI); (b) Registered Aboriginal Parties (RAPs) and LALCs; and (c) the relevant councils and relevant government agencies.	Compliant	Yes	Compliant	Communication Strategy M1 Pacific Motorway extension to Raymond Terrace V3.0 January 2024.	Yes	Compliant	Communication Strategy M1 Pacific Motorway extension to Raymond Terrace V3.0 January 2024.	Previously compliant	Communication Strategy prepared by Proponent. Requirements addressed as follows: (a) Section 3.3 - Section 3.4 (b) Section 3.3 - Section 3.4 (c) Section 3, Section 5.6, Section 6 Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no revisions in the Communication Strategy.	
B2	The Communication Strategy must: (a) identify people, organisations, relevant councils and government agencies to be consulted during the design and work phases of the CSSI; (b) address how the Proponent will engage with the people, organisations and relevant councils and government agencies; (c) address how the requirements of Condition A8 will be met; (d) identify details of the community demographics; (e) identify timing of any consultation; (f) set out procedures and mechanisms for the regular distribution of accessible information including to LOTE and CALD and other vulnerable and marginalised groups or communities about or relevant to the CSSI; (g) identify opportunities for education within the community about construction sites; (h) detail the measures for advising the community in advance of upcoming construction including upcoming out-of-hours work as required by Condition E77 and blasting activities (if proposed);	Compliant	Yes	Compliant	Communication Strategy M1 Pacific Motorway extension to Raymond Terrace V3.0 January 2024.	Yes	Compliant	Communication Strategy M1 Pacific Motorway extension to Raymond Terrace V3.0 January 2024.	Previously compliant	Requirements addressed as follows: (a) Section 3.3 - Section 3.4, Section 6, Section 7 (b) Section 3.3 - Section 3.4, Section 6, Section 7 (c) Section 6.6 (d) Section 3.2 (e) Section 3.3, Section 7 (f) Section 7 (g) Section 7 (h) Section 4.2, Section 7 (i) Section 4.2, Section 7 (j) Section 7 (k) Section 5.0, Section 7, Section 8	
	(i) identify the mechanisms for engaging with the community to determine periods of respite, as required by Condition E77; (j) provide for the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community(ies) for the CSSI; and (k) set out procedures and mechanisms: (i) through which the community can discuss or provide feedback to the Proponent; (ii) through which the Proponent will respond to enquiries or feedback from the community; and (iii) to resolve any issues and mediate any disputes that may arise in relation to the environmental management and delivery of the CSSI, including disputes regarding rectification or compensation.										
B3	The Communication Strategy must be submitted to the Planning Secretary for approval no later than one month before the commencement of any Work.	Compliant	Yes	Compliant	Letter from DPHI to TfNSW dated 13/02/23 approving Communications Strategy. Letter from DPHI to TfNSW dated 31/01/24 approving revised Communication Strategy.	Yes	Compliant	Letter from DPHI to TfNSW dated 13/02/23 approving Communications Strategy. Letter from DPHI to TfNSW dated 31/01/24 approving revised Communication Strategy.	Previously compliant	Communications Strategy submitted to DPHI 08/12/22 and approved 13/02/23. Revised Communications Strategy (current) submitted 19/01/24 and approved 31/01/24. Original strategy approved more than one month prior to commencement of work.	
B4	Work for the purposes of the CSSI must not commence until the Communication Strategy has been approved by the Planning Secretary.	Compliant	Yes	Compliant	Letter from DPHI to TfNSW dated 13/02/23 approving original Communications Strategy.	Yes	Compliant	Letter from DPHI to TfNSW dated 13/02/23 approving original Communications Strategy.	Previously compliant	Original Communications Strategy submitted to DPHI 08/12/22 and approved 13/02/23. More than one month prior to commencement of work.	
B5	The Communication Strategy , as approved by the Planning Secretary, must be implemented for the duration of work and for 12 months following the completion of construction.	Compliant	Yes	Compliant	Project website	Yes	Compliant	Project website	Previously compliant	The Communication Strategy has been implemented for the duration of the works thus far. Project website provides latest news posts, allows to register for updates, and includes a construction notifications map.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	Public Liaison Officer										
B6	A Public Liaison Officer(s) must be appointed to assist the public with questions and complaints they may have at any time during Work. The Public Liaison Officer(s) must be available at all times that Work is occurring.	Compliant	Yes	Compliant	Previous audit	Yes	Compliant	Previous audit	Previously compliant	Ricardo Martinelli - 13 November. Monica Porte	
	COMPLAINTS MANAGEMENT SYSTEM										
B7	A Complaints Management System must be prepared and implemented before the commencement of any Work and maintained for the duration of Work and for a minimum for 12 months following completion of construction of the CSSI. Note: <i>In the situation where there are different entities constructing and operating the CSSI, continuity of access to the Complaints Management System must be maintained.</i>	Compliant	Yes	Compliant	Section 8 of Communication Strategy. Email dated 20/02/26 from Transport to GeoLINK responding to information request provided complaints register.	Yes	Compliant	Audit interview Section 8 of Communication Strategy. Email dated 20/02/26 from Transport to GeoLINK responding to information request provided complaints register.	Previously compliant	The Complaints Management System is confirmed to be in place. Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples of the Complaint register and email providing these to the ER. Email dated 09/02/26 from the ER responding to information request confirmed complaint register was recieved.	
B8	The following information must be available to facilitate community enquiries and manage complaints one month before the commencement of Work and for 12 months following the completion of construction: (a) a 24-hour telephone number for the registration of complaints and enquiries about the CSSI; (b) a postal address to which written complaints and enquires may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved. This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level and must be provided on the website required under Condition B12 .	Compliant	Yes	Compliant	Section 8 of Communication Strategy	Yes	Compliant	Section 8 of Communication Strategy	Previously compliant	(a) available on Proponent's project website and via letterbox drops and signage at site compound. (b) available on Proponent's project website. (c) available on Proponent's project website. (d) included in Comms strategy - see website. Website is WCAG compatible and available in various languages. Project website meets NSW Government standards for website accessibility.	
B9	A Complaints Register must be maintained and record information on all complaints received about the CSSI during the carrying out of any Work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the: (a) number of complaints received; (b) the date and time of the complaint; (c) the method by which the complaint was made; (d) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (e) nature of the complaint; (f) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and (g) if no action was taken, the reason(s) why no action was taken. 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>	Compliant	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples of the Complaint register and email providing these to the ER. Email dated 09/02/26 from the ER responding to information request confirmed complaint register was recieved.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided examples of the Complaint register and email providing these to the ER. Email dated 09/02/26 from the ER responding to information request confirmed complaint register was recieved.	Previously compliant	Complaints register with individual complaints recorded with the required information (a) to (e)	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
B10	Complainants must be advised of the following information before, or as soon as practicable after, providing personal information: (a) the Complaints Register may be forwarded to government agencies, including the Department (Department of Planning and Environment, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150), to allow them to undertake their regulatory duties; (b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies; (c) the supply of personal information by the complainant is voluntary; and (d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement). The Collection Statement must be included on the website required under Condition B12 to make prospective complainants aware of their rights under the Privacy and Personal Information Protection Act 1998 (NSW). Note: Should a complainant disagree with the Collection Statement, a note to that effect must be recorded in the Complaints Register.	Compliant	Yes	Compliant	Section 8 of Communication Strategy Project website	Yes	Compliant	Section 8 of Communication Strategy Project website	Previously compliant	Collection statement included on contact form on project website.	
B11	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	Not Triggered	No	Not Triggered	Not triggered.	No	Not Triggered	Not triggered.	Previously not triggered	No request from DPHI. Not triggered at this time.	
PROVISION OF ELECTRONIC INFORMATION											
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	Compliant	Yes	Compliant	Project website	Yes	Compliant	Project website	Previously compliant	Project teams confirmed all documents meant to be available are considered to be uploaded on the website. 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.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	(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. Notes: 1. The intention of this condition is to increase transparency and for information/documents required as part of the approval to be provided proactively and publicly in an easily accessible manner. Where information is excepted by this condition, it is intended that these documents are provided in their redacted form. 2. The Planning Secretary may instruct the Proponent to finalise and upload any report or documents to the Project's website in accordance with Condition A4.										
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	Not triggered.	No	Not Triggered	Not triggered.	Previously not triggered	Proponent is not seeking to cease providing information via website. Not triggered at this time.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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;	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: During this audit period, the following documents have received approval from the ER: - Construction Environmental Management Plan. M1 Motorway Extension to Raymond Terrace – Heatherbrae Bypass. Revision 02, October 2025. (CEMP) - CEMP Appendix B1. Construction Traffic, Transport and Access Management Sub-plan. Revision 04, October 2025. - CEMP Appendix B2. Construction Noise and Vibration Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025. - CEMP Appendix B3. Construction Flora and Fauna Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025. - CEMP Appendix B4. Construction Flood Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2024 - CEMP Appendix B5. Construction Air Quality Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025 - CEMP Appendix B6. Construction Soil and Water Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025 - CEMP Appendix B7. Construction Cultural Heritage Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025 - CEMP Appendix B8. Bushfire Management Plan. Revision 02, October 2025. - CEMP Appendix B9. Construction Waste Management Sub-plan. Revision 02 October 2025.	
	(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. Note: CEMP(s) may reflect the staged construction of the project through geographical activities, temporal activities or activity-based contracting and staging.									- M1 Pacific Motorway extension to Raymond Terrace – Nth Stage. Construction Environment Management Plan. Appendix B1 Construction Traffic, Transport and Access Management Sub-plan, Revision 04. October 2025. (TT&) Southern Package: During this audit period, the following documents have received approval from the ER: - CEMP Appendix K. Surface Water and Groundwater Quality Construction Monitoring Program. Revision 5, September 2025. - CEMP Appendix B - Traffic, Transport and Access Management Sub-Plan. Revision 11, July 2025 - CEMP Appendix J - BH2T Non-Aboriginal Heritage Management Sub-Plan. Revision 2, February 2026 - CEMP Appendix F - Air Quality Management Sub-Plan, Revision 6, December 2025 - CEMP Appendix E - Flood Management Sub-Plan. Revision 2, December 2025. - CEMP Appendix D - Flora and Fauna Management Sub-Plan. Revision 6, February 2026. - CEMP Appendix H - Groundwater Management Sub-Plan. Revision5, December 2025. - CEMP Appendix K – Surface Water and Groundwater Quality Construction Monitoring Program. Revision 5, September 2025. - CEMP Appendix L - Bushfire Management Sub-Plan. Revision 2, February 2026. - CEMP Appendix K – Surface Water and Groundwater Quality Construction Monitoring Program. Revision 5, September 2025	
C3	CEMP(s) (and relevant CEMP Sub-plans) must be submitted to the Planning Secretary for approval	Compliant	Yes	Compliant	Letter from DPHI (formally DPE) dated 13/11/23 granting approval, subject to directions.	Yes	Compliant	CEMP for Northern Package, Revision E October 2023. Letter from DPHI (formally DPE) dated 09/10/23 granting approval, subject to directions.	Previously compliant	Northern package: Directions from DPHI (formally DPE) approval letter have been addressed in CEMP Revision E document on 11/10/23. Revision as track changes was sighted during first audit interview. Southern package: Direction 2 from the DPE letter granting approval has been completed.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance																					
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 DPHI (formally 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.																						
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 .	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.																						
	<table border="1"><thead><tr><th>Required CEMP Sub-plan</th><th>Relevant government agencies and councils to be consulted for each CEMP Sub-plan</th></tr></thead><tbody><tr><td>(a) Traffic, transport and access</td><td>Relevant council(s)</td></tr><tr><td>(b) Noise and vibration</td><td>Relevant council(s)</td></tr><tr><td>(c) Flora and Fauna</td><td>AG, DCC/DEW, DPHI, Fisheries, Water Group, BCS, and relevant council(s)</td></tr><tr><td>(d) Flooding</td><td>BCS, Flooding unit, relevant council(s)</td></tr><tr><td>(e) Air quality (including odour)</td><td>Relevant council(s)</td></tr><tr><td>(f) Soils and surface water (including contaminated lands and acid sulfate soils)</td><td>Northern DCC/DEW, Water, BCS, Hunter Water (if Hunter Water's assets are affected and relevant council(s))</td></tr><tr><td>(g) Groundwater</td><td>Water Group, BCS, Hunter Water (where it is proposed to discharge groundwater into Hunter Water's assets and relevant council(s))</td></tr><tr><td>(h) Aboriginal Heritage</td><td>Heritage NSW, BCS, Local Aboriginal Land Council, and Council, relevant council(s)</td></tr><tr><td>(i) Non-Aboriginal heritage</td><td>Relevant council(s)</td></tr><tr><td>(j) Dredging and Disposal</td><td>DPHI, Fisheries, EPA</td></tr></tbody></table> Section 8 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.	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	AG, DCC/DEW, DPHI, Fisheries, Water Group, BCS, and relevant council(s)	(d) Flooding	BCS, 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)	Northern DCC/DEW, Water, BCS, Hunter Water (if Hunter Water's assets are affected and relevant council(s))	(g) Groundwater	Water Group, BCS, Hunter Water (where it is proposed to discharge groundwater into Hunter Water's assets and relevant council(s))	(h) Aboriginal Heritage	Heritage NSW, BCS, Local Aboriginal Land Council, and Council, relevant council(s)	(i) Non-Aboriginal heritage	Relevant council(s)	(j) Dredging and Disposal	DPHI, Fisheries, EPA	of the s or								
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	AG, DCC/DEW, DPHI, Fisheries, Water Group, BCS, and relevant council(s)																															
(d) Flooding	BCS, 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)	Northern DCC/DEW, Water, BCS, Hunter Water (if Hunter Water's assets are affected and relevant council(s))																															
(g) Groundwater	Water Group, BCS, Hunter Water (where it is proposed to discharge groundwater into Hunter Water's assets and relevant council(s))																															
(h) Aboriginal Heritage	Heritage NSW, BCS, Local Aboriginal Land Council, and Council, relevant council(s)																															
(i) Non-Aboriginal heritage	Relevant council(s)																															
(j) Dredging and Disposal	DPHI, Fisheries, EPA																															
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 implemented 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;	Not Triggered	No	Not Triggered	Staging report letter - notification for no dredging.	No	Not Triggered	Staging report letter - notification for no dredging.	Previously not triggered	No dredging proposed so sub-plan is not required. Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this is not triggered at this time.																						

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	(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 surrounding areas; and (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. <i>Note: If dredging is not proposed, the requirements of Conditions CS(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 CSS; (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	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Compliant	Yes	Compliant	CEMP Appendix - Construction Soil and Water Management Sub-plan	Yes	Compliant	CEMP Appendix - Construction Soil and Water Management Sub-plan	Previously compliant	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 Cavanba Consulting. Southern Package: Addressed in Table 3-2 and the following sections of the BH2T SSWMSP (a) Section 6.1 and 7.4 SWGQCMSP (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	
	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.										
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 DPHI (formally 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 DPHI (formally DPE) dated 10/10/23 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.	Compliant	Yes	Compliant	ER approval of minor amendments issued 24/07/2025 for Construction Flora and Fauna Management Sub-plan ER approval of minor amendments issued 12/12/25 for air quality management sub-plan ER approval of minor amendments issued 16/12/2025 for Groundwater Management Sub-Plan ER approval of minor aqmdments issued 18/12/2025 for Flooding Management Sub-Plan ER approval of minor amendments issued 15/07/2025 for Traffic, Transport and Access Management Sub-Plan	Yes	Compliant	ER approval of minor amendments issued 22/10/2025 for: Construction Environmental Management Plan. M1 Motorway Extension to Raymond Terrace – Heatherbrae Bypass. Revision 03, October 2025. (CEMP) CEMP Appendix B1. Construction Traffic, Transport and Access Management Sub-plan. Revision 4. October 2025. CEMP Appendix B2. Construction Noise and Vibration Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025. CEMP Appendix B3. Construction Flora and Fauna Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025. CEMP Appendix B4. Construction Flood Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025. CEMP Appendix B5. Construction Air Quality Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025 CEMP Appendix B6. Construction Soil and Water Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025 CEMP Appendix B7. Construction Cultural Heritage Management Sub-plan, Heatherbrae Bypass. Revision 02, October 2025 CEMP Appendix B8. Construction Bushfire Management Sub-plan. Revision 02. October 2025. • CEMP Appendix B9. Construction Waste Management Sub-plan. Revision 02. October 2025.	Stage 1- Previously Non-Compliant Stage 2-Previously Compliant	Northern Package: CEMP(s) and CEMP Sub-plans implemented as approved during this audit period. Southern Package: CEMP(s) and CEMP Sub-plans implemented as approved during this audit period.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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 DPHI (formally 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. 6 Monthly Construction Surface Water & Groundwater Monitoring Report issued April 2026 (prior to ER Review). Report covers May 2025 - November 2025. 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 DPHI (formally DPE) dated 10/10/23 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	Northern Package: CEMP and sub plans for Northern Package approval granted on 09/10/23. Northern Package commenced construction 10/10/23. Southern Package: CEMP and sub plans for Southern Package approval granted on 13/11/23. Southern Package commenced construction 14/11/23. Surface water SSTV established in the 6 Monthly Construction Surface Water & Groundwater Monitoring Report issued April 2026	
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	Appendix C (CMP) of Noise and Vibration Management Sub-plan. Appendix G (CMP) of Flora and Fauna Management Sub-plan.	Yes	Compliant	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	CMPs for both packages are being implemented. Note for Southern Package: Minor amendments to the CMPs were approved by the ER during this audit period.	
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. <i>Note : Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan .</i>	Compliant	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided submission receipts. 6 Monthly Construction Noise & Vibration Monitoring Report issued June 2025. Report covers November 2024 - May 2025. 6 Monthly Construction Noise & Vibration Monitoring Report issued November 2025. Report covers May 2025 - November 2025. 6 Monthly Construction Surface Water & Groundwater Monitoring Report issued December 2025. Report covers November 2024 - May 2025. 6 Monthly Construction Surface Water & Groundwater Monitoring Report issued April 2026 (prior to ER Review). Report covers May 2025 - November 2025. 6 Monthly Construction Depositional Dust Monitoring Report issued September 2025. Report covers February 2025 - August 2025. 6 Monthly Construction Flora and Fauna Monitoring Report issued November 2025. Report covers November 2024 - May 2025.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided submission receipts. Six Monthly Construction Noise & Vibration Monitoring Report issued November 2025. Report covers April 2025 - September 2025. Six Monthly Construction Noise & Vibration Monitoring Report issued December 2025, covers May 2025 to Nov 2025 Six Monthly Construction Surface Water & Groundwater Monitoring Report issued November 2025. Report covers April 2025 - September 2025. Six Monthly Construction Surface Water & Groundwater Monitoring Report issued May 2025. Report covers October 2024 - March 2025. Six Monthly Surface Water & Groundwater Monitoring Report issued December 2025. Report covers November 2024 to May 2025	Previously compliant	Reports have been prepared and submitted to the relevant regulatory agencies as nominated in the associated sections of each management plan.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this stage of the project has not yet been reached.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Yes	Compliant	Site inspection	Previously compliant	Water carts were sited at both the Northern and Southern package sites and no excessive dust generation was observed. Note- it was raining during the Site Inspection, reducing any dust impact.	
	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	Unexpected Finds Protocol.	Yes	Compliant	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 BCS 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 BCS.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously not triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed 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	Condition E6 Clearing Report, July 2025.	Yes	Compliant	Condition E6 Clearing Report, July 2025.	Previously compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no exceedance of threatened species and threatened ecological communities has occurred. Condition E6 Clearing Report demonstrated impacts on native vegetation, mangroves and koala habitat have been minimised.	
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request. Condition E6 Clearing Report, July 2025.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request. Condition E6 Clearing Report, July 2025.	Previously compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed clearing of native vegetation was 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, BCS and AG DCCEEW for information, within 12 months of the commencement of construction.	Compliant	Yes	Compliant	Condition E6 Clearing Report, July 2025.	Yes	Compliant	Condition E6 Clearing Report, July 2025.	Previously not triggered	The Condition E6 Clearing Report was submitted to the Planning Secretary, BCD, and DCCEEW on 9 October 2024. As the construction for the HBB package commenced on 10/10/23, this meets the requirement to be submitted within 12 months of the commencement of construction. Note that the clearing report was completed with some clearing still occurring, with a revised (version 4) issued in July 2025.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance																																												
	Table 3. Ecosystem Credits to be Retired <table><tr><th colspan="3">Ecosystem Credits</th></tr><tr><th>Plant Community Type (PCT) ID and name</th><th>Amended construction footprint (hectares)</th><th>Number of Credits</th></tr><tr><td>1590 Spotted Gum – Broad-leaved Mahogany – Red Ironbark shrubby open forest</td><td>40.93</td><td>2274</td></tr><tr><td>1588 Grey Ironbark – Broad-leaved Mahogany – Forest Red Gum shrubby open forest on Coastal Lowlands of the Central Coast</td><td>7.74</td><td>497</td></tr><tr><td>1640 Smooth-barked Apple - Blackbutt – Old Man Banksia woodland on coastal sands of the Central and Lower North Coast</td><td>27.73</td><td>1385</td></tr><tr><td>1640 Smooth-barked Apple – Red Mahogany – Swamp Mahogany – Moisture tolerant healthy swampy woodlands of coastal lowlands</td><td>1.33</td><td>70</td></tr><tr><td>1680 Forest Red Gum grassy open forest on floodplains of the lower Hunter</td><td>0.51</td><td>31</td></tr><tr><td>1710 Philly-leaved Paperbark Forest on coastal lowlands of the Central Coast and Lower North Coast</td><td>1.88</td><td>107</td></tr><tr><td>1717 Broad-leaved Paperbark – Swamp Mahogany – Swamp Oak – Saw Sedge swamp forest of the Central Coast and Lower North Coast</td><td>10.56</td><td>473</td></tr><tr><td>1724 Broad-leaved Paperbark – Swamp Oak – Saw Sedge swamp forest on coastal lowlands of the Central Coast and Lower North Coast</td><td>1.64</td><td>77</td></tr><tr><td>1727 Swamp Oak – Sea Rush – Swamp juniper swamp forest on coastal lowlands of the Central Coast and Lower North Coast</td><td>6.84</td><td>427</td></tr><tr><td>1736 Water Couch – Tall Spike Rush freshwater wetland of the Central Coast and lower Hunter</td><td>59.21</td><td>2311</td></tr><tr><td>1742 Jointed Twig-rush wetland</td><td>1.79</td><td>122</td></tr><tr><td>1071 Phragmites australis and Typha orientalis coastal heathland wetlands of the Sydney Basin Bioregion</td><td>8.05</td><td>340</td></tr><tr><td>TOTAL ECOSYSTEM CREDITS</td><td>170.21</td><td>8111</td></tr></table> Notes: 1. Credits have been calculated using the Framework for Biodiversity Assessment. 2. Includes credits required under the Environment Protection	Ecosystem Credits			Plant Community Type (PCT) ID and name	Amended construction footprint (hectares)	Number of Credits	1590 Spotted Gum – Broad-leaved Mahogany – Red Ironbark shrubby open forest	40.93	2274	1588 Grey Ironbark – Broad-leaved Mahogany – Forest Red Gum shrubby open forest on Coastal Lowlands of the Central Coast	7.74	497	1640 Smooth-barked Apple - Blackbutt – Old Man Banksia woodland on coastal sands of the Central and Lower North Coast	27.73	1385	1640 Smooth-barked Apple – Red Mahogany – Swamp Mahogany – Moisture tolerant healthy swampy woodlands of coastal lowlands	1.33	70	1680 Forest Red Gum grassy open forest on floodplains of the lower Hunter	0.51	31	1710 Philly-leaved Paperbark Forest on coastal lowlands of the Central Coast and Lower North Coast	1.88	107	1717 Broad-leaved Paperbark – Swamp Mahogany – Swamp Oak – Saw Sedge swamp forest of the Central Coast and Lower North Coast	10.56	473	1724 Broad-leaved Paperbark – Swamp Oak – Saw Sedge swamp forest on coastal lowlands of the Central Coast and Lower North Coast	1.64	77	1727 Swamp Oak – Sea Rush – Swamp juniper swamp forest on coastal lowlands of the Central Coast and Lower North Coast	6.84	427	1736 Water Couch – Tall Spike Rush freshwater wetland of the Central Coast and lower Hunter	59.21	2311	1742 Jointed Twig-rush wetland	1.79	122	1071 Phragmites australis and Typha orientalis coastal heathland wetlands of the Sydney Basin Bioregion	8.05	340	TOTAL ECOSYSTEM CREDITS	170.21	8111									
Ecosystem Credits																																																							
Plant Community Type (PCT) ID and name	Amended construction footprint (hectares)	Number of Credits																																																					
1590 Spotted Gum – Broad-leaved Mahogany – Red Ironbark shrubby open forest	40.93	2274																																																					
1588 Grey Ironbark – Broad-leaved Mahogany – Forest Red Gum shrubby open forest on Coastal Lowlands of the Central Coast	7.74	497																																																					
1640 Smooth-barked Apple - Blackbutt – Old Man Banksia woodland on coastal sands of the Central and Lower North Coast	27.73	1385																																																					
1640 Smooth-barked Apple – Red Mahogany – Swamp Mahogany – Moisture tolerant healthy swampy woodlands of coastal lowlands	1.33	70																																																					
1680 Forest Red Gum grassy open forest on floodplains of the lower Hunter	0.51	31																																																					
1710 Philly-leaved Paperbark Forest on coastal lowlands of the Central Coast and Lower North Coast	1.88	107																																																					
1717 Broad-leaved Paperbark – Swamp Mahogany – Swamp Oak – Saw Sedge swamp forest of the Central Coast and Lower North Coast	10.56	473																																																					
1724 Broad-leaved Paperbark – Swamp Oak – Saw Sedge swamp forest on coastal lowlands of the Central Coast and Lower North Coast	1.64	77																																																					
1727 Swamp Oak – Sea Rush – Swamp juniper swamp forest on coastal lowlands of the Central Coast and Lower North Coast	6.84	427																																																					
1736 Water Couch – Tall Spike Rush freshwater wetland of the Central Coast and lower Hunter	59.21	2311																																																					
1742 Jointed Twig-rush wetland	1.79	122																																																					
1071 Phragmites australis and Typha orientalis coastal heathland wetlands of the Sydney Basin Bioregion	8.05	340																																																					
TOTAL ECOSYSTEM CREDITS	170.21	8111																																																					
	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>Eucalyptus parramattensis subsp. decedens</td><td>34 plants</td><td>476</td></tr><tr><td>Quint. amensis</td><td>209 plants</td><td>15,862</td></tr><tr><td>Callistemon lwerifolius</td><td>159 plants</td><td>2,226</td></tr><tr><td>Pericoma exilis</td><td>3 plants</td><td>36</td></tr><tr><td>Austroaletris Biform</td><td>43.74 ha</td><td>569</td></tr><tr><td>Black Blenny</td><td>51.74 ha</td><td>673</td></tr><tr><td>Koala</td><td>69.1 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>TOTAL SPECIES CREDITS</td><td></td><td>22,942</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	Eucalyptus parramattensis subsp. decedens	34 plants	476	Quint. amensis	209 plants	15,862	Callistemon lwerifolius	159 plants	2,226	Pericoma exilis	3 plants	36	Austroaletris Biform	43.74 ha	569	Black Blenny	51.74 ha	673	Koala	69.1 ha	2,317	Wallum Froglet	3.1 ha	40	Mahony's Toadlet	3.1 ha	40	TOTAL SPECIES CREDITS		22,942																					
Species	Loss of habitat (ha) or individuals	Number of Credits																																																					
Eucalyptus parramattensis subsp. decedens	34 plants	476																																																					
Quint. amensis	209 plants	15,862																																																					
Callistemon lwerifolius	159 plants	2,226																																																					
Pericoma exilis	3 plants	36																																																					
Austroaletris Biform	43.74 ha	569																																																					
Black Blenny	51.74 ha	673																																																					
Koala	69.1 ha	2,317																																																					
Wallum Froglet	3.1 ha	40																																																					
Mahony's Toadlet	3.1 ha	40																																																					
TOTAL SPECIES CREDITS		22,942																																																					
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 BCS and AG 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided communication on the review and update of biodiversity offset obligations dated 18/07/2025 and 11/08/2025.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided communication on the review and update of biodiversity offset obligations dated 18/07/2025 and 11/08/2025.	Previously not triggered	Planning Secretary approved the changes to the EA Ecosystem credit requirements (dated 11/08/2025).																																													

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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.	Compliant	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided communication on the review and update of biodiversity offset obligations dated 18/07/2025 and 11/08/2025.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request provided communication on the review and update of biodiversity offset obligations dated 18/07/2025 and 11/08/2025.	Previously not triggered	Planning Secretary approved the changes to the EA Ecosystem credit requirements (dated 11/08/2025).	
E10	Where verification surveys are required, they must be undertaken in consultation with BCS. 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered at this time.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered at this time.	Previously not triggered	Not triggered at this time.	
E11	The Proponent must submit to the Planning Secretary and AG 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.	Compliant	Yes	Compliant	Previous audit Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed there were no retirements during audit period	Yes	Compliant	Previous audit Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed there were no retirements during audit period	Previously compliant	No retirements during audit period	
	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 DPIRD Fisheries. The habitat offsets must be provided by no later than 18 months following the commencement of operation.	Not Triggered	No	Not Triggered	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.	Stage 1- Previously Compliant Stage 2- Previously not triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered at this time.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Requirements incorporated into Design and Landscape Plans. Consultation with community completed and is documented in the respective Design and Landscape Plans. Document reviewed by TfNSW Centre for Urban Design.	
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.	Stage 1- Previously Compliant Stage 2- 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 compliant	Design and Landscape plans of the respective packages meet this condition.	
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	Previous audit Approval letter from DPHI dated 14/05/2024.	Yes	Compliant	Previous audit Approval letter from DPHI dated 10/07/2024.	Previously compliant	Northern Package: Approval received from DPHI dated 11 July 2024. Southern Package: Approval received from DPHI dated 14 May 2024.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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		Design and Landscape Plans for respective packages address condition.	
E26	The DLP must include, but not be limited to: (a)the design of the permanent built elements of the CSSI including their form, materials and detail, with a focus on high quality bridge design (for the Hunter River viaduct), and integrated art; (b)the design of the project landform and landscaping elements (including visual screening requirements); (c)details of strategies to rehabilitate, regenerate or revegetate disturbed areas with priority given to the use of local native species; (d)landscaping outcomes agreed to under Condition E20 ; (e)details of how Aboriginal and non-Aboriginal heritage interpretation and public art are incorporated within the design of built features (such as noise barriers, viaduct), having regard to the results of any archaeological investigations; (f)developed visualisations, cross sections and plans showing the proposed design outcome; and (g)management and routine maintenance standards and regimes for design elements and landscaping work (including adequate watering of plants following planting depending on forecast weather conditions and including weed management) to ensure the success of the design and landscape outcomes.	Compliant	Yes	Compliant	Design and Landscape Plan (a) Chapters 4 and 6 (b) Chapters 5.1 and 6.7 (c) Chapter 6.16 (d) Chapters 5 and 6.7 (e) Chapters 4.2 and 6 (f) Chapters 5 and 6 (g) Chapter 6.8	Yes	Compliant	Design and Landscape Plan (a) Chapter 6 (b) Chapters 5, 6.2, 6.12, and 6.13 (c) Chapters 6.12 and 6.13 (d) N/A (e) Chapters 4.2 and 6.4 (f) Chapter 5 and 6 (g) Chapter 6.11	Previously compliant	Design and Landscape Plans for respective packages address condition.	
E27	Unless otherwise agreed with the Planning Secretary, construction of permanent built work or landscaping that are the subject of the DLP must not be commenced (in the area to which the DLP applies) until the DLP has been approved by the Planning Secretary.	Compliant	Yes	Compliant	Previous audit	Yes	Compliant	Previous audit	Previously compliant	Northern Package: No permanent Design and Landscape work occurred prior to the approval in May 2024. Southern Package: No permanent Design and Landscape work occurred prior to the approval dated 14 May 2024.	
	Operational Maintenance										
E28	The ongoing maintenance and operation costs of urban design, open space, landscaping and recreational items and work implemented as part of this approval remain the Proponent's responsibility until satisfactory arrangements have been put in place for the transfer of the asset to the relevant authority. Before the transfer of assets, the Proponent must maintain items and work to at least the design standards established in the DLP required by Condition E26 .	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered at this time.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered at this time.	Previously not triggered	No permanent works completed to date. Not triggered at this time.	
E29	The Planning Secretary must be advised in writing of the date of transfer of the asset(s) to the relevant authority.	Not Triggered	No	Not Triggered	As above.	No	Not Triggered	As above.	Previously not triggered	No permanent works completed to date. Not triggered at this time.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E30	Should plant loss occur during the maintenance period that impacts the capacity of the landscaping to achieve the design objectives (eg reduction in canopy species cover), the plants must be replaced by the same plant species and with similar growth form (i.e. a tree with an advanced juvenile tree) unless it is determined by a suitably qualified person that a different species is more suitable for that location. Any replacement plantings must use native species of local provenance from the relevant native vegetation community.	Not Triggered	No	Not Triggered	As above.	No	Not Triggered	As above.	Previously not triggered	No permanent works completed to date. Not triggered at this time.	
	Active Transport Network										
E31	The CSSI must not preclude the delivery of the Hexham Junction (intersection of the Minmi to Hexham rail line corridor and the pipeline corridor) to Tarro active transport link. <i>Note : This is a council led active transport link and the Proponent must consult with the City of Newcastle o ensure the CSSI does not preclude the delivery of the cycleway.</i>	Compliant	Yes	Compliant	Chapter 6.15 of Design and Landscape Plan.	No	Not Triggered	N/A to Northern Package	Stage 1- Previously Compliant Stage 2- Previously not triggered	Design and Landscape Plan for Southern Package confirms that the project does not preclude the delivery of the Hexham Junction to Tarro active transport link.	
	FLOODING										
E32	Measures identified in the documents listed in Condition A1 that are aimed at minimising the overall impact of the CSSI on flood behaviour must be incorporated into the design of the CSSI.	Compliant	Yes	Compliant	Flood Design Report, April 2025	Yes	Compliant	Flood Design Report, April 2025.	Previously compliant	Work done in concept design to include flooding mitigation measures. Information is detailed in the Flood Design Report.	
	Quantitative Design Limits										
E33	The CSSI must be designed and operated to limit impacts on flooding characteristics in areas outside the project boundary during flood events up to and including the 1% AEP flood event, in accordance with the following Quantitative Design Limits (QDLs): (a)a maximum increase in inundation time of one hour or 10% which ever is greater; (b)a maximum increase of 10 mm in above-floor inundation to habitable rooms where floor levels are currently inundated; (c)no above-floor inundation of habitable rooms which are currently not inundated in the 1%AEP flood event; (d)a maximum increase of 50 mm in inundation of land zoned as residential, industrial or commercial; (e)a maximum increase of 100 mm in inundation of land zoned as rural, primary production, environment zone or public recreation; (f)no significant increase in the flood hazard or risk to life; and (g)maximum relative increase in velocity of 10%, where the resulting velocity is greater than 1.0 m/s, unless adequate scour protection measures are implemented and/or the velocity increases do not exacerbate erosion as demonstrated through site-specific risk of scour or geomorphological assessments.	Compliant	Yes	Compliant	CEMP Appendix B4 Construction Flood Management Sub plan, Rev 2 December 2025	Yes	Compliant	CEMP Appendix E Flood Management Sub-Plan, Rev 2 October 2025	Previously compliant	Updated flood modeling completed as per Condition E36 below against criteria in Condition E33.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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 20/02/26 from Transport to GeoLINK responding to information request.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously not triggered	The updated flood model and design report Rev 3.3, 3 April 2025. The flood model information will be provided closer to operation. 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously not triggered	The updated flood model and design report Rev 3.3, 3 April 2025.	
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	Audit no. 1 (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	Audit no. 1 (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 audit no. 1, 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 audits: 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	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Previous audit.	No	Not Triggered	N/A to Northern Package	Previously not triggered	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	Section 6.1.2 of Aboriginal Heritage Management Sub-plan. Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no unexpected finds.	Yes	Compliant	Section 6.1.2 of Aboriginal Heritage Management Sub-plan. Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no unexpected finds.	Previously compliant	Reasonable steps are being taken to not harm, modify or otherwise impact Aboriginal objects or places of cultural significance. Both Packages: There were no unexpected finds during this audit period.	
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	Aboriginal Heritage Management Sub-plan. Audit Interview - sited the induction slides 10 and 11.	Yes	Compliant	Construction Cultural Heritage Management Sub-plan Training remains in place. Audit Interview - sited the induction slide 92 and 93. Poster and portal has training videos on (completed with local community).	Previously compliant	Northern Package: Aboriginal Cultural Heritage Awareness has been completed. Southern Package: Face to face sessions are held with RAPs to targeted staff for excavations.	
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	Dec 2025-M12RT Project Update (posted on website) Project website. Section 6.1.2 of Aboriginal Heritage Management Sub-plan. Communication Strategy.	Yes	Compliant	Dec 2025-M12RT Project Update (posted on website) Project website. Section 6.3 of Construction Cultural Heritage Management Sub-plan. Communication Strategy.	Previously compliant	The December 2025 project update posted on the website provides community engagement data RAPs are on a community list which is emailed out. The engagement team consults and engages regularly. Next quarterly update is due to be published in April 2026.	

[illegible]

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E61	An Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected heritage finds (including maritime discoveries) in accordance with any guidelines and standards prepared by Heritage NSW and the Heritage Council of NSW. The Unexpected Heritage and Human Remains Procedure must be submitted to the Planning Secretary for approval at least one month before the commencements of Work. Work cannot commence until the unexpected finds procedure is approved by the Planning Secretary.	Compliant	Yes	Compliant	An Unexpected Heritage Finds and Human Remains Procedure (July 2024, Rev 3) Approval letter from DPHI dated 23/01/23.	Yes	Compliant	An Unexpected Heritage Finds and Human Remains Procedure (July 2024, Rev 3) Approval letter from DPHI dated 23/01/23.	Previously compliant	An Unexpected Heritage Finds and Human Remains Procedure was created and approval was obtained. The Unexpected Heritage Finds and Human Remains Procedure has been updated as of July 2024.	
E62	The Unexpected Heritage Finds and Human Remains Procedure must be implemented for the duration of Work. <i>Note: Human remains that are found unexpectedly during the carrying out of work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.</i>	Compliant	Yes	Compliant	Section 2 of the Unexpected Heritage Finds and Human Remains Procedure, version 3.	Yes	Compliant	Section 2 of the Unexpected Heritage Finds and Human Remains Procedure, version 3.	Previously compliant	There were no unexpected finds during this audit period for either package.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E63	No ground intrusive activities are to be undertaken within the heritage curtilage of the Tarro Historic Site (as listed in the Newcastle Local Environmental Plan, item A18) and the site must not be destroyed, modified or otherwise adversely affected, unless otherwise approved by the Planning Secretary.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered at this time.	No	Not Triggered	N/A to Northern Package	Previously not triggered	Not trigged during this audit period.	
	NOISE AND VIBRATION										
	Work Hours										
E64	Work must only be undertaken during the following hours: (a) 7:00 am to 6:00 pm Mondays to Fridays, inclusive; (b) 8:00 am to 5:00 pm Saturdays; and (c) at no time on Sundays or public holidays.	Compliant	Yes	Compliant	Audit Interview - copy of the complaints was provided. OOHW on project site Section 3 of Out of Hours Work Protocol and Section 3.1 of Noise and Vibration Management Sub-plan. There was New England Highway Emergency Works completed in Feb 202, with no complaints associated with the works.	Yes	Compliant	Audit Interview - copy of the complaints was provided. Two complaints/ incidents were reported in the Audit Period for safety/ traffic only. Induction pack sited during the audit period - slide 117 provide hours and receptors on 118-120. OOHW on project site. Section 3 of Out of Hours Work Protocol and Section 3.1 of the Construction Noise and Vibration Management Sub-plan.	Previously compliant	Northern Package: There are blanket contingency permits in place for starting early or going late. No unauthorised out of hours works has occurred during this audit period. Southern Package: There are OOHW permits in place. No complaints associated with the Emergency Works completed.	
	Highly Noise Intensive Work										
E65	Except as permitted by an EPL, highly noise intensive works that result in an exceedance of the applicable NML at the same receiver must only be undertaken: (a) between the hours of 8:00 am to 6:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) if continuously, then not exceeding three hours, with a minimum cessation of Work of not less than one hour. For the purposes of this condition, 'continuously' includes any period during which there is less than one hour between ceasing and recommencing any of the work.	Compliant	Yes	Compliant	Audit Interview. Any works completed under the EPL are finished before midnight with the exclusion of line marking. OOHW on project site Section 3 of Out of Hours Work Protocol and Section 5.2 and Table 8-1 of Noise and Vibration Management Sub-plan.	Yes	Compliant	OOHW on project site. Induction pack sited during the audit period - slide 117 provide hours and receptors on 118-120. Section 3 of Out of Hours Work Protocol and Section 5.3.2 of the Construction Noise and Vibration Management Sub-plan.	Previously compliant	Northern Package: Works have occurred under this condition. No complaints have been received. Southern Package: Works have occurred under this condition as permitted by the EPL.	

[illegible]

[illegible]

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E71	Noise and Vibration Impact Statements (NVIS) must be prepared for any Work: (a) that may exceed the noise management levels, vibration criteria and/or ground-borne noise levels specified in Condition E68 and Condition E69 at any residence outside work hours identified in Condition E64 , or (b) where receivers will be highly noise affected. The NVIS must include specific mitigation measures identified through consultation with affected receivers of the sensitive land use(s) and the mitigation measures must be implemented for the duration of the works. A copy of the NVIS must be provided to the ER prior to the commencement of the associated works. The Planning Secretary and the EPA may request a copy/ies of NVIS .	Compliant	Yes	Compliant	Section 7.1 and 7.2 and Table 8-1 of Noise and Vibration Management Sub-plan.	Yes	Compliant	Noise and Vibration Impact Statement dated November 2023. Section 8.1 of Noise and Vibration Management Sub-plan. Section 4.2 of the Out of Hours Work Protocol. Project Site - January and March 2026 NVIS.	Previously compliant	Email dated 09/02/26 from Mathew Billings to GeoLINK responding to information request mentioned refinement of modelled impacts was provided to the ER via provision of OOHW permits, which included activity specific NVIS Northern Package: All OOHW approvals have NVIS attached. Southern Package: There is an overarching Noise and Vibration Impact Statement for the project in place.	
E72	Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before work that generates vibration commences in the vicinity of those properties. If the potential exceedance is to occur more than once or extend over a period of 24 hours, owners and occupiers are to be provided a schedule of potential exceedances on a monthly basis for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Ancillary Site Establishment Management Plan required by Condition A17 and/or the Noise and Vibration CEMP Sub-plan required by Condition C5 , and the owners and occupiers notified in accordance with the Communication Strategy required by Condition B1 .	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request: Section 6.3.2 of the NVMP addresses construction vibration impacts and Section 6.3.3. addresses the vibration assessment on residential, commercial and heritage buildings. Appendix D of the NVMP addresses the out of hours works approval procedure. Not triggered - no works have been undertaken within the safe working distance during this reporting period.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request: Condition included within CNVMP. Based on design and construction works, no properties are assessed as exceeding cosmetic damage. Regular Vibration monitoring is undertaken in areas adjacent to buildings within 100m of the construction site to confirm predictions. No vibration exceedances for cosmetic damage have been measured.	Previously not triggered	No works have been undertaken within the safe working distances during this audit period for either package.	
	Vibration Mitigation - Heritage										
E73	The Proponent must conduct vibration testing before and during vibration generating activities that have the potential to impact on heritage items to identify minimum working distances to prevent cosmetic damage. In the event that the vibration testing and attended monitoring shows that the preferred values for vibration are likely to be exceeded, the Proponent must review the construction methodology and, if necessary, implement additional mitigation measures.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	No	Not Triggered	N/A to Northern Package	Previously not triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered and no works have been undertaken within the safe working distance during this reporting period.	
E74	Advice from a heritage specialist must be sought on the methods and locations for installing equipment used for vibration, movement and noise monitoring at heritage-listed structures. Note: The installation of noise and vibration equipment must not impact on the heritage value of the heritage items .	Not Triggered	No	Not Triggered	Email dated 12/02/2026 GeoLINK request for info to TfNSW.	No	Not Triggered	N/A to Northern Package	Previously not triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered at this time.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E79	Mitigation measures such as temporary alternative accommodation or other agreed mitigation measures, must be offered/ made available to residents affected by out-of-hours work (including where utility works are being undertaken for the CSSI or under a road occupancy licence) where the construction noise levels between: (a) 10:00 pm and 7:00 am, Monday to Friday; (b) 10:00 pm Saturday to 8:00 am Sunday; and (c) 6:00 pm Sunday and public holidays to 7:00 am the following day unless that day is Saturday then to 8:00 am, are predicted to exceed the NML by 25 dB(A) or are greater than 75 dBA (LAeq(15 min)), whichever is the lesser and the impact is planned to occur for more than two (2) nights over a seven (7) day rolling period. The NML must be reduced by 5 dB where the noise contains annoying characteristics and may be increased by 10 dB if the property has received at-property acoustic treatment. The noise levels and duration requirements identified in this condition may be changed through an EPL applying to the CSSI.	Compliant	Yes	Compliant	Black Hill to Tomago Noise and Vibration Management Sub-plan (October 2025).	Yes	Compliant	Heatherbrae Bypass Construction Noise and Vibration Management Sub-Plan August 2024).	Previously compliant	Northern Package: Section 8.6, NV29, Section 8.7, and Appendix C of Construction Noise and Vibration Management Sub-plan. Southern Package: Section 5.2, Table 8-1, and Appendix D of Noise and Vibration Management Sub-plan.	
	Crushing and Grinding Works										
E80	Crushing and grinding works must only be undertaken during the hours specified in Condition E64 unless otherwise approved by the Planning Secretary or through an EPL or if it meets the requirements of Condition E66 .	Compliant	Yes	Compliant	Same as previous audit. Email dated 20/02/26 from Transport to GeoLINK responding to information request: Crushing and Grinding works have been undertaken during the OOHW periods and are detailed in the approved OOHW permits. Noise monitoring has also been undertaken at AS3 during the evening period during the previous reporting period confirming compliance. Section 5.2, 7, Table 8-1, and Appendix D of Noise and Vibration Management Sub-plan.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request: Not triggered Section 8.6, NV28 of Construction Noise and Vibration Management Sub-plan.	Stage 1- Previously Compliant Stage 2- Previously not triggered	Northern Package: None of these works are currently occurring in the Northern package. Southern Package: Crushing and Grinding works have been completed during the OOHW periods, with noise monitoring.	
	Blasting										
E81	Blasting associated with the CSSI must only be undertaken during the following hours: (a) 9:00 am to 5:00 pm, Monday to Friday, inclusive; (b) 9:00 am to 1:00 pm on Saturday; and (c) at no time on Sunday or public holidays; or (d) as authorised through an EPL. This condition does not apply in the event of a direction from the NSW Police Force or other relevant authority for safety or emergency reasons to avoid loss of life, property loss and/or to prevent environmental harm.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no blasting during the audit period.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no blasting during the audit period.	Previously not triggered	No blasting proposed. Not triggered.	
	Blasting Management Strategy										
E82	A Blast Management Strategy must be prepared and must include: (a) sequencing and review of trial blasting to inform blasting; (b) regularity of blasting; (c) intensity of blasting; (d) periods of relief; and (e) blasting program.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no blasting during the audit period.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no blasting during the audit period.	Previously not triggered	Not triggered.	
E83	The Blast Management Strategy must be endorsed by a suitably qualified and experienced person.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no blasting during the audit period.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no	Previously not triggered	Not triggered.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E87	Before the commencement of Work, a Traffic Noise Monitoring Program must be prepared to inform the calculation of operational road traffic noise impacts at sensitive land use(s). The program must: (a) include monitoring at the noise monitoring locations used to inform the EIS; and (b) identify additional locations at which monitoring will be undertaken to determine the change in operational traffic noise as a result of the CSSI. The additional monitoring locations must be located around elements of the CSSI that will create a change of noise (such as interchanges near residents and behind noise barriers) and be representative of the range of sound propagation conditions along the length of the CSSI corridor. The monitoring program must be submitted to the Planning Secretary for approval at least one month prior to undertaking any noise monitoring. Noise monitoring must not commence until the Planning Secretary has approved the Traffic Noise Monitoring Program. Noise monitoring must be undertaken prior to commencing Work in the vicinity of a noise monitoring location. Note: The intent of this condition is to establish baseline noise levels for post construction compliance.	Compliant	Yes	Compliant	Audit no. 1 Letter from DPHI to TfNSW dated 22/12/22 approving Traffic Noise Monitoring Program. M1 to Raymond Terrace Traffic Noise Monitoring program, prepared by Arup Rev 1 24/11/22	Yes	Compliant	Audit no. 1 Letter from DPHI to TfNSW dated 22/12/22 approving Traffic Noise Monitoring Program. M1 to Raymond Terrace Traffic Noise Monitoring program, prepared by Arup Rev 1 24/11/22	Previously compliant	As per audit no. 1, program prepared and approved by DPHI more than one month prior to commencing work in the vicinity of a noise monitoring location.	
E88	Conditions E86(a) and E87 do not apply if it can be demonstrated to the satisfaction of the Planning Secretary that alternate monitoring addresses these condition requirements.	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	Traffic Noise Monitoring Program undertaken as noted in the Noise and Vibration Management Sub-plan	
	Operational Noise Review (ONR)										
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));	Compliant	Yes	Compliant	Operational Noise Review.	Yes	Compliant	Audit interview Operational Noise Review, Revision E dated 13/03/2025 on the Project Site, approved by DPHI on 31/05/2025 (sited during audit interview).	Previously compliant	Northern Package: ONR, Revision E dated 13/03/2025. Southern Package: Approved 22/5/2024.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	(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); (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.	Yes	Compliant	Operational Noise Review, Revision E dated 13/03/2025 on the Project Site.	Previously compliant	Operational Noise Review has been prepared for both Packages.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E91	Where the noise management level in Condition E68(a) is likely to be exceeded at residences during construction, operational noise mitigation measures identified in Condition E89 , or in the absence of the final ONR the EIS, that will not be physically affected by construction must be implemented within 12 months of the commencement of construction at the residences where the NML is exceeded, unless another timeframe is agreed to by the Planning Secretary. All requests to the Planning Secretary for an extension to the timeframe must be accompanied by a report justifying why, along with details of temporary measures that would be implemented to reduce construction noise impacts, until such time that the operational noise mitigation measures are implemented. The report must be submitted to the Planning Secretary before the commencement of construction at the residences where the NML is exceeded. All temporary measures must be implemented within six months of the commencement of construction in the vicinity of the impacted residences. Note: <i>Not having finalised detailed design is not sufficient justification for not implementing the proposed operational noise mitigation measures.</i>	Not Triggered	No	Not Triggered	Letter dated 01/07/2025 alternative timeframe of 30/11/2025 to complete the installation of noise walls and 31/03/2026 to complete the installation of at-property noise treatments, to be adjusted to: - BH2T complete installation of at-property noise treatments prior to operation - BH2T to complete installation of noise walls on BH2T prior to operation	No	Not Triggered	Not triggered.	Previously not triggered	Not yet triggered due to extensions of time.	
E92	The implementation of at-property acoustic treatment does not preclude the application of other noise and vibration mitigation and management measures, including temporary accommodation, to manage and mitigate construction noise.	Compliant	Yes	Compliant	Audit no. 1 Noise and Vibration Management Plan.	Yes	Compliant	Audit no. 1 Noise and Vibration Management Plan.	Previously compliant	As per audit no. 1, other noise and vibration mitigation and management measures covered in approved NVMPs and implemented as required.	
E93	Operational traffic noise mitigation measures must be prioritised to address source control measures, road design and then the application of additional mitigation measures (such as at-property acoustic treatment).	Compliant	Yes	Compliant	Operational Noise Review.	No	Not Triggered	Operational Noise Review.	Previously compliant	Included in ONR.	
E94	All operational noise mitigation measures identified in the ONR required by Condition E89 must be implemented prior to operation of the CSSI, unless otherwise agreed with the Planning Secretary.	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	This stage of works not yet reached.	
	Operational Noise Validation										
E95	Within 12 months and at 5 years of the commencement of operation of the CSSI, monitoring of operational noise must be undertaken to compare actual noise performance of the CSSI against the noise performance predicted in the review of noise mitigation measures required by Condition E89 .	Not Triggered	No	Not Triggered	N/A	No	Not Triggered	N/A	Previously not triggered	This stage of works not yet reached.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E96	The Proponent must prepare an Operational Monitoring Report which sets out how monitoring is to be undertaken for the comparison of noise performance required by Condition E95 . The report must include: (a) proposed monitoring methodology; (b) location of noise monitoring sites, with reference to specific impacts on receivers. Monitoring locations must be grouped by - (i) pavement type, (ii) topography, (iii) line of sight from a monitoring location to the CSSI, and (iv) road design elements e.g. interchange, on- and off-ramps; (c) an assessment of the acoustic performance of different pavement types over their design life; and (d) any required recalibrations of the noise model taking into consideration factors such as noise monitoring and actual traffic numbers and proportions.	Not Triggered	No	Not Triggered	Audit Interview.	No	Not Triggered	Audit Interview.	Previously not triggered	Not triggered.	
	The Operational Monitoring Report must be provided to the Planning Secretary for approval at least one month prior to undertaking the monitoring and 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 with the report.										
E97	Classified traffic counts must be undertaken simultaneously with noise measurements to confirm traffic volumes and traffic mix assumptions and must be included in the Operational Monitoring Report .	Not Triggered	No	Not Triggered	Audit Interview.	No	Not Triggered	Audit Interview.	Previously not triggered	Not triggered.	
	Operational Noise Compliance Report (ONCR)										
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;	Not Triggered	No	Not Triggered	Previous audit.	No	Not Triggered	Previous audit.	Previously not triggered	Not triggered.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Audit no. 1 Communication Strategy.	Yes	Compliant	Audit no. 1 Communication Strategy.	Previously compliant	As per audit no. 1, the communication strategy addresses consultation with utilities and services providers.	
E102	The Proponent must liaise with DPIRD Fisheries, Local Land Services and Water Group (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 : DPIRD Fisheries, Local Land Services and Water Group (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	Previous audit.	No	Not Triggered	Previous audit.	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	Previous audit.	No	Not Triggered	Previous audit.	Previously 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	Previous audit.	No	Not Triggered	Previous audit.	Previously not triggered	Not triggered.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Previous audit.	No	Not Triggered	Previous audit.	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	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed: Northern Package: Access maintained as required. No restrictions have occurred. Consultation ongoing during construction with affected stakeholders undertaken, where applicable. E.g. Traffic switches. Northern Package: Access maintained	
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously compliant	Northern Package: No restrictions during this audit period. Southern Package: No restrictions during this audit period.	
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously compliant	Northern Package: No restrictions during this audit period. Southern Package: No restrictions during this audit period.	
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously compliant	Northern Package: No restrictions during this audit period. Southern Package: No restrictions during this audit period.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request. Audit Interview. Pedestrians detour along Tomago Road where pathway cuts inland due to flooding issues. Project Site - Old Punt Road temporary partial closure (July 2025) and cyclists deyoure via Lenaghans Drive (September 2025).	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request. Audit interview - Temporary cycle detour consultation report (17 December 2024) and details provided. Detour began 31 March 2025 along Adelaide Street and Richard Road (sited on Project Site).	Previously compliant	Northern Package: Cyclist detour in place. Southern Package: Cyclist and pedestrian detours in place.	
	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	Email dated 20/02/26 from Transport to GeoLINK responding to information request. Communication Strategy, January 2023	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Stage 1- Previously Compliant Stage 2- Previously not triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request stated <i>"the Project is continuously consulting with affected landowners regarding property adjustments. The Evergreen Stud Farm and the Racecourse have been consulted to ensure the construction operations minimise intrusion and disruption to agricultural operations/activities in surrounding properties. Property adjustments agreements have been issued and signed"</i> .	
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously not triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered.	
	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 12-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	Workforce development, Aboriginal participation and community improvement report FY24/25 Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Yes	Compliant	Workforce development, Aboriginal participation and community improvement report FY24/25 Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously compliant	MOD 1 changed the reporting requirements to 12 months. The last report was issued in September 2025. Reviewed to compliance. The next report is due September 2026.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Stage 1- Previously Compliant Stage 2- Previously not triggered	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 the site inspection and were found to be in good order.	
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously not triggered	Southern Package: Correspondence about the scour protection is included in the detailed design. There are two permits available for temporary works. Applications for one temporary and one permanent permit are being submitted. Works are expected to be completed within the next audit period. Not triggered at this time.	
	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	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 Cavanba Consulting 24/10/2023	Yes	Compliant	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 Cavanba Consulting 25/07/2023	Previously compliant	Northern Package: No updates from last audit Southern Package: No updates from last audit	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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.	Compliant	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously non-compliant	Northern Package: No updates from last audit Southern Package: No updates from last audit	
	<i>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.</i>										
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	Audit no. 1 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 Cavanba Consulting 25/07/2023	Yes	Compliant	Audit no. 1 Heatherbrae Ancillary Compound Sample Analysis and Quality Plan, M1 to Raymond Terrace, Ade Consulting Group, October 2023	Previously compliant	As per audit no. 1, 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	Project website	Yes	Compliant	Project website	Previously compliant	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.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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 audits 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 audits Detailed Site investigation - Heatherbrae Ancillary Compound M1 To Raymond Terrace - 2206-2212 Pacific Highway, Heatherbrae 28/11/23	Previously compliant	As per previous audits, 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	Previous audits	Yes	Compliant	Previous audits	Previously compliant	Northern Package: No changes. Southern Package: No changes.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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.	Compliant	Yes	Compliant	Previous audits	Yes	Compliant	Previous audits	Previously compliant	Northern Package: No updates from last audit Southern Package: No updates from last audit	
	Note: Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports for separate contaminated sites.										
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.	Compliant	Yes	Compliant	Previous audits Detailed Site Investigations (AOPCR3, AOPCR10, AOPCR19).	Yes	Compliant	Previous audits Detailed Site Investigation - Heatherbrae Ancillary Compound	Previously compliant	Same as last audit - DSIs for both packages cover requirements for (a) to (i)	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
	(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.										
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no new documents since the last audit.	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no new documents since the last audit.	Previously compliant	No DSI's completed during this audit period.	
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.	Compliant	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request: Recommendations of the Detailed Site Investigations have been incorporated into the Soil and Surface Water Management Sub-Plan (SSWMP). Additionally, refer to Section 6.1.6.1 and Appendix I - Contaminated Land Management Plan of the SSWMP.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Previously not triggered	Northern Package: Not triggered Southern Package: Recommendations are included in the Soil and Surface Water Management Sub-Plan (SSWMP).	
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.	Not Triggered	No	Not Triggered	Previous RAPs: -Remedial Action Plan AOPCR03, January 2024. -Remedial Action Plan AOPCR10, January 2024. -Remedial Action Plan Former RZM Site Tomago, September 2023.	No	Not Triggered	Previous audit.	Stage 1- Previously Compliant Stage 2- Previously not triggered	Northern Package: Nothing has occurred during this audit period. Southern Package: As per previous audit, RAPs (Southern Package) prepared in accordance with the requirements of this condition.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E128	Before commencing remediation, Interim Audit Advice or 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 Interim Audit Advice or Site Audit Statement(s) for separate contaminated sites.	Compliant	Yes	Compliant	Previous audit. RAP and work compelled/ signed off by Auditor for: Detailed Site Investigation AOPCR03, September 2023. Detailed Site Investigation AOPCR10, December 2023. Detailed Site Investigation AOPCR19, March 2024. RAP Fill 18 Botanical Gardens to Old Punt Road is currently being prepared (hydrocarbon impacted materials identified).	No	Not Triggered	Audit interview - confirmed this is not triggered.	Previously compliant	Northern Package: As per previous audits, site audit statements were prepared prior to the commencement of remediation. Southern Package: As per previous audits, site audit statements were prepared prior to the 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.	Compliant	Yes	Compliant	Audit interview AOPCR10 works has been complete and signed off.	No	Not Triggered	Audit interview	Stage 1- Previously Compliant Stage 2- Previously not triggered	Northern Package: Package not yet at this stage. Not triggered at this time. Southern Package: RAPs have been signed off.	
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.	Not Triggered	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request. 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	Stage 1- Previously Compliant Stage 2- Previously not triggered	Southern Package: Under previous audit, three SAS were developed. Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed this was not triggered.	
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 audits CEMP Appendix G BH2T Soil and Surface Water Management Sub-plan, Rev 3 January 2025 M1 Pacific Motorway Extension to Raymond Terrace SSWMP Rev 5 September 2025	Yes	Compliant	Previous audits CEMP Appendix B6 Construction Soil and Water Management Sub-plan, Heatherbrae Bypass Rev 2 October 2025. Appendix H Construction Contaminated Land Management Sub-plan Heatherbrae Bypass October 2025	Previously compliant	Compliant as per previous audits. Northern 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 Southern Package: - Table A1 of CEMP Appendix B6 Construction Soil and Water Management Sub-plan	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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 audits. 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 audits. 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	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	Letter from DPHI dated 27/09/2024 approving alternative timeframes. Sustainability Strategy for M1 Pacific Motorway to Raymond Terrace (Heatherbrae Bypass), Rev B, December 2023. TfNSW and JGGJV certified by ISC for a Leading IS Design Rating.	Yes	Compliant	Letter from DPHI dated 27/09/2024 approving alternative timeframes. Audit Interview - confirmed it is in process. Sustainability Strategy for M1 Pacific Motorway Extension to Raymond Terrace Stage 1 Black Hill to Tomago (Heatherbrae Bypass), Rev 0 08/11/23	Previously compliant	Previous audit - An extension of time has been approved by DPHI to Conditions E133(a) and E133(b). The alternative timeframes are: Condition E133(a) - 'within one month of ISC issuing certification of the 'Design' rating' Condition E133(b) - 'within one month of ISC issuing certification of the 'As Built' rating'	
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 (Heatherbrae Bypass), Rev B, December 2023	Previously compliant	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.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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.	Compliant	Yes	Compliant	Previous audits M1 Motorway Extension to Raymond Terrace - Stage 1 Black Hill to Tomago Appendix E - Water Reuse Strategy, Rev 1, November 2023	Yes	Compliant	Previous audits Construction Water Reuse Strategy, Heatherbrae Bypass, September 2023, Rev C	Previously compliant	Found to be compliant under previous audits.	
	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. <i>Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational phases of the CSSI.</i>										
	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 - Letter from Transport dated 12/03/2025 alerting non-compliance to Department.	Yes	Compliant	Construction Traffic, Transport and Access Management Sub-plan Heatherbrae Bypass October 2025 Letter from DPHI to Transport re HBB CEMP dated 09/10/2023	Previously compliant	Northern Package: As per previous audit, noted in HBB Appendix A Table A1 and Section 5.2. In addition, a letter from DPHI dated 09/10/2023 agrees to use of Camfield Dr by heavy vehicles for 6 months from commencement of construction. This has been extended for another 6 months and was approved by the ER as a minor amendment on 11/10/24. Southern Package: Table 5-2 was updated in the TTAMP Rev9 to include Alledale St, Pamela St, Beth St and Pasadena Cr. The TTAMP Rev9 was approved by DPHI 13/12/24.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E140	Before any local road is used by a heavy vehicle for the purposes of the CSSI, a Road Dilapidation Report must be prepared for the road unless otherwise agreed to by the relevant road authority. A copy of the Road Dilapidation Report must be provided to the relevant council within three weeks of completion of the survey and no later than two weeks before the road being used by heavy vehicles associated with the CSSI. If damage to roads occurs as a result of the construction of the CSSI, the Proponent must rectify the damage to restore the road to at least the condition it was in pre-construction in consultation with the relevant road authority. Rectification works must be undertaken within three months of the subject road no longer being used for the construction of the CSSI unless an alternative timeframe is agreed to by the relevant road authority.	Compliant	Yes	Compliant	Previous audit Email dated 16/08/2023 from BH2T to NCC with link to road dilapidation reports for Anderson Drive, Lenaghans Drive, Woodlands Close, Aurizon Access, Road and Quarter Sessions Road	Yes	Compliant	Previous audit Email dated 26/05/23 from HBB to Port Stephens Council with dilapidation report for Camfield Drive Heatherbrae Inspections for the report conducted on 10/05/23	Previously compliant	As per previous audits, road dilapidation reports were prepared and submitted to the relevant councils within the required timeframes.	
	Pedestrian and Cyclist Access										
E141	Safe pedestrian and cyclist access must be maintained around work sites during construction. In circumstances where pedestrian and cyclist access is restricted or removed due to construction activities, a proximate alternative route which complies with relevant standards, unless otherwise endorsed by an independent, appropriately qualified and experienced person, must be provided (including signposting) prior to the restriction or removal of the impacted access.	Compliant	Yes	Compliant	CEMP Appendix B BH2T Traffic Management and Safety Plan BH2T Rev 11 July 2025	Yes	Compliant	CEMP Appendix B1 Traffic, Transport and Access Management Sub-plan, Heatherbrae Bypass, Rev 04 October 2025	Previously compliant	A cyclist detour was provided for an alternative route and was communicated to the community via the project website.	
E142	The CSSI must maintain the existing roadway at and adjacent the access and egress points to the construction areas and ancillary facilities to ensure safe passage for cyclists, unless alternative arrangements are made in accordance with Condition E141 . <i>Note: The intent of this condition is to enhance community safety (cyclist and vehicular) in the general vicinity of site access entrance and exits as the Proponent will be required to maintain roadways including road shoulders so that gravel and other debris is minimised.</i>	Compliant	Yes	Compliant	CEMP Appendix B BH2T Traffic Management and Safety Plan BH2T Rev 11 July 2025	Yes	Compliant	CEMP Appendix B1 Traffic, Transport and Access Management Sub-plan, Heatherbrae Bypass, Rev 04 October 2025	Previously compliant	Cyclist and pedestrian access has not been restricted during this audit period. Existing roads remain operational. Streetsweepers on site and regular inspections to pick up any debris. Northern Package: Heatherbrae Traffic, Transport and Access Management Sub-plan - Covered in Vehicle Management Plans and Pedestrian Movement Plans. Section 4.6, 5.7 Southern Package: Table 6-1 (TTAMM21) of BH2T Traffic, Transport and Access Management Sub-plan - Covered by Traffic Management Safety Plan, Alternative access plans and AMS/Risk Assessments Section 4.7, section 5.2.4.2, section 5.2.4.3, fig 4-5	
	Road Safety										
E143	The CSSI (including new or modified local roads, parking, pedestrian and cycle infrastructure) must be designed to meet relevant design, engineering and safety guidelines, including the Austroads Guide to Traffic Management.	Compliant	Yes	Compliant	Audit interview M1 stage 2 north bound sited in Audit Interview.	Yes	Compliant	Audit interview - confirmed no change.	Previously not triggered	Both permanent and temporary addressed in design reports.	

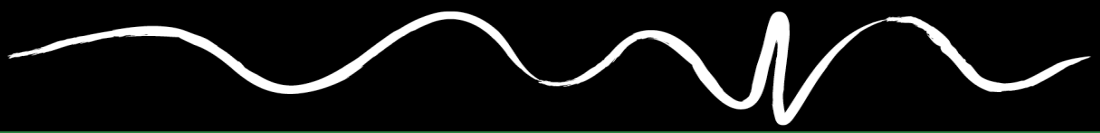
CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E144	An independent Road Safety Audit must be undertaken to assess the safety performance of new or modified local road, parking, pedestrian and cycle infrastructure provided as part of the CSSI (including ancillary facilities) to ensure that they meet the requirements of relevant design, engineering and safety guidelines, including Austroads Guide to Traffic Management. The audit(s) must be undertaken by an appropriately qualified and experienced person during detailed design development (audit of plans) and prior to opening (pre-opening audit). The audit findings and recommendations of the detailed design plans (audit of the plans) must be actioned prior to construction of the relevant infrastructure. The pre-opening audit findings and recommendations must be actioned prior to the relevant infrastructure being made available for use. All audit findings must be made available to the Planning Secretary on request, within the timeframe stated in the request.	Compliant	Yes	Compliant	Audit interview JHGJV provided RSA examples for: -Pre-opening Audit - RSA78 M1 Northbound Stage 2 Rev 1 28 January 2026 -Post opening Audit - RSA79 M1 Northbound to Stage 2 Rev 1 28 January 2026 -Pre-opening Audit - RSA80 John Renshaw Dr N/B & New England Hwy E/B Rev 1 4 February 2026 -Post opening Audit - RSA81 John Renshaw Dr N/B & New England Hwy E/B Rev 1 4 February 2026 -Post opening Audit - RSA79 M1 Northbound to Stage 2 Rev 1 28 January 2026	Yes	Compliant	Audit interview - pre and post opening Road Safety Audit Report discussed. Masonite Road Switch Road Safety Audit Report (issued 8 December 2025) sited and undertaken during the Audit Period.	Previously compliant	Road Safety Audits are done anytime there is a switch.	
	WASTE										
E145	Waste generated during construction and operation must be dealt with in accordance with the following priorities: (a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; (b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and (c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.	Compliant	Yes	Compliant	Audit interview Induction sited, slide 16 and 17 - sustainability and reduce, reuse and recycle. Waste and resource recovery Register; and internal and external register (location, reuse and recycle info) was sited during Audit Interview. Site inspection CEMP Appendix M Waste and Resource Management Sub-plan, BH2T, Rev 0 November 2023	Yes	Compliant	Audit interview - monthly waste reports, waste to destination audits (sustainability requirement); site induction sited. Site inspection CEMP Appendix B9 Waste Management Plan, Rev 02, Oct 2025	Previously compliant	Northern Package: Waste Mgt Plan being implemented. Details of waste minimisation included in the Project Induction (Slide 1 of Induction Slides). At this stage there is mostly only import for this package. Southern Package: The waste management plan is being implemented as approved. Priority is given to avoid generation of waste where possible. A weekly updated report details the destination of all waste. The Site inspection noted construction material left in Windeyer's Creek including rock and steel bars, which need to be removed.	
E146	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the EPL in force for the CSSI, or be done in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, as the case may be.	Compliant	Yes	Compliant	Audit interview - for every import site there is a review of VENM reports and soil site inspection to validate material before it comes to the project. JHGJV provided import inspection examples for 48 Rees James Road, 119 McFarlanes Road Chisholm and 122 Herring Road Macquarie Park. CEMP Appendix M Waste and Resource Management Sub-plan, BH2T, Rev 0 November 2023	Yes	Compliant	Audit interview - ENM not received during this audit period. Tunnelling soil was received during this audit period (ending 11/07/2025). EPA notice to provide documentation request by Dr Christopher Burt on 10 October 2025 - and SW issued 28/10/2025 with documents (waste management plan, supplier info, invoices) and no non-compliances, received by EPA on 29/10/2025 CEMP Appendix B9 Waste Management Plan, Rev 02, Oct 2025	Previously compliant	Northern Package: VENM and tunnelling soil (crushed sandstone) materials from other project coming to site as material covered by RRE. VENM also coming from quarries. Southern Package: Material goes through a review and inspection process for source materials. The project has switched to the SMZ and ENM sites.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
E147	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	Compliant	Yes	Compliant	Workforce development, Aboriginal participation and community improvement report FY24/25 Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Yes	Compliant	Audit interview - confirmed this is still the same. Register to be provided the 10th of every month and the excel report was sited showing waste type, date, quantities, skip breakdowns - all combined into an annual waste report by 31 July 2026.	Previously compliant	Waste disposal tip register was sited during the audit interview, noting disposal facility, waste type, EPL number and tip site approval.	
E148	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	Compliant	Yes	Compliant	Previous audit Waste and Resource Recovery Reporting	Yes	Compliant	Previous audit Waste and Resource Recovery Reporting CEMP Appendix B9 Waste Management Plan, Rev 02, Oct 2025	Previously compliant	Waste registers were previously established and are being maintained.	
	WATER										
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: 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.	Compliant	Yes	Compliant	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no changes from previous audit. 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no changes from previous audit.	Previously compliant	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: " 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 ." 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	Email dated 20/02/26 from Transport to GeoLINK responding to information request. BH2T Appendix E Flooding Management Sub-Plan, 17/12/2025	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	Stage 1- Previously Compliant Stage 2- Previously not triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed requirements are incorporated into PESCP and the working in waterways EWMS. 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: 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 .	Compliant	Yes	Compliant	Chapter 6.16 of Design and Landscape Plan	Yes	Compliant	Chapter 6.12.3 of Design and Landscape Plan	Previously compliant	Requirements of condition addressed within Design and Landscape Plan.	

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Stage 1- Previously Compliant Stage 2- Previously not triggered	Requirements of condition addressed within Design and Landscape Plan.	
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	Email dated 20/02/26 from Transport to GeoLINK responding to information request.	No	Not Triggered	Email dated 20/02/26 from Transport to GeoLINK responding to information request confirmed no complaints or evidence of material decline in water supply levels, quality or quantity have been identified.	Previously not triggered	Northern Package: Bi monthly ground water monitoring is undertaken. Changes in the sandbeds appear to follow the historical changes. Ground water measures appear good. Not triggered at this time. Southern Package: Ground water monitoring program is in place with no changes outside of cut. All measures have been within a meter and been on the up due to recent weather. Only changes have been where it has been expected. Not triggered at this time. No complaints or evidence of material decline in water supply levels, quality or quantity have been identified.	
E154	Impacts to the Hunter Valley Flood Mitigation Scheme infrastructure should be avoided. Where impact is not avoidable, consultation with Water Group (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	Audit interview Have to provide final design of all infrastructure (perm and temp) they need approval from Hunter Valley. Still finalising the perm access track design. Restoration works on the eastern side of Hunter River do not impact the levy but are within the floodplain (discussed in M1 Pacific Motorway Extension to Raymond Terrace Black Hill to Tomago Mangrove Rehabilitation Area Shoreline Stabilisation Design Report Rev 2 17 March 2026). S256 Water management act.	No	Not Triggered	Audit interview - N/A	Stage 1- Previously Compliant Stage 2- Previously not triggered	Northern Package: Not applicable. Southern Package: Consultation undertaken during the preparation of EIS, CEMP and associated documents. Generally, impacts have been avoided were practical and there are no impacts to infrastructure. Regular contact with Water Group occurs	
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	Stormwater Drainage Report, Setpember 2024 (Rev 0)	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 stormwater systems.	

[illegible]

CoA	Requirement	Overall Compliance Status	Triggered (Stage 1)	Compliance Status (Stage 1)	Evidence Collected for Stage 1 (Southern, BH2T)	Triggered (Stage 2)	Compliance Status (Stage 2)	Evidence Collected for Stage 2 (Northern, HBB)	Previous Audit Overall Compliance Status	Independent Audit Findings and Recommendations Red text = carry over from 2025 audit	Unique Identification on Non Compliance
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	Previous audit Site inspection CEMP Appendix G BH2T Soil and Surface Water Management Sub-plan, Rev3 Jan 2025 Audit Interview - Sediment basins are located within the groundwater.	No	Not Triggered	Previous audit 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 02 October 2025	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 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	Audit response	No	Not Triggered	N/A to Northern Package	Previously not triggered	No dredging activities occurring; therefore, condition not triggered.	



Appendix F

Site Inspection Photographs

1. Northern Package Site Inspection – 19 Mach 2026



Figure 1.1 The Site Inspection locations (Google Earth, 2026)

Site Inspection stop 1 - Permanent Basin 9700 Southern Limit - Tomago Sand Beds



Plate 1.1



Plate 1.2



Plate 1.3



Plate 1.4

Site Inspection stop 2 - Watermain and Electrical Easement - Ch 11500 - Tomago Sand Beds



Plate 1.5



Plate 1.6



Plate 1.7

Site Inspection stop 3 - Masonite Road Intersection



Plate 1.8



Plate 1.9



Plate 1.10



Plate 1.11

Site Inspection stop 4 - Windeyers Creek Bridge



Plate 1.12



Plate 1.13

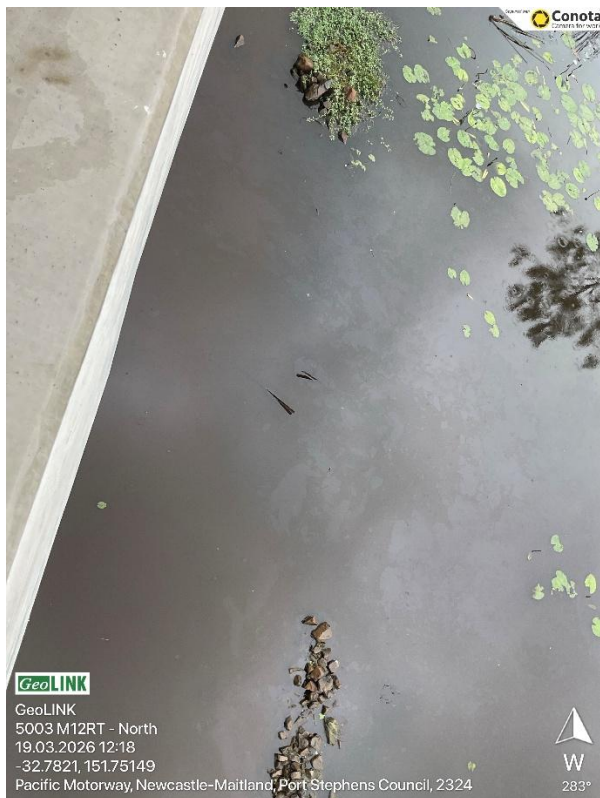


Plate 1.14



Plate 1.15



Plate 1.16

Site Inspection stop 5 - Northern Interchange



Plate 1.17



Plate 1.18



Plate 1.19



Plate 1.20



Plate 1.21



Plate 1.22



Plate 1.23



Site Inspection stop 6 - Storage Area - compound site - chemical storage



Plate 1.24



Plate 1.25



Plate 1.26



Plate 1.27



Plate 1.28



Plate 1.29



Plate 1.30

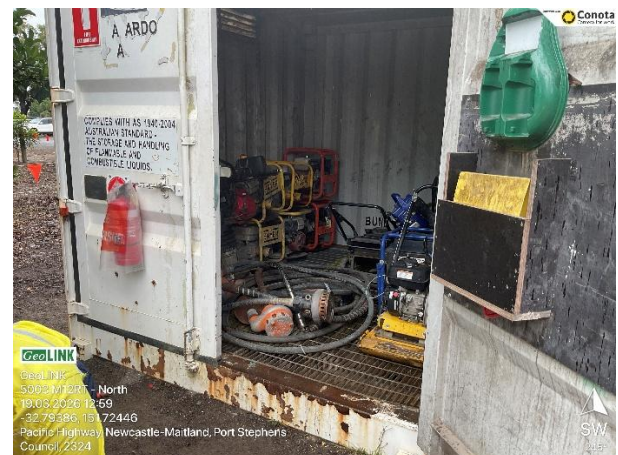


Plate 1.31

2. Southern Package Site Inspection – 20 March 2026



Figure 2.1 The Site Inspection locations (Google Earth, 2026)

Site Inspection stop 1 - Western Platform Boat Ramp



Plate 2.1



Plate 2.2



Plate 2.3



Plate 2.4



Plate 2.5

Site Inspection stop 2 - Pier 52 access scaffolding



Plate 2.6

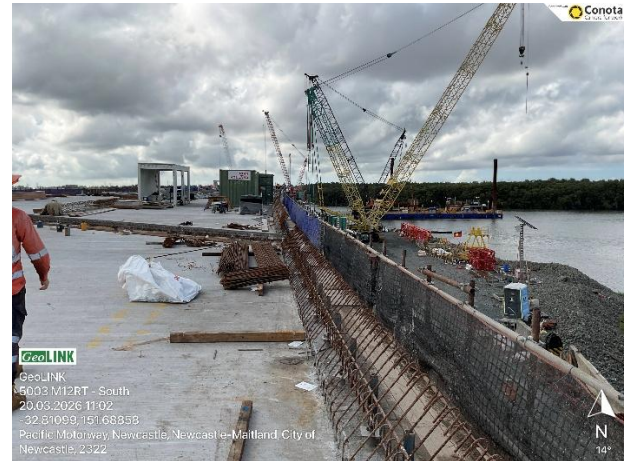


Plate 2.7

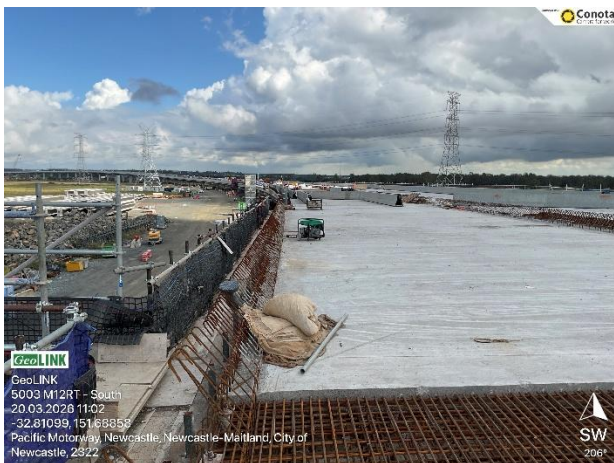
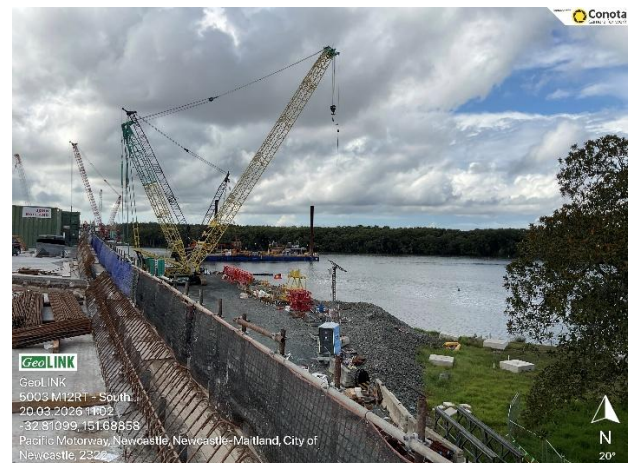


Plate 2.8



Site Inspection stop 3 - Pier 59 end of bridge works



Plate 2.9



Plate 2.10

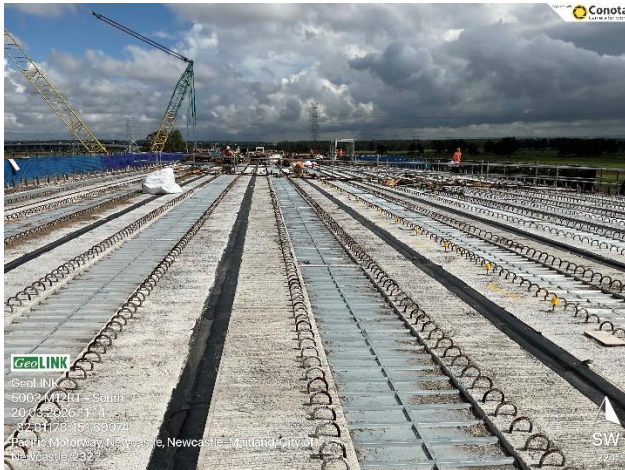


Plate 2.11



Plate 2.12

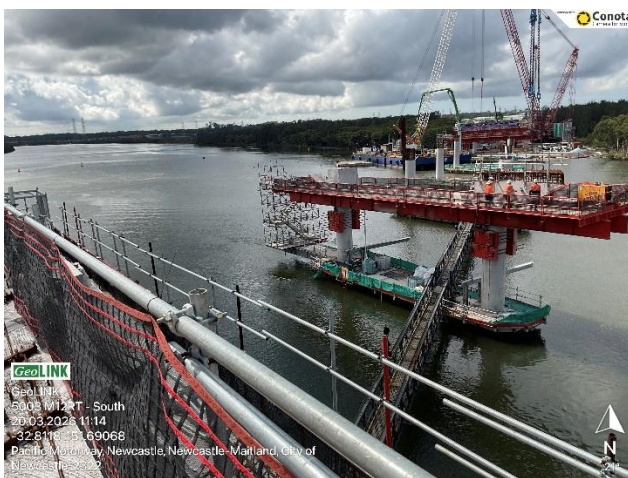


Plate 2.13

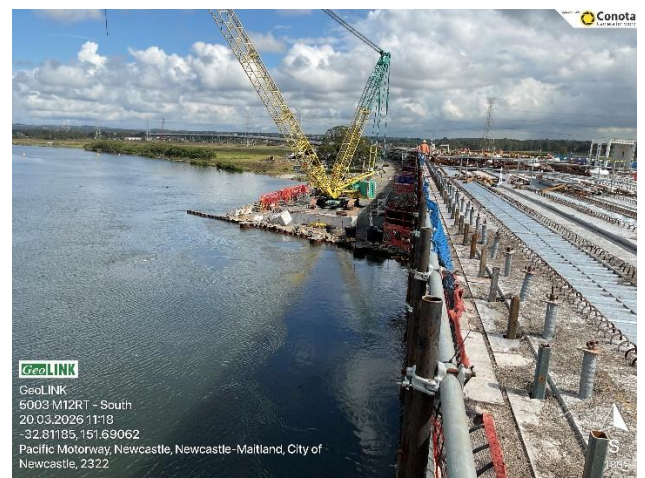


Plate 2.14

Site Inspection stop 4 - AS11 Ancillary Facility



Plate 2.15

Site Inspection stop 5 - Bridge 9 Abutment A



Plate 2.16



Plate 2.17



Plate 2.18



Plate 2.19



Plate 2.20



Plate 2.21



Plate 2.22



Plate 2.23

Site Inspection stop 6 - Bridge 2 South



Plate 2.24



Plate 2.25



Plate 2.26



Plate 2.27

Site Inspection stop 7 - Southern Tie In



Plate 2.28



Plate 2.29



Plate 2.30



Plate 2.31



Plate 2.32

Site Inspection stop 8 - Bridge 2 North



Plate 2.33



Plate 2.34



Plate 2.35

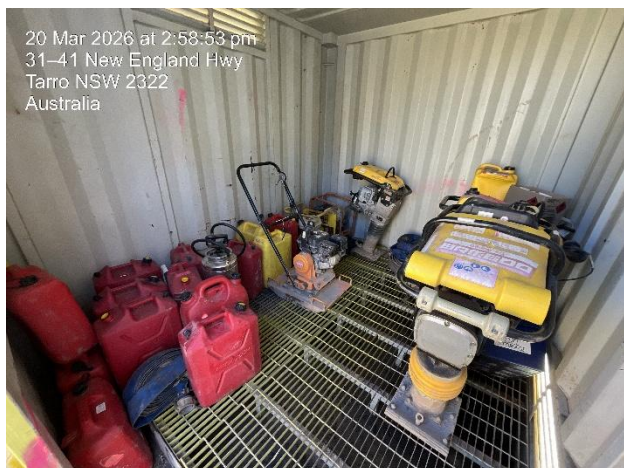
Site Inspection stop 9 - Chemical Storage



Plate 2.36



Plate 2.37



**Plate 2.38 Provided by John Holland Gamuda Australia
Joint Venture (storage was locked on the day of the Site
Inspection**