



Healthy Buildings International

INDEPENDENT AUDIT NO. 6

AUDIT REPORT

Western Harbour Tunnel (WHT) - Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works)

SSI 8863

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EXECUTIVE SUMMARY

This report presents the findings of the Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with a site inspection on 28 October 2025 for Stages 3B and 3C of the Western Harbour Tunnel (WHT) component of the Western Harbour Tunnel and Warringah Freeway Upgrade (WHTWU) Project, State Significant Infrastructure (SSI) 8863.

This audit is the **sixth** Independent Audit conducted for the WHT Project; the temporal period covered by the audit is from the date of the site inspection of the fifth Independent Audit (IA5) to the date of the site inspection for this Independent Audit of Stages 3B and 3C, respectively and as described within this report.

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSI 8863 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan (CEMP) and Sub-plans. Specifically, this audit was required to satisfy Condition A38 of SSI 8863 which requires Independent Audits of the Critical SSI to be carried out in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated May 2020 (DPIE, 2020).

In summary, a total of **302 conditions** were assessed, **seven** non-compliances identified were all self-reported by WHT Stages 3B and 3C during the audit period; with no new non-compliances raised as part of this audit.

In addition to the above, **seven** observations were identified.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of the Audit Scope. The level of implementation of these requirements on site was also observed as high.

The Auditor would like to thank the Auditees from TfNSW and ACCIONA for their organisation, cooperation and support during the conduct of the audit.



1. INTRODUCTION

This report presents the findings of the Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with a site inspection on 28 October 2025 for Stages 3B and 3C of the Western Harbour Tunnel (WHT) component of the Western Harbour Tunnel and Warringah Freeway Upgrade (WHTWUFU) Project, State Significant Infrastructure (SSI) 8863.

This audit is the **sixth** Independent Audit conducted for the WHT Project and has been conducted in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated May 2020 (DPIE, 2020).

1.1 The Project

1.1.1 Overview

The Western Harbour Tunnel and Warringah Freeway Upgrade (WHTWUFU) comprises a new tolled motorway tunnel connection across Sydney Harbour, and an upgrade of the Warringah Freeway to integrate the new motorway infrastructure with the existing road network. TfNSW has elected to stage the project as detailed in the WHTWUFU Staging Report (SSI 8863).

The Western Harbour Tunnel (WHT) component of the project comprises of a new crossing of Sydney Harbour involving twin tolled motorway tunnels connecting the M4-M5 Link at Rozelle and the existing Warringah Freeway at North Sydney (refer to Figure 1).

The Environmental Impact Statement (EIS) was prepared and finalised in January 2020 to assess the impacts of construction and operation of the Project and was placed on public exhibition between 29 January and 30 March 2020. A Response to Submissions Report (RtS) was prepared and finalised in September 2020.

The Minister for Planning and Public Spaces approved the WHTWUFU under Part 5, Division 5.2 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Clause 94 of the *State Environmental Planning Policy (Infrastructure) (SEPP) 2007*. The Project was declared Critical State Significant Infrastructure (CSSI) under Section 5.13 under the *EP&A Act* and Clause 16 of the *SEPP (State and Regional Development) 2011* on 21 January 2021. The approval incorporated the Minister's Conditions of Approval (MCoA) (SSI-8863).

Key features of the Western Harbour Tunnel (WHT) component of the project are shown in Figures 1 and 2 and include:

- Twin mainline tunnels about 6.5 kilometres long connecting the M4-M5 Link at Rozelle to the Warringah Freeway, near Cammeray
- A crossing of Sydney Harbour between Birchgrove and Balls Head using TBM methodology
- Underground connections to the M4-M5 Link project beneath Rozelle
- Tunnelled ramps and surface connections at Rozelle, North Sydney and Cammeray, including direct connections to and from the Warringah Freeway (including integration with the



Warringah Freeway Upgrade), an off ramp to Falcon Street and an on ramp from Berry Street at North Sydney

- Fit out and commissioning of a ventilation outlet and motorway facilities at the Rozelle Interchange
- Construction of a ventilation outlet and motorway facilities at the Warringah Freeway in Cammeray
- Operational facilities including a motorway control centre at Waltham Street, in the Artarmon industrial area, and tunnel support facilities at the Warringah Freeway in Cammeray
- Other operational infrastructure including groundwater and tunnel drainage management and treatment systems, signage, tolling infrastructure, fire and life safety systems, lighting, emergency evacuation and emergency smoke extraction infrastructure, CCTV and other traffic management systems
- Design and construction of Berrys Bay foreshore parkland (refer Figure 3).

1.1.2 *Changes to the Project*

Modifications

Modifications to the Project are summarised below (including previously approved Modifications, for completeness):

- **Modification 1 (SSI-8863-Mod-1) determined on 08 August 2023** and applicable to the WFU component of the Project:

The provision of an additional ancillary facility site, located at 160 Wicks Road, Macquarie Park, to support the Warringah Freeway Upgrade stage of work.

- **Modification 2 (SSI-8863-Mod-2) determined on 27 January 2024** and applicable to the WHT component of the Project:

Change to the tunnelling methodology to cross Sydney Harbour from an immersed tube tunnel design to a tunnel boring machine, and to establish an additional ancillary facility site at Emu Plains (WHT13) for the manufacture and storage of precast segments for lining of the tunnel.

- **Modification 3 (SSI-8863-Mod-3) determined on 24 October 2025** and applicable to the WHT component of the Project:

Correction to the application of air quality monitoring systems that would result in alignment with prescribed test methods, Australian Standards, and be generally consistent with operation of Sydney road tunnels.

Above modification was determined on 24 October 2025 and correspondence from the Department of Planning Housing and Infrastructure (DPHI) was provided to the Proponent (TfNSW) on 28 October 2025 regarding approval of Modification 3. Noting approval correspondence was provided at the end of this audit's temporal period (i.e. 6 May 2025 – 28 October 2025), Modification 3 has been excluded from the scope of this Audit and will be considered in the next Audit.



Refer Figures 1 and 2 and further detail on the approved modifications are available on the NSW planning portal.

Consistency Assessments

The following two Consistency Assessments (CA) were determined and approved by TfNSW during this sixth Independent Audit:

- **Consistency Assessment - Berrys Bay Foreshore Parklands (May 2025):** The proposed changes identified in Section 2.2 of the CA (summarised below) were assessed, deemed to be consistent with the Division 5.2 Approval and approved by TfNSW:
 - Modification to the Bund Wall
 - Deconstruction of Woodleys Shed and adaptive re-use of heritage elements
 - Removal of the Administration Building
 - Structural repairs to the sea wall (Precinct 2) and addition of a Rip Rap / revetment repair to the sea wall (Precinct 1)
 - Tree removal, alterations to heritage element and removal of derelict and dangerous (marine infrastructure).
- **Consistency Assessment - Berrys Street Configuration (June 2025):** The proposed change involves a reconfiguration of the Berry Street intersections, aiming to preserve Sydney Metro's upgrades at Berry/Miller Street while optimising movements at Berry Street/Pacific Highway. The proposed changes identified in Section 2.1 of the CA were assessed, deemed to be consistent with the Division 5.2 Approval and approved by TfNSW.





Figure 1: Key Features of the WHT Component of the Project (Source: Western Harbour Tunnel and Warringah Freeway Upgrade Modification 2 Report, Figure 5-1)



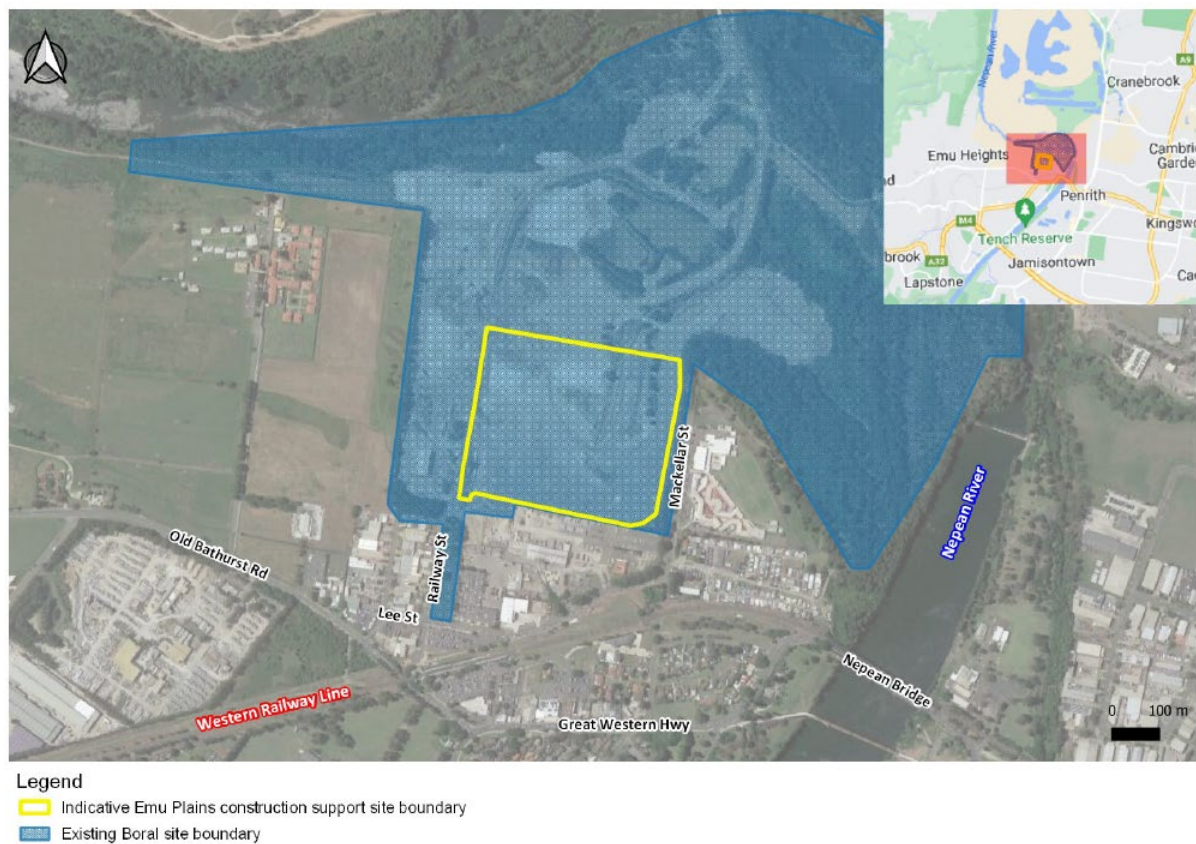


Figure 2: Location of the Emu Plains construction support site (Mod-2) as part of the WHT Component of the Project (Source: Western Harbour Tunnel and Warringah Freeway Upgrade Modification 2 Report, Figure 5-14)





Figure 3: Location of Berrys Bay as part of the Western Harbour Tunnel component of the project. Precinct 3 is excluded from the scope (Source: Western Harbour Tunnel and Warringah Freeway Upgrade Staging Report – September 2024)

1.1.3 Staging

The WHTWU Staging Report (SSI 8863), Revision 12 (dated 04 July 2025) has been prepared and structured to address the requirements of Conditions of Approval (CoA) A10 to A14 of the SSI 8863 planning approval. The current version of the Staging Report (i.e. Revision 12, dated 04 July 2025) has been utilised during this audit, to inform applicable conditions to the audit stage.

The stages of the project comprise of:

Stage 1 - Early and enabling works:

- Stage 1A – Critical utility installation, relocation and protection (CUT) (works completed as of 11 October 2023)
- Stage 1B – Cammeray Golf Course adjustment works (CGC) (works completed as of 26 May 2023)
- Stage 1C – Massey to Amherst noise wall (M2A) (works completed as of 10 February 2023)
- Stage 1D – WHT construction power and utilities (WHTCP) (works cancelled as of December 2022)
- Stage 1E – Berry's Bay – Berry's Bay archaeological investigation (BB) (activities completed as of 4 September 2023)

Stage 2 - Warringah Freeway Upgrade project:

- Stage 2 – Warringah Freeway Upgrade (WU) (commencement of construction 23 May 2022)

Stage 3 - Western Harbour Tunnel project (WHT):

- Stage 3A – WHT Southern Tunnel Works (works completed as of 14 Feb 2025)
- Stage 3B - Northern Tunnelling and Integration works (commencement of construction 22 May 2023)
- Stage 3C – Sydney Harbour Crossing between Birchgrove and Balls Head, Waverton, which includes (commencement of construction 20 May 2024):
 - Excavation of about 1.8 km of twin mainline tunnels using Tunnel Boring Machine (TBM) methodology.
 - Use of Ridge Street North (WHT9) as a tunnelling support site, including the construction of an acoustic shed.
 - Construction and operation of an additional construction ancillary facility at Emu Plains (WHT13), primarily for the prefabrication and storage of tunnel lining segments, box culverts and other pre-cast concrete elements.
 - Construction of Berrys Bay foreshore parkland (Refer Figure 3)

Appendix A (Table 4) of the Staging Report sets out the applicability of Conditions of Approval to each stage.



The WHT component is being delivered by TfNSW in three stages:

- The southern section of the tunnel referred to as Stage 1 or Package 1 (Rozelle to Birchgrove) comprises of Stage 3A – WHT Southern Tunnel Works Package;
- The northern section of the tunnel referred to as Stage 2 or Package 2 (Birchgrove to Cammeray) comprises of:
 - Stage 3B - Northern Tunnelling and Integration works; and
 - Stage 3C - WHT Sydney Harbour Crossing

Stage 3A – WHT Southern Tunnel Works Package includes:

- Twin mainline tunnels about 2 kilometres long and each accommodating three lanes of traffic in each direction, connecting with the stub tunnels from the M4-M5 Link at Rozelle.
- Connections to the stub tunnels at the M4-M5 Link project in Rozelle.
- Ventilation cavern and tunnel excavation in Rozelle and Balmain.
- Limited in tunnel operational infrastructure including road pavement and drainage to enable Stage 3B works.

TfNSW engaged John Holland and CPB Contractors (JHCPB) to deliver Stage 3A – WHT Southern Tunnel Works Package. It is understood from TfNSW that WHT Stage 3A works were completed and handed over to Stage 2 or Package 2 Contractor (ACCIONA) on 14 February 2025; with JHCPB fully demobilised by 14 March 2025. The Staging Report has since been updated, with latest version (Revision 12, dated 04 July 2025) reflecting Stage 3A (WHT Southern Tunnel Works) was completed as of 14 February 2025; and has been excluded from the scope of these Independent Audits since the fifth Independent Audit.

Stage 3B – WHT Northern Tunnelling and Integration works include:

- Excavation of twin mainline tunnels about 2.5 kilometres long and each accommodating three lanes of traffic in each direction, connecting portals adjacent to the Cammeray Golf Course to the Harbour Crossing section of the tunnel at Berrys Bay.
- Excavation of Falcon Street off-ramp tunnel.
- Excavation of Berry Street on-ramp tunnel.
- Cut and cover infrastructure surface construction at the Ridge Street North construction support site (WHT9), Berry Street and the Warringah Freeway portals.
- Integration works including Mechanical and Electrical (M&E) fit out for the Southern and Northern tunnelling sections, paving, surface connections, ventilation cavern fit out, integration and fit out of the Motorway Operation Centre (MOC) and Motorway Control Centre (MCC).
- Establishment and operation of Glebe Island / White Bay (WHT3) – southern portion. The northern portion of WHT3 as described in the EIS will not be used; Ridge Street North (WHT9), and Cammeray Golf Course (WHT10) construction support sites.
- Operation of the City West Link Portal tunnelling support site (WHT12) after the completion of Stage 3A.



- Installation of acoustic structures.
- Utilities connections including but not limited to power, potable water, sewerage.
- Carrying out of surveys, test drilling, test excavations, geotechnical or contamination investigations or other tests or surveys, sampling or investigation.

Stage 3C - WHT Sydney Harbour Crossing works include:

- Excavation of about 1.8 km of twin mainline tunnels using Tunnel Boring Machine (TBM) methodology.
- Construction of launch chambers beneath Birchgrove, and receival chambers and burial beneath the Waverton Peninsula.
- Establishment and operation of an underground slurry treatment plant within an existing ventilation cavern (constructed by the Stage 3A contractor).
- Establishment and operation of an underground Water Treatment Plant.
- Establishment and operation of an underground grout batching plant.
- Access and egress via City West Link Portal (WHT12) for:
 - Spoil removal.
 - Materials and equipment delivery, including concrete tunnel segments and box culverts.
- Use of Ridge Street North (WHT9) as a tunnelling support site, including the construction of an acoustic shed.
- Construction and operation of an additional construction ancillary facility at Emu Plains (WHT13), primarily for the prefabrication and storage of tunnel lining segments, box culverts and other pre-cast concrete elements.
- Design and construction of Berrys Bay foreshore parkland

Stage 3B will be carried out concurrently with Stage 3C. TfNSW have engaged ACCIONA to deliver WHT Stage 3B (Northern Tunnelling and Integration works) and WHT Stage 3C (Sydney Harbour Crossing works).

1.1.4 Works conducted during the audit period

The scope of this sixth Independent Audit includes the following stages:

- Stage 3B – WHT Northern Tunnelling and Integration works (referred to henceforth as WHT Stage 3B), which commenced construction on 22 May 2023 and Stage 3C – WHT Sydney Harbour Crossing works (referred to henceforth as WHT Stage 3C), which commenced construction on 20 May 2024.

High-level summary of key WHT Stage 3B and 3C activities during the audit period as provided by Auditees on 22 September 2025 and 28 October 2025 include:

WHT3 (Glebe Island) construction support site

- Laydown



- Worker Parking
- TBM 1 and 2 delivery
- TBM and slurry treatment plants preassembly

WHT1 (Rozelle MOC2)

- Construction Water treatment plant (WTP) in operation
- Fit-out and FRP of Substation 01
- Fire pump building modification
- Fit-out of DRS and workshop

WHT8 (Berry Street North) construction support site

- Break through from Berry St dive to mainline tunnel early July
- Drainage and services works close to complete
- Permanent road and barrier works underway

WHT9 (Ridge Street) construction support site

- WTP in operation – TWA discharge only
- Tunnelling works ongoing – no spoil haulage

WHT10 (Cammeray Golf Course) construction support site

- Ventilation building construction underway
- Vent outlet dividing wall construction
- Portal ramps pavement works
- WTP in operation – TWA discharge only
- Tunnelling works ongoing

CWL Portal (WHT12) / Southern Tunnel Works

- Launch Caverns finalised
- Gantry cranes installed
- Delivery and fit-out of two slurry treatment plants
- Works in Package 1 (utilities)

WHT13 (Emu Plains) construction support site –

- Culvert facility operational
- Area 2 established and stockpiling activities
- Landscaping completed

Berrys Bay Foreshore Parklands site

- Site Handover July 2025
- Site establishment, install of ERSED controls



- Demolition of Administration Building, Slipway Office and Woodley's Shed

The audit site inspections focussed on Berrys Bay and WHT13 (Emu Plains); in accordance with scope consultation undertaken with DPHI and audit interviews/scope consultation with the ER and AA. The Lead Auditor also considers that above sites inspected (in addition to desktop reviews conducted), covers EPA scope consultation correspondence - refer Table 2, Section 2.2.5 and Appendix E of this Report, for further details.

1.2 Audit team

In accordance with Condition of Approval (CoA) A37 of SSI 8863, and Section 3.1 of the Independent Audit Post Approval Requirements (IAPAR), independent audits must only be undertaken by a suitably qualified, experienced and independent auditor; with the appointment of the auditor agreed in writing by the Planning Secretary before each audit is commissioned.

Auditor agreement of Lead Auditor was provided by the NSW Department of Planning, Housing and Infrastructure (DPHI) on 15 September 2025. Auditor agreement is presented in **Appendix B**.

Table 1 presents the audit team for this, sixth Independent Audit on the Project. Declarations from the Auditors are presented in **Appendix F**.

Table 1 Audit Team

Name & Position	Company	Audit Role	Certification
Swathi Gowda	Healthy Buildings International Pty Ltd (HBI)	Lead Auditor	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-442234)
Rui Henriques	Healthy Buildings International Pty Ltd (HBI)	Alternate Lead Auditor	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-486435)

1.3 Audit objectives

This sixth Independent Audit is to satisfy CoA A38 (refer below) of the State Significant Infrastructure (SSI) 8863 planning approval for the Project, which states:

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

This sixth Independent Audit aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs), which sets out the audit methodology and reporting requirements for the Independent Audit.

Furthermore, in response to TfNSW's request in letter dated 25 July 2023 (Ref: PA-465), DPHI's agreement to regularise the frequency of the ongoing construction phase independent audits for



the WHT and WFU project (SSI 8863) so that the audit site inspection is undertaken each May and November (Ref: SSI-8863-PA-465, dated 7 August 2023) and more recent correspondence within the Auditor Agreement letter (Ref: SSI-8863-PA-1125) in relation to audit site inspections are both included in **Appendix B** of this Audit Report.

In order to meet the above, including the Audit delivery program and schedule; the site inspection commenced on 28 October 2025 for WHT Stages 3B and 3C.

1.4 Audit scope

The sixth Independent Audit comprises of four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance and Reporting.

The proposed scope of the sixth Independent Audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 8863 (as modified; the Approval) Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to Stage 3B (WHT Northern Tunnelling and Integration works) and Stage 3C (WHT Sydney Harbour Crossing works) of the project, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and



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

1.5 Audit period

The temporal period covered by the Audit for WHT Stages 3B and 3C is from the date of the site inspection of the fifth Independent Audit (6 May 2025), to the date of the site inspection for this sixth Independent Audit of WHT Stages 3B and 3C (28 October 2025).



2. AUDIT METHODOLOGY

2.1 Audit process

The sixth Independent Audit was conducted in a manner consistent with below reference documents and evidence submitted for review during the audit:

- Independent Audit Post Approval Requirements (DPIE, 2020)
- ISO 14001: 2015 Environmental Management Systems
- AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems

2.2 Audit process detail

2.2.1 *Audit initiation and scope development*

The Auditee organisations (together referred to as the Auditee/s or Project team) were identified as follows:

- The Proponent: Transport for NSW (TfNSW)
- The WHT Stages 3B and 3C Principal Contractor: ACCIONA

Personnel representing the Auditees are identified in Section 2.2.3 of this Independent Audit Report. Prior to the commencement of the audit the following tasks were completed:

- Confirmation with DPHI on agreed auditor(s);
- Meeting and consultation with DPHI on the audit scope; and
- Development of an Audit Plan detailing the audit objectives, scope, audit period and indicative audit program.

The Lead Auditor consulted with DPHI on 23 September 2025 to obtain inputs to the scope of this sixth Independent Audit in accordance with Section 3.2 of the IAPARs. DPHI responded on 1 October 2025 and requested that Inner West Council (IWC), Penrith City Council (PCC), North Sydney Council (NSC) and the Environment Protection Authority (EPA) also be consulted on the scope for this sixth Independent Audit.

IWC, PCC, EPA and NSC (joint consultation for WHT and WFU) were consulted to provide input to the scope and confirm any key issues that above Councils and EPA would like examined, relating to post-approval requirements and compliance. Requirements from scope consultation with DPHI on this sixth Independent Audit were also included in the consultation correspondence to the Councils and EPA, requesting a response as per timeframes specified within the consultation correspondence. A summary of the key issues and areas of focus raised by the stakeholders (where response was provided) is presented in Table 2. Consultation records are presented in **Appendix D**.



Table 2: Key issues and areas of focus raised during stakeholder consultation

Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
Department of Planning, Housing and Infrastructure (DPHI)	Scope consultation correspondence sent to DPHI on 23 September 2025. DPHI responded on 1 October 2025: <i>“Further to the proposed scope detailed in HBI letter (dated 23 September 2025), NSW Planning requests that the audit includes the following:</i> <i>An assessment of management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Walker Street, North Sydney; and</i> <i>Review of complaints that has required escalation during the reporting period and whether the escalation procedures were adequately implemented in accordance with the Community Communication Strategy of the Project and whether outstanding issues were appropriately closed out.</i> <i>NSW Planning requests particular focus on the following construction support sites and associated works:</i> <i>Berrys Bay</i> <i>Emu Plains</i> <i>As per previous audits, NSW Planning requests you consult with the NSW EPA and North Sydney Council (NSC), Inner West Council and Penrith City Council. NSW Planning also requests that consultation with NSC is coordinated with the consultation for the next Warringah Freeway Upgrade (WFU) Independent Audit, i.e., a single consultation with NSC covering both the WHT and WFU.”</i>	This audit was conducted in accordance with CoA A38 and the IAPARs. All conditions have been assessed for the current works, noting staged construction. Refer Audit Table within Appendix A. Audit site inspections focussed on Berrys Bay and Emu Plains. DPHI scope is summarised in: - Section 2.2.5 - Site Inspection (includes DPHI and EPA matters). - Appendix E, Table E presents details and photographs from the audit site inspections. - Section 3.2 Non-compliances, Observations and Actions. - Table 6 presents audit observations and findings. In summary, nil non-compliances and four observations recorded from the audit site inspections. - Section 3.6 Complaints (including DPHI and EPA and matters) and CoA B5-B13. - Section 3.7 Incidents and Non-Compliances (including DPHI matters). - Scope consultation correspondence sent to Councils and EPA requesting a response as per timeframes specified within consultation correspondence. Refer Council and EPA consultation below and refer Consultation Records in Appendix D. In addition to above: - Environmental performance assessment (including but not limited to actual versus predicted impacts) is included in Section 3.8. - A high-level assessment of the environmental management plans/sub-plans is included in Sections 3.3 and 3.8.



Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
Independent Environmental Representative (ER)	ER Audit Interview/scope discussion conducted on 21 October 2025 (Teams Meeting) in relation to: • Scope consultation received from DPHI and EPA; and • Any key issues or areas of concerns to be included in this Audit – nil raised for inclusion in this sixth Independent Audit for WHT Stages 3B and 3C.	Not Applicable.
Independent Acoustic Advisor (AA)	AA Audit Interview/scope discussion conducted on 24 October 2025 (Teams Meeting) in relation to: • Scope consultation received from DPHI and EPA; and • Any key issues or areas of concerns to be included in this Audit – nil raised for inclusion in this sixth Independent Audit for WHT Stages 3B and 3C.	Not Applicable.
NSW EPA	Scope consultation correspondence sent to EPA on 3 October 2025, requesting a response before 17 October 2025. EPA scope consultation correspondence received on 7 October 2025, stating below: <i>“Priority areas for the EPA regarding this project include:</i> • <i>Groundwater treatment and management</i> • <i>Noise and vibration management from tunnelling operations</i> • <i>Materials storage at the Emu Plains support site</i>	Addressed in the following Sections of the Audit Report and under specific CoAs (for e.g.) as follows; where these specific conditions may have interactions with other CoAs, an assessment of those requirements have been included as audit evidence and findings in the Audit Table (refer Appendix A). - Section 3.2 Non-compliances, Observations and Actions and Table 6. - Section 3.6 Complaints (including DPHI and EPA and matters) and CoA B5-B13. - Section 3.7 Incidents and Non-Compliances. - Section 2.2.5 - Site Inspection (includes DPHI and EPA matters). - Appendix E, Table E presents details and photographs from the audit site inspections. - EPA scope is summarised in Sections 3.6 and 3.8, with a detailed review of Conditions in the Audit Table within Appendix A. Refer Audit Table within Appendix A – for example: - CoA A31, CoA A34 (Independent AA) - CoA A27 (Independent ER)



Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
		- CoA C13 (Noise and Vibration Monitoring); CoA E71 (GBN) - CoA E68, CoA E69, CoA E88 - CoA E114 – Soils (including Water Management) - CoA E206 - Water (including Water Management) Refer complete Consultation Records in Appendix D.
North Sydney Council (NSC)	Joint scope consultation correspondence sent to NSC (covering both WHT and WFU Projects) on 3 October 2025, requesting a response before 17 October 2025 with indication of project/location where issues/concerns relate to. No response received from NSC within timeframe requested and correspondence received on 23 October 2025. Further discussions were held with NSC by Lead Auditors from WHT and WFU to understand any specific concerns or issues not already covered by this Audit's Scope. Further correspondence provided to NSC on 23 and 27 October 2025 in terms of seeking NSC's inputs (as per normal audit protocols) to scope consultation process in the next six-monthly audit of both WHT and WFU; including indicative timing of scope consultation requests.	Not Applicable. Refer Consultation Records in Appendix D.
Inner West Council (IWC)	Scope consultation correspondence sent to IWC on 3 October 2025, requesting a response before 17 October 2025. No response received from IWC.	Not Applicable. Refer Consultation Records in Appendix D.
Penrith City Council (PCC)	Scope consultation correspondence sent to PCC on 3 October 2025 and on 9 October 2025, requesting a response before 17 October 2025. No response received from PCC.	Not Applicable. Refer Consultation Records in Appendix D.



2.2.2 *Preparing audit activities*

The Lead Auditor performed a document review, prepared an Audit Plan with an indicative program and prepared an Audit Table (refer **Appendix A**) for this sixth Independent Audit. The proposed audit plan was provided to the Auditees (refer **Appendix C**), in preparation for the sixth Independent Audit.

2.2.3 *Personnel involvement*

Table 3 presents the involvement of key personnel representing the Auditees in this sixth Independent Audit.

Opening and closing meeting attendance is presented separately in **Appendix C**.



Table 3: Auditees and key personnel involved

Organisation	Project Stage	Position Title	Name	Involvement
TfNSW	WHT Stages 3B and 3C	Environment and Sustainability - Manager	Simon Pigozzo	Opening/closing meetings (refer Appendix C Attendance), site inspections, audit interview and document review
TfNSW	WHT Stages 3B and 3C	Senior Manager, Environment & Sustainability	Rob Owens	Closing meeting (refer Appendix C Attendance)
TfNSW	WHT Stages 3B and 3C	Communications and Stakeholder Engagement Manager	Claudia Wright	Audit interview and document review
APP Group	WHT Stages 3B and 3C	Independent Environmental Representative (ER)	Gillian Lehn	Audit interview including scope consultation
Acoustic Studio	WHT Stages 3B and 3C	Independent Acoustic Advisor (AA)	Sav Shimada	Audit interview including scope consultation
APP Group	WHT Stages 3B and 3C	Independent Certifier	Joseph Cacadac	Opening meeting (refer Appendix C Attendance) Site inspection - WHT13
APP Group	WHT Stages 3B and 3C	Independent Certifier	Nilda Soto	Closing meeting (refer Appendix C Attendance)
ACCIONA	WHT Stages 3B and 3C	Environment and Sustainability Manager	Charles Scarf	Opening/closing meetings (refer Appendix C Attendance), site inspections, audit interview and document review
ACCIONA	WHT Stages 3B and 3C	Senior Environmental Advisor	Verity Avery	Opening/closing meetings (refer Appendix C Attendance), site inspections, audit interview and document review
ACCIONA	WHT Stages 3B and 3C	Environmental Coordinator	Scott Thompson	Opening/closing meetings (refer Appendix C Attendance), site inspections, audit interview and document review



Organisation	Project Stage	Position Title	Name	Involvement
ACCIONA	WHT Stages 3B and 3C	Senior Environmental Advisor	Lochlan Browne	Opening/closing meetings (refer Appendix C Attendance), site inspection (Berrys Bay), audit interview and document review
ACCIONA	WHT Stages 3B and 3C	Environment Coordinator	Lotta Nummela	Opening/closing meetings (refer Appendix C Attendance), site inspections, audit interview and document review
ACCIONA	WHT Stages 3B and 3C	Environment Advisor	Christian Del Castillo Macedo	Opening/closing meetings (refer Appendix C Attendance), audit interview and document review (Teams)
ACCIONA	WHT Stages 3B and 3C	Environment Coordinator	James Greig	Opening meeting (refer Appendix C Attendance), site inspection (WHT13-Emu Plains), audit interview and document review (Teams)
ACCIONA	WHT Stages 3B and 3C	Environmental Advisor	Chistian Grinberg	Closing meeting (refer Appendix C Attendance), audit interview and document review (Teams)
ACCIONA	WHT Stages 3B and 3C	Site Supervisor – Civils	Neal Streicher	Site inspection (WHT13-Emu Plains)
ACCIONA	WHT Stages 3B and 3C	Production Supervisor	Gary Stewart	Site inspection (WHT13-Emu Plains)
ACCIONA	WHT Stages 3B and 3C	Site Supervisor – Berrys Bay	Chris Behnke	Site inspection (Berrys Bay)
ACCIONA	WHT Stages 3B and 3C	Spoil Manager	Kimon Blyth	Audit interview and document review
ACCIONA	WHT Stages 3B and 3C	Senior Community and Stakeholder Manager	Amanda Muir	Audit interview and document review
ACCIONA	WHT Stages 3B and 3C	Place Manager South	Amy McDonald	Audit interview and document review
ACCIONA	WHT Stages 3B and 3C	Place Manager North	Tara Kennedy	Audit interview and document review
ACCIONA	WHT Stages 3B and 3C	Tunnel Ventilation Lead	Harry Ganesan	Audit interview and document review
ACCIONA	WHT Stages 3B and 3C	M & E Engineering Manager	Ashkun Jalili	Audit interview and document review



Organisation	Project Stage	Position Title	Name	Involvement
ACCIONA	WHT Stages 3B and 3C	Senior Project Engineer – Geotechnical	Andrew Goldsmith	Audit interview and document review
ACCIONA	WHT Stages 3B and 3C	Interface and Property Coordinator	Tracey Taing	Audit interview and document review



2.2.4 Meetings

The opening and closing meetings were held with the Lead Auditor, relevant TfNSW and ACCIONA personnel. Opening and closing audit meetings were held, as follows:

- Opening meeting (including Teams): 28 October 2025
- Closing meeting (Teams): 4 December 2025

A copy of the Audit Plan, opening and closing meeting attendance is presented in **Appendix C**.

2.2.5 Site inspection (including DPHI and EPA matters)

Site inspections were conducted as part of this sixth Independent Audit, to assess compliance and validate implementation of the following:

- Mitigation measures and controls in the nominated management plans and associated documents (within this Independent Audit scope and as outlined in the Audit Table in **Appendix A**);
- Effectiveness of environmental controls; and
- To further verify responses provided by the Auditees.

Prior to the site inspections ACCIONA provided a brief overview of key current works and activities – refer Section 1.1.4 of this Report and **Appendix E – Table E** for works and activities observed.

DPHI and EPA Consultation Scope

As outlined previously in Section 1.1.4, the audit site inspections focussed on Emu Plains (WHT13) and Berrys Bay sites. Following summary of observations are of note at the time of the audit site inspection:

- Emu Plains site (WHT13): Some of the controls/mitigation measures observed include - stabilised areas, hardstands, landscaping, site access/egress maintained - no tracking, evidence of internal haul roads being wet down (for dust suppression), clean water diversions installed, appropriate ERSED controls installed, temporary sediment basin on-site for surface water management, detention ponds in Area 2 constructed and evidence of application of soil binder in Area 2.
- Berrys Bay Foreshore Parklands site: Some of the controls/mitigation measures observed include delineation fencing, flagging, bollards and signage for exclusion and environmental protection / no-go zones; appropriate ERSED controls installed [for e.g. silt curtains, sediment filtration barrier controls (haybales wrapped in geofabric)], evidence of application of soil binder on exposed surfaces, batters and stockpiles, no identifiable Project (branded) worker vehicles observed near site access/egress and site access/egress maintained - no tracking.

Site inspection observations (including positive observations) and photographs are presented in **Appendix E – Table E**.

Above sites inspected were notably well maintained; with mitigation measures and controls being implemented in accordance with post-approval and Project related documents. Nil non-compliances



or issues identified during the audit site inspection. A few opportunities for improvement (OFI) were identified relating to Emu Plains site (WHT13) - refer Table 6 of the Audit Report for OFIs raised during this audit.

The Lead Auditor considers that above sites inspected (in addition to desktop reviews conducted), covers DPHI and EPA scope consultation.

2.2.6 *Document review and interviews*

The sixth Independent Audit included investigation and review of documents, reports and records to evaluate compliance. Interviews with key Project personnel were conducted and further documentary evidence was also sought to verify responses provided by Auditees during the course of the audit.

Refer to Section 2.2.3 for details of personnel interviewed. Audit interviews and document review sessions were conducted with the Auditees as follows:

- Environmental Representative: 21 October 2025 (via Teams)
- Acoustic Advisor: 24 October 2025 (via Teams)
- TfNSW and ACCIONA: 28 and 30 October 2025 (face-to-face and via Teams with some personnel)

In addition to the above, the Lead Auditor requested further information, to obtain evidence that was not accessible or available during the audit interviews and document reviews. These requests were provided promptly by the Auditees within required timeframes.

2.2.7 *Generating audit findings*

This is the Sixth Independent Audit of the Project, with all previous Independent Audit Reports (including audit evidence and findings for each audit period), available on the Project Website – refer <https://caportal.com.au/rms/wht>.

This Audit Report and Audit Table (in **Appendix A**) presents audit evidence and findings for the temporal audit period, as described in Section 1.5. The audit findings were based on verifiable evidence collected and reviewed. The evidence included:

- Relevant correspondence from DPHI and any other stakeholders;
- Review of relevant records, documents and specialist reports;
- Interviews with relevant personnel;
- Figures, plans and photographs;
- Site inspections of relevant locations, activities and processes;
- Monitoring data and analysis;
- Other applicable approvals, permits, records or Project-specific environmental requirements (as documented within the Audit Table in **Appendix A**).



2.2.8 Compliance evaluation

Evaluation of compliance has been carried out in accordance with Section 3.7 of the IAPARs and documented in an Audit Table, which includes the conditions of SSI 8863. The compliance status of each compliance requirement in the Audit Table has been determined using the relevant descriptors in Section 3.8, Table 2 of the IAPARs, as listed in Table, below:

Table 4: Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
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.

As part of this sixth Independent Audit evaluation, the Lead Auditor has made observations and notes to provide context, identify any opportunities for improvement (OFI) in relation to any compliance requirement or any other aspect of the Project. This includes any positive observations where the project has applied initiatives beyond compliance requirements.

The compliance status has been attained by assessing a representative sample of documents, records and data for each requirement in the audit period prescribed. Observations on-site during the audit site inspections are based on current activities and assumed to be representative of ACCIONA's performance across the Project.

2.2.9 Evaluation of post approval documentation

The Lead Auditor assessed whether post approval documents (such as Environmental Management Plans and Sub-plans):

- have been developed in accordance with the conditions of consent and approvals applicable to the Project (if any) and their content is adequate; and
- have been implemented in accordance with the conditions of consent for the Project.

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

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



2.2.10 *Completing the audit*

A draft of the sixth Independent Audit Report was distributed to the Auditees for review to ensure content is factual and representative. The Lead Auditor's findings have been determined independent of the Auditees, DPHI and any other parties, based on the evidence assessed during the audit.



3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

Key documentation reviewed prior to and after the site visits and interviews are listed below. This list is not exhaustive. The full set of documents and relevant evidence sighted against each requirement is detailed within the Audit Table (refer **Appendix A**).

Overarching WHTWUFU Project documentation:

- Western Harbour Tunnel (WHT) and Warringah Freeway Upgrade (WUFU) Environmental Impact Statement (the EIS) (January 2020)
- TfNSW WHT and WUFU Response to Submissions Report (September 2020) (the RTS)
- WHT and WUFU Wicks Road Construction Support Site – Modification Report (Modification 1 Report, dated October 2022)
- WHT and WUFU Modification – Wicks Road Construction Support Site Submissions report (Mod – 1) (TfNSW, May 2023)
- WHT and WUFU Modification 2 – TBM Construction Methodology (dated July 2023)
- TfNSW WHT and WUFU Modification 2 - TBM Construction Methodology Submissions Report (dated October 2023)
- Emu Plains Flood Impact and Risk Assessment (dated 12 January 2024)
- Consolidated Minister’s Conditions of Approval (SSI 8863) (as modified, the Approval) (not including Modification 3)
- Staging Report WHT and WUFU (SSI 8863) (Rev 12, dated 04 July 2025)
- TfNSW WHT and WUFU Community Communication Strategy (WHTWUFU CCS, Rev 11, dated 29 May 2025)

WHT Stages 3B and 3C documentation:

- WHT DPE Complaint Register, as provided on 24 October 2025 (Ref: WHT_DPE Complaint Register_251024.xlsx, with date range of 2 May – 24 October 2025 utilised for this audit and summarisation in Section 3.6 and Audit Table in Appendix A)
- Unexpected Finds Register, extract provided for audit period on 28 October 2025 (Ref: Unexpected Finds Register.xlsx)
- WHT Environmental Incident register, extract provided for audit period on 28 October 2025 (Ref: WHT Environmental Incident register May - October 2025.xlsx)
- WHT SDRP Terms of Reference (source: WHT Project website)



- Ancillary Site Establishment Management Plans (ASEMP) Berry Street North (WHT8) construction ancillary facility (Rev 02, dated 29 January 2024)
- Ancillary Site Establishment Management Plan Emu Plains (WHT13) construction ancillary facility (Rev 06, dated 04 March 2025)
- Ancillary Site Establishment Management Plan Glebe Island (WHT3) construction ancillary facility (Rev 3.4, dated 9 October 2025)
- Heavy Vehicle Local Roads (HVLRL) – 33kV Installation – Lilyfield and Rozelle (WHTP2-ACOC-WHT-TF-GE01-PLN-000012, Rev 05, dated 10 December 2024)
- Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) including below in Appendices
 - Construction Parking and Access Strategy North Rev 10, dated 28 June 2024
 - Construction Parking and Access Strategy South Rev 8, dated 3 July 2025
 - Construction Parking and Access Strategy West Rev 1.2, dated 5 November 2024
 - Construction Parking and Access Strategy Berrys Bay - Rev 01, dated 27 May 2025
- Construction Parking and Access Strategy – Performance Report (North) (Apr to Jun 2025), Revision B, dated 12 August 2025 (sighted as an example)
- Construction Environmental Management Plan (Rev 9.16, dated 19 September 2025)
- Flora and Fauna Management Sub-Plan (Rev 6.7, dated 03 June 2025) (Appendix C)
- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D)
- Noise and Vibration Monitoring Program (Rev 03, dated 22 April 2024) incorporated as Appendix D2 within the Noise and Vibration Management Sub Plan
- Out of Hours Works Protocol - Western Harbour Tunnel Package 2 Project (dated July 2024) included as Appendix D3 within the Noise and Vibration Management Sub Plan
- Soil and Surface Water Management Sub Plan (Rev 3.5, dated 16 May 2025) (Appendix E)
- Surface Water Monitoring Program (Rev 2.1, dated 6 January 2025) (note typo on document history table for year) incorporated as Appendix E2 within the Soil and Surface Water Management Sub Plan
- Acid Sulfate Soil Procedure incorporated as Appendix E1 within the Soil and Surface Water Management Sub Plan (Rev B, dated 14 June 2023)
- Spill Response and Management Procedure (dated December 2022) incorporated as Appendix E3 within the Soil and Surface Water Management Sub Plan



- Unexpected Finds (UXF) of Contaminated Land Procedure incorporated as Appendix E4 within the Soil and Surface Water Management Sub Plan (Rev 0.1, dated 14 August 2023)
- Groundwater Management Sub Plan (Rev 3.6, dated 15 October 2025) (Appendix F)
- Groundwater Monitoring Program (Rev 2.1, dated 14 November 2024) incorporated as Appendix F1 within the Groundwater Management Sub Plan
- Non-Aboriginal Heritage Management Sub Plan (Rev 10, dated 23 July 2025 (Appendix G)
- Aboriginal Cultural Heritage Management Sub Plan (Rev 4.2, dated 09 September 2024) (Appendix H)
- Air Quality Management Sub Plan (Rev 6.2, dated 12 August 2024) (Appendix I)
- Air Quality Monitoring Program (Rev 05, dated 15 April 2024) incorporated as Appendix I2 within the Air Quality Management Sub Plan
- Waste and Resource Management Sub-Plan (Rev 03, dated 26 March 2024) (Appendix J)
- Microbat Monitoring Program (Rev 00, dated 27 August 2025)
- Maritime Heritage Management Sub-Plan (Rev 02, dated 23 July 2025) (Appendix N)
- WHT Ridge Street North Support Site Construction Noise and Vibration Impact Statement (Stage 3B, ACCIONA) (Doc no. 22003-NV-RP-3-9, Rev 9, dated 29 April 2024)
- WHT Cammeray Construction Support Site Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-2-9, Rev 9, dated 02 June 2025)
- WHT Berry Street Support Site Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-9-1, Rev 1, dated 22 January 2024)
- WHT Utilities 11KV Noise and Vibration Impact Statement Report (Assessment Date 07/11/2023 and Assessment ID 11KVA)
- WHT White Bay (WHT3) Support Site Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-10-3, Rev 3, dated 9 July 2025)
- WHT Tunnelling Works (Acciona) Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-7-6, Rev 6, 27 March 2025)
- WHT– Rozelle 33kV Alignment Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-1-3, Rev 3, 09 July 2024)
- WHT – Pre-cast Yard (Emu Plains) Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-8-9, Rev 9, dated 19 May 2025)
- Rozelle Motorway Operation Centre - Site Establishment and Water Treatment Plant Noise and vibration impact statement (Assessment Date 11/03/2025 and Assessment ID Rev 02)



- Berrys Bay Construction Noise and Vibration Impact Statement (Document no. 22003-NV-RP-11-1, Rev 1, dated 7 March 2025)
- City West Link Integration works, Noise and vibration impact statement (Assessment Date 05/09/2025, Assessment Id RD04)
- Sustainability Strategy (WHTP2-ACOC-WHT-EV-PLN-000016, Rev 02.01, dated 21 May 2024)
- WHT Water Reuse Strategy (WHTP2-ACOC-WHT-EV-PLN-000015, Rev 02.01, dated 7 May 2024)
- Independent Property Impact Assessment Panel for M6S1, WHT P2, WFU and WHT EW - Terms of Reference [TfNSW, Ver 1.0, dated May 2023 (and approved Ver 1.0, dated 28 June 2023)]
- EPL¹ #21791 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit)
- Emu Plains EPL #21881 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit)
- WHT – EPL 21791 Monitoring Report (Reporting Period: October 2025) (Western Harbour Tunnel, WHTP2-ACOC-WHT-EV-GE01-RPT-000002, Rev 00, dated 15/10/2025)
- Six Monthly Groundwater Data Report: 1 December 2024 – 31 May 2025 (Rev 01, dated 13 August 2025)
- Air Quality Bi-Annual Construction Monitoring Report, 1 December 2024 – 31 May 2025 (Rev 00, dated 23 June 2025)
- Noise and Vibration Construction Bi-Annual Monitoring Report: 18 November 2024 – 31 May 2025 (Rev 00, dated 26 June 2025)
- Surface Water Monitoring Construction Bi-Annual Monitoring Report: 18 November 2024 – 31 May 2025 (Rev 00, no date)
- WFU and WHT Operational Noise Review (SLR Ref: 610.30202-R09 Version No: -v2.0, dated 4 September 2024)
- WHT Stage 3B and 3C MCoA E83 OOHW Consultation Summary (1 April to 30 June 2025) WHTP2-ACOC-WHT-EV-GE01-RPT-000030, Revision 01 Date: 23 September 2025

¹ Note: Compliance assessment with EPL requirements is not within the scope of these Independent Audits.



3.2 Non-compliances, Observations and Actions

This section presents findings from this sixth Independent Audit. The summary of conditions assessed and compliance status from this sixth Independent Audit is presented in Table 5. Detailed audit findings and evidence against each requirement is presented in the Audit Table (refer **Appendix A**).

*Table 5: Summary of conditions assessed and compliance status from this **sixth** Independent Audit*

Part of the Project Approval	No. of conditions assessed	Compliance status		
		Compliant	Non-compliant	Not triggered
Part A	48	33	1 (One non-compliance self-reported against A17)	14
Part B	15	11	0	4
Part C	18	18	0	0
Part D	13	0	0	13
Part E	208	86	1 (Six non-compliances self-reported against E132)	121
Total	302	148	2*	152

* Note: Table reflects two non-compliant conditions, however this includes - one non-compliance self-reported against CoA A17 and six non-compliances self-reported against CoA E132. Also refer Table 6 for further details and summary below for Audit results.

With respect to this sixth Independent Audit:

- **302** conditions were assessed.
- **Seven** non-compliances identified, were all self-reported by WHT Stages 3B and 3C during the audit period.
- **Nil** new non-compliances raised as part of this Audit.
- **148** conditions were considered to be compliant.
- **152** conditions were considered not triggered.

In addition to the above, **seven** observations were identified. These are detailed in **Table 6**.

Table 7 presents the close-out status of previous Independent Audits.



Table 6: Sixth Independent Audit Observations (October 2025)

Item	Ref	Type	Requirement	Audit Finding and Stage applicable to	Recommended or completed action, by Whom and When	Status
IA6 – NC01	CoA E132	Non-compliance	CoA E132 states “Local roads proposed to be used by heavy vehicles to directly access the construction boundary and ancillary facilities that are not shown in Figure 5-7 to 5-22 inclusive of Appendix F of the EIS, and Figure 7-1 of the Modification 1 Report and Figure 9.2 of the Modification 2 Report, as described in Condition A1, must be approved by the Planning Secretary and included in the Traffic, Transport and Access Management CEMP Sub-plan”	During this audit period, ACCIONA self-reported below non-compliance (Date became aware of non-compliance - 16 June 2025) in relation to one heavy vehicle using unapproved local roads (CoA E132): “On 12th June 2025, Driver working for Mulgoa Excavations drove a heavy vehicle (registration number XO30IZ) along Walker Street and McLaren Street, North Sydney at approximately 9:11am. Walker Street and McLaren Street are local roads not approved for heavy vehicles use on the project.” TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 16 June 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)].	During this sixth Independent Audit, close-out of action(s) raised (including their adequacy) to address NC was reviewed by the Lead Auditor, with following sample evidence sighted: - ACCIONA’s correspondence to Haulier and response from Haulier [Ref: 250612 Maps Notification RW WHTP2 (R2065).msg] - DPHI’s response to TfNSW on 21 July 2025, in reference to the NC notification provided on 16 June 2025 (Ref: Communication regarding Notification A45 - WHT HVLR various - 12 Jun 25 SSI-8863-PA-1056) - DPHI noted (excerpt only) that the non-compliance has been assessed, with NSW Planning determining to record the breach with no further enforcement action proposed; DPHI’s considerations in reaching this decision and that the NC will be taken into consideration in the assessment of any future breaches of the Approval.	CLOSED
IA6 – NC02	CoA A17	Non-compliance	CoA A17 states “Before establishment of any construction ancillary facility (excluding minor construction ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A19), the Proponent must prepare an Ancillary Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the construction ancillary facilities.....”	During this audit period, ACCIONA self-reported below non-compliance (Date became aware of non-compliance - 14 August 2025) in relation to establishment of an Ancillary Facility prior to approval (CoA A17): “During a scheduled ER site inspection of WHT3 on 14 August 2025, the ER observed “Carparking and storage..... outside the boundary approved under the ASEMP”. As the Glebe Is. ASEMP update had yet to be approved, the ER identified this as a non-compliance.” TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 21 August 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (A17)].	During this sixth Independent Audit, close-out of action(s) raised (including their adequacy) to address NC was reviewed by the Lead Auditor, with following sample evidence sighted: - ER approval of ASEMP – Glebe Island (WHT3) construction ancillary facility, dated 18th August 2025 of under CoA A27 (i) (REF: AQ1148.31 WHT ASEMP Glebe Island rev3.1 endorsement 250818) and latest version of ASEMP available on the Projects website. - DPHI’s response to TfNSW on 5 September 2025, in reference to the NC notification provided on 21 August 2025 (Ref: Communication regarding Notification A45 - WHT ASEMP - 30 Jul 2025 SSI-8863-PA-1109) DPHI noted (excerpt only) that the non-compliance has been assessed and, on this occasion, determined to record the NC with no further enforcement action proposed; DPHI’s considerations in reaching this decision and that the NC will be taken into consideration in the assessment of any future breaches of the Approval.	CLOSED



Item	Ref	Type	Requirement	Audit Finding and Stage applicable to	Recommended or completed action, by Whom and When	Status
IA6 – NC03	CoA E132	Non-compliance	CoA E132 states “Local roads proposed to be used by heavy vehicles to directly access the construction boundary and ancillary facilities that are not shown in Figure 5-7 to 5-22 inclusive of Appendix F of the EIS, and Figure 7-1 of the Modification 1 Report and Figure 9.2 of the Modification 2 Report, as described in Condition A1, must be approved by the Planning Secretary and included in the Traffic, Transport and Access Management CEMP Sub-plan”	During this audit period, ACCIONA self-reported below non-compliance (Date became aware of non-compliance - 20 August 2025) in relation to one heavy vehicle using unapproved local roads (CoA E132): “On 13 August 2025, Driver working for Mulgoa Excavations Pty Ltd drove a heavy vehicle (registration number GOA545) along Walker Street, between Pacific Highway and Berry Street, North Sydney at 4:41pm. Walker Street is a local road not approved for heavy vehicles use on the project. The driver was in the wrong lane resulting in a turn off the approved route.” TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 22 August 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)].	During this sixth Independent Audit, close-out of action(s) raised (including their adequacy) to address NC was reviewed by the Lead Auditor, with following sample evidence sighted: - ACCIONA’s correspondence to Haulier and response from Haulier [Ref: 250813 Maps Notification RW WHTP2 (R2065).msg] - DPHI’s response to TfNSW on 22 September 2025, in reference to the NC notification provided on 22 August 2025 (Ref: Communication regarding Notification A45 - WHT Walker St - 13 Aug 2025 SSI-8863-PA-1111) DPHI noted (excerpt only) that the non-compliance has been assessed, with NSW Planning determining to record the breach with no further enforcement action proposed; DPHI’s considerations in reaching this decision and that the NC will be taken into consideration in the assessment of any future breaches of the Approval. DPHI’s correspondence also requested that Mulgoa Excavations is informed of NSW Planning’s response to this non-compliance.	CLOSED
IA6 – NC04	CoA E132	Non-compliance	CoA E132 states “Local roads proposed to be used by heavy vehicles to directly access the construction boundary and ancillary facilities that are not shown in Figure 5-7 to 5-22 inclusive of Appendix F of the EIS, and Figure 7-1 of the Modification 1 Report and Figure 9.2 of the Modification 2 Report, as described in Condition A1, must be approved by the Planning Secretary and included in the Traffic, Transport and Access Management CEMP Sub-plan”	During this audit period, ACCIONA self-reported below non-compliance (Date became aware of non-compliance – 1 September 2025) in relation to one heavy vehicle using unapproved local roads (CoA E132): “On 27 August 2025, Driver (Khash Ghosemian) working for Tempus Civil drove a heavy vehicle (registration number TEMP09) along Walker Street, between Denison Street and Little Walker Street, North Sydney at 9:29am. Walker Street is a local road not approved for heavy vehicles use on the project. TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 2 September 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)].	During this sixth Independent Audit, close-out of action(s) raised (including their adequacy) to address NC was reviewed by the Lead Auditor, with following sample evidence sighted: - ACCIONA’s correspondence to Haulier [Ref: RE Maps Notification RW WHTP2 (R2065) - Exclusion Zone Entry.msg] - DPHI’s response to TfNSW on 19 September 2025, in reference to the NC notification provided on 2 September 2025 (Ref: Communication regarding Notification A45 - WHT- Walker St 27 Aug 2025 SSI-8863-PA-1119) DPHI noted (excerpt only) that the non-compliance has been assessed, with NSW Planning determining to record the breach with no further enforcement action proposed; DPHI’s considerations in reaching this decision and that the NC will be taken into consideration in the assessment of any future breaches of the Approval. DPHI’s correspondence also requested that Tempus Civil and the driver is informed of NSW Planning’s response to this non-compliance - Sighted issue of above DPHI correspondence to Haulier company by ACCIONA (as sample evidence) (Ref: FW: Non-compliance notification -Condition E132 - 27 August 2025, dated 25/09/2025)	CLOSED



Item	Ref	Type	Requirement	Audit Finding and Stage applicable to	Recommended or completed action, by Whom and When	Status
IA6 – NC05	CoA E132	Non-compliance	CoA E132 states “Local roads proposed to be used by heavy vehicles to directly access the construction boundary and ancillary facilities that are not shown in Figure 5-7 to 5-22 inclusive of Appendix F of the EIS, and Figure 7-1 of the Modification 1 Report and Figure 9.2 of the Modification 2 Report, as described in Condition A1, must be approved by the Planning Secretary and included in the Traffic, Transport and Access Management CEMP Sub-plan”	During this audit period, ACCIONA self-reported below non-compliance (Date became aware of non-compliance – 22 September 2025) in relation to one heavy vehicle using unapproved local roads (CoA E132): “On 19 September 2025, Driver working for Load Master drove a heavy vehicle (registration number XP68IQ) along Walker Street, North Sydney at 12:59pm. Walker Street is a local road not approved for heavy vehicles use on the project.” TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 22 September 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)].	During this sixth Independent Audit, close-out of action(s) raised (including their adequacy) to address NC was reviewed by the Lead Auditor, with following sample evidence sighted: - ACCIONA’s correspondence to Haulier and Haulier response [Ref: 250919 Maps Notification RW WHTP2 (R2065).msg] - DPHI’s response to TfNSW on 22 October 2025, in reference to the NC notification provided on 22 September 2025 (Ref: Communication regarding Notification A45 - WHT- Walker St 22 Sep 2025 SSI-8863-PA-1139) DPHI noted (excerpt only) that the non-compliance has been assessed, with NSW Planning determining to record the breach with no further enforcement action proposed; DPHI’s considerations in reaching this decision and that the NC will be taken into consideration in the assessment of any future breaches of the Approval.	CLOSED
IA6 – NC06	CoA E132	Non-compliance	CoA E132 states “Local roads proposed to be used by heavy vehicles to directly access the construction boundary and ancillary facilities that are not shown in Figure 5-7 to 5-22 inclusive of Appendix F of the EIS, and Figure 7-1 of the Modification 1 Report and Figure 9.2 of the Modification 2 Report, as described in Condition A1, must be approved by the Planning Secretary and included in the Traffic, Transport and Access Management CEMP Sub-plan”	During this audit period, ACCIONA self-reported below non-compliance (Date became aware of non-compliance – 23 September 2025) in relation to one heavy vehicle using unapproved local roads (CoA E132): “On 22 September 2025, Driver working for Load Master Pty Ltd drove a heavy vehicle (registration number XO83MH) along Walker Street, North Sydney at 5:03pm. Walker Street is a local road not approved for heavy vehicles use on the project.” TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 26 September 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)]	During this sixth Independent Audit, close-out of action(s) raised (including their adequacy) to address NC was reviewed by the Lead Auditor, with following sample evidence sighted: - Acknowledgement receipt email from DPHI to TfNSW, dated 26/09/2025 in relation to NC submission [Ref: Western Harbour Tunnel & Warringah Freeway Upgrade - Post Approval Document Received - (SSI-8863-PA-1142).eml] - ACCIONA’s correspondence to Haulier and Haulier response [Ref: 250922 Maps Notification RW WHTP2 (R2065).msg]	OPEN At the time of issue of this Audit Report, Auditees indicated DPHI’s assessment and response was still pending.
IA6 – NC07	CoA E132	Non-compliance	CoA E132 states “Local roads proposed to be used by heavy vehicles to directly access the construction boundary and ancillary facilities that are not shown in Figure 5-7 to 5-22 inclusive of Appendix F of the EIS, and Figure 7-1 of the Modification 1 Report and Figure 9.2 of the Modification 2 Report, as described in Condition A1, must be approved by the Planning Secretary and included in the Traffic, Transport and Access Management CEMP Sub-plan”	During this audit period, ACCIONA self-reported below non-compliance (Date became aware of non-compliance – 13 October 2025) in relation to one heavy vehicle using unapproved local roads (CoA E132): “On 13 October 2025, Driver working for Load Master Pty Ltd drove a heavy vehicle (registration number XO54JM) along Walker Street, North Sydney at 9:16pm. Walker Street is a local road not approved for heavy vehicle use on the project” TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 20 October 2025 [Ref: SSI 8863 -	During this sixth Independent Audit, close-out of action(s) raised (including their adequacy) to address NC was reviewed by the Lead Auditor, with following sample evidence sighted: - ACCIONA’s correspondence to Haulier and Haulier Response [Ref: 251013 Maps Notification RW WHTP2 (R2065).msg] - ACCIONA’s update regarding engaging North Sydney Council to discuss construction heavy vehicles along Walker Street (refer Section 3.7 of this Audit Report for status)	CLOSED – refer OFI (IA6-OFI01) raised below, as part of this Audit.



Item	Ref	Type	Requirement	Audit Finding and Stage applicable to	Recommended or completed action, by Whom and When	Status
				Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)).	- DPHI's response to TfNSW on 7 November 2025, in reference to the NC notification provided on 20 October 2025 (Ref: Communication regarding Notification A45 - WHT- Walker St- 13 October 2025 SSI-8863-PA-1162) - DPHI noted (excerpt only) that the non-compliance has been assessed, with NSW Planning determining to record the breach with no further enforcement action proposed; DPHI's considerations in reaching this decision and that the NC will be taken into consideration in the assessment of any future breaches of the Approval. DPHI's correspondence also requested that Load Master and the driver is informed of NSW Planning's response to this non-compliance	
IA6-OFI01	CoA E132	Observation	Review of DPHI scope consultation, which requires – <i>“Assessment of management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Walker Street, North Sydney.”</i>	Notwithstanding measures (refer Section 3.7) and noting consistent trend of non-compliances across this audit period and IEA#5 audit period (6), the Lead Auditor raised this observation (OFI) and recommendation.	Recommend investigation of any further options such as additional signage in appropriate location, cameras and escalated actions in terms of the WHT Heavy Vehicle Compliance Actions Matrix for any repeats.	OPEN
IA6-OFI02	CoA E22	Observation	CoA E22 states <i>“The Proponent must install monitoring equipment to monitor pollutants from the ventilation outlets. Pollutant monitoring from the ventilation outlets (by sampling and obtaining results by analysis) must be in accordance with the methods and frequencies for the pollutant parameters specified in Table 6 and be undertaken at commencement of and throughout operation...</i> <i>.... Note 1 within Condition, states Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (EPA 2207) or an alternative method approved by the Planning Secretary in consultation with the EPA.</i>	DPHI approved the request on 29 August 2025 for alternate moisture monitoring method known as Special Method 2 in accordance with condition E22 noting that this document is made publicly available on the project website at the earliest convenience [Ref: SSI-8863-PA-1094, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI-8863_ – Alternative method of monitoring moisture at ventilation outlets, condition E22].	Recommend that DPHI Letter approving the request for alternate moisture monitoring method known as Special Method 2 is placed on the Project website.	OPEN
IA6-OFI03	CoA C14	Observation	<i>The Groundwater Monitoring Program must include:</i> <i>(a) results from existing monitoring bores and from additional monitoring bores required following a review of the monitoring bore network, with the review based on actual results of existing monitoring and groundwater modelling findings in relation to the final tunnel detailed design;</i> <i>(b) daily measurement of the amount of water discharged from the water treatment plants;</i> <i>(c) water quality testing of the water discharged from treatment plants;</i> <i>(d) monitoring of groundwater levels in aquifers adjacent to the tunnel alignment;</i> <i>(e) monitoring of groundwater levels, electrical conductivity and temperature in key locations between saline water bodies and the tunnel (including beneath high risk sites for contamination);</i>	Section 8.5 Reporting (Table 8-2) of the GWMonP states frequency of issue of quarterly water monitoring reports to Sydney Water, as every 3 months when discharging to Sydney Water assets. It was noted that submission to Sydney Water for second quarter was through the six -monthly groundwater data report on 29 August 2025	Recommend that this is explicitly mentioned in the GWMonP as it is for other reporting requirements and recipients (relevant authority) that <i>"For every second quarter this requirement may be achieved by including the data with the six-monthly Groundwater Monitoring Report"</i>	OPEN



Item	Ref	Type	Requirement	Audit Finding and Stage applicable to	Recommended or completed action, by Whom and When	Status
			(f) measures to record or otherwise estimate and report groundwater inflows into the tunnels during their construction; <u>(g) methods for providing the data collected under (a) and (b) to Sydney Water where discharges are directed to their assets; and</u> (h) a method for providing the groundwater monitoring data to DPE Water every three months during construction of the tunnels and portals. Note: With regards to monitoring data to be provided to DPE Water, the format of the dataset must be both in a tabulated and electronic quality-controlled data (csv, excel) ready to use format.			
Site Inspection Observations – WHT Stages 3B and 3C						
IA6-OFISI01	Site Inspection Observation			IA6-OFISI01 - WHT13 (Emu Plains): Temporary sediment basin on-site for surface water management; with some scouring observed on batters and sediment build-up.	Recommend review of sediment basin batters for some scouring for repair and maintenance (including removal of sediment build-up), as required. ACCIONA provided following response (06/11/2025): “Scouring of retention pond to continue to be monitored. Maintenance of pond to be investigated pending safety of access for people / plant and the potential destabilisation of the banks. Maintenance can only be undertaken once pond is empty/ drained which is likely to occur during warmer drier months.” Refer Appendix E for further details. 04/12/2025 - Lead Auditor Response: Open.	OPEN
IA6-OFISI02	Site Inspection Observation			IA6-OFISI02 - Area 2, WHT13 (Emu Plains): Polymer (soil binder) applied on stockpiles in Area 2 and some unsealed surfaces; with exception of small stockpile of material from detention pond construction works. Auditees indicated material had been recently excavated.	Recommend application of polymer (soil binder) on small stockpile of material from detention pond construction works. ACCIONA provided evidence of close-out (06/11/2025) – with Image of stockpile being sprayed. Refer Appendix E for further details. 04/12/2025 - Lead Auditor Response: Closed.	CLOSED
IA6-OFISI03	Site Inspection Observation			IA6-OFISI03 WHT13 (Emu Plains site): Operator observed washing out kibble (hardstand area, outside culvert facility); with discussion held to review kibble wash down area including extending bund to contain wash out water.	Recommend reviewing kibble wash down area and extending bund to contain wash out water. ACCIONA provided evidence of close-out (06/06/2025) – “Extension of bund being installed for culvert facility washdown area.” Refer Appendix E for further details. 04/12/2025 - Lead Auditor Response: Closed.	CLOSED



Item	Ref	Type	Requirement	Audit Finding and Stage applicable to	Recommended or completed action, by Whom and When	Status
IA6-OFISI04	Site Inspection Observation			IA6-OFISI04 Area 2 - WHT13 (Emu Plains): Rumble grid and wheelwash installed at exit from Area 2. Rumble grid observed to have some material build-up. No spoil trucks or vehicle movements observed o at the time of the inspection. ACCIONA indicated no spoil haulage since September 2025 and not scheduled to occur for approximately next 4 to 6 weeks, at this stage.	Recommend maintenance of rumble grid (clean out of material build-up) before spoil haulage recommences from Area 2, to restore further capacity. ACCIONA provided response that - <i>“Rumble grid will be monitored and cleanouts will occur when soil is impacting the effectiveness of the rumble grid or presents a containment risk.”</i> Refer Appendix E for further details. 04/12/2025 - Lead Auditor Response: Open.	OPEN



Table 7: Close out status of fourth and fifth Independent Audit

Item	Ref	Type	Requirement	Audit Finding and Stage applicable to	Recommended or completed action, by Whom and When	Status
IA4						
IA4-OFI06	CoA E135A	Observation	CoA E135A states that “The number of spoil haulage trucks and concrete trucks exiting from the Ridge Street construction ancillary facility (WHT9) between the hours of 10:00 pm and 7:00 am, Monday to Sunday and travelling westbound along Falcon Street, is limited to a total of 100 vehicles per night unless an alternative number of vehicle movements is permitted through an Environment Protection Licence. Measures must be put in place to monitor the number of spoil and concrete trucks making this movement. Details on the number of movements must be provided to the EPA and the Planning Secretary on request, within one week of the EPA and the Planning Secretary making the request.”	WHT Stages 3B and 3C Section 6.3 of TTAMP notes that daily heavy vehicle numbers will be recorded by a gate warden or an electronic system to ensure the 100 vehicle limit is not exceeded and Table 6-4 of the Sub Plan includes measure #TTAMP05 reflecting CoA E135A requirements, however the evidence column reflects ‘traffic management plans’ instead of actual system and records maintained.	Recommend that Section 6.3 and Table 6-4 mitigation measure #TTAMP05 of the Sub Plan is updated to reflect actual system and records maintained, to monitor and demonstrate compliance.	Noted below response from ACCIONA - Change has been made to Table 6-4 and will be approved in the next TTAMP ER endorsement The TTAMP is currently with the ER for approval CLOSED (04/12/2025) – sighted updated TTAMP and ER endorsement.
IA5						
IA5 – NC07	CoA E140 k)	Non-compliance	CoA E140 (excerpt only) states that “Construction Parking and Access Strategy must be prepared to identify and mitigate impacts resulting from on- and off-street parking changes during construction of the CSSI. The Strategy must include, but not necessarily be limited to: a) -j) and; <u>(k) provision of reporting of monitoring results to the Planning Secretary and relevant council(s) at three monthly intervals.</u> The Construction Parking and Access Strategy must be submitted to the Planning Secretary for approval at least one month before the commencement of any construction that reduces the availability of existing parking. The approved Strategy must be implemented before impacting on on-street parking and incorporated into the Traffic, Transport and Access Management CEMP Sub-plan.” Additionally, CPAS’s prepared by the Project states the following under Section 6.2 (Reporting): “Quarterly reports of compliance, monitoring results, and effectiveness of the controls and parking strategies will be provided in accordance with MCoA E140(k). The report will be provided as a standalone report.”	IA5 – NC07: As per, CoA E140k) requirements, CPAS Performance Reports have not been submitted to the Planning Secretary and relevant councils at three monthly intervals. Submissions of the following CPAS Performance Reports to TfNSW in May 2025, for internal review (prior to external submission was sighted): CPAS (South) – Performance Report (Jul to Sep 2024) Q3 2024 Rev B - submitted to TfNSW 06 May 2025 - CPAS (South) – Performance Report (Oct to Dec 2024) Q4 2024 Rev A – submitted to TfNSW on 06 May 2025 - CPAS (South) – Performance Report (Jan to Mar 2025) Q1 2025 Rev A submitted to TfNSW on 06 May 2025 - CPAS (North) - Performance Report (Oct to Dec 2024) Q4 2024 Rev A submitted to TfNSW on 02 May 2025 - CPAS (North) - Performance Report (Jan to Mar 2025) Q1 2025 Rev A submitted to TfNSW on 05 May 2025 - CPAS (West) – Performance Report (October to December 2024) Q4 2024 Rev A submitted to TfNSW on 06 May 2025 - CPAS (West) – Performance Report (Jan to Mar 2025) Q1 2025 Rev A – submitted to TfNSW on 07 May 2025	- #1 Recommend submission of CPAS performance Reports (listed in this audit finding) for North, South and West to the Planning Secretary and relevant council(s) and to ensure CoA E140 k) requirements are met in future - #2 Recommend including timeframes within CPAS’ of when CPAS performance Reports will be submitted by, in order to meet CoA E140 k) <u>Proponent’s Action to above recommendation was submitted to DPHI with the IEA#5 Audit Report noting below</u> - #1 Undertake a review by 11 July to determine the capacity of the traffic consultant scoped with CPAS monitoring and reporting to provide reports in a timely manner. If there is a lack of confidence for future timely performance, descope the consultant and allocate new resources to undertake monitoring and reporting. - #2 At the next required CPAS update the Project will modify CPAS (North & South) ‘Section 6.2 Reporting’ by copying the reporting requirements under CoA E140(k) from Section 1.4 and placing it in Section 6.2.	CLOSED (04/12/2025)- sighted submissions of CPAS Performance Reports as raised in the NC and following for example: - Inclusion of reporting in Rev 08 - WHTP2-ACOC-WHT-EV-PLN-000026 CPAS (South) - CPAS Monitoring and Reporting Guide – Presentation and WHT - CPAS Monitoring for Performance Report - Nominees



Item	Ref	Type	Requirement	Audit Finding and Stage applicable to	Recommended or completed action, by Whom and When	Status
IA5 – OFI02 and IA5 – OFI03	CoA E206	Two x Observations	CoA E206 states: <i>“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.”</i>	<u>EPL Monitoring Report (Reporting Period: May 2025)</u> IA5-OFI02: For groundwater discharges to Monitoring Point 8 – WTP Discharge Point, results currently presented in the Table appear to be within EPL criteria; with typographical errors observed in relation to following EPL Criteria for below parameters (noting that the report states that all units being reported in micrograms per litre): - Copper criteria noted as 400 micrograms per litre instead of 40 micrograms per litre (<i>EPL under Condition L2.4 prescribes - 0.04 milligrams per litre for Point 8</i>) - Nickle criteria noted as 2000 micrograms per litre instead of 200 micrograms per litre (<i>EPL under Condition L2.4 prescribes - 0.2 milligrams per litre for Point 8</i>) <u>Groundwater Management Sub-Plan and Groundwater Monitoring Program</u> IA5-OFI03: The Groundwater Management Sub-Plan (for example, Sections 3.1.2, Section 7.1 WTP) and the Groundwater Monitoring Program (Section 4.1) includes below (excerpts only): - Section 3.1.2 (Additional approvals, licences, permits and requirements) and Section (7.1 Water Treatment Plants) states <i>“In some cases, a Trade Waste Agreement may be sought from Sydney Water for disposal of wastewater into the sewer system, however this is currently not the preferred method of groundwater management and no agreement has been sought at this time.”</i> - Section 4.1 (WTP - discharge water volumes) states <i>“Water is not planned to be discharged to Sydney Water assets. In the event water is discharged to Sydney Water assets consultation will be undertaken to confirm if the receiving asset has flow rate constraints and any applicable discharge criteria, to be captured within a Trade Waste Agreement.”</i>	- IA5-OFI02: Recommend review of results presented in Table to further confirm within EPL criteria (noting further escalation of observation maybe required if not within EPL criteria) and update of EPL Monthly Monitoring Report to reflect EPL Criteria in Table for parameters raised in this audit observation. - IA5-OFI03: Recommend review and update of the GWMP and GWMoNP to reflect current management of treated water from the WTPs at WHT9 and WHT10 sites, wherein treated water is discharged to Sydney Water assets via Trade Waste Agreements obtained from Sydney Water.	IA5-OFI02 CLOSED (04/12/2025) – addressed within EPL - 21791 Monitoring Report (Reporting Period: October 2025, Rev 00, dated 15/10/2025) including note to Discharge / Monitoring Point 8 – WTP Discharge Point Results Table that criteria updated to be displayed in unit mg/L for consistency with the EPL IA5-OFI03 CLOSED (04/12/2025) –Sighted update to relevant sections of the Groundwater Management Sub-plan (Rev 3.6, dated 15 October 2025) and ER Approval of the amendment (Ref: AQ1148.31 WHT3B_C GMP Rev3.6 endorsement 251017)
IA5-OFI04	CoA E163/ CoA A7	Observation	- CoA E163 states that <i>“The Proponent must construct and operate the CSSI with the objective of minimising light spillage to surrounding properties. All lighting associated with the construction and operation of the CSSI must be consistent with the requirements of AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting and relevant Australian Standards in the series AS/NZ 1158 – Lighting for Roads and Public Spaces. Additionally, the Proponent must provide mitigation measures to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.”</i> - CoA A7 states that <i>“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”</i>	LT03 External and Feature Lighting Design Report - covers the Cammeray ventilation building and outlet, Warringah Freeway portal façade and dive walls, with standards and specifications applicable to the design package listed in Section 2.2.3, for example: - AS/NZS 4282:2023 Control of the obtrusive effects of outdoor lighting - AS/NZS 1158.2:2020 - Lighting of roads and public spaces Computer procedures for the calculation of light technical parameters for Category V and Category P lighting) - AS/NZS 1158.3.1:2020 - Lighting for roads and public spaces Part 3.1: Pedestrian area (Category P) lighting—Performance and design requirements-	Recommend seeking further written clarification from DPHI if further approval is required for use of AS/NZS 4282:2023 instead of AS/NZS 4282:2019. <u>Proponent’s Action to above recommendation was submitted to DPHI with the IEA#5 Audit Report noting below</u> - Seek technical advice by 29 August 2025 to determine if the LT03 design package for the purposes of construction and operation is consistent with AS 4282:2019. That is, do the revisions in AS4282:2023 affect the construction or operation of the Project. - If the LT03 design package is not consistent with AS 4282:2019, prepare a report noting the changes	CLOSED (04/12/2025) – Sighted memo prepared, which outlines the consistency of the LT03 lighting design report with both the 2023 and 2019 versions of AS4282, Control of the Obtrusive Effects of Outdoor Lighting with (Ref: Consistency of Lighting Design Report LT03 with AS4282 Standards (WHTP2-ACOC-WHT-EL-LT03-MEM-000001, 28/08/2025, Revision A). Also refer CoA



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				NB: WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) submitted to DPHI is currently under review (including RFI); pending RFI response from Auditees, further update and DPHI approval (at the time of this Audit).	<i>relevant to the Project and their implications for submission to the Planning Secretary by 26 September 2025 seeking a direction under condition A4(g).</i>	E163 in Audit Table (Appendix A) for further details.
IA5 Site Inspection Observations – WHT Stages 3B and 3C						
IA5-OFISI03	Site Inspection Observation			IA5-OFISI03 WHT13 (Emu Plains site): Water flow paths to be reviewed and additional controls installed (as appropriate). Minor scouring observed in section of swale on Western perimeter. Noted swale drains to the sediment basin on-site.	Recommend reviewing water flow paths into swale from Boral site and installing additional controls (as appropriate) along section of Acciona’s swale drain on Western perimeter to manage surface water run-off from Boral’s site including addressing minor scouring observed in section of swale. 13/06/2025 - Lead Auditor Response: OFI remains open noting ACCIONA’s response on 06/06/2025 – “ <i>Installation of controls along fence line is to be undertaken at completion of landscaping works i.e. Silt fence to push water to BORAL swale drain.</i> ”	CLOSED (04/12/2025) – ACCIONA provided evidence of close out of controls installed along fence line (for e.g. silt fence) and also as observed in site audit inspection on 28 October 2025 at Emu Plains (WHT13) site



3.3 Adequacy of Environmental Management Plans, Sub-plans and post approval documents

As part of the Audit, the Lead Auditor reviewed the CEMP, Sub-plans and environmental post-approval documents (refer Section 3.1 for references) and conducted a high-level assessment of whether the above documents:

- have been developed in accordance with the conditions of consent and approvals applicable to the Project (if any) and their content is adequate; and
- have been implemented in accordance with the conditions of consent for the Project.

The Lead Auditor also assessed the adequacy of post approval documents (on the basis of whether):

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

3.3.1 *Environmental documents*

The Project's post-approval documents have been reviewed by required parties - TfNSW, the ER, AA (where relevant) and DPHI. Endorsements from the ER, AA (where relevant) and approvals from DPHI have been granted prior to actual Project construction commencing on 22 May 2023 for WHT Stage 3B and 20 May 2024 for WHT Stage 3C. The endorsements and approvals to date have also confirmed that the relevant requirements from the Project Approval, the EIS and RtS have been incorporated.

During this audit period, DPHI approved post approvals documents relating to WHT Stages 3B and 3C (for e.g. Maritime Heritage Management Sub-plan, Non-Aboriginal Heritage Management Sub-plan, Microbat Monitoring Program, CPAS Berrys Bay). Where DPHI Approvals included any conditional requirements, directions and/or reminders to ensure that approved documents are available on the Project website; these has been further reviewed and evidenced in the Audit Table as relevant to the Condition and approved document (refer **Appendix A**).

The CEMP, Sub-plans, Strategies and Construction Monitoring Programs prepared for the Project are of high quality. The evidence reviewed and/or sighted during this sixth Independent Audit indicates that these documents are being implemented; with no non-compliances raised against the mitigation measures within. One opportunity for improvement (i.e. IA6-OFI03 was raised)– refer Table 6.

3.3.2 *Communication and Traffic documents*

Refer Sections 3.6 and 3.8 for further discussion (where applicable) within this Audit Report.



3.4 Summary of notices from agencies (including any DPHI, EPA matters)

During the conduct of this sixth Independent Audit and interviews, Auditees indicated that the Project has not been issued with notices (for example, warning letters or penalty infringement notices) from agencies during the Audit Period.

The Project has received correspondence from DPHI regarding breaches recorded against non-compliances with Condition E132 and Condition A17 with no further enforcement action, at this stage - refer Table 6 within this Audit Report for further details. DPHI's determination on IA6 – NC05 was still pending at the time of issue, of this Audit Report.

3.5 Other matters considered relevant by the Auditor or DPHI

The Lead Auditor is not aware of any other matters considered relevant by DPHI other than inputs from DPHI during consultation on the scope of this sixth Independent Audit (refer Table 2 and where addressed).

3.6 Complaints (including DPHI and EPA matters)

Section 11 of the Community Communication Strategy (CCS) addresses complaints and issue management. As identified in the CCS, WHT Stages 3B and 3C utilise TfNSW's stakeholder database Consultation Manager to record all complaints, feedback and enquiries received by the Project, which informs the Complaints Register. TfNSW submits the Complaints Register to DPHI on a weekly basis; with complaints also summarised in ER and AA Monthly Reports submitted to DPHI.

The Complaints Register was reviewed and recorded around 77 complaints within this audit period in comparison to the previous audit period - IA5 ~50 (with six complaints recorded in Register as unrelated to WHT). Of the 77 complaints recorded within this audit period – seven complaints in the Register noted that complaints were unrelated to WHT, following investigation. Review of select and topical complaint samples are presented in this Section.

Noise and Vibration Complaints

Complaints recorded in the audit period predominantly related to ground borne noise and vibration from tunnelling and fit out works; with summary below including other noise complaints and issues raised:

- May 2025: Ground borne noise and vibration - tunnelling and fit out work works (12) and cumulative noise and vibration impacts from WFU and WHT Projects (1)
- June 2025: Ground borne noise and vibration - tunnelling and fit out works (3)
- July 2025: Ground borne noise and vibration - tunnelling and fit out works (7), noise from trucks speeding/compression braking (1) and noise from hammering works – surface civil (1)



- August 2025: Ground borne noise and vibration - tunnelling and fit out works (5), noise from investigation work on City West Link (1)
- September 2025: Ground borne noise and vibration - tunnelling and fit out works (14)
- October 2025: Ground borne noise and vibration - tunnelling (3), noise and vibration from tunnelling including property damage - cracking and separation (1)

The Complaints Register indicates for ground borne noise and vibration complaints, that ACCIONA generally confirmed responses such as where no Project works had not been undertaken in the area, modelled impacts/validation of predictions, appropriate mitigation offered/implemented, monitoring offered/completed (where deemed required to confirm levels), reference to works notified and further work updates, clarification for AA not being offered (outside of noise predicted offer area) with further offer to monitor noise to validate noise being experienced against modelled predictions.

Other Complaints

The Complaints Register also recorded other complaints and categories in the audit period. Complaint categories varied and included other issues raised such as – short notice for respite offers (1), worker parking - Cammeray (5) and Glebe Island (1), construction fatigue (1), community engagement process (6), property damage (2), response to information request (1), worker behaviour – Emu Plains (2), planned OOHW oversize delivery including temporary parking changes and traffic controllers (1) and parking removal complaint (1).

ER and AA raised no specific concerns in relation to complaints management and resolution in the audit period. AA Monthly Reports to DPHI also notes that complaints have been dealt with appropriately by ACCIONA.

Review of DPHI scope consultation - Review of complaints that has required escalation during the reporting period and whether the escalation procedures were adequately implemented in accordance with the Community Communication Strategy (CCS) of the Project and whether outstanding issues were appropriately closed out.

Below presents a high-level qualitative assessment limited to whether the escalation procedures were adequately implemented in accordance with the Project CCS and whether outstanding issues were appropriately closed out based on complaints escalated, audit interviews (including discussions with the AA and ER), evidence provided and reviewed; noting that review / assessment of particulars of complaints escalated, is considered to be outside the scope of this audit:

- The Project runs a team of community/engagement professionals that have carriage of implementation of the CCS. Review of community communication and engagement information provided as part of audit indicates that communication materials are comprehensive, thorough and engagement is frequent and proactive.



- The Complaints Register generally satisfies CoA B9 requirements, indicates where complaints recorded in the audit period have been closed, where mediation was required (two complaints) and Auditees have generally responded adequately to the complaints in accordance with the CCS (for select samples reviewed within the audit period).
- The CCS is available on the Project website - Section 11 of the CCS outlines the complaints and issue management system; with for example, Complaint escalation procedure (Section 11.8), Escalation process tools (Section 11.9), ER (Section 11.10) and Community Complaints Mediator (CCM) (Section 11.12).
- Auditees provided the following:
 - High-level timeline and correspondence relating to two complaints escalated to TfNSW, ER and AA review (as relevant); and complainants' requests to further escalate complaints to the Independent Community Complaints Mediator (CCM) within this audit period.
 - Correspondence including for example, details on further complaint escalation process/procedure, if the complainant should wish to escalate their complaint further and CCM details (in line with the CCS).
 - Current status of complaints with the CCM; with one complainant yet to reach out to the CCM with a written request per CCS and other complainant contacted by the CCM was still away and was requested to contact the CCM on their return, to further discuss the complaint.

Noting above and current status of complaints with the CCM, nil non-compliances or observations were raised as part of this Audit in relation to above DPHI scope consultation.

Review of EPA scope consultation - Noise and Vibration management from tunnelling operations

The following high level qualitative assessment is provided based on GBN complaints (discussed above), audit interviews (including discussions with the AA), evidence provided and reviewed:

- Noise levels are predicted by the Project's noise modelling software (KNOWnoise).
- Three-week lookaheads reviewed for upcoming works to manage GBN and mitigation measures to be applied – such as general notifications, specific notifications, monitoring, alternate accommodation triggers and not scheduling works such as rock bolting during night shifts (where predictions trigger alternate accommodation) and communication of this requirement to the wider Project Team. Sighted sample correspondence in relation to alternate accommodation triggered by rock bolting around M110S between Miller St and Walker St (Wenona), with communication that rock bolting is not to be carried out at nighttime (22:00 to 07:00).
- Section 2.2 of the Bi-annual Noise and Vibration Construction Monitoring Report (18 November 2024 – 31 May 2025) completed in the audit period, reviewed by the AA and published on the Project website notes that all ground borne noise monitoring results were compliant with the applicable criteria and/or in line with predictions confirming appropriate mitigation measures had been implemented.



- Further sample ground borne noise and vibration monitoring records sighted in this audit period (including AA's review of records requested / provided by ACCIONA) indicate that monitoring results were compliant with the applicable criteria and/or in line with predictions.

Also refer CoA C13, CoA A31 and CoA E71 (for example) within the Audit Table in **Appendix A** for further audit evidence and findings.

Noting above, nil non-compliances or observations raised as part of this Audit in relation to above EPA scope consultation.

3.7 Incidents and Non-Compliances (including DPHI matters)

Incidents

ACCIONA's Environmental Incident Register records eight environmental incidents related to spills/leaks, five report only events in the audit period; and were generally classified as insignificant or minor environmental risk.

Auditees indicated that no environmental incidents recorded in the audit period, required notification under the planning approval.

Non-compliances

The following non-compliances (summarised below) were self-reported and notified to the Planning Secretary, in the audit period:

- IA6 – NC01: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132)
- IA6 – NC02: One non-compliance in relation to establishment of an Ancillary Facility prior to approval (CoA A17)
- IA6 – NC03: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132)
- IA6 – NC04: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132)
- IA6 – NC05: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132)
- IA6 – NC06: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132)
- IA6 – NC07: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132)



For further detail in relation to above non-compliances including dates and times, close-out actions and DPHI response, refer Section 3.2 and Table 6 of the Audit Report. Nil non-compliance raised, as part of this Audit.

Review of DPHI scope consultation – Assessment of management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Walker Street, North Sydney

During the audit period, the self-reported non-compliances were all related to heavy vehicles (HV) using unapproved local road - Walker Street (North Sydney); with no repeat drivers within this specific audit period. No complaints were recorded from the community in relation to the non-compliances reported.

The following high-level qualitative assessment is provided based on audit interviews (including discussions with the ER), evidence provided and reviewed; including adequacy of actions implemented by ACCIONA, in response to identified non-compliances with summary provided below:

- Non-compliance notifications to DPHI outlined actions taken by the Auditees including management systems/processes in place, such as:
 - Drivers issued with warning (if driver is given a further warning, they maybe stood down for a period of 28 days) and reminder to adhere to the approved Vehicle Movement Plan for non-compliances recorded in the audit period (sighted correspondence from ACCIONA to Hauliers, including non-conformance reports provided by Hauliers – refer Table 6 of this Audit Report for further detail).
 - WHT Heavy Vehicle Compliance Actions Matrix in place – outlining warning system, suspension and project removal [sighted Matrix and correspondence previously issued notifying haulers of the infringement matrix (Ref: WHT TBT 0424 - email to haulers.msg dated 10/12/2024, outside this audit period)].
 - Companies providing spoil hauling services to the Project are contractually required to comply with the Vehicle Management Plans and the Traffic Transport and Access Management Sub Plan.
 - All drivers undertake a driver's induction prior to commencing work on the Project.
 - Haulage companies provide route orientation to drivers before commencing on the Project; with Auditees further confirming that new driver buddy system in place with haulers utilising this, by either new drivers sitting as a passenger in a truck driven by a driver who has WHT experience, or new driver follows an experienced driver (Ref: Spoil Manager response to buddy system.msg).
 - All subcontractors are regularly provided with up-to-date Vehicle Management Plans which detail the approved heavy vehicle routes. These are presented to drivers in



training sessions by their haulage company (sighted correspondence detailing updated VMPs issued in the audit period, for example on 01 October 2025, Ref: BM#100724 - BM#100780 ISSUED 01-OCT-25_ 12_50 PM.msg)

- Project's Vehicle Management Plan Ridge Street North - Access and Egress includes 'no HV access permitted on Walker Street' (Ref: ACOC-TM-VMP-FAL-0001, Rev I, dated 16 July 2025).

Auditees indicated that the Project has reached out to NSC and intends to discuss non-compliances along Walker Street and further provided rationale for removing previously installed VMS (High Street, North Sydney), to prevent HVs driving into Walker Street; noting that no drivers had repeated the mistake twice, with focus therefore on onboarding and route toolboxes to ensure adherence to requirements.

Notwithstanding above measures and noting consistent trend of non-compliances across this audit period and IEA#5 audit period (6), the Lead Auditor recommends observation (OFI) and recommendation – i.e. IA6-OFI01, as detailed in Table 6 of this Audit Report.

Table 6 of the Audit Report also presents further detail of the non-compliances reported, identified actions and close-out verification as part of this audit. Audit Table in **Appendix A** also includes details, audit evidence and findings under CoA E132 and CoA E139, for example.

3.8 Environmental Performance

Actual Vs Predicted Impacts

A qualitative assessment has been undertaken as part of this sixth Independent Audit to assess actual versus predicted impacts for works conducted during the audit period, considering below:

- The extent to which the Project has been altered to that assessed and approved in the EIS and RtS during the audit period;
- Incidents and non-compliance during the audit period;
- Complaints during the audit period;
- Six-monthly construction monitoring and reporting during the audit period, where applicable;
- Compliance with the Project Approval during the audit period;
- Review of key scope consultation issues and area of concerns; and
- High -level assessment of adequacy and implementation of post approval documents.

Qualitative assessment findings are summarised below:

- Refer Section 1.1.2 for consistency assessments (CAs) determined and approved by TfNSW during this audit period. A high-level desktop review of the CA was conducted of proposed changes, environmental assessment and where additional assessments were required;



- Refer Section 3.6 for complaints recorded within the audit period;
- Refer Section 3.7 for incidents and non-compliances recorded within the audit period; and
- Refer Section 3.3 for a high-level assessment of the adequacy and implementation of post approval documents.

In addition to compliance tracking conducted by the Auditees (for example, via JIRA Online Compliance Management System), the ER and AA have also been engaged and provide support in the management of compliance with the planning approval. The ER provides a summary of analysis of monitoring results in the monthly report to DPHI. WHT Stages 3B and 3C have submitted quarterly and six-monthly construction monitoring reports to DPHI and relevant regulatory agencies within this audit period as specified in the Monitoring Programs (approved by DPHI/endorsed by the ER) and where triggered. Reports published on the Project website provide analysis of monitoring results, compliance with nominated monitoring criteria and justification / commentary where any exceedances were noted. The Audit Table in **Appendix A** includes details, audit evidence and findings for select samples reviewed (for example, refer Conditions C13, C14, C21 and E1).

Review of key EPA scope consultation issues and areas of concern

- ***Noise and Vibration management from tunnelling operations***
 - Addressed under Section 3.6 of this Report.
- ***Groundwater treatment and management***

The following high-level qualitative assessment is provided based on audit interviews (including discussions with the ER), evidence provided and reviewed:

- Treated water from the WTPs at WHT9 (Ridge Street Site) and WHT10 (Camberay Golf Course site) continues to be routed predominantly for tunnel reuse activities; with remainder of the treated water discharged to Sydney Water assets via Trade Waste Agreements (TWA) obtained from Sydney Water.
- No groundwater discharges from Water Treatment Plants (WTPs) at WHT9 (Ridge Street Site) and WHT10 (Camberay Golf Course site) to EPL Monitoring Points 5 and 3 in the audit period; with last discharges as noted within the EPL Monitoring Report published on the Project website (Ref: WHT – EPL 21791 Monitoring Report, Reporting Period: October 2025, Rev 00, dated 15/10/2025 sighted on the Project website).
- Groundwater discharges noted from WTP at the MOC (Rozelle) in this audit period to EPL Monitoring Point 9, with no exceedances of EPL criteria as per results published in the EPL Monitoring Report [Ref: WHT – EPL 21791 Monitoring Report, Reporting Period: October 2025, Rev 00, dated 15/10/2025 sighted on the Project website]. Above WTP at the MOC is subject to further EPL sampling requirements such as proof of performance (under EPL Condition U2 - Performance of the Construction WTP at the Rozelle MOC).



- Six-Monthly Groundwater Data Report (for reporting period 1 December 2024 – 31 May 2025) completed in the audit period / published on the Project website notes below (excerpts only):
 - Section 2.1 of above Report notes that for Ridge Street and Cammeray, groundwater treated and discharged to Sydney Water Sewer under a trade waste agreement, which came into effect on 24 January 2025; this Section and Appendix A includes the volume discharged **to trade waste only** during the reporting period from both sites.
 - Section 2.5 of above Report notes that groundwater inflows are generally low with most of the water introduced to the tunnel face for dust mitigation and cooling of the machinery being from a potable source and that the estimated groundwater flow at present across 4.5km of excavated tunnel is 0.75 L/s/km.
 - Section 2.7 of above Report notes negligible groundwater inflow observed within the excavated tunnels; with no additional mitigation measures required to stem groundwater flow.

Auditees further indicated that discussions with the EPA are ongoing in relation to groundwater treatment and management:

- For WTPs in the North (Ridge Street, Cammeray), internal water sampling is continuing to ascertain if water quality would meet prescribed EPL criteria; however, high nitrogen remains a concern. Treated water continues to be reused or discharged via trade waste agreement with Sydney Water.
- For WTP in the South at the MOC (Rozelle), an initial three- month proof of performance has been submitted to the EPA at this stage, with the WTP currently meeting EPL criteria and six-month proof of performance due to the EPA (following six months of operation, ~ mid-November 2025).

Also refer CoA E206 and CoA C14 (for example) within the Audit Table in **Appendix A** for further details, audit evidence and findings.

• **Materials storage at the Emu Plains support site**

The following high-level qualitative assessment is provided based on the audit site inspection, audit interviews (including discussions with the ER), evidence provided and reviewed of Area 2:

Audit site inspection observations of Area 2 – used for stockpiling WHT TBM spoil

- Gate installed and locked, restricting Boral's access to and use of WHT's TBM Spoil Stockpiling area (i.e. Area 2).
- Soil binder applied on TBM spoil stockpiled in Area 2 and some unsealed surfaces; with exception of small stockpile of material from detention pond construction works.
- No vehicle movements observed in Area 2 and no spoil trucks observed during the audit site inspection at Emu Plains. Auditees (ACCIONA) further indicated no spoil haulage activities



at Emu Plains site since September 2025 and not scheduled to occur for approximately next 4 to 6 weeks, at this stage.

- Rumble grid and wheelwash installed at exit from Area 2.
- No visible dust noted during the audit site inspection.

In addition to above, nil dust complaints recorded for WHT13 (Emu Plains) site in the audit period. Also refer CoA E114 and CoA E1 (for example) within the Audit Table in **Appendix A and Appendix E** for further details, audit evidence and findings.

Noting above, nil non-compliances raised or specific observations raised as part of this Audit in relation to EPA scope consultation. However, **two** site observations (OFIs) raised as part of this Audit - refer Table 6 of the Audit Report for details.

Overall Environmental Performance

The environmental performance of the Project during the audit period is considered to be high. The Lead Auditor notes below:

- The Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (CEMP, Sub Plans and construction monitoring programs) that formed a part of this sixth Independent Audit's Scope.
- The implementation of post approval document requirements further assessed on-site was also observed as high, with no non-compliances raised during the site inspections (refer Section 2.2.5 and Appendix E).
- The Auditees were organised and responded promptly to additional information requests during this audit.



4. CONCLUSION

This Audit Report presents the findings from the sixth Independent Audit on WHT Stages 3B and 3C. The temporal period covered by the audit is from the date of the site inspection of the fifth Independent Audit (IA5) to the date of the site inspection for this Independent Audit of WHT Stages 3B and 3C, respectively.

With respect to this sixth Independent Audit:

- **302** conditions were assessed.
- **Seven** non-compliances identified, were all self-reported by WHT Stages 3B and 3C during the audit period.
- **Nil** new non-compliances raised as part of this Audit.
- **148** conditions were considered to be compliant.
- **152** conditions were considered not triggered.

In addition to the above, **seven** observations were identified.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of this sixth Audit's Scope. The implementation of these requirements on site was also observed as high.

The Lead Auditor would like to thank the Auditees from TfNSW and ACCIONA for their organisation, cooperation and support during the conduct of this sixth Independent Audit.



5. LIMITATIONS

The audit has been prepared in accordance with the associated proposal and HBI's Terms and Conditions. This report is for the sole purposes of the Client. Except as required by law, no fourth party may use or rely on this Report unless otherwise agreed by HBI in writing.

The matters raised in this report are only those which came to our attention during the course of performing our assessment and are not necessarily a comprehensive statement of all the weaknesses that may exist or improvements that might be made. Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of construction/operation and their responsibility to prevent and detect irregularities.

Recommendations and suggestions for improvement should be assessed by management for their full commercial impact before they are implemented. We have generally used and relied upon information supplied as being regarded as authoritative and reliable, but no warranty of completeness, accuracy, or reliability is given. The document review conducted during this assessment was limited to those documents and information supplied as part of the audit. The audit scope did not include the independent verification of these sources unless otherwise noted within the report. HBI will not accept any liability for inaccurate conclusions if the information provided was incomplete, inaccurate, withheld, misrepresented or otherwise not fully disclosed.

This Report does not purport to give legal advice; legal advice can only be given by qualified legal practitioners. To the extent permitted by law, HBI expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any fourth party relating to or resulting from the use of, or reliance on, any information contained in this report (including without limitation matters arising from any negligent act or omission of HBI). HBI does not admit that any action, liability or claim may exist or be available to any fourth party. The scope of this audit does not cover a detailed verification of compliance with the conditions of the Deed, nor does it extend to the verification of items assessed by the Independent Certifier prior to issuing of a certificate for any stage.





HBI

Healthy Buildings International

APPENDIX A – SSI 8863 CONDITIONS OF APPROVAL AUDIT TABLE



Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
PART A ADMINISTRATIVE CONDITIONS				
GENERAL				
A1	The Proponent shall carry out the CSSI in accordance with the terms of this approval and generally in accordance with the: (a) Western Harbour Tunnel and Warringah Freeway Upgrade Environmental Impact Statement – Volumes 1A-B and 2A-J (dated January 2020) (the EIS); (b) Western Harbour Tunnel and Warringah Freeway Upgrade Response to Submissions Report (dated September 2020) (the Rts);Additional Crossing of the Clarence River at Grafton Submissions Report Main Volume and Appendices, prepared by Roads and Maritime Services, dated October 2014; (c) Western Harbour Tunnel and Warringah Freeway Upgrade Wicks Road Construction Support Site – Modification Report (dated October 2022) (Modification 1 Report); (d) Western Harbour Tunnel and Warringah Freeway Upgrade Modification – Wicks Road Construction Support Site Submissions Report (dated May 2023); (e) Western Harbour Tunnel and Warringah Freeway Upgrade Modification 2 – TBM Construction Methodology (dated July 2023); and (f) Western Harbour Tunnel and Warringah Freeway Upgrade Modification 2 - TBM Construction Methodology Submissions Report (dated October 2023). (g) Emu Plains Flood Impact and Risk Assessment (dated 12 January 2024)	- Evidence referred to elsewhere within this Audit Table - Site Inspection (28 October 2025) - Interview with TfNSW and ACCIONA (28 October 2025)	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout.
A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	- Evidence referred to elsewhere within this Audit Table - Site Inspection (28 October 2025) - Interview with TfNSW and ACCIONA (28 October 2025)	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout.
A3	In the event of an inconsistency between: (a) the terms of this approval and any document listed in Condition A1 inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in Condition A1 inclusive, the most recent document will prevail to the extent of the inconsistency. Note: For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.	Interview with TfNSW and ACCIONA (28 October 2025)	NT	Auditees not aware of any events of inconsistencies requiring further interpretation within this audit period. As such, no requests for interpretation have been submitted to DPHI within this audit period. Condition not triggered in this audit period.
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.	- Interview with TfNSW and ACCIONA (28 October 2025) - Evidence referred to elsewhere within this Audit Table	NT	Auditees indicated no formal written requirements or directions issued by the Planning Secretary under this Condition, within this audit period. Where any conditional requirements and/or reminders to ensure that approved documents are available on the Project website under Condition B15 have been included by DPHI in agreement or approval letters (for example), refer evidence and findings elsewhere within this Audit Table.
A5	Where the terms of this approval require a document or monitoring program to be prepared or a review to be undertaken in consultation with identified parties, evidence of the consultation undertaken must be submitted to the Planning Secretary with the document. The evidence must include: (a) documentation of the engagement with the party identified 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.	- Interview with TfNSW and ACCIONA (28 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Also refer CoA C7 (for example) within this Audit Table for audit evidence	C	As per conditions requiring consultation throughout this Audit Table, including in relation to monitoring programs and document review. Also refer audit evidence and findings elsewhere within this Audit Table, for example CoA C7 (Maritime Heritage Management CEMP Sub Plan).

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
A6	This approval lapses five years after the date on which it is granted, unless work has physically commenced on or before that date.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports (No. 2 - 5, for example) for audit evidence - Minister's Consent Conditions - SSI 8863 (as modified; the Approval) - Letter, TfNSW to DPE (now DPHI) (Ref: SSI 8863, dated 16 March 2023) (Notification of Commencement A35 & A36 – Stage 3B – WHT Northern Tunnelling and Integration works) - Letter, TfNSW to DPE (now DPHI) (Ref: SSI-8863, dated 23 May 2023) (Notification of Commencement A35 & A36 – Stage 3B – WHT Northern Tunnelling and Integration works) - Letter, TfNSW to DPE (now DPHI) [Ref: WHT and WFU (SSI 8863) Notification of Commencement (A35 & A36), dated 17 October 2023] (WHT Stage 3C – Sydney Harbour Crossing between Birchgrove and Balls Head, Waverton) - Letter, TfNSW to DPHI (Ref: SSI 8863-PA-547, dated 4 June 2024) (Notification of Commencement A35 & A36 – Stage 3C – WHT Sydney Harbour Crossing between Birchgrove and Balls Head, Waverton works) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>Outside this audit period:</u> SSI-8863 approval was granted on 21/1/2021. Notifications of commencement of construction were submitted to DPHI for WHT Stages 3B and 3C; with commencement of construction for WHT Stages 3B and 3C within the five year requirement. Notifications of actual commencement of construction are available on the Project website. For detailed audit evidence and findings outside this audit period, refer previous Independent Audit Reports. <u>During this audit period:</u> Notifications of actual commencement of construction are available on the Project website. No further notifications of commencement of construction submitted to DPHI during this audit period. Also refer CoA A36 within this Audit Table for audit evidence and findings.
A7	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.	Refer to evidence sighted elsewhere within this Audit Table (for example CoAs relating to CEMP, Sub Plans, Construction Monitoring Programs and Strategies)	C	The CEMP, Sub Plans, Construction Monitoring Programs and Strategies sighted as part of this Audit appear to address guidelines, protocols, Australian Standards or policies. Furthermore, above documents have been reviewed by relevant independent appointments (ER, AA), TfNSW and DPE (now DPHI) prior to endorsement and final approval, where required.
A8	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 with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident under Conditions A43 and A45.	- Interview with TfNSW and ACCIONA (28 October 2025) - Agreement Letter, DPHI to TfNSW, dated 30 September 2025 [(Ref:SSI-8863-PA-1131, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI 8863) Request for Extension to Operational Noise Review (Condition E89)) Also refer CoA A15 and CoA E177 (for example) within this Audit Table for audit evidence	C	Auditees indicated that the Project submitted an extension of time request to the Planning Secretary under Condition E89 for the ONR Stage 2 - Fixed Operational Facilities; with request for an extension until 19 December 2025. DPHI agreed to the extension of time until 19 December 2025 to complete the Stage 2 ONR review required to be submitted to the Department. Refer evidence and also CoA E89 within this Audit Table for audit evidence and findings. Also refer CoA A15 and CoA E177 (for example) within this Audit Table for audit evidence and findings.
NOISE INSULATION PROGRAM				
A9	The implementation of the Noise Insulation Program (NIP) does not trigger the following Conditions A24, A30, B1 and B11, until such time that construction commences	Not Applicable	NT	Not applicable to WHT Stage 3B and WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
STAGING				
A10	The CSSI may be constructed and operated in stages. Where staged construction or operation is proposed, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the Planning Secretary for information. The Staging Report must be endorsed by the ER and then submitted to the Planning Secretary 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).	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Staging Report WHT and WFU SSI 8863 (TfNSW, Rev 12, dated 4 July 2025) - Letter, DPHI to TfNSW, dated 28 July 2025 [(Ref: SSI-8863-PA-1074 - Western Harbour Tunnel & Warringah Freeway Upgrade (SSI-8863) - Staging Report, Revision 12 (Condition A10)] - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	For audit evidence and findings outside this audit period, refer previous Independent Audit Reports. <u>During this audit period:</u> The Staging Report has been updated to Revision 12 and submitted to the Planning Secretary for information. DPHI's Letter to TfNSW noted that Revision 12 dated 4 July 2025 submitted to the Department for information in accordance with condition A10 of SSI-8863 has been: - <i>"updated with a revised <u>Warringah Freeway Upgrade (WFU) Aspects and Impacts Register, incorporating amendments made to the WFU Construction Environmental Management Plan (CEMP) Revision 9;</u></i> - <i>endorsed by the Environmental Representative for the WFU;</i> and - <i>reviewed by Transport for NSW (TfNSW) and no issues were raised."</i> No conditions were prescribed by DPHI in the Letter but included a reminder that TfNSW is responsible for coordinating the various stages of work in a manner that minimises its cumulative impacts that may arise from the proposed staging and to ensure that the Staging Report is placed on the Project website per Condition B15. <u>The Project is being staged:</u> - ACCIONA have been engaged by TfNSW to deliver WHT Stage 3B and WHT Stage 3C. Actual construction commencement of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C was on 20 May 2024 (also refer CoA A36 within this Audit Table for audit evidence and findings). Staging Report (Rev 12, dated 4 July 2025), available on the Project website has been considered for the remainder of this Audit.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
A11	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 other 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.	Staging Report WHT and WFU SSI 8863 (TfNSW, Rev 12, dated 4 July 2025)	C	The Staging Report includes the information specified in this condition: a) Sections 2.2 and 2.4 (and Table 2) outline the activities which will occur within each construction stage and an indicative program for the works. b) Sections 2.3 and 2.4 (and Table 2) outline the activities which will occur within each operational stage and an indicative program for the works. c) Section 3 discusses the environmental management system which would be implemented on the Project to manage compliance across the stages of the Project. d) Section 2.7 (Rev 12) includes details on how cumulative impacts will be managed.
A12	The CSSI must be staged in accordance with the Staging Report, and submitted for information to the Planning Secretary.	Staging Report WHT and WFU SSI 8863 (TfNSW, Rev 12, dated 4 July 2025)	C	The WHT Stage 3B and Stage 3C Project appears to be staged in accordance with the Staging Report. ACCIONA have been engaged by TfNSW to deliver WHT Stage 3B and WHT Stage 3C.
A13	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.	Staging Report WHT and WFU SSI 8863 (TfNSW, Rev 12, dated 4 July 2025)	C	The WHT Stage 3B and Stage 3C Project appears to be staged in accordance with the Staging Report. ACCIONA have been engaged by TfNSW to deliver WHT Stage 3B and WHT Stage 3C. Appendix A and Appendix B allocate the applicability of each CoA and Revised Environmental Mitigation Measures (REMMs) to each stage of the Project. This Audit assesses compliance of the Project in consideration of the timing specified in the Staging Report.
A14	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 prior to the proposed change in the staging.	Same as CoA A10 (refer CoA A10 within this Audit Table for audit evidence)	NT	Latest version of Staging Report is Revision 12, dated 4 July 2025 - refer CoA A10 within this Audit Table for audit evidence and findings. Section 2.5 of the Staging Report notes that where changes are proposed to the staging of construction or operation, a revised Staging Report will be prepared, endorsed by the ER and submitted to the Planning Secretary for information no later than one month prior to the proposed changed in the staging. Condition not triggered in audit period.
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS				
A15	With the approval of the Planning Secretary, the Proponent may submit any strategies, plans or programs required by this approval on a progressive basis. Notes: 1. While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to 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 staged, 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 any future stages, and the trigger for updating the strategy, plan or program.	<u>Evidence outside this audit period:</u> - Approval Letter, DPHI to TfNSW (Ref:SSI-8863-PA-779, dated 19 August 2024) [WHT – Stage 3 (SSI-8863): Staging of the Place Design and Landscape Plan] - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October2025) - Approval Letter, DPHI to TfNSW dated 28 May 2025 [Ref:SSI-8863-PA-976, Western Harbour Tunnel – Stage 3 (SSI-8863): Place Design and Landscape Plan - Updated addendum staging timeframes (condition A15)] <u>Draft PDLP addendum for WHT Berrys Bay - Part 2 sighted:</u> - https://caportal.com.au/rms/wh/pdlp-part-2 and JIRA for public display dates - WHT - Berrys Bay, Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000011), Rev F, dated 21 July 2025 - Fw EXT Have your say on the future Berrys Bay foreshore parkland design elements.msg - RE_ A15 RFI Response.msg (Correspondence between TfNSW and Lead Auditor, dated 13 November 2025) - Correspondence between DPHI and TfNSW, (dated 26 and 27 November 2025) (Ref: FW_ Stage 3 PDLP staging request.msg) - Also refer CoA E179 (for example) within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> DPHI approved request to stage the WHT Place Design and Landscape Plan (PDLP), in letter dated 19 August 2024 (refer evidence) Refer previous Independent Audit Reports for further audit evidence and findings. <u>During this audit period:</u> Further request to update the staging timeframes of the Stage 3 WHT Place Design and Landscape Plan (PDLP) addendums was approved by DPHI on 28 May 2025 (refer evidence)) as below: - Berrys Bay Master Plan addendum - Q2 2025 or Q3 2025 / Q2 or Q3 2025 [Approved date for public consultation / Planning Secretary submission (E179)]; and - Cammeray residual land addendum - Q3 2026 / Q3 2026 [Approved date for public consultation / Planning Secretary submission (E179)] Refer below for status of the Addendum PDLPs: - PDLP addendum for WHT Berrys Bay (Part 2) - currently in draft following stakeholder and community consultation (went on public display on 28 July 2025 and consultation closed on the 24 August 2025, with some consultation extension provided until 4 September 2025), refer evidence including draft sighted on Project website; and - PDLP addendum for WHT Cammeray Parkland PDLP (Part 3) – in early planning phase. Auditees further indicated that the PDLP addendum for WHT Berrys Bay (Part 2) and progress has been raised with the Department, as recently as interface meeting dated 29 October 25; with design considerations (and to an extent consultation) ongoing to-date, in response to the exhibition period. Submission of the WHT Berrys Bay (Part 2) PDLP to the Planning Secretary was proposed, outside this audit period. Sighted further discussion and correspondence with the Department and Auditees on proposed timeframe changes to the PDLP (from those in recent approval letter) including submission of a new request to the Department in January 2026 (refer evidence). Also refer CoA E179 within this Audit Table for audit evidence and findings.
ANCILLARY FACILITIES				
A16	Ancillary facilities 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 user(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.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025) - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - Also refer CoA A17 within this Audit Table for further audit evidence	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings outside this audit period. <u>During this audit period:</u> Auditees indicated three ancillary facilities were established under CoA A16 during the audit period; and were all further extensions of the Glebe Island Ancillary Facility. A16 assessment memos were prepared for each extension area to support the Glebe Island ASEMP update and provided to the ER for determination of the ASEMP update. ER review of ASEMP - Glebe Island (WHT3) updates classified as minor, with amendments approved under CoA A27 (i) were sighted - refer CoA A17 within this Audit Table for further audit evidence and findings.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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SITE ESTABLISHMENT WORK

Ancillary Site Establishment Management Plan

A17	Before establishment of any construction ancillary facility (excluding minor construction ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A19), the Proponent must prepare an Ancillary Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the construction ancillary facilities. The Ancillary Site Establishment Management Plan must be prepared in consultation with the relevant council and government agencies. The Plan must be submitted to the Planning Secretary for approval one month before the establishment of any construction ancillary facilities. The Ancillary Site Establishment Management Plan must detail the management of the construction ancillary facilities and include: (a) a description of activities to be undertaken during establishment of the construction ancillary facility (including scheduling and duration of work to be undertaken at the site); (b) figures illustrating the proposed operational site layout and the location of the closest sensitive land user(s); (c) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken prior to the commencement of site establishment work; (d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to: (i) meet the performance outcomes stated in the documents listed in Condition A1, and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and (e) a program for monitoring the performance outcomes, including a program for construction noise monitoring. Nothing in this condition prevents the Proponent from preparing individual Ancillary Site Establishment Management Plans for each construction ancillary facility.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ER (21 October 2025) - Interview with TfNSW and ACCIONA (28 October 2025) - WHT Environmental Incident register (including non-compliances), extract provided for audit period on 28 October 2025 (Ref: WHT Environmental Incident register May - October 2025.xlsx) - Construction Environmental Management Plan (Rev 9.16, dated 19 September 2025) - Ancillary Site Establishment Management Plan Glebe Island (WHT3) construction ancillary facility (Rev 3.4, dated 9 October 2025) ER review/approval of amendments - ASEMP Glebe Island ((WHT3) updates in the audit period: - Ref: AQ1148.31 WHT ASEMP Glebe Island rev3.1 endorsement 250818 - Ref: AQ1148.31 WHT ASEMP Glebe Island rev3.3 endorsement 250915 - Ref: AQ1148.31 WHT ASEMP Glebe Island rev3.4 endorsement 251013 - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	NC	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period,</u> the following non-compliance was self-reported and notified to the Planning Secretary: - IA6 – NC02: One non-compliance in relation to establishment of an Ancillary Facility prior to approval (CoA A17) TfNSW submitted the non-compliance notification for above (refer evidence under CoA A45 within this Audit Table), to the Planning Secretary and response from DPHI in relation to this non-compliance was sighted (refer Table 6 of the Audit Report for audit evidence). Also refer Section 3.2, Table 6 and Section 3.7 of the Audit Report for further details of the non-compliance including dates and times, verification and close-out of actions raised to address the non-compliance. ER review of ASEMP - Glebe Island (WHT3) updates classified as minor, with amendments approved under CoA A27 (i) were sighted (including for the non-compliance raised above) - refer evidence. Latest approved version of the ASEMP - Glebe Island (WHT3) was available on the Project website.
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Use of Construction Ancillary Facilities

A18	The use of a construction ancillary facility for construction must not commence until the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition C4 and relevant Construction Monitoring Programs required by Condition C11 have been approved by the Planning Secretary.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025) - Construction Environmental Management Plan (Rev 9.16, dated 19 September 2025) - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - Also refer CoA A17, CoA A27, CoA C4 and CoA C11 (for example) and elsewhere within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> The CEMP and CEMP Sub-Plans have been updated further and approved in this audit period; with no updates to the Construction Monitoring Programs within this audit period. Auditees indicated that main casting start date as 2 June 2025 and opening ceremony as 14 June 2025 for Emu Plains (WHT13) in the audit period. Section 5.18.1 of the CEMP sets out ASEMP requirements, ASEMPs developed for the Project [including for e.g. Emu Plains (WHT13)] and notes that <i>"the management of each of the ancillary facilities during their operation will be through the implementation of the Stage 3B/C CEMP and Sub-plans in accordance with CoA A18. Any future or additional ancillary sites require an ASEMP to be prepared, which requires approval by the Planning Secretary in accordance with CoA A17."</i> Also refer CoA A17, CoA A27, CoA C4 and CoA C11 (for example) and elsewhere within this Audit Table for audit evidence and findings.
A18A	Once an ancillary facility is no longer required for the CSSI, the land must be returned to its pre-existing or better condition within six months of the site being decommissioned or within two years of operation (whichever is the earliest), unless the land is subject to another requirement of this approval or another section of the EP&A Act.	- Construction Environmental Management Plan (Rev 9.16, dated 19 September 2025) - Interview with TfNSW and ACCIONA (28 October 2025)	NT	This condition was included following approval of Modification 2 (27 January 2024) outside this audit period. Auditees indicated below: - Any Ancillary Facilities established so far, are currently in use; and - Condition not triggered during this audit period.

Minor Construction Ancillary Facilities

A19	Lunch sheds, office sheds, portable toilet facilities, car parking, material storage, and the like, can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria: NSW Government 18 Department of Planning, Industry and Environment Western Harbour Tunnel & Warringah Freeway Upgrade (SSI-8863) (a) are located within or 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), 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.	- Interview with ER (21 October 2025) - Interview with TfNSW and ACCIONA (28 October 2025) <u>ER Endorsements of MCAFs:</u> - Ref: AQ1148.31 WHT MAF Berrys Bay endorsement 250722 - Ref: AQ1148.31 WHT MAF Cammeray cut and cover ramps endorsement 250804 - Ref: AQ1148.31 WHT MAF Cammeray cut and cover ramps endorsement 251008 rev3 - Also for example, refer CoA A27(Monthly ER Reports, ER Inspections) and CoA A34 within this Audit Table for audit evidence	C	Sighted ER endorsement correspondence for the following Minor Construction Ancillary Facility (MCAF) Plans assessed in this audit period: - Minor Construction Ancillary Facility Plan – Berrys Bay Foreshore Parklands Revision 00 (refer evidence for ER Endorsement) including that in accordance with CoA A34 (h)(iv) the noise impact of the facility has been reviewed by the AA and has been determined to be NML compliant during standard work hours; and - Minor Construction Ancillary Facility Plan – Cammeray Cut and Cover Ramps Revision 1 and 3 (refer evidence for ER Endorsements) including that in accordance with CoA A34 (h)(iv) the noise and vibration impacts from the operation of the Cammeray cut and cover have been reviewed by the AA and are predicted to be negligible. Also refer CoA A27 and CoA A34 within this Audit Table for audit evidence and findings.
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Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Boundary screening				
A20	Boundary screening must be erected between ancillary facilities and are adjacent to sensitive land user(s) for the duration of the ancillary facility is in use unless otherwise agreed with relevant affected residents, business operators or landowners. All Boundary screening must minimise visual impacts on adjacent sensitive land user(s).	- Site Inspection (28 October 2025) - Also refer ER Inspection Reports evidenced under CoA A27 and CoA E155 within this Audit Table for audit evidence	C	The audit site inspection covered Emu Plains and Berrys Bay foreshore parkland sites - with no issues/OFls identified in the site inspection in relation to this Condition. Refer Section 2.2.5 Site Inspection of the Audit Report. Also refer ER Inspection Reports evidenced under CoA A27 and CoA E155 within this Audit Table for audit evidence and findings.
INDEPENDENT APPOINTMENTS				
A21	All Independent Appointments required by this approval must hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	<u>Evidence outside this audit period:</u> - Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-183, dated 27 June 2022, WHT and WFU SSI-8863 Nomination of Environmental Representatives - Conditions A24 and A26) - Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-190, dated 27 June 2022, WHT and WFU SSI-8863 Nomination of Acoustic Advisors - Conditions A30 and A32) - Approval Letter, DPE (now DPHI) to TfNSW, dated 08 February 2021 (WHT and WFU SSI 8863 Nomination of Community Complaints Mediator - Condition B11) - Approval Letter, DPE (now DPHI) to TfNSW, dated 20 June 2023 [Ref: SSI-8863-PA-398 WHT - SSI 8863 - Stages 3B and 3C - Nomination of Air Quality Independent Reviewer (AQIR), Condition E3] <u>Evidence during this audit period:</u> - TfNSW WHT construction portal (https://caportal.com.au/rms/whl) - Interview with TfNSW and ACCIONA (28 October 2025) - Also refer CoA A26 within this Audit Table for audit evidence	C	Refer below: - DPE (now DPHI) approved (27 June 2022) TfNSW's nomination of Ms Gillian Lehn as primary Environmental Representative (ER) and Ms Anita Rylah as the alternate ER, both from AQUAS (now APP Group). Also refer CoA A24 and CoA A26 within this Audit Table for audit evidence and findings; - DPE (now DPHI) approved (27 June 2022) TfNSW's nomination of Ms Sav Shimada as the lead Acoustic Advisor (AA) and Mr Dave Anderson as the alternate AA, both from Acoustic Studios. Also refer CoA A30 and CoA A32 within this Audit Table for audit evidence and findings; and - DPE (now DPHI) approved (08 February 2021) the appointment of Ms Margaret Harvie (PlanCom Consulting) as the Community Complaints Mediator (CCM) in accordance with condition B11 of SSI 8863. Also refer CoA B11 within this Audit Table for audit evidence and findings. - DPE (now DPHI) approved (20 June 2023) the appointment of Mr Gary Graham from Northstar Air Quality Pty Ltd as the Air Quality Independent Reviewer (AQIR) in accordance with Condition E3. Also refer CoA E3 within this Audit Table for audit evidence and findings. Copies of the ER, AA and AQIR Independent Appointment Approval Letters from DPE (now DPHI) are available on the Project website. Auditees indicated no change to above appointments, in this audit period; with the exception of nomination of an alternate ER submitted to the Planning Secretary on 17 October 2025- refer CoA A26 within this Audit Table for audit evidence and findings.
A22	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.	Interview with TfNSW and ACCIONA (28 October 2025)	NT	Auditees indicated no audits have been commissioned of Independent Appointments by the Planning Secretary, in relation to this Condition during the audit period. Condition not triggered in this audit period.
A23	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 A22 and A23 apply to all Independent Appointments including the ER, AA, Community Complaints Mediator and the AQIR.	Interview with TfNSW and ACCIONA (28 October 2025)	NT	Auditees indicated no Independent Appointments (ER, AA, CCM and AQIR applicable to the Project) have been withdrawn by the Planning Secretary, in relation to this Condition during the audit period. Condition not triggered in this audit period.
ENVIRONMENT REPRESENTATIVE				
A24	Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	- Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-183, dated 27 June 2022, WHT and WFU SSI-8863 Nomination of Environmental Representatives - Conditions A24 and A26) - TfNSW WHT construction portal (https://caportal.com.au/rms/whl) - Also refer CoA A26 within this Audit Table for audit evidence	C	DPE (now DPHI) approved (27 June 2022) TfNSW's nomination of Ms Gillian Lehn as primary ER and Ms Anita Rylah as the alternate ER, both from AQUAS (now APP Group), noting that TfNSW have provided evidence to demonstrate that they: - " <i>are suitably qualified and experienced</i> ; - <i>were not involved in the preparation of the documents listed in Condition A1</i> ; - <i>are independent from the design and construction of the project</i> ; and - <i>meet the requirements set out in the Environmental Representative Protocol (DPIE, 2018).</i> " <u>DPE (now DPHI) approved the ER and alternate ER on 27 June 2022.</u> <u>Actual construction commencement</u> of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C was on 20 May 2024. Also refer CoA A36 within this Audit Table for audit evidence and findings. Approval of the ER and Alternate ER was outside of this audit period. <u>During this audit period</u> , nomination of an alternate ER was submitted to the Planning Secretary on 17 October 2025 - refer CoA A26 within this Audit Table for audit evidence and findings.
A25	The proposed ER 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.	- Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-183, dated 27 June 2022, WHT and WFU SSI-8863 Nomination of Environmental Representatives - Conditions A24 and A26) - TfNSW WHT construction portal (https://caportal.com.au/rms/whl) - Also refer CoA A26 within this Audit Table for audit evidence	C	DPE (now DPHI) approved (27 June 2022) TfNSW's nomination of Ms Gillian Lehn as primary ER and Ms Anita Rylah as the alternate ER, both from AQUAS (now APP Group), noting that TfNSW have provided evidence to demonstrate that they: - " <i>are suitably qualified and experienced</i> ; - <i>were not involved in the preparation of the documents listed in Condition A1</i> ; - <i>are independent from the design and construction of the project</i> ; and - <i>meet the requirements set out in the Environmental Representative Protocol (DPIE, 2018).</i> " Copy of the ER Independent Appointment Approval Letter from DPE (now DPHI) is available on the Project website. Also refer CoA A27 within this Audit Table for audit evidence and findings. Approval of the ER and Alternate ER was outside of this audit period. <u>During this audit period</u> , nomination of an alternate ER was submitted to the Planning Secretary on 17 October 2025 - refer CoA A26 within this Audit Table for audit evidence and findings.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
A26	The Proponent may engage more than one ER 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.	- Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-183, dated 27 June 2022, WHT and WFU SSI-8863 Nomination of Environmental Representatives - Conditions A24 and A26) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - DPHI Post Approval Document acknowledgement receipt email, dated 17 October 2025 [Ref: Western Harbour Tunnel & Warringah Freeway Upgrade - Post Approval Document Received - (SSI-8863-PA-1141)]	C	DPE (now DPHI) approved (27 June 2022) TfNSW's nomination of Ms Gillian Lehn as primary ER and Ms Anita Rylah as the alternate ER, both from AQUAS (now APP Group), noting that TfNSW have provided evidence to demonstrate that they: <i>- "are suitably qualified and experienced;</i> <i>- were not involved in the preparation of the documents listed in Condition A1;</i> <i>- are independent from the design and construction of the project; and</i> <i>- meet the requirements set out in the Environmental Representative Protocol (DPIE, 2018)."</i> <u>Actual construction commencement of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C was on 20 May 2024.</u> Also refer CoA A36 within this Audit Table for audit evidence and findings. Copy of the ER Independent Appointment Approval Letter from DPE (now DPHI) is available on the Project website. Approval of the ER and Alternate ER was outside of this audit period. <u>During this audit period</u>, nomination of an alternate ER was submitted to the Planning Secretary on 17 October 2025 (refer evidence). Auditees indicated that approval of the alternate ER nominated was still pending at the time of this audit.
A27	For the duration of the work until the commencement of operation, 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; NSW Government 19 Department of Planning, Industry and Environment Western Harbour Tunnel & Warringah Freeway Upgrade (SSI-8863) (d) review documents identified in Conditions A10, A17, C1, C4 and C11 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); (e) regularly monitor the implementation of the documents listed in Conditions A10, A17, C1, C4 and C11 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 A38 of this approval; (g) as may be requested by the Planning Secretary, assist in the resolution of community complaints; (h) consider or assess the impacts of minor ancillary facilities comprising lunch sheds, office sheds and portable toilet facilities as required by Condition A19 of this approval; (i) consider any minor amendments to be made to the Ancillary Site Establishment Management Plan, CEMP, CEMP Sub-plans and monitoring programs without increasing impacts to nearby receivers or that comprise updating or are of an administrative nature, and are consistent with the terms of this approval and the CEMP, CEMP Sub-plans and 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; (j) prepare and submit to the Planning Secretary and other relevant regulatory 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; and (k) assess the impacts of activities as required by the Low Impact Works definition.	- Interview with ER (21 October 2025) <u>ER Inspection Reports (~23 Inspections within audit period, sighted samples):</u> - 250507 WHT ER Site Surveillance WHT071 to 251022 WHT ER Site Surveillance WHT093 <u>ER Monthly Reports in audit period:</u> - Ref: AQ1148.31 monthly report 2505 - Ref: AQ1148.31 monthly report 2506 - Ref: AQ1148.31 monthly report 2507 - Ref: AQ1148.31 monthly report 2508 - Ref: AQ1148.31 monthly report 2509 - Ref: AQ1148.31 monthly report 2510 <u>ER Review and/or Endorsement of documents (examples) in audit period:</u> - Documents issued, reviewed and/or endorsed sighted in above Monthly ER Reports submitted to DPHI, with some examples, below: - Ref: AQ1148.31 WHT3B_C CEMP rev9.16 endorsement 250929 - Ref: AQ1148.31 WHT3B_C FFMP rev6.7 endorsement 250616 - Ref: AQ1148.31 WHT3B_C GMP Rev3.6 endorsement 251017 - Ref: AQ1148.31 WHT3B_C NVMP Rev4.7 endorsement 250612 - Ref: AQ1148.31 WHT3B_C SSWMP rev3.5 endorsement 250616 - Ref: AQ1148.31 WHT3B_C TTAMP rev5.11 endorsement 250616 - Ref: AQ1148.31 WHT3B_C NAHMP Rev 8 endorsement 250604 - Ref: AQ1148.31 WHT rev 00 MHMP endorsement 250604 - Also refer evidence referred to elsewhere within this Audit Table	C	Interview with ER (21 October 2025) with evidence reviewed and summarised as follows, for the audit period: - ER has received no communication to respond to or requests from the Planning Secretary under A27 a), f) or g); - ER Inspections undertaken of sites as identified within the ER Inspection Reports (refer evidence) including issues and OFIs raised by the ER, with close out by ACCIONA documented/tracked within the ER Inspection Reports. Issues raised by the ER were predominantly in relation to soil and water across the WHT Stage 3B and 3C sites, in the audit period as presented in Figure 1 of the Monthly ER Report submitted to the Planning Secretary. - ER has reviewed and/or endorsed documents, as noted in Monthly ER Reports submitted to the Planning Secretary in the audit period - refer examples below (and under evidence): - Glebe Island ASEMP updates (refer CoA A17 within this Audit Table for audit evidence and findings). - CEMP and CEMP Sub-plans (refer evidence and elsewhere within this Audit Table for audit evidence and findings). - Minor ancillary facilities (refer CoA A19 within this Audit Table for audit evidence and findings). - ER reported no emergency works and two consistency assessments during audit period (refer CoA A28 within this Audit Table for audit evidence). - ER Monthly Reports submitted to DPHI under A27 j) noted for example: - analysis of (construction) monitoring results; - nil OOH approvals (under OOHW Protocol); - non-compliances (refer CoA A45 within this Audit Table); and - environmental incidents (refer CoA A43 within this Audit Table). - Summary Table Community Consultation (Community Information Events, Complaints, Media Release, Construction Notifications, Fact Sheets) - ER has not assessed any Low Impact Works and associated approvals under A27 k) - ER participates in Project meetings (refer ER Monthly Reports in relation to meetings attended for detail).
A28	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition A27 (including preparation of the ER monthly report), as well as: (a) the complaints register (to be provided on a weekly basis or as requested); 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).	- Interview with ER (21 October 2025), TfNSW and ACCIONA (28 October 2025) and review of ER Monthly Reports (refer CoA A27 within this Audit Table for audit evidence) - WHT DPE Complaint Register, as provided on 24 October 2025 (Ref: WHT_DPE Complaint Register_251024.xlsx) <u>Sighted (sample) submission evidence of weekly complaints register to ER, AA and DPHI by TfNSW:</u> WHT_DPE Complaint Register_251024.xlsx - TeamBinder Correspondence, from TfNSW to ER and AA, dated 24 October 2025 (Ref: WHTPW-TFNSW-ACOC-CORR-000061- WHT Project Complaints Report : 17 October - 24 October 2025 with reference to attachments WHT_DPE Complaint Register_251024.xlsx and Post Approval Form_20251024041718 submission to DPHI) WHT_DPE Complaint Register_251017.xlsx - TeamBinder Correspondence, from TfNSW to ER and AA, dated 17 October 2025 (Ref: WHTPW-TFNSW-ACOC-CORR-000060- WHT Project Complaints Report : 10 October - 17 October 2025 with reference to attachments WHT_DPE Complaint Register_251017.xlsx and Post Approval Form_20251017040458 submission to DPHI) <u>CAs issued to the ER:</u> - Sighed Teambinder Document Transmittal correspondence dated 19 May 2025 (Ref: WHTP2- TFNSW- TX- 003427) of Revision 02 of the WHTP2-TFNSW-WHT-EV-RPT-000002 - Consistency Assessment WHT and WFU Division 5.2 Approval Berrys Bay Foreshore Parklands. Auditees indicated - Sighted General Teambinder correspondence dated 4 August 2025 (Ref: WHTP2-TFNSW-APP-CORR-000054) of Berry Street Configuration Consistency Assessment	C	The ER advised all required information has been provided to them by the Proponent in order for them to undertake their duty during the audit period, as applicable. In relation to this CoA: a) TfNSW provides ER, AA and DPHI copy of the Complaints Register weekly (refer sample evidence sighted) b) Following two Consistency Assessments (CAs) provided to the ER (refer evidence): - CA for Berrys Bay Foreshore Parklands - ACCIONA indicated that works related to this CA was site establishment at Berrys Bay site - commenced on 7 July 2025, with correspondence of CA determined by TfNSW issued to the ER on 19 May 2025 (refer evidence sighted) - CA for Berry Street Configuration - ACCIONA indicated that works related to this CA have not commenced yet, with correspondence of CA determined by TfNSW issued to the ER on 4 August 2025 (refer evidence sighted)

Item
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Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
ACOUSTICS ADVISOR				
A29	A suitably qualified and experienced Acoustics Advisor(s) (AA) in noise and vibration management, who is independent of the design and construction personnel, must be nominated by the Proponent and engaged for the duration of work (as required by Condition A32) and for no less than six months following completion of construction of the CSSI.	- Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-190, dated 27 June 2022, WHT and WFU SSI-8863 Nomination of Acoustic Advisors - Conditions A30 and A32) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	DPE (now DPHI) approved (27 June 2022) TfNSW's nomination of Ms Sav Shimada as the lead AA and Mr Dave Anderson as the alternate AA, both from Acoustic Studios, noting that TfNSW provided evidence to demonstrate that they: - <i>"are suitably qualified and experienced;</i> - <i>hold current memberships of relevant professional bodies;</i> - <i>are independent from the design and construction of the project; and</i> - <i>meet the requirements set out in Seeking approval from the Department for the appointment of independent experts (DPIE, 2020)."</i> <u>Actual construction commencement of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C was on 20 May 2024.</u> Also refer CoA A36 within this Audit Table for audit evidence and findings. Copy of the AA Independent Appointment Approval Letter from DPE (now DPHI) is available on the Project website. Also refer CoA A34 within this Audit Table for audit evidence and findings. Approval of the AA and Alternate AA was outside of this audit period.
A30	Work must not commence until an AA has been nominated by the Proponent and approved by the Planning Secretary	- Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-190, dated 27 June 2022, WHT and WFU SSI-8863 Nomination of Acoustic Advisors - Conditions A30 and A32) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	DPE (now DPHI) approved (27 June 2022) TfNSW's nomination of Ms Sav Shimada as the lead AA and Mr Dave Anderson as the alternate AA, both from Acoustic Studios, noting that TfNSW provided evidence to demonstrate that they: - <i>"are suitably qualified and experienced;</i> - <i>hold current memberships of relevant professional bodies;</i> - <i>are independent from the design and construction of the project; and</i> - <i>meet the requirements set out in Seeking approval from the Department for the appointment of independent experts (DPIE, 2020)."</i> <u>DPE (now DPHI) approved the lead and alternate AA on 27 June 2022. Actual construction commencement of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C was on 20 May 2024.</u> Also refer CoA A36 within this Audit Table for audit evidence and findings. Copy of the AA Independent Appointment Approval Letter from DPE (now DPHI) is available on the Project website. Approval of the AA and Alternate AA was outside of this audit period.
A31	The Proponent must cooperate with the AA by: (a) providing access to noise and vibration monitoring activities as they take place; NSW Government 20 Department of Planning, Industry and Environment Western Harbour Tunnel & Warringah Freeway Upgrade (SSI-8863) (b) providing for review of noise and vibration plans, assessments, monitoring reports, data and analyses undertaken; and (c) considering any recommendations to improve practices and demonstrating, to the satisfaction of the AA, why any recommendation is not adopted.	- Interview with AA (24 October 2025) - TeamBinder Correspondence from AA to ACCIONA, dated 26 June 2025 (Ref: WHT 6 Monthly N&V CMR4 - May 25) - Ground-borne Noise Monitoring Event Report (Cheltenham St, Rozelle NSW 2039 07/05/25 – 08/05/25, Ref: 250507 - Cheltenham Street GBN monitoring report) - Ground-borne Noise Monitoring Event Report (Brockley St, Rozelle NSW 2039 08/05/25 – 09/05/25, Ref: 250508 - Brockley Street GBN monitoring report) - Email, ACCIONA to AA dated 23/10/2025, with GBN Monitoring Reports and raw data from two receiver locations in October 2025 at Woolcott Street, Waverton (Ref: GBN monitoring report from North.msg dated 23/10/2025) - 251007 - Woolcott Street GBN monitoring report (1) and 251009 - Woolcott Street GBN monitoring report (1) - Email, AA to Lead Auditor, dated 26 October 2025 (Re_ Sixth Independent Audit for WHT .msg) <u>AA inspections in audit period:</u> - Ref: 20250825 WHT AA inspection report Emu Plains 20250730 - Also refer CoA A19, CoA A34, CoA C13 and CoA E75 within Audit Table for audit evidence	C	AA reviewed/provided comments on noise and vibration documents submitted by ACCIONA in the audit period, for example: - CNVIS' - refer CoA E75 within this Audit Table; - MCAF review - refer CoA A19 within this Audit Table; - Ground-borne Noise (GBN) Monitoring Event Reports for Permit to Hammer additional mitigation measure verification at two locations in Rozelle during May 2025 (refer evidence); - Following receipt of GBN complaints, AA requested and reviewed GBN Monitoring Reports and raw data from two receiver locations in October 2025 at Woolcott Street, Waverton and agreed with ACCIONA's conclusions and interpretation of the results. ACCIONA's correspondence to AA noted that that both residences were monitored for validation of KNOWnoise predictions, but the reports results were used as a response to the two complaints received on 9 October from Woolcott Street (Waverton) and results confirmed the tunnelling was in line with the predictions and not exceeding the 45dB AA trigger] (refer evidence); - Six-monthly noise and vibration monitoring report for period 18 November 2024 – 31 May 2025 (refer evidence); - One AA inspection conducted in audit period of Emu Plains (now operational) on 30 July 2025 (to observe site set up and operations and carry out noise measurements of dominant noise sources). No actions nor recommendations were raised from the AA site inspection (refer evidence). Also refer CoA A34, CoA C13 and CoA E75 within Audit Table for audit evidence and findings.
A32	The Proponent may nominate additional suitably qualified and experienced persons to assist the lead AA for the Planning Secretary's approval.	- Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-190, dated 27 June 2022, WHT and WFU SSI-8863 Nomination of Acoustic Advisors - Conditions A30 and A32) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	DPE (now DPHI) approved (27 June 2022) TfNSW's nomination of Ms Sav Shimada as the lead AA and Mr Dave Anderson <u>as the alternate AA</u>, both from Acoustic Studios, noting that TfNSW provided evidence to demonstrate that they: - <i>"are suitably qualified and experienced;</i> - <i>hold current memberships of relevant professional bodies;</i> - <i>are independent from the design and construction of the project; and</i> - <i>meet the requirements set out in Seeking approval from the Department for the appointment of independent experts (DPIE, 2020)."</i> DPE (now DPHI) approved the lead and alternate AA on 27 June 2022. Actual construction commencement of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C was on 20 May 2024. Also refer CoA A36 within this Audit Table for audit evidence and findings. Copy of the AA Independent Appointment Approval Letter from DPE (now DPHI) is available on the Project website. Approval of the AA and Alternate AA was outside of this audit period.

Item
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Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggerred

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
A33	Any activities generating noise in excess of 5 dB(A) above the 'Noise affected' Noise Management Levels (NMLs) derived from the Interim Construction Noise Guideline (DECC, 2009) (ICNG) must not commence until an AA, nominated under Condition A29 of this approval, has been approved by the Planning Secretary	- Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-190, dated 27 June 2022, WHT and WFU SSI-8863 Nomination of Acoustic Advisors - Conditions A30 and A32) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	DPE (now DPHI) approved (27 June 2022) TfNSW's nomination of Ms Sav Shimada as the lead AA and Mr Dave Anderson as the alternate AA, both from Acoustic Studios, noting that TfNSW provided evidence to demonstrate that they: - <i>"are suitably qualified and experienced;</i> - <i>hold current memberships of relevant professional bodies;</i> - <i>are independent from the design and construction of the project; and</i> - <i>meet the requirements set out in Seeking approval from the Department for the appointment of independent experts (DPIE, 2020)."</i> <u>AA approval in place as of 27 June 2022;</u> with actual construction commencement of WHT Stage 3B on 22 May 2023 and WHT Stage 3C on 20 May 2024. Also refer CoA A36 within this Audit Table for audit evidence and findings. Copy of the AA Independent Appointment Approval Letter from DPE (now DPHI) is available on the Project website. Approval of the AA and Alternate AA was outside of this audit period.
A34	The approved AA must: (a) receive and respond to communication from the Planning Secretary in relation to the performance of the CSSI in relation to noise and vibration; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval relating to noise and vibration; (c) consider and recommend, to the Proponent, improvements that may be made to avoid or minimise adverse noise and vibration impacts; (d) review all proposed night-time works to determine if sleep disturbance would occur and recommend measures to avoid sleep disturbance or appropriate additional alternative mitigation measures; (e) review all noise and vibration documents required to be prepared under the terms of this approval and, should they be consistent with the terms of this approval, endorse them before submission to the Planning Secretary (if required to be submitted to the Planning Secretary) or before implementation (if not required to be submitted to the Planning Secretary); (f) regularly monitor the implementation of all noise and vibration documents required to be prepared under the terms of this approval to ensure implementation is in accordance with what is stated in the document and the terms of this approval; (g) notify the Planning Secretary of noise and vibration incidents in accordance with Conditions A43 and A45 of this approval; (h) in conjunction with the ER, the AA must: (i) as may be requested by the Planning Secretary or Community Complaints Mediator (required by Condition B12), help plan, attend or undertake audits of noise and vibration management of the CSSI including briefings, and site visits, (ii) in the event that conflict arises between the Proponent and the community in relation to the noise and vibration performance of the CSSI, follow the procedure in the Community Communication Strategy approved under Condition B2 to attempt to resolve the conflict, and if it cannot be resolved, notify the Planning Secretary, (iii) consider relevant minor amendments made to the Ancillary Site Establishment Management Plan, CEMP, relevant sub-plans and noise and vibration monitoring programs that require updating or are of an administrative nature, and are consistent with the terms of this approval and the management plans and monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, endorse the amendment, (this does not include any modifications to the terms of this approval), (iv) review the noise impacts of minor construction ancillary facilities, and (v) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, a Monthly Noise and Vibration Report detailing the AA's actions and decisions on matters for which the AA was responsible in the preceding month. The Monthly Noise and Vibration Report must be submitted within seven days following the end of each month for the duration of the AA's engagement for the CSSI, or as otherwise agreed by the Planning Secretary.	- Interview with AA (24 October 2025) <u>AA Monthly Reports in audit period:</u> - Ref: 202505 WHT monthly AA report May25 - Ref: 202506 WHT monthly AA report Jun25-revB - Ref: 202507 WHT monthly AA report Jul25-revB - Ref: 202508 WHT monthly AA report Aug25 - Ref: 202509 WHT monthly AA report Sep25 - Ref: 202510 WHT monthly AA report Oct25 <u>AA Review and/or Endorsement of documents (examples) in audit period:</u> - Documents issued, reviewed and/or endorsed sighted in above Monthly AA Reports submitted to DPHI, with some examples, below: - Ref: 20250529 WHTAcc Emu Plains CNVIS rev9 AA endorse - Ref: 20250619 WHT Acc NVMP rev4.7 AA endorse - Ref: 20250707 WHTAcc Cammeray CNVIS rev9 AA endorse - Ref: 20250710 WHTAcc White Bay CNVIS rev3 AA endorse - Ref: 20250918 WHTAcc CWL CNVIS AA endorse <u>AA inspections in audit period:</u> - Ref: 20250825 WHT AA inspection report Emu Plains 20250730 <u>AA Review of MAFs:</u> - Refer CoA A19 within this Audit Table for audit evidence - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Also refer CoA A19, CoA A31 and CoA B7-B9 within this Audit Table for audit evidence	C	Interview with AA (24 October 2025) with evidence reviewed and summarised as follows, for the audit period: - AA has received no communication to respond to or requests from DPHI under A34 a) and h) (i); - AA participates in Project meetings (refer AA Monthly Reports in relation to meetings attended for detail); - AA Monthly Reports (refer evidence) submitted to DPHI A34 (h)(v) noted for example: - no emergency works; - noise and vibration complaints, including note that complaints dealt with appropriately by ACCIONA (for WHT Stages 3B and 3C), with further note in May 2025 Monthly AA Report regarding inclusion of offers for noise monitoring and temporary stop work plus future offers of alternative office spaces for complainants affected when working from home; - nil initiatives / best practice observations; and - ongoing and upcoming environmental risks, and recommendations (incl auditing) - AA endorsed the following in the audit period, for example (refer evidence): - Updates to NVMP and new/updated CNVIS' (these documents are publicly available on the WHT Project website) - Minor construction ancillary facilities reviewed by AA for noise impacts under A34 (h)(iv) in the audit period - refer CoA A19 within this Audit Table for audit evidence and AA Monthly Reports in audit period (refer evidence) AA Inspection in the audit period: - One AA inspection conducted in audit period of Emu Plains (now operational) on 30 July 2025 (to observe site set up and operations and carry out noise measurements of dominant noise sources). No actions nor recommendations were raised from the AA site inspection (refer evidence) and CoA A31 for audit evidence and findings. Also refer CoA A19, CoA A31 and CoA B7-B9 within this Audit Table for audit evidence, findings and Section 3.6 for Complaints management and resolution.
NOTIFICATION OF COMMENCEMENT				
A35	The Department must be notified in writing of the dates of commencement of construction and operation at least one month before those dates.	Refer CoA A36 within this Audit Table for notifications of staged construction commencement including audit evidence.	NT	Refer CoA A36 within this Audit Table for notifications of staged construction commencement including audit evidence and findings. Condition not triggered in this audit period.
A36	If the construction or operation of the CSSI is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of the commencement of that stage.	<u>Evidence outside this audit period:</u> - Minister's Consent Conditions - SSI 8863 (as modified; the Approval) - Letter, TfNSW to DPE (now DPHI) (Ref: SSI 8863, dated 16 March 2023) (Notification of Commencement A35 & A36 – Stage 3B – WHT Northern Tunnelling and Integration works) - Letter, TfNSW to DPE (now DPHI) (Ref: SSI-8863, dated 23 May 2023) (Notification of Commencement A35 & A36 – Stage 3B – WHT Northern Tunnelling and Integration works) - Letter, TfNSW to DPE (now DPHI) [Ref: WHT and WFU (SSI 8863) Notification of Commencement (A35 & A36), dated 17 October 2023] (WHT Stage 3C – Sydney Harbour Crossing between Birchgrove and Balls Head, Waverton) - Letter, TfNSW to DPHI (Ref: SSI 8863-PA-547, dated 4 June 2024) (Notification of Commencement A35 & A36 – Stage 3C – WHT Sydney Harbour Crossing between Birchgrove and Balls Head, Waverton works) - Refer previous Independent Audit Reports for audit evidence <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	NT	<u>Outside this audit period:</u> the following staged construction commencement notifications were sighted during previous Independent Audits: - TfNSW notification to DPE (now DPHI) dated 16 March 2023 that <i>"Stage 3B - Northern Tunnelling and Integration works will commence construction on 1 May 2023."</i> - TfNSW notification to DPE (now DPHI) dated 23 May 2023 that <i>"the actual commencement of construction for Stage 3B - WHT Northern Tunnelling and Integration works, occurred on 22 May 2023."</i> - Notification of actual commencement of construction for WHT Stage 3C – WHT Sydney Harbour Crossing between Birchgrove and Balls Head, Waverton works, occurring on 20 May 2024 was provided to DPHI on 4 June 2024. Above notification referred to previous correspondence on 17 October 2023, notifying the Department of TfNSW's intention to commence construction for Stage 3C – WHT Sydney Harbour Crossing between Birchgrove and Balls Head, Waverton works no sooner than 17 November 2023 and also outlined reasons for delay in the actual commencement date. Refer evidence within this Audit Table for notifications and for further detail refer previous Independent Audit Reports. <u>During this audit period:</u> Notifications of actual commencement of construction are available on the Project website. No further notifications of commencement of construction submitted to DPHI during this audit period. Condition not triggered in this audit period.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
AUDITING				
A37	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit. This condition does not apply to the engagement of auditors required under Condition E145.	- Agreement Letter, DPHI to TfNSW dated 15 September 2025 [Ref:SSI-8863-PA-1125, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI 8863) – Stage 3B and 3C - Agreement to independent auditors] - Email and Letter, HBI Lead Auditor to DPHI (23 September 2025) - Email, DPHI to HBI Lead Auditor (1 October 2025)	C	TfNSW submitted correspondence [submission dated 5 September 2025 (SSI-8863-PA-1125)] requesting the Planning Secretary's agreement to suitably qualified, experienced, and independent persons to conduct independent audits of Stage 3B and 3C of the Western Harbour Tunnel and Warringah Freeway Upgrade (Project), under SSI-8863 as modified (the approval). DPHI agreed to the following independent auditors for the Western Harbour Tunnel and Warringah Freeway Upgrade Project (SSI 8863) – Stage 3B and 3C on 15 September 2025: - Swathi Gowda, Healthy Buildings International Pty Ltd (HBI), as lead auditor - Rui Henriques, HBI, as alternate lead auditor DPHI's correspondence noted requirements (refer evidence) including that above correspondence is appended to the independent audit reports, which is included in Appendix B of the Audit Report. Scope consultation correspondence was sent to DPHI by the Lead Auditor on 23 September 2025, following a meeting held with DPHI/TfNSW on 21 September 2025 to discuss the scope of this Independent Audit. DPHI responded to the scope consultation correspondence on 1 October 2025. To meet the Audit Schedule and Delivery timeframes: - The site inspection of WHT Stages 3B and 3C and this sixth Independent Audit commenced on 28 October 2025.
A38	Independent Audits of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).	<u>Evidence outside this audit period:</u> - Agreement Letter, DPE (now DPHI) to TfNSW (Ref:SSI-8863-PA-465, dated 7 August 2023) (WHT and WFU SSI 8863 – ongoing construction phase independent audit frequency) <u>Evidence during this audit period:</u> - Agreement Letter, DPHI to TfNSW dated 15 September 2025 [Ref:SSI-8863-PA-1125, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI 8863) – Stage 3B and 3C - Agreement to independent auditors] - This sixth Independent Audit [Report Name: Independent Audit No. 6 – Audit Report, WHT Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works)]	C	<u>Outside this audit period:</u> TfNSW submitted a request to DPE (now DPHI) [submission dated 25 July 2023 (PA-465)] requesting the Planning Secretary's agreement to revise the ongoing construction phase independent audit frequency for the WHT Project. DPE (now DPHI) agreed (Ref: SSI-8863-PA-465 dated 7 August 2023) to TfNSW's request to regularise the frequency of the ongoing construction phase independent audits so that the audit site inspection must be undertaken each May and November. <u>During this audit period:</u> DPHI's correspondence agreeing to independent auditors on 15 September 2025 (refer evidence) , noted requirements including that per the Planning Secretary's agreement dated 7 August 2023, audit site inspections must be undertaken by the end of each May and/or November (SSI-8863-PA-465). To meet above DPHI requirements, the Audit Schedule and Delivery timeframes: - The site inspection of WHT Stages 3B and 3C and this sixth Independent Audit commenced on 28 October 2025. This sixth Independent Audit was conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020). Also refer Independent Audit No. 6 – Audit Report, WHT Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) for details of audit evidence and findings. Above DPHI agreement letters are appended to the Audit Report (refer Appendix B of the Audit Report) submitted under this regularised frequency.
A39	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.	Interview with TfNSW and ACCIONA (28 October 2025)	NT	Auditees indicated no such requests have been received from the Planning Secretary in relation to this Condition within this audit period. Condition not triggered in this audit period.
A40	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 A38 or Condition A39; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report and response to it publicly available 60 days after submission to the Planning Secretary, or as otherwise agreed by the Planning Secretary.	- Independent Audit No. 5 – Audit Report, Western Harbour Tunnel (WHT) - Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) (May 2025) (Rev 1, dated 27/06/2025) including TfNSW's response to Audit Findings [TfNSW – WHTWFO CSSI 8863 Proponent Response to Audit Findings – Independent Audit (#5), May 2025] - Letter, DPHI to TfNSW, dated 6 August 2025 [Ref:SSI-8863-PA-1072, Western Harbour Tunnel (SSI 8863) - Independent audit #5] - TfNSW WHT construction portal (https://caportal.com.au/rms/whl) - Interview with TfNSW (28 October 2025) - Sighted screenshot of TfNSW's upload of above Independent Audit No. 5 – Audit Report on the Project website [document info created date - 7/08/2025 - ref: image (4).png]	C	Independent Audit No. 5 of WHT Stage 3B and Stage 3C was conducted, with site inspection and audit commencing on 6 May 2025. DPHI's correspondence to TfNSW (dated 6 August 2025) referred to submission of the fifth independent audit report and the response to audit recommendations, as required by Condition A41 on 30 June 2025 noting below (excerpts only): - <i>"NSW Planning considers the audit report to generally satisfy the reporting requirements of the approval and the NSW Planning's 2020 Independent Audit Post Approval Requirements;</i> - <i>Non-compliances against Condition E132 (NC01 to NC06) have been addressed previously by NSW Planning;</i> - <i>Non-compliance against Condition E140 (NC07) has been assessed per the NSW Planning's Compliance Policy, with NSW Planning on the occasion determining to record the breach with no further enforcement action proposed. However, please note that recording the breach does not preclude NSW Planning from taking an alternative enforcement action should it become apparent that an alternative response is more appropriate;</i> - <i>Please ensure a status update for all actions outlined in the response is included in each subsequent audit report, until all actions are completed."</i> Independent Audit No. 5 (May 2025) (Rev 1, dated 27/06/2025) including TfNSW's response to Audit Findings is available on the Project website. Sighted screenshot of TfNSW's upload of above Independent Audit No. 5 – Audit Report on the Project website [document info created date - 7/08/2025 - ref: image (4).png]
A41	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).	Same as CoA A40 within this Audit Table for audit evidence	C	Same as CoA A40 within this Audit Table for audit evidence and findings.
A42	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.	Interview with TfNSW and ACCIONA (28 October 2025)	NT	Auditees indicated no such requests have been received from the Planning Secretary in relation to this Condition within this audit period. Condition not triggered in this audit period.
INCIDENT AND NON-COMPLIANCE NOTIFICATION AND REPORTING				
A43	The Planning Secretary must be notified via the Major Projects Website immediately 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 location and nature of the incident.	- Interview with TfNSW and ACCIONA (28 October 2025) - WHT Environmental Incident register, extract provided for audit period on 28 October 2025 (Ref: WHT Environmental Incident register May - October 2025.xlsx)	NT	ACCIONA's Environmental Incident Register records eight environmental incidents related to spills/leaks, five report only events in the audit period; and were generally classified as insignificant or minor environmental risk. Auditees indicated that no environmental incidents recorded in the audit period, required notification under the planning approval. Also refer Section 3.7 (Incidents and Non-Compliances) within the Audit Report.

Item
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Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
A44	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A	- Interview with TfNSW and ACCIONA (28 October 2025) - Refer CoA A43 within this Audit Table for audit evidence and findings	NT	Condition not triggered in this audit period. Refer CoA A43 within this Audit Table for audit evidence and findings.
Non-Compliance Notification				
A45	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 <i>NSW Government 22 Department of Planning, Industry and Environment Western Harbour Tunnel & Warringah Freeway Upgrade (SSI-8863)</i> 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.	- Interview with ER (21 October 2025) - Interview with TfNSW and ACCIONA (28 October 2025) - WHT Environmental Incident register (including non-compliances), extract provided for audit period on 28 October 2025 (Ref: WHT Environmental Incident register May - October 2025.xlsx) <u>NC notifications to DPHI:</u> - TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 16 June 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)] - TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 21 August 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (A17)] - TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 22 August 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)] - TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 2 September 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)] - TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 22 September 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)] - TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 26 September 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)] - TfNSW submitted a non-compliance (NC) notification to DPHI under CoA A45 dated 20 October 2025 [Ref: SSI 8863 - Western Harbour Tunnel and Warringah Freeway Upgrade – Notification of non-compliance (E132)]	C	During this audit period, the following non-compliances were self-reported and notified to the Planning Secretary: - IA6 – NC01: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC02: One non-compliance in relation to establishment of an Ancillary Facility prior to approval (CoA A17) - IA6 – NC03: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC04: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC05: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC06: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC07: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) TfNSW submitted non-compliance notifications for above (refer evidence), to the Planning Secretary and response from DPHI in relation to these non-compliances were sighted, where provided (refer Table 6 of the Audit Report for audit evidence). Also refer CoA A17 and CoA E132, within this Audit Table; refer Section 3.2, Table 6 and Section 3.7 of the Audit Report for further details of the non-compliances including dates and times, verification and close-out of actions raised to address the non-compliances.
A46	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Interview with TfNSW and ACCIONA (28 October 2025)	NT	Condition not triggered in this audit period. Refer CoA A45 within this Audit Table for audit evidence and findings.
IDENTIFICATION OF WORKFORCE AND COMPOUNDS				
A47	All heavy vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and CSSI application number to enable immediate identification by a person viewing the heavy vehicle. Details of the project identification markings must be submitted to the Planning Secretary for approval prior to the heavy vehicles used for spoil haulage being utilised for the CSSI.	<u>Evidence outside this audit period:</u> - Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-396, dated 06 June 2023) [WHT and WFU SSI 8863 - Stage 3B WHT: Project Identification on Heavy Vehicles (A47)] - Sighted 2117210 pre production proof_Rev01 (HV Sticker) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025) - Site inspection (28 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B)	NT	Section 6.3 of the Traffic, Transport and Access Management Sub-Plan includes that " <i>all heavy vehicles used for spoil haulage will be clearly marked on the sides and rear with the project name and CSSI application number to enable immediate identification by a person viewing the heavy vehicle. The markings will be in accordance with CoA A47.</i> " DPE (now DPHI) approved the identification signage under Condition A47 (referring to TfNSW submission dated 21 April 2023, requesting approval of the signage as required under condition A47) noting that the proposed signage - " <i>will enable the immediate identification of the Project by a person viewing the heavy vehicle; contains the information required by the conditions of approval; and has been reviewed by Transport of NSW and no issues have been raised.</i> " Actual construction commencement of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C on 20 May 2024. DPHI approval was outside of this audit period; Auditees indicated no changes to above during this audit period. During the audit site inspection on 28 October 2025, no spoil haulage trucks were observed at Emu Plains or Berrys Bay to further verify implementation.
A48	The CSSI name; application number; 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 B15 of this approval.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Site inspection (28 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	Sighted Project signage per this Condition during previous audit site inspections - refer previous Independent Audits for audit evidence and findings. During this audit, sighted Project signage at Berrys Bay foreshore parkland site (for example) - refer Section 2.2.5 Site Inspection of the Audit Report.

Item
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Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT

Community Communication Strategy

B1	A Community 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); and (b) the relevant councils, EPA, EHG, NSW Health, Heritage NSW, DPE Water, and Sydney Water, as applicable. The Strategy must address who (the Proponent, Independent Appointments and/or construction contractor) will engage with the community, relevant councils and agencies, how they will engage and the timing of engagements.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025) - Approval Letter, DPHI to TfNSW, dated 30 June 2025 [Ref:SSI-8863-PA-1044, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI-8863) - Community Communication Strategy, Revision 11 (condition B3)] - TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) Above approved CCS is available on the Project website: - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings outside this audit period. <u>During this audit period:</u> The CCS has been further updated in this audit period (Ref: WHTWFU CCS, Rev 11, dated 29 May 2025); approved by DPHI on 30 June 2025 and available on the Project website. DPHI's Approval Letter (refer evidence) noted that the CCS, Revision 11 (dated 29 May 2025) submitted in accordance with condition B3 of SSI 8863: - <i>"has been revised to include two new sub-sections relating to responding to complex complaints and management of complaints made via third-party platforms (Section 11.6 and Section 11.7), in response to observations raised by the Warringah Freeway Upgrade Independent Environmental Representative; and</i> - <i>has been reviewed by Transport for NSW who raised no issues."</i> DPHI's Approval Letter also noted that the CCS is to be placed on the project website in accordance with condition of approval B15. The CCS sets out the mechanisms for which communication between the community and key stakeholders will be carried out. Sections 5, 6 of the CCS addresses CoA B1 and further detail on the types of tools and activities used to engage is provided in Section 9 (Table 5). Section 6.3 of the CCS identifies the North Sydney Council (NSC), Inner West Council (IWC), other Councils, government agencies and levels of engagement and communications tools and activities and timing of engagement. Also refer CoA B2 and CoA B5 within this Audit Table for audit evidence and findings.
B2	The Community Communication Strategy must: (a) identify people, organisations, councils and agencies to be consulted during the design and work phases; (b) identify details of the community demographics; (c) set out procedures and mechanisms for the regular distribution of accessible information including to LOTE and CALD and vulnerable communities about or relevant to the CSSI; (d) identify opportunities for education within the community about construction sites; (e) detail the measures for advising the community in advance of upcoming construction including upcoming out-of-hours work as required by Condition E83 and blasting activities (f) provide for the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community(is) for the CSSI; (g) detail the role and responsibilities of the Public Liaison Officer(s) engaged under Condition B6; and (h) set out procedures and mechanisms: (i) through which the community can discuss or provide feedback to the Proponent 24 hours a day, seven days per week; (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.	<u>Evidence outside this audit period:</u> - TfNSW WHT and WFU Community Communication Strategy (CCS) (Ref: WHTWFU CCS, Rev 6, dated 25 May 2021) - Approval Letter, DPE (now DPHI) to TfNSW dated 09 June 2021 (WHT and WFU SSI 8863 CCS, Rev 6, dated 25 May 2021) - TfNSW WHT and WFU Community Communication Strategy (CCS) (Ref: WHTWFU CCS, Rev 9, dated 27 March 2024) - Approval Letter, DPHI to TfNSW dated 28 March 2024 [Ref: SSI-8863-PA-598, WHT and WFU (SSI 8863) Community Communication Strategy Revision 9 (condition B3)] - TfNSW WHT and WFU Community Communication Strategy (CCS) (Ref: WHTWFU CCS, Rev 10, dated 21 February 2025) - Approval Letter, DPHI to TfNSW, dated 14 March 2025 [Ref: SSI-8863-PA-960, WHT and WFU (SSI 8863) - Community Communication Strategy Revision 10 (condition B3)] - Also refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025) - Approval Letter, DPHI to TfNSW, dated 30 June 2025 [Ref:SSI-8863-PA-1044, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI-8863) - Community Communication Strategy, Revision 11 (condition B3)] - TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) Above approved CCS is available on the Project website:	C	<u>Outside this audit period:</u> The TfNSW WHT and WFU Community Communication Strategy (CCS) was submitted to the Planning Secretary and approved by DPE (now DPHI) on 09 June 2021 (prior to construction commencement); with further updates to the CCS approved by DPHI since and outside this audit period (refer evidence and previous Independent Audit Reports for audit evidence and findings outside this audit period). Actual construction commencement of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C was on 20 May 2024 (refer CoA A36 within this Audit Table for audit evidence and findings). <u>During this audit period:</u> The CCS has been further updated in this audit period (Ref: WHTWFU CCS, Rev 11, dated 29 May 2025); approved by DPHI on 30 June 2025 and available on the Project website. Table 1 of the CCS sets out how the Project will comply with parts (a)-(h) of Condition B2 and further detail on the types of tools and activities used to engage is provided in Section 9 (Our Approach). Also refer CoA B5 within this Audit Table for audit evidence and findings.
B3	The Community Communication Strategy must be submitted to the Planning Secretary and approved prior to the commencement of construction, unless otherwise agreed by the Planning Secretary.	Same as CoA B2 (refer CoA B2 within this Audit Table for audit evidence)	C	Same as CoA B2 (refer CoA B2 within this Audit Table for audit evidence and findings).
B4	Construction for the purposes of the CSSI must not commence until the Community Communication Strategy has been approved by the Planning Secretary.	Same as CoA B2 (refer CoA B2 within this Audit Table for audit evidence)	C	Same as CoA B2 (refer CoA B2 within this Audit Table for audit evidence and findings).

Item
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Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
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Result	Comment
NC	Non compliant (NC)
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NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
B5	The Community Communication Strategy, as approved by the Planning Secretary, must be implemented for the duration of the work and for 12 months following the completion of construction	- Interview with TfNSW and ACCIONA (28 October 2025) - Approval Letter, DPHI to TfNSW, dated 30 June 2025 [Ref:SSI-8863-PA-1044, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI-8863) - Community Communication Strategy, Revision 11 (condition B3)] - TfNSW WHT and WFU Community Communication Strategy (WHTWFC CCS, Rev 11, dated 29 May 2025) <u>Communication tools, systems and activities:</u> - WHT construction portal - https://caportal.com.au/rms/wh/ - https://caportal.com.au/rms/wh/documents-and-notifications - https://caportal.com.au/rms/wh/stage2 (tunnelling) - https://caportal.com.au/rms/wh/notifications-map - The "Contact Us" tab on the WHT construction portal (specific link - https://caportal.com.au/rms/wh?view=NavLink_11eb06f4) for complaints, enquires and to stay informed - WHT DPE Complaint Register, as provided on 24 October 2025 (Ref: WHT_DPE Complaint Register_251024.xlsx) - TfNSW Consultation Manager (sample records sighted for select complaint close-out) <u>Community Updates / Notifications / Out of hours work three month lookahead (examples in audit period below, including elsewhere within this Audit Table):</u> - Western Harbour Tunnel Work notification Tunnelling near you – Birchgrove, June 2025 - Western Harbour Tunnel Work notification Tunnelling update North Sydney, July 2025 - Widening the ventilation tunnels under Rozelle Western Harbour Tunnel, October 2025 - Inner West Community update Western Harbour Tunnel, October 2025 - WFU and WHT Work notification Out of hours work three month lookahead, July – September 2025 - Berrys Bay work update - Site establishment work for Berrys Bay foreshore parkland, Date published 16 June 2025 - Berrys Bay work notification - Site establishment work update, Date published: 4 Jul 2025 <u>Fact Sheets (examples in audit period):</u> - Fact sheet – Parking and haulage Western Harbour Tunnel – Berrys Bay June 2025 - Fact sheet – Tunnel widening under Rozelle, Western Harbour Tunnel, August 2025 - Also refer CoA B7, CoA B9 (within this Audit Table) and Section 3.6 of the Audit Report including DPHI Consultation Scope for audit evidence	C	<u>During this audit period:</u> The CCS has been further updated in this audit period (Ref: WHTWFC CCS, Rev 11, dated 29 May 2025); approved by DPHI on 30 June 2025 and available on the Project website. Refer below for review of implementation of select /sample elements of the CCS: Section 9 of CCS - Community Updates, Notifications, Work notices and Fact Sheets: - Project communication tools, systems and activities in place (refer evidence) - For example - Community Updates and Notifications in chronological order, Weekly email Work Updates, Tunnelling notification map for example (refer evidence) - Project contact details and interpreter service sighted in Community Updates/Notifications (refer evidence) Section 9 of CCS – Community information sessions/staffed pop-up displays/markets and events - note below examples (only) from ER Monthly Reports (submitted to the Planning Secretary) (refer CoA A27 within this Audit Table for evidence): - Evidence as sighted in ER Monthly Reports under Summary Table Community Consultation (Community Information Events, Complaints, Media Release, Construction Notifications, Fact Sheets): - 24 July 2025 – Coffee cart in Hancock Lane Rozelle to thank the community during 33kV work - 30 July 2025 – Tunnel Ventilation and Air Quality online information session - 11-15 August 2025 – Doorknocking for 115 impacted properties with offer of Property Condition Surveys for VF02/03 work package to commence in November - 12 September – Drop-in community information session for the Work Package on Ventilation Tunnels widening (Nov) 11am – 1pm at the Native Rose Hotel, Rozelle Sections 11 and 12 of the CCS – Complaints and Issues Management/Reporting: - TfNSW Consultation Manager and ACCIONA Complaints Register in place - Complaints management is covered under CoA B7, CoA B9 (within this Audit Table) and Section 3.6 of the Audit Report including DPHI Consultation Scope for audit evidence and findings.
Public Liaison Officer				
B6	A Public Liaison Officer must be appointed for construction ancillary facilities and for utility work to assist the public with questions and complaints they may have at any time during construction. The Public Liaison Officer must be available at all times during the operation of ancillary facilities and or when utility work is occurring.	- TfNSW WHT and WFU Community Communication Strategy (WHTWFC CCS, Rev 11, dated 29 May 2025) - Interview with ACCIONA (28 October 2025)	C	Sections 5.3 of the CCS outlines the suggested Contractor Communication and Stakeholder Engagement Team requirements and Section 9 of the CCS refers to detailed community action plans (CAP) being developed consistent with this CCS, including roles and responsibilities Auditees outlined the Communication and Stakeholder Engagement team during this audit (also sighted in previous Independent Audits in within ACCIONA's WHT Community Action Plan).
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 construction and for a minimum of 12 months following completion of construction of the CSSI.	- TfNSW Consultation Manager for WHT (online TfNSW database) - Interview with ER and AA (21 and 24 October 2025) - Interview with TfNSW and ACCIONA (28 October 2025) - WHT DPE Complaint Register, as provided on 24 October 2025 (Ref: WHT_DPE Complaint Register_251024.xlsx) - TfNSW WHT and WFU Community Communication Strategy (WHTWFC CCS, Rev 11, dated 29 May 2025) - AA and ER Monthly Reports within Audit Period (refer CoA A27 and CoA A34 within this Audit Table for audit evidence) - Evidence elsewhere within this Audit Table for toolbox records sighted, following complaints	C	Section 11 of the CCS outlines the complaints and issue management system. DPE (now DPHI) approved the CCS on 09 June 2021 (outside this audit period) and actual construction commencement of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C on 20 May 2024 (also refer CoA B1-B3 and A36 within this Audit Table for audit evidence and findings). TfNSW Consultation Manager is used for WHT Stages 3B and 3C with email chain and contextual information. <u>Implementation was verified through review of below examples:</u> - The Complaints Register generally satisfies CoA B9 requirements, indicates where complaints recorded in the audit period have been closed, where mediation was required (two complaints) and Auditees have generally responded adequately to the complaints in accordance with the CCS (for select samples reviewed within the audit period) - ER and AA raised no specific concerns in relation to complaints management and resolution in the audit period; - AA Monthly Reports to DPHI notes that complaints have been dealt with appropriately by ACCIONA (refer CoA A34 within this Audit Table); and - Sighted sample toolbox records following complaints (refer evidence elsewhere within this Audit Table for toolbox records sighted). Also refer CoA B9 within this Audit Table and Section 3.6 of the Audit Report for further detail on Complaints including DPHI Consultation Scope for audit evidence and findings.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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.	- TfNSW WHT construction portal (https://caportal.com.au/rms/wht): The "Contact Us" tab on the WHT construction portal (specific link - https://caportal.com.au/rms/wht?view=NavLink_11eb06f4) for complaints, enquires and to stay informed - TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) <u>Examples of Notifications:</u> - Western Harbour Tunnel Work notification Tunnelling near you – Birchgrove June 2025 - Western Harbour Tunnel Work notification Tunnelling update North Sydney, July 2025 - Widening the ventilation tunnels under Rozelle Western Harbour Tunnel, October 2025 - Inner West Community update Western Harbour Tunnel October 2025	C	Section 11 of the CCS outlines the complaints and issue management system; with for example, tools for contacting the Project Team outlined in Section 11.3, Complaint escalation procedure (Section 11.8), Escalation process tools (Section 11.9), ER (Section 11.10) and Community Complaints Mediator (CCM) (Section 11.12). The following information is available on the TfNSW WHT construction portal, Notifications and Community Updates: - The "Contact Us" tab on the WHT construction portal for complaints, enquires and to stay informed; - Overarching CCS available on the Project website which includes mediation system for complaints unable to be resolved (as outlined above); and - Examples of Notifications (sighted) include contacts (Phone, Email and Postal address), interpreter services (refer evidence).
B9	A Complaints Register must be maintained recording 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. Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.	- Interview with ER and AA (21 and 24 October 2025) - Interview with TfNSW and ACCIONA (28 October 2025) - WHT DPE Complaint Register, as provided on 24 October 2025 (Ref: WHT_DPE Complaint Register_251024.xlsx) - TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht): The "Contact Us" tab on the WHT construction portal (specific link - https://caportal.com.au/rms/wht?view=NavLink_11eb06f4) for complaints, enquires and to stay informed	C	Section 12 of the CCS outlines the complaints register, proposed mechanisms for reporting to agencies with examples of the level of detail required (in Appendix C and D). In addition to evidence under CoA B7-B8, implementation was verified through review of below within the audit period: - The Complaints Register generally satisfies CoA B9 requirements, indicates where complaints recorded in the audit period have been closed, where mediation was required (two complaints) and Auditees have generally responded adequately to the complaints in accordance with the CCS (for select samples reviewed within the audit period); - The "Contact Us" tab on the WHT construction portal addresses CoA B9 requirements within the privacy statement section; - Complaint escalation process is publicly available via the Overarching CCS (for example); - ER and AA raised no specific concerns in relation to complaints management and resolution in the audit period; and - AA Monthly Reports to DPHI notes that complaints have been dealt with appropriately by ACCIONA (refer CoA A34 within this Audit Table). Also refer Section 3.6 of the Audit Report for further detail on Complaints including DPHI Consultation Scope.
B10	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	- Interview with TfNSW and ACCIONA (28 October 2025) - TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) - WHT DPE Complaint Register (as per CoA B7, CoA B9 audit evidence within this Audit Table) Sighted (sample) submission evidence of weekly complaints register to ER, AA and DPHI by TfNSW: WHT_DPE Complaint Register_251024.xlsx - TeamBinder Correspondence, from TfNSW to ER and AA, dated 24 October 2025 (Ref: WHTPW-TFNSW-ACOC-CORR-000061- WHT Project Complaints Report : 17 October - 24 October 2025 with reference to attachments WHT_DPE Complaint Register_251024.xlsx and Post Approval Form_20251024041718 submission to DPHI) WHT_DPE Complaint Register_251017.xlsx - TeamBinder Correspondence, from TfNSW to ER and AA, dated 17 October 2025 (Ref: WHTPW-TFNSW-ACOC-CORR-000060- WHT Project Complaints Report : 10 October - 17 October 2025 with reference to attachments WHT_DPE Complaint Register_251017.xlsx and Post Approval Form_20251017040458 submission to DPHI)	NT	Section 12 and Table 9 of the CCS reflects below: - Provision of copies of the Complaint Register to DPHI upon request (when triggered); - Outlines proposed reporting frequency and details of complaints to agencies; and - Lists that DPHI be provided with the register to include full list of all complaints received during the period at a weekly frequency. Auditees indicated below: - TfNSW provides the Complaints Register to DPHI on a weekly basis; and - The requirements of this CoA have not been triggered, with no specific request from DPHI for the Complaints Register during the audit period. Sighted weekly emails and submissions (samples only) of Complaints Register from TfNSW to DPHI, ER and AA, as part of this audit (refer evidence).
B11	A Community Complaints Mediator that is independent of the design and construction personnel must be nominated by the Proponent, approved by the Planning Secretary and engaged during work associated with the CSSI. The nomination of the Community Complaints Mediator must be submitted to the Planning Secretary for approval within one month before the commencement of work.	- Approval Letter, DPE (now DPHI) to TfNSW, dated 08 February 2021 (WHT and WFU SSI 8863 Nomination of Community Complaints Mediator - Condition B11) - Interview with TfNSW and ACCIONA (28 October 2025)	C	DPE (now DPHI) approved the appointment of Ms Margaret Harvie (PlanCom Consulting) as the Community Complaints Mediator (CCM) in accordance with condition B11 of SSI 8863 noting TfNSW's CCM nomination (in correspondence dated 5 February) and providing evidence to demonstrate that the nominated CCM: - <i>"is suitably qualified and experienced;</i> - <i>does not have any pecuniary interest in the Project, proponent or related entities;</i> - <i>is independent from the design and construction of the project; and</i> - <i>meets the requirements of Seeking approval from the Department for the appointment of independent experts (DPIE, 2020)."</i> The DPE (now DPHI) approval letter did not contain any conditional approval. It included a reminder to ensure the CCM is made aware of the CCM's obligations and functions under the approval and that information required to undertake the role is provided in a timely and complete manner. DPE (now DPHI) approved the CCM appointment on 08 February 2021. Actual construction commencement of WHT Stage 3B was on 22 May 2023 and WHT Stage 3C was on 20 May 2024 (also refer CoA A36 within this Audit Table for audit evidence and findings). CCM appointment and DPHI approval was outside of this audit period. Auditees indicated no further change to above CCM appointment, during this audit period.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
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Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
B12	The role of the Community Complaints Mediator is to address any complaint where a member of the public is not satisfied by the Proponent's response. Any member of the public that has lodged a complaint which is registered in the Complaints Management System identified in Condition B7 may ask the Community Complaints Mediator to review the Proponent's response. The application must be submitted in writing and the Community Complaints Mediator must respond within 28 days of the request being made or other specified timeframe agreed between the Community Complaints Mediator and the member of the public.	- Interview with TfNSW and ACCIONA (28 October 2025) - WHT DPE Complaint Register (as per CoA B7, CoA B9 audit evidence within this Audit Table) - RE_ Escalated complaints .msg - Complaint escalation -.msg - Escalated Complaint -.msg - Response letter.msg - TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025)	NT	The CCS is available on the Project website - Section 11 of the CCS outlines the complaints and issue management system; with for example, Complaint escalation procedure (Section 11.8), Escalation process tools (Section 11.9), ER (Section 11.10) and Community Complaints Mediator (CCM) (Section 11.12). Auditees provided the following: - High-level timeline and correspondence relating to two complaints escalated to TfNSW, ER and AA review (as relevant); and complainants' requests to further escalate complaints to the Independent Community Complaints Mediator (CCM) within this audit period. - Correspondence including for example, details on further complaint escalation process/procedure, if the complainant should wish to escalate their complaint further and CCM details (in line with the CCS). - Current status of complaints with the CCM; with one complainant yet to reach out to the CCM with a written request per CCS and other complainant contacted by the CCM was still away and was requested to contact the CCM on their return, to further discuss the complaint. Noting above and current status of complaints with the CCM, this condition was not considered further in this audit period and will need to be reviewed in the next IEA. Also refer CoA B7, CoA B9 within this Audit Table for audit evidence and findings and Section 3.6 of the Audit Report for further detail on Complaints and DPHI Consultation Scope
B13	The Community Complaints Mediator will: (a) review any unresolved disputes if the procedures and mechanisms under Condition B2(h) (iii) do not satisfactorily address complaints; and (b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes.	Same as CoA B12 (refer CoA B12 within this Audit Table for audit evidence)	NT	Same as CoA B12 (refer CoA B12 within this Audit Table for audit evidence and findings).
B14	The Community Complaints Mediator will not act before the Complaints Management System required by Condition B7 has been executed for a complaint and will not consider issues such NSW Government 25 Department of Planning, Industry and Environment Western Harbour Tunnel & Warringah Freeway Upgrade (SSI-8863) as property acquisition, where other dispute processes are provided for in this approval or clear government policy and resolution processes are available, or matters which are not within the scope of this CSSI.	Same as CoA B12 (refer CoA B12 within this Audit Table for audit evidence)	NT	Same as CoA B12 (refer CoA B12 within this Audit Table for audit evidence and findings).

PROVISION OF ELECTRONIC INFORMATION

B15	A website or webpage providing information in relation to the CSSI must be established before commencement of work and be maintained for the duration of construction, and for a minimum of 24 months following the completion of construction. The following up-to-date information (excluding confidential, private, 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 current copy of the final version of each document required under the terms of this approval; and (f) a copy of the audit reports required under this approval. Where the information / document relates to a particular work or is required to be implemented, it must be published before the commencement of the relevant work to which it relates or before its implementation. All information required in this condition is to be provided on the Proponent's website, ordered in a logical sequence and easy to navigate.	- Project website: https://caportal.com.au/rms/whl - Link to <u>ACCIONA's current EPLs including Emu Plains</u> via the Project website: https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=21791&id=21791&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued https://app.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=21881&id=21881&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued - Interview with TfNSW and ACCIONA (28 October 2025)	C	A project website had been established for WHT Stages 3B and 3C (Stage 2) - TfNSW WHT construction portal https://caportal.com.au/rms/whl . Also refer evidence elsewhere within this Audit Table. <u>The project website includes:</u> a) Community Updates and Notifications in chronological order, Weekly email Work Updates, Tunnelling notification map for example, at the time of the audit: - https://caportal.com.au/rms/whl/documents-and-notifications - https://caportal.com.au/rms/whl/stage2 (tunnelling) - https://caportal.com.au/rms/whl/notifications-map b) and c) Documents listed in Condition A1 were available on the WHT Project website and included: - Guide to the EIS, EIS Chapters and Appendices, Submissions Report - Stage 2 Modification Report (Guide to the Modification Report Stage 2 and Stage 2 Modification Chapters) - Project Approval overarching documents e.g. Consolidated Ministers Conditions of Approval, Approval of Experts (ER,AA, CCM and AQIR), WHTWFU Community Communications Strategy, WHTWFU Staging Report and WHT SDRP Terms of Reference (ToR) - Project Approval specific documents e.g. CEMP, Sub Plans including Construction Monitoring Programs, CPAS', CNVIS', IPIAP ToR, CEMP Approval Letters and Notification of Construction Commencement - WHT Stages 3B and 3C specific documents e.g. ASEMPs, CPAS Monitoring Reports, Six Monthly Reports (Groundwater, Dust Deposition, Surface Water, Noise and Vibration Monitoring) d) EPL Monitoring Reports and links to current EPLs - ACCIONA EPLs # 21791 and #21881 e) WHT Initial Independent Audit Report No. 1 (May 2023), WHT Independent Audit Report No. 2 (October/November 2023), WHT Independent Audit Report No. 3 (May 2024), WHT Independent Audit Report No. 4 (October 2024) and WHT Independent Audit Report No. 5 (May 2025)
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PART C
CONSTRUCTION ENVIRONMENTAL MANAGEMENT

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). The CEMP must detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during construction.	<u>Evidence outside this audit period:</u> - Refer CoA C2 within this Audit Table, previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Construction Environmental Management Plan (Rev 9.16, dated 19 September 2025) - Ref: AQ1148.31 WHT3B_C CEMP rev9.16 endorsement 250929 - Staging Report WHT and WFU SSI 8863 (TfNSW, Rev 12, dated 4 July 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/whl) - Refer CoA A27 within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> The Construction Environmental Management Plan (CEMP) was prepared, submitted to the Planning Secretary and approved by DPE (now DPHI) outside this audit period – refer CoA C2 within this Audit Table, previous Independent Audit Reports for audit evidence and findings. <u>During this audit period:</u> The CEMP has been further updated with amendments approved by the ER on 29 September 2025 and available on the Project website. Also refer CoA A27 and CoA C10 within this Audit Table for audit evidence and findings. Appendix C of the Staging Report documents applicable WHTWFU Construction Environmental Management Framework (CEMF) requirements for WHT Stages 3B and 3C.
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Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
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Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
C2	The CEMP must provide: (a) a description of activities to be undertaken during construction (including the scheduling of construction); (b) details of environmental policies, guidelines and principles to be followed in the construction of the CSSI; (c) a program for ongoing analysis of the key environmental risks arising from the activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of construction of the CSSI; (d) details of how the activities described in subsection (a) of this condition will be carried out to: (i) meet the performance outcomes stated in the documents listed in Condition A1; and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; (e) an inspection program detailing the activities to be inspected and frequency of inspections; (f) a protocol for managing and reporting any: (i) incidents; and (ii) non-compliances with this approval or statutory requirements; (g) procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction; (h) a list of all the CEMP Sub-plans required in respect of construction, as set out in Condition C4. 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) a description of the roles and environmental responsibilities for relevant employees and their professional / organisational relationship with the ER; (j) for training and induction for employees, including contractors and sub-contractors, in relation to environmental and compliance obligations under the terms of this approval; (k) for periodic review and update of the CEMP and all associated plans and programs; and (l) the outcomes of consultation with government agencies in accordance with Condition A5.	<u>Evidence outside this audit period:</u> - Approval Letter, DPE (now DPHI) to TfNSW (Ref: SSI-8863-PA-366, dated 17 May 2023) (CEMP, Sub Plans, Monitoring Programs and OOHV Protocol -Conditions C3, C9, C18 and E69) - Approval Letter, DPHI to TfNSW (Ref: SSI-8863-PA-680, dated 16 May 2024) [WHT and WFU (SSI 8863) Stage 3C Harbour Crossing Works Package -Construction Environmental Management Plan, Sub Plans and Monitoring Programs - Conditions C3, C9 and C18] - Approval Letter, DPHI to TfNSW [Ref: SSI-8863-PA-680, dated 13 November 2024], WHT (SSI-8863) - Stage 3C and 3B Construction Environmental Management Plan (CEMP) update, condition C3] - Construction Environmental Management Plan (CEMP) (Rev 9.11, dated 28 October 2024) - Also refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Construction Environmental Management Plan (Rev 9.16, dated 19 September 2025) - Ref: AQ1148.31 WHT3B_C CEMP rev 9.16 endorsement 250929 - Staging Report WHT and WFU SSI 8863 (TfNSW, Rev 12, dated 4 July 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/whl) - Refer CoA A27 within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> The CEMP was prepared, submitted to the Planning Secretary and approved by DPE (now DPHI) on 17 May 2023 for WHT Stage 3B, on 16 May 2024 for WHT Stage 3C; with further update for Berrys Bay Parkland foreshore works under Stage 3C, approved on 13 November 2024 (prior to construction commencement of WHT Stage 3B, WHT Stage 3C and Berrys Bay Parkland foreshore works) - refer evidence (including approval from DPHI <u>of CEMP Sub Plans, Monitoring Programs, and the OOHV Protocol</u> , as relevant) and previous Independent Audit Reports for detailed audit evidence and findings outside this audit period. <u>During this audit period:</u> The CEMP has been further updated with amendments approved by the ER on 29 September 2025 and available on the Project website. Also refer CoA A27 and CoA C10 within this Audit Table for audit evidence and findings.
C3	The CEMP must be endorsed by the ER and then 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 that stage.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Same as CoA C2 and CoA C10 (refer CoA C2 and CoA C10 within this Audit Table for audit evidence)	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence. <u>During this audit period:</u> Same as CoA C2 and CoA C10 (refer CoA C2 and CoA C10 within this Audit Table for audit evidence and findings).

Item
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C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)																																	
C4	The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies 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 A5. <table><tr><th></th><th>Required CEMP Sub-plan</th><th>Relevant government agencies to be consulted for each CEMP Sub-plan</th></tr><tr><td>(a)</td><td>Traffic, transport and access</td><td>Relevant council(s)</td></tr><tr><td>(b)</td><td>Noise and vibration</td><td>NSW Health, relevant council(s)</td></tr><tr><td>(c)</td><td>Flora and Fauna</td><td>DPI Fisheries, DPE Water, EHG, and relevant council(s)</td></tr><tr><td>(d)</td><td>Air quality and odour</td><td>NSW Health, and relevant council(s)</td></tr><tr><td>(e)</td><td>Soil and surface water</td><td>DPE Water, EHG, EPA, Sydney Water (if Sydney Water's assets are affected) and relevant council(s)</td></tr><tr><td>(f)</td><td>Groundwater</td><td>DPE Water, EHG, EPA, Sydney Water (where it is proposed to discharge groundwater into Sydney Water's assets) and relevant council(s)</td></tr><tr><td>(g)</td><td>Maritime Heritage</td><td>Heritage NSW and relevant council(s)</td></tr><tr><td>(h)</td><td>Non-Aboriginal Heritage</td><td>Heritage NSW and relevant council(s)</td></tr><tr><td>(i)</td><td>Aboriginal Cultural Heritage</td><td>Heritage NSW</td></tr><tr><td>(j)</td><td>Dredging and Disposal Management Plan</td><td>EPA, DPI Fisheries, Port Authority of NSW (including Harbour Master)</td></tr></table>		Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan	(a)	Traffic, transport and access	Relevant council(s)	(b)	Noise and vibration	NSW Health, relevant council(s)	(c)	Flora and Fauna	DPI Fisheries, DPE Water, EHG, and relevant council(s)	(d)	Air quality and odour	NSW Health, and relevant council(s)	(e)	Soil and surface water	DPE Water, EHG, EPA, Sydney Water (if Sydney Water's assets are affected) and relevant council(s)	(f)	Groundwater	DPE Water, EHG, EPA, Sydney Water (where it is proposed to discharge groundwater into Sydney Water's assets) and relevant council(s)	(g)	Maritime Heritage	Heritage NSW and relevant council(s)	(h)	Non-Aboriginal Heritage	Heritage NSW and relevant council(s)	(i)	Aboriginal Cultural Heritage	Heritage NSW	(j)	Dredging and Disposal Management Plan	EPA, DPI Fisheries, Port Authority of NSW (including Harbour Master)	Evidence outside this audit period: - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table Evidence during this audit period: - Staging Report WHT and WFU SSI 8863 (TfNSW, Rev 12, dated 4 July 2025) DPHI Approvals of revised CEMP Sub-plans - Maritime Heritage Management Sub-Plan (Rev 02, dated 23 July 2025) (Appendix N) - Approval Letter, DPHI to TfNSW, dated 24 July 2025 [Ref: SSI-8863-PA-988, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI-8863) – Maritime Heritage Management Sub-Plan Revision 02, condition C4(g)] - Acknowledgement receipt email, DPHI to TfNSW, dated 06 June 2025 [Ref: Western Harbour Tunnel & Warringah Freeway Upgrade - Post Approval Document Received - (SSI-8863-PA-988)] and Post Approval Form_20250606080327 which included consultation attachment (Ref: 20250606_WHT_C4g_MHMP A5 Memo_Rev 00)] - Non-Aboriginal Heritage Management Sub Plan (Rev 10, dated 23 July 2025 (Appendix G) - Approval Letter, DPHI to TfNSW, dated 28 July 2025 [Ref: SSI-8863-PA-1035, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI 8863) – Non-Aboriginal Heritage Management Sub-Plan, Revision 10, 23 July 2025] - Acknowledgement receipt email, DPHI to TfNSW, dated 06 June 2025 [Ref: Western Harbour Tunnel & Warringah Freeway Upgrade - Post Approval Document Received - (SSI-8863-PA-1035) and Post Approval Form_20250606053341 which included consultation attachment (Ref: 20250606_WHT_C4h_NAHMP A5 Memo_Rev 3) Sub-Plans amended within this audit period (for ER amendment approvals / AA endorsements, where relevant - refer CoA C10, CoA A27 and CoA A34 within this Audit Table for audit evidence) - Soil and Surface Water Management Sub Plan (Rev 3.5, dated 16 May 2025) (Appendix E) - Flora and Fauna Management Sub-Plan (Rev 6.7, dated 03 June 2025) (Appendix C) - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - Groundwater Management Sub Plan (Rev 3.6, dated 15 October 2025) (Appendix F) Sub-Plans not amended within this audit period - Air Quality Management Sub Plan (Rev 6.2, dated 12 August 2024) (Appendix I) - Aboriginal Cultural Heritage Management Sub Plan (Rev 4.2, dated 09 September 2024) (Appendix H) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	Partially Applicable to WHT Stage 3B and Applicable to Stage 3C as per Table 4 of the Staging Report. Table 3 of the Staging Report lists all the following Sub Plans as applicable to WHT Stages 3B and 3C, with the exception of two Sub Plans for WHT Stage 3B: a) Traffic, Transport and Access Sub-plan b) Noise and Vibration Sub-plan c) Flora and Fauna Sub-plan d) Air Quality Sub-plan e) Soil and Surface Water Sub-plan f) Groundwater Sub-plan g) Maritime Heritage Sub-plan (A to WHT Stage 3C and N/A to WHT Stage 3B) - refer CoA C7 regarding the Maritime Heritage Sub-plan within this Audit Table. h) Non-Aboriginal Heritage Sub-plan i) Aboriginal Cultural Heritage Sub-plan [A to WHT Stage 3C and N/A to WHT Stage 3B, however, Sub-plan prepared and approved by DPE (now DPHI), outside this audit period] j) Dredging and Disposal - removed as part of Mod 2 Also refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. During this audit period, below CEMP Sub-Plans were revised for approval / endorsement: The Non-Aboriginal Heritage Management Sub Plan (NAHMP) was submitted to the Planning Secretary for approval under condition C4(h) and approved by DPHI on 28 July 2025 (refer evidence). DPHI's Approval Letter noted that the NAHMP (Revision 10, dated 23 July 2025): - <u>"has been prepared in consultation with Heritage NSW and North Sydney Council;</u> - <u>has been endorsed by the Environmental Representative; and</u> - <u>has been reviewed by Transport for NSW and no issues have been raised with the Department."</u> The Maritime Heritage Management Sub-Plan (MHMP) was submitted to the Planning Secretary for approval under condition C4(g) and approved by DPHI on 24 July 2025 (refer evidence). DPHI's Approval Letter noted that the MHMP (Revision 02, dated 23 July 2025): - <u>"has been prepared in consultation with Heritage NSW and North Sydney Council;</u> - <u>has been endorsed by the Environment Representative ; and</u> - <u>has been reviewed by Transport for NSW and no issues have been raised with the Department."</u> DPHI's Approval Letters noted requirement to ensure that above documents are made publicly available on the Project website as soon as possible, in accordance with the requirements of Condition B15 of the approval. Sighted sample evidence of submission of the MHMP to DPHI on 06 June 2025, with Auditees indicating maritime works commencement was on 12 August 2025 at Berrys Bay site. Sub-Plans amended within this audit period (for ER amendment approvals / AA endorsements, where relevant - refer CoA C10, CoA A27 and CoA A34 within this Audit Table for audit evidence): - Soil and Surface Water Management Sub-plan - Flora and Fauna Management Sub-plan - Noise and Vibration Management Sub-plan - Traffic, Transport and Access Management Sub-plan - Groundwater Management Plan Sub-plan Sub-Plans not amended within this audit period: - Air Quality Management Sub-plan - Aboriginal Cultural Heritage Management Sub-plan CEMP Sub-plans (with Monitoring Programs required per CoA C11 incorporated into CEMP Sub-plans) were available on the Project website. Also refer CoA A27 and CoA A34 within this Audit Table for audit evidence and findings.
	Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan																																			
(a)	Traffic, transport and access	Relevant council(s)																																			
(b)	Noise and vibration	NSW Health, relevant council(s)																																			
(c)	Flora and Fauna	DPI Fisheries, DPE Water, EHG, and relevant council(s)																																			
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(f)	Groundwater	DPE Water, EHG, EPA, Sydney Water (where it is proposed to discharge groundwater into Sydney Water's assets) and relevant council(s)																																			
(g)	Maritime Heritage	Heritage NSW and relevant council(s)																																			
(h)	Non-Aboriginal Heritage	Heritage NSW and relevant council(s)																																			
(i)	Aboriginal Cultural Heritage	Heritage NSW																																			
(j)	Dredging and Disposal Management Plan	EPA, DPI Fisheries, Port Authority of NSW (including Harbour Master)																																			
C5	The CEMP Sub-plans must state how: (a) the environmental performance outcomes identified in the documents listed in 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 cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART principles.	Same as CoA C4 and CoA C10 (refer CoA C4 and CoA C10 within this Audit Table for evidence)	C	The CEMP and CEMP Sub-plans have been reviewed by required parties - TfNSW, the ER, AA (where relevant) and DPE (now DPHI); with approvals / endorsements granted by DPHI, ER and AA (as relevant). Evidence shows that the CEMP Sub-plans have been prepared in accordance with Table 4 of the Staging Report and this CoA's requirements. During this audit period, some of the above documents have been further revised (as detailed elsewhere within this Audit Table); with approvals / endorsements granted by DPHI, ER and AA (as relevant). CEMP Sub-plans were available on the Project website. Also refer CoA C4 and CoA C10 within this Audit Table for audit evidence and findings.																																	

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
C6	The Flora and Fauna Management CEMP Sub-Plan must include, but not be limited to: (a) Deleted (b) Deleted (c) Deleted (d) Deleted (e) details for undertaking pre-clearing/demolition inspections for native fauna including threatened species by a suitably qualified ecologist, of any vegetation to be cleared and any buildings or structures identified as potential roosting habitat for microbats that are to be demolished or refurbished; methods and procedures for welfare and relocation of displaced fauna; and management/offset measures; (f) details of a dewatering plan of the stormwater harvesting storage facility / dam at Cammeray Golf Course including: i. a methodology of relocating native fauna species known to inhabit and/or use the dam; ii. the location and suitability of the proposed relocation sites; and iii. any potential impacts of relocating the fauna to the relocation sites; and (g) details of the measures to minimise disturbance to and monitor the Powerful Owl (Ninox strenua) in Lane Cove National Park during construction and operation of the proposed Wicks Road Construction Support Site (Mod 1), as described in Condition A1. The measures and monitoring requirements must be developed by an appropriately qualified ecologist with experience in Powerful Owl in consultation with BirdLife Australia, EHG and NPWS, and monitoring data shared with BirdLife Australia, EHG and NPWS and the Planning Secretary when requested.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Flora and Fauna Management Sub-Plan (Rev 6.7, dated 03 June 2025) (Appendix C)) - TfNSW WHT construction portal (https://caportal.com.au/rms/whnt) - Interview ACCIONA and TfNSW (28 October 2025) <u>Sighted below:</u> - WHT Pre-Clearing Permit - Permit No: 003 [Ref: Inspection Permits (Pre & Post)] - Signed toolbox record of Pre-Clearing Permit and applicable EWMS requirements dated 21 July 2025 including Arborist (Plateau) and Ecologist (East Coast Ecology) (Ref: EWMS & permit TBT sign on) - Pre-Clearing hold point release by TfNSW (Ref: HPWP_HP_-1948) - Arboricultural Review Western Harbour Tunnel – Berrys Bay Open Parklands prepared by our garden path (Rev 6, dated 28/05/2025) - Site Inspection (28 October 2025)	C	<u>Outside this audit period:</u> The Flora and Fauna Management Sub Plan was prepared and approved by DPE (now DPHI) outside this audit period – refer previous Independent Audit Reports for audit evidence and findings. <u>During this audit period:</u> The Flora and Fauna Management Sub-Plan has been revised; with amendments approved by the ER on 16 June 2025 (refer evidence and CoA A27 within this Audit Table for audit evidence and findings). Implementation of select (sample) requirements of the approved FFMP Sub-plan for clearing and grubbing activities for site establishment at Berrys Bay Foreshore Parklands site in the audit period was reviewed: - Sighted WHT Pre-Clearing Permit - Permit No: 003 including for example checks prior to clearing and after clearing, Clearing and Grubbing Plan, Vegetation Clearing Site Map, Pre-Clearing Survey Report from East Coast Ecology with recommendations and Arboricultural Review WHT – Berrys Bay Open Parkland (refer evidence); - Sighted only Hold Point released by TfNSW on 24 June 2025, prior to clearing and grubbing scheduled to commence 30 June 2025 of the main site area at at Berrys Bay (refer evidence); and - Signed toolbox record of Pre-Clearing Permit and applicable EWMS requirements dated 21 July 2025 including Arborist (Plateau) and Ecologist (East Coast Ecology) (refer evidence). Also refer Section 2.2.5 Site Inspection of the Audit Report and CoA E48 within this Audit Table for further audit evidence and findings.
C7	The Maritime Heritage Management CEMP Sub-plan must: (a) be prepared in consultation with a suitably qualified and experienced maritime archaeologist; (b) detail artefact management procedures; (c) outline relevant work method requirements and maritime heritage inductions tailored for each type of work activity; (d) identify exclusion zones, archival recording requirements, baseline and periodic monitoring protocols (including before and during construction), and final site inspections within three months of completion of works for the following maritime heritage sites: (i) Deleted (ii) Deleted (iii) Deleted (iv) Collapsed wharf, BP site, Berrys Bay (v) Deleted (e) detail requirements for any mitigation, recovery or archaeological excavations. Should further assessment determine that the heritage sites identified in (d) of this condition are not heritage item(s), the requirements of Condition C7(d) do not apply	- Interview with TfNSW and ACCIONA (28 October 2025) - Maritime Heritage Management Sub-Plan (Rev 02, dated 23 July 2025) (Appendix N) - Approval Letter, DPHI to TfNSW, dated 24 July 2025 [Ref: SSI-8863-PA-988, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI-8863) – Maritime Heritage Management Sub-Plan Revision 02, condition C4(g)] - Sighted Post Approval Form_20250606080327 submission (no date stamp) to DPHI including evidence of consultation - reference 20250606_WHT_C4g_MHMP A5 Memo_Rev 00 as attachment - Environmental Work Method Statement (EWMS) (Western Harbour Tunnel – Working near items of heritage significance, WHTP2-ACOC-WHT-EV-GE01-WMS-000008, REV 01: 06/02/2025) including EWMS sign-on records on 26/09/2025 - Environmental Work Method Statement (EWMS) (Western Harbour Tunnel – Berrys Bay Foreshore Parkland, Working In or Adjacent Waterways, WHTP2-ACOC-WHT-EV-GE01-WMS-000005, REV 01: 23/07/2025) including EWMS sign-on records on 12/08/2025 and 15/09/2025 - TfNSW WHT construction portal (https://caportal.com.au/rms/whnt)	C	<u>During this audit period:</u> The Maritime Heritage Management Sub-Plan (MHMP) was submitted to the Planning Secretary for approval under condition C4(g) and approved by DPHI on 24 July 2025 (refer evidence). DPHI's Approval Letter noted that the Maritime Heritage Management Sub-Plan (MHMP), Revision 02 (dated 23 July 2025): - " <u>has been prepared in consultation with Heritage NSW and North Sydney Council;</u> - <u>has been endorsed by the Environment Representative;</u> and - <u>has been reviewed by Transport for NSW and no issues have been raised with the Department.</u> " DPHI's Approval Letter noted requirement to ensure that the document is made publicly available on the Project website as soon as possible, in accordance with the requirements of Condition B15 of the approval. Implementation of select (sample) requirements of the approved MHMP (available on the Project website) was reviewed: - EWMS prepared for working near items of heritage significance for Berrys Bay Foreshore Parkland site and communicated (refer evidence sighted including EWMS sign-on records on 26/09/2025) - EWMS prepared for working in or adjacent waterways for Berrys Bay Foreshore Parkland site and communicated (refer evidence sighted including EWMS sign-on records on 12/08/2025 and 15/09/2025)
C8	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
C9	The CEMP Sub-plans must be submitted to the Planning Secretary for approval along with, or subsequent to, the submission of the CEMP but in any event, no later than one month before construction.	Same as CoA C4 (refer CoA C4 within this Audit Table for audit evidence)	C	Same as CoA C4 (refer CoA C4 within this Audit Table for audit evidence and findings).
C10	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved, unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of construction. Where construction of the CSSI is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been endorsed by the ER and approved by the Planning Secretary.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Refer CoA C4 within this Audit Table for audit evidence (i.e. DPHI Approval Letters for the Maritime Heritage Management Sub-Plan and Non Aboriginal Heritage Management Sub Plan) - Refer CoA A27 and CoA A34 within this Audit Table for audit evidence of ER amendment approvals / AA endorsements (where relevant) of CEMP Sub-plans - TfNSW WHT construction portal (https://caportal.com.au/rms/whnt) - Evidence elsewhere within this Audit Table	C	Outside this audit period: Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. During this audit period: - The Maritime Heritage Management and Non Aboriginal Heritage Management Sub-plans were approved by DPHI - refer CoA C4 within this Audit Table for audit evidence and findings; and - The CEMP and following CEMP Sub-plans have been further updated; with amendments approved by the ER and endorsed by the AA (where relevant): - CEMP - Soil and Surface Water Management Sub-plan - Flora and Fauna Management Sub-plan - Noise and Vibration Management Sub-plan - Traffic, Transport and Access Management Sub-plan - Groundwater Management Sub-plan Refer CoA A27 and CoA A34 within this Audit Table for audit evidence of ER amendment approvals / AA endorsements (where relevant) of above CEMP and CEMP Sub-plans. Above approved CEMP and CEMP Sub-plans were available on the Project website. Implementation of the CEMP and CEMP Sub-plans are assessed as part of this Audit elsewhere within this Audit Table with audit evidence and findings.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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CONSTRUCTION MONITORING PROGRAMS

C11	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP: <table><tr><th></th><th>Required Construction Monitoring Programs</th><th>Relevant government agencies to be consulted for each Construction Monitoring Program</th></tr><tr><td>(a)</td><td>Noise and Vibration Monitoring Program</td><td>EPA</td></tr><tr><td>(b)</td><td>Air Quality (including Odour) Monitoring</td><td>EPA</td></tr><tr><td>(c)</td><td>Surface Water Monitoring Program</td><td>DPE Water, (Sydney Water if any Sydney Water assets are impacted), EPA, EHG (as it relates to Wicks Road Construction Support Site [Mod 1], as described in Condition A1).</td></tr><tr><td>(d)</td><td>Groundwater Monitoring Program</td><td>DPE Water, EPA</td></tr><tr><td>(e)</td><td>Marine Monitoring Program</td><td>DPI Fisheries, EPA</td></tr><tr><td>(f)</td><td>Dredging Monitoring Program</td><td>DPI Fisheries, EPA</td></tr></table>		Required Construction Monitoring Programs	Relevant government agencies to be consulted for each Construction Monitoring Program	(a)	Noise and Vibration Monitoring Program	EPA	(b)	Air Quality (including Odour) Monitoring	EPA	(c)	Surface Water Monitoring Program	DPE Water, (Sydney Water if any Sydney Water assets are impacted), EPA, EHG (as it relates to Wicks Road Construction Support Site [Mod 1], as described in Condition A1).	(d)	Groundwater Monitoring Program	DPE Water, EPA	(e)	Marine Monitoring Program	DPI Fisheries, EPA	(f)	Dredging Monitoring Program	DPI Fisheries, EPA	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Staging Report WHT and WFU SSI 8863 (TfNSW, Rev 12, dated 4 July 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Noise and Vibration Monitoring Program (Rev 03, dated 22 April 2024) incorporated as Appendix D2 within the Noise and Vibration Management Sub Plan - Air Quality Monitoring Program (Rev 05, dated 15 April 2024) incorporated as Appendix I2 within the Air Quality Management Sub Plan - Surface Water Monitoring Program (Rev 2.1, dated 6 January 2025) incorporated as Appendix E2 within the Soil and Surface Water Management Sub Plan - Groundwater Monitoring Program (Rev 2.1, dated 14 November 2024) incorporated as Appendix F1 within the Groundwater Management Sub Plan	C	Applicable to WHT Stages 3B and 3C as per Table 4 of the Staging Report. Table 3 of the Staging Report lists the following Construction Monitoring Programs as applicable to WHT Stages 3B and 3C: a) Noise and Vibration Monitoring Program - incorporated as Appendix D2 within the Noise and Vibration Management Sub-plan; b) Air Quality - incorporated as Appendix I2 within the Air Quality Management Sub-plan; c) Surface Water Monitoring Program - incorporated as Appendix E2 within the Soil and Surface Water Management Sub-plan; d) Groundwater Monitoring Program - incorporated as Appendix F1 within the Groundwater Management Sub-plan; e) and f) Maritime Monitoring Program – removed as part of MOD2 and Dredging Monitoring Program - removed as part of MOD2 Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period</u>, no Monitoring Programs under CoA C11 were updated. The Monitoring Programs incorporated into CEMP Sub-plans are available on the Project website.
	Required Construction Monitoring Programs	Relevant government agencies to be consulted for each Construction Monitoring Program																							
(a)	Noise and Vibration Monitoring Program	EPA																							
(b)	Air Quality (including Odour) Monitoring	EPA																							
(c)	Surface Water Monitoring Program	DPE Water, (Sydney Water if any Sydney Water assets are impacted), EPA, EHG (as it relates to Wicks Road Construction Support Site [Mod 1], as described in Condition A1).																							
(d)	Groundwater Monitoring Program	DPE Water, EPA																							
(e)	Marine Monitoring Program	DPI Fisheries, EPA																							
(f)	Dredging Monitoring Program	DPI Fisheries, EPA																							
C12	Each Construction Monitoring Program must provide: a) details of baseline data available; b) details of baseline data to be obtained and when; c) details of all monitoring of the project to be undertaken; d) the parameters of the project to be monitored; e) the frequency of monitoring to be undertaken; f) the location of monitoring; g) the reporting of monitoring results and analysis results against relevant criteria; h) details of the methods that will be used to analyse the monitoring data; i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicate unacceptable project impacts; j) a consideration of SMART principles; k) any consultation to be undertaken in relation to the monitoring programs; and l) any specific requirements as required by Conditions C13 to C14.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Also refer CoA C11 (for Construction Monitoring Programs applicable to the Project), CoA C13, CoA C14 and CoA E1, CoA E206 (for example) within this Audit Table for audit evidence - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> No Monitoring Programs under CoA C11 were updated in this audit period. The Monitoring Programs incorporated into CEMP Sub-plans are available on the Project website. Evidence shows that the Construction Monitoring Programs satisfies this CoA's requirement as relevant. Also refer CoA C11 within this Audit Table for audit evidence and findings. Construction Monitoring Program implementation (samples only) for this Audit is addressed elsewhere within this Audit Table - for example, refer CoA C13 (Noise and Vibration Monitoring Program), CoA C14 (Ground Water Monitoring), CoA E1 (Air Quality Monitoring) and CoA E206 within this Audit Table for audit evidence and findings.																					
C13	The Noise and Vibration Monitoring Program must include: (a) noise and vibration monitoring locations, including for ground borne noise and vibration at Birchgrove and Waverton in the vicinity of the launch and receival chambers, determined in consultation with the AA to confirm construction noise and vibration levels; (b) for the purposes of (a), noise monitoring must be undertaken during the day, evening and night-time periods and within the first month of work as well as throughout the construction period and cover the range of activities being undertaken at the sites; (c) a protocol for reviewing the implemented management and mitigation measures, based on the monitoring results, to confirm they are consistent with the CEMP Subplan (Condition C4b), and to identify any additional management and mitigation measures that must be implemented; and (d) a process to undertake real time noise and vibration monitoring. The results of the monitoring must be readily available to the construction team, Proponent, ER and AA. The Planning Secretary and EPA must be provided with access to the results on request.	- Interview with AA (24 October 2025) and ACCIONA (28 October 2025) - Noise and Vibration Monitoring Program (Rev 03, dated 22 April 2024) incorporated as Appendix D2 within the Noise and Vibration Management Sub Plan <u>Monitoring Reports/Records within audit period:</u> - Noise and Vibration Construction Bi-Annual Monitoring Report (18 November 2024 – 31 May 2025, Rev 00, dated 26 June 2025) - TeamBinder Correspondence from AA to ACCIONA, dated 26 June 2025 (Ref: WHT 6 Monthly N&V CMR4 - May 25) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Ref: Noise Monitoring Event Report (250611) Railway St, 11/06/25 and Ref: Noise Monitoring Event Report (250617) Penola School, 17/06/25 - Also refer CoA A31, CoA E71 for GBN monitoring, CoA E79 (for example) and CoA C21 within this Audit Table for audit evidence	C	During this audit period, (sample) noise and vibration monitoring reports/records sighted below: - Published Bi-annual Noise and Vibration Construction Monitoring Report for period 18 November 2024 – 31 May 2025 (reviewed by AA) included the following key points (excerpts only): - Section 2.1 outlines Airborne Noise Monitoring, with summary of the airborne monitoring presented in Appendix A (nil exceedances noted, with commentary); - Section 2.2 outlines Ground borne Noise Monitoring and states "<i>All ground borne noise monitoring results were compliant with the applicable criteria and/or in line with predictions confirming appropriate mitigation measures had been implemented</i>", with further reference to Ground-borne noise monitoring event reports discussed in further detail in Appendix B (nil exceedances noted, with commentary); - Section 2.3 outlines Vibration Monitoring, with summary of vibration monitoring presented in Appendix C (nil exceedances noted, with commentary); and - Section 2.4 outlines Mitigation Measures such as no rockbolting occurred at night time during the excavation of Ridge St off ramp and Berry Street on ramp, trencher used to enable the tunnel fit out works, to replace the use of excavators with hammers, Berry Street construction site completed a noise wall structure March 2025) Sample CNVIS validation noise monitoring records for Emu Plains in June 2025 (operational within this audit period) was sighted noting dominant sources, no WHT works audible at the receiver and where WHT works were infrequently audible (LAeq was less than the NML) - refer evidence. Also refer CoA A31, CoA E71 for GBN monitoring, CoA E79 (for example) and CoA C21 within this Audit Table for audit evidence and findings.																					

Item
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Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
C14	The Groundwater Monitoring Program must include: (a) results from existing monitoring bores and from additional monitoring bores required following a review of the monitoring bore network, with the review based on actual results of existing monitoring and groundwater modelling findings in relation to the final tunnel detailed design; (b) daily measurement of the amount of water discharged from the water treatment plants; (c) water quality testing of the water discharged from treatment plants; (d) monitoring of groundwater levels in aquifers adjacent to the tunnel alignment; (e) monitoring of groundwater levels, electrical conductivity and temperature in key locations between saline water bodies and the tunnel (including beneath high risk sites for contamination); (f) measures to record or otherwise estimate and report groundwater inflows into the tunnels during their construction; (g) methods for providing the data collected under (a) and (b) to Sydney Water where discharges are directed to their assets; and (h) a method for providing the groundwater monitoring data to DPE Water every three months during construction of the tunnels and portals. Note: With regards to monitoring data to be provided to DPE Water, the format of the dataset must be both in a tabulated and electronic quality-controlled data (csv, excel) ready to use format.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Groundwater Management Sub Plan (Rev 3.6, dated 15 October 2025) (Appendix F) - Groundwater Monitoring Program (Rev 2.1, dated 14 November 2024) incorporated as Appendix F1 within the Groundwater Management Sub Plan - Six Monthly Groundwater Data Report (1 December 2024 – 31 May 2025, Rev 01, dated 13 August 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/whl) - Also refer audit evidence elsewhere within this Audit Table (for example - CoA C12, CoA C21, CoA E102, CoA E206, CoA E219 and CoA E221)	C	Sections 3 and 4 of the Groundwater Monitoring Program, sets out baseline monitoring and construction monitoring methodology. Section 5 outlines specific groundwater reporting requirements during construction. <u>During this audit period:</u> - Water quality testing reported within EPL Monitoring Report published on the Project website (refer CoA E206 within this Audit Table for audit evidence and findings); - Quarterly and Six-Monthly reporting requirements completed; and - Annual reporting requirement, not triggered at the time of this audit. Key points from the published Six -Monthly Groundwater Data Report (1 December 2024 – 31 May 2025) are as follows (excerpts only): - Section 1.2 states <i>"This report documents groundwater monitoring undertaken on the Western Harbour Project (the Project) from 1st December 2024 – 31st May 2025 and covers the quarterly and 6-monthly reporting requirements under the CoA"</i>; - Section 2.1 notes that for Ridge Street and Cammeray, groundwater treated and discharged to Sydney Water Sewer under a trade waste agreement, which came into effect on 24 January 2025; this Section and Appendix A includes the volume discharged <u>to trade waste only</u> during the reporting period from both sites; - Section 2.5 states <i>"Groundwater inflows are generally low with most of the water introduced to the tunnel face for dust mitigation and cooling of the machinery being from a potable source - estimated groundwater flow at present across 4.5km of excavated tunnel is 0.75 L/s/km"</i>; - Section 2.6 states <i>"The results have been reviewed by the Projects Geotech and confirm that all monitoring is within the expected groundwater predictions accounted for in the Groundwater Model"</i> - Section 2.7 states <i>"Negligible groundwater inflow is observed within the excavated tunnels. No additional mitigation measures were required to stem groundwater flow"</i>; - Section 2.8 states <i>"Annual reporting was conducted in CMR report 4 (Dec 2024-Feb 2025). As such annual reporting in line with E221 will occur in Q4 2025."</i> Next Quarterly Groundwater Data Report (1 June 2025 – 31 August 2025) was due outside of this audit period (therefore not sighted in this audit). Also refer CoA C12, CoA C21, CoA E102, CoA E206, CoA E219 and CoA E221 within this Audit Table for audit evidence and findings. IA6-OF103: Section 8.5 Reporting (Table 8-2) of the GWMonP states frequency of issue of quarterly water monitoring reports to Sydney Water, as every 3 months when discharging to Sydney Water assets. It was noted that submission to Sydney Water for second quarter was through the six -monthly groundwater data report on 29 August 2025 Recommend that this is explicitly mentioned in the GWMonP as it is for other reporting requirements and recipients (relevant authority) that "For every second quarter this requirement may be achieved by including the data with the six monthly Groundwater Monitoring Report"
C15	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
C16	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
C17	The Construction Monitoring Programs must be developed in consultation with relevant government agencies as identified in Condition C11. 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 Construction Monitoring Programs, including copies of all correspondence from those agencies as required by Condition A5.	Refer CoA C4, CoA C11 and CoA A5 (for example) within this Audit Table for audit evidence and findings.	C	Refer CoA C4, CoA C11 and CoA A5 (for example) within this Audit Table for audit evidence and findings.
C18	The Construction Monitoring Programs must be endorsed by the ER and then submitted to the Planning Secretary for approval at least one month before the commencement of construction.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Also refer CoA C11 (for Construction Monitoring Programs applicable to the Project) and CoA C20 (for example) within this Audit Table for audit evidence - TfNSW WHT construction portal (https://caportal.com.au/rms/whl)	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence for audit evidence and findings, outside this audit period. <u>During this audit period:</u> No Monitoring Programs under CoA C11 were updated in this audit period. The Monitoring Programs incorporated into CEMP Sub-plans are available on the Project website. Also refer CoA C11 (for Construction Monitoring Programs applicable to the Project) and CoA C20 (for example) within this Audit Table for audit evidence and findings.
C19	Unless otherwise agreed with the Planning Secretary, construction must not commence until all of the relevant Construction Monitoring Programs have been approved by the Planning Secretary, and all relevant baseline data for the specific construction activity has been collected.	Same as CoA C18 (Refer CoA C18 within this Audit Table for audit evidence)	C	Same as CoA C18 (Refer CoA C18 within this Audit Table for audit evidence and findings).
C20	The Construction Monitoring Programs, as approved by the Planning Secretary 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.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (28 October 2025) - Refer CoA A27 within this Audit Tabe for ER Monthly Reports (analysis of monitoring results section) - Refer CoA C13, CoA C14, CoA E1, CoA E206 (for example) within this Audit Table for audit evidence - TfNSW WHT construction portal (https://caportal.com.au/rms/whl)	C	Construction Monitoring Program implementation (samples only) for this Audit is addressed elsewhere within this Audit Table - for example, refer CoA C13 (Noise and Vibration Monitoring Program), CoA C14 (Ground Water Monitoring), CoA E1 (Air Quality Monitoring) and CoA E206 within this Audit Table for audit evidence and findings. In addition to above: - The Project team provides a summary analysis of surface water quality monitoring results including comparison of any exceedances to applicable criteria, to the ER on a monthly basis; and - Monthly ER Reports submitted to DPHI include above analysis between May 2025 and October 2025 and other construction monitoring (Ref: ER Monthly Reports - with analysis of monitoring results section).

Item
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Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)						
C21	The results of the Construction Monitoring Programs 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 Construction Monitoring Program. Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.	Monitoring Reports: - Air Quality Bi-Annual Construction Monitoring Report (1 December 2024 – 31 May 2025, Rev 00, dated 23 June 2025) - Surface Water Monitoring Construction Bi-Annual Monitoring Report (18 November 2024 – 31 May 2025, Rev 00, no date) - Six Monthly Groundwater Data Report (1 December 2024 – 31 May 2025, Rev 01, dated 13 August 2025) - Noise and Vibration Construction Bi-Annual Monitoring Report (18 November 2024 – 31 May 2025, Rev 00, dated 26 June 2025)) Sighted sample submissions to the Planning Secretary (DPHI) / relevant agencies: Air Quality Report: - Acknowledgement receipt email, DPHI to TfNSW, dated 15 July 2025 [Ref: Western Harbour Tunnel & Warringah Freeway Upgrade - Post Approval Document Received - (SSI-8863-PA-1088)] - Letter, DPHI to TfNSW, dated 07 August 2025 [Ref: SSI-8863-PA-935, Western Harbour Tunnel – Air Quality Monitoring Report, December 2024 to May 2025] - Email, ACCIONA to EPA, dated 16 July 2025 [Ref: EXT: Automatic reply: Western Harbour Tunnel Air Quality and Odour CMR 4 Rev00 from EPA on 116 July 2025 and EXT: Thank you for your email. Your Reference Id is 01249611 (ref:100D7F06iTix.1500Mn0y3nMc:ref) 16 July 2025] Surface Water Monitoring Report: - CORR-WHTP2-TfNSW-ACOC-CORR-001377-Post Approval Form_20250715062236 (1).pdf (no date stamp for submission of WHT_-_Surface_Water_6_Monthly_CM_R_4 - Nov_May 2025) - Fw_EXT_FW_ Western Harbour Tunnel & Warringah Freeway Upgrade - C21 - WHT - SWMR - May 2025 (1).msg, dated 26 August 2025 Groundwater Reports: - Email, ACCIONA to Sydney Water, dated 20 May 2025 [Ref: Western Harbour Tunnel - CoA C14 - Quarterly Construction Monitoring Report - Report 4 (1).msg] - Email, ACCIONA to DPE Water (now DCCEEW), dated 20 May 2025 [Ref: Western Harbour Tunnel - CoA C14 - Quarterly Construction Monitoring Report - Report 4.msg] - Email, ACCIONA to DPE Water (now DCCEEW), dated 27 August 2025 (Ref: Western Harbour Tunnel - CoA C14 - Six Monthly Construction Monitoring Report - Report 3) with reference to following attached [WHT 6 monthly Groundwater CMR_Report 3 (for the period 1st December 2024 – 31st May 2025 and GW CMR data zip file)] - Email, acknowledgement receipt of the reports on 28 August 2025 from DPE Water (now DCCEEW), dated 28 August 2025 [Ref: EXT_Re_ Western Harbour Tunnel - CoA C14 - Six Monthly Construction Monitoring Report - Report 3.msg] - Acknowledgement receipt email, DPHI to TfNSW, dated 27 August 2025 [Ref: Western Harbour Tunnel & Warringah Freeway Upgrade - Post Approval Document Received - (SSI-8863-PA-1114)] - Email, ACCIONA to Sydney Water, dated 29 August 2025 (Ref: Report 3 CMR submission 29.08.25) Noise and Vibration Monitoring Report: - TeamBinder correspondence from AA to ACCIONA, dated 26 June 2025 (Ref: WHT 6 Monthly N&V CMR4 - May 25) and AA June Monthly Report (refer CoA A34 within this Audit Table) - Email, ACCIONA to EPA, dated 9 July 2025 [Ref: Western Harbour Tunnel Noise and Vibration CMR 4 Rev00 (1).msg] - Acknowledgement receipt email, DPHI to TfNSW, dated 8 July 2025 [Ref: Western Harbour Tunnel & Warringah Freeway Upgrade - Post Approval Document Received - (SSI-8863-PA-1082)]	C	During this audit period, the following monitoring reports have been completed and submitted to DPHI and relevant regulatory agencies (sample submissions reviewed), for information at the frequency identified in the relevant Construction Monitoring Programs: - As per Section 4.3 of the Air Quality Monitoring Program, Air Quality Bi-Annual Construction Monitoring Report was submitted to EPA on 16 July 2025 (refer evidence sighted / out of office reply from EPA submission); and - DPHI on 15 July 2025 by TfNSW, with response from DPHI on 7 August 2025 regarding receipt of document for information and that it has been filed. - As per Section 5.4 of the Surface Water Monitoring Program, Surface Water Monitoring Construction Bi-Annual Monitoring Report was submitted to DPE Water (now DCCEEW) - with email response sighted on 26 August 2025 from DPiE (refer evidence sighted, as provided by Auditees). - As per Section 5 of the Groundwater Monitoring Program (Quarterly Groundwater Data Report and Six -Monthly Groundwater Report including quarterly reporting) was submitted to <u>Quarterly Groundwater Data Report</u> - Sydney Water and DPE Water (now DCCEEW) on 20 May 2025 [quarterly Groundwater report CMR_4 for the period 1st December 2024 - 28th February 2025] (refer evidence) <u>Six -Monthly Groundwater Report</u> - DPE Water (now DCCEEW) on 27 August 2025 and acknowledgement receipt of the reports on 28 August 2025 (refer evidence) - DPHI on 27 August 2025 (refer evidence) - Sydney Water on 29 August 2025 (refer evidence) - As per Section 8 of the Noise and Vibration Monitoring Program, Six monthly Noise & Vibration Monitoring Report was submitted to: - AA for review (refer evidence); - EPA by ACCIONA on 9 July 2025 (refer evidence);and - DPHI by TfNSW on 8 July 2025 (refer evidence for acknowledgement receipt email from DPHI to TfNSW, dated 08 July 2025) Above reports are available on the Project Website. Also refer CoA C13, CoA C14 and CoA E1 for example within this Audit Table for audit evidence and findings.						
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.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.						
D2	An OEMP is not required for the CSSI if the Proponent has an Environmental Management System (EMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that through the 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.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.						
D3	The OEMP or EMS 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.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.						
D4	The OEMP or EMS or equivalent as agreed with the Planning Secretary, as submitted to the Planning Secretary and amended from time to time, must be implemented for the duration of operation and the OEMP or EMS or equivalent must be made publicly available before the commencement of operation.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.						
OPERATIONAL MONITORING PROGRAM										
D5	The following Operational Monitoring Programs must be prepared in consultation with the relevant authorities identified for each Operational Monitoring Program to compare actual operational performance against predicted performance. 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 Operational Monitoring Program, including copies of all correspondence from those agencies as required by Condition A5. <table><tr><th></th><th>Required Operational Monitoring Programs</th><th>Relevant authority(s) and council(s) to be consulted for each Operational Monitoring Program</th></tr><tr><td>(a)</td><td>Groundwater Monitoring Program</td><td>DPE Water, relevant council(s)</td></tr></table>		Required Operational Monitoring Programs	Relevant authority(s) and council(s) to be consulted for each Operational Monitoring Program	(a)	Groundwater Monitoring Program	DPE Water, relevant council(s)	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.
	Required Operational Monitoring Programs	Relevant authority(s) and council(s) to be consulted for each Operational Monitoring Program								
(a)	Groundwater Monitoring Program	DPE Water, relevant council(s)								

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Result	Comment
NC	Non compliant (NC)
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Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
D6	Each operational monitoring program must include: (a) details of baseline data; (b) details of all monitoring of the project to be undertaken; (c) the parameters of the project to be monitored; (d) the frequency and lifespan of monitoring to be undertaken; (e) the location of monitoring; (f) the reporting of monitoring and analysis results against relevant criteria; (g) details of the methods that will be employed to analyse the monitoring data; (h) procedures to identify and implement additional mitigation measures where results of monitoring are unsatisfactory; and (i) any consultation to be undertaken in relation to the monitoring programs.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.
D7	The Operational Groundwater Monitoring Program must include: (a) daily measurement of the amount of water discharged from all water treatment plants; (b) monitoring quantity and water quality of the water discharged from all water treatment plants; (c) monitoring of groundwater levels in aquifers adjacent to or intersected by the tunnel alignment, in consultation with DPE Water; (d) monitoring of groundwater levels, electrical conductivity and temperature in key locations between saline water bodies and the tunnel with a minimum of two groundwater monitoring wells at different depths, with each deep bore at an adequate depth below the base of the tunnel, provided in each key location in consultation with DPE Water; (e) monitoring of the quantity, quality and reporting of groundwater inflows into the tunnels and beneath high risk sites for contamination; (f) a method for providing the data collected in (a) and (b) to Sydney Water every three months where flows are discharged to their assets to demonstrate the project's compliance with the discharge criteria or otherwise as required by a relevant trade waste licence; and (g) a process for annually forwarding data on the monthly volume of groundwater discharged from each water treatment plant to DPE Water for a minimum period of ten years, consistent with Condition D8. Note: The monitoring data to be provided to DPE Water must be both in a tabulated and electronic quality controlled data (csv, excel) ready-to-use format.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.
D8	Groundwater monitoring must continue for a period of at least ten years following the completion of construction of the tunnels. At least six months prior to the end of the ten year monitoring period, the Proponent must undertake a review of all collected and collated groundwater monitoring data, ascertain any measured or incidental impact against the predicted impacts from the groundwater modelling for the final design and construction phase, and define all future monitoring requirements in consultation with DPE Water. The review must determine if additional monitoring is required, and the time period for continued monitoring. The Proponent must notify the Planning Secretary within two weeks of the review as to the outcomes of the review and any requirements for future monitoring. Note: The monitoring data to be provided to DPE Water should be in a tabulated, quality controlled, electronic (csv, excel) ready-to-use data format.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.
D9	The Operational Monitoring Program(s) must be submitted to the Planning Secretary for approval at least three months prior to the commencement of operation.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.
D10	Operation must not commence until the Planning Secretary has approved all of the required Operational Monitoring Programs, and all relevant baseline data has been collected.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.
D11	The Operational Monitoring Programs, as approved by the Planning Secretary, must be implemented for the duration identified in the terms of this approval. Where no duration is specified in this approval, they must be implemented for the duration specified in the relevant Operational Monitoring Program or as specified by the Planning Secretary, whichever is the greater.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.
D12	The results of the Operational Monitoring Programs must be submitted to the Planning Secretary, and relevant regulatory authorities, for information in the form of an Operational Monitoring Report at the frequency identified in the in the terms of this approval. Where no frequency is identified in this approval, the results must be submitted at the frequency identified in the relevant Operational Monitoring Program.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.
D13	Where a relevant OEMP Sub-plan exists, the relevant Operational Monitoring Program may be incorporated into that OEMP Sub-plan.	Operational condition, not yet triggered.	NT	Applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025; however operational condition, not yet triggered.

Item
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Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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PART E
KEY ISSUE CONDITIONS

Air Quality and Odour

E1	Measures must be implemented to minimise and manage the emission of dust, odour and other air pollutants during construction and operation	- Air Quality Management Sub Plan (Rev 6.2, dated 12 August 2024) (Appendix I) - Air Quality Monitoring Program (Rev 05, dated 15 April 2024) incorporated as Appendix I2 within the Air Quality Management Sub Plan - WHT DPE Complaint Register (as per audit evidence under CoA B7, CoA B9 within this Audit Table) - Air Quality Bi-Annual Construction Monitoring Report, 1 December 2024 – 31 May 2025 (Rev 00, dated 23 June 2025) - Site Inspection (28 October 2025) - Dust Deposition Monitoring Register May-October 2025.xlsx (extract as provided on 29 October 2025, by ACCIONA) Samples sighted below of exceedance investigation: - Ref: OCT25 Exceedance investigation- emu plains - Ref: Jul- 25 Dust Exceedance investigation - Cammeray - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - ER Inspection Reports (Refer CoA A27 within this Audit Table for evidence)	C	Implementation of this CoA including the Air Quality Management Sub Plan/Program requirements were verified during the audit site inspections and audit interviews - refer below for sample evidence sighted: - Sighted Air Quality and Odour Bi-Annual Construction Monitoring Report (1 December 2024 – 31 May 2025) completed in this audit period, with key points from published report below (excerpts only): - Section 2.1.2.2 Monthly Air Quality results states: "Results show compliance with performance criteria outlined in section 2.1. One exceedance of performance criteria was observed at the Cammeray construction site during December 2024 (4.6 g/m2). The investigation of this exceedance is documented in Appendix A." - Section 2.3 outlines Management Response where dust deposition results were greater than 4 g/m2/month and Appendix A includes Table A-1 with Monthly Dust Exceedance Management Responses for above exceedance and investigation findings at the Cammeray Site and Management Response. - Controls/mitigation measures observed during the audit site inspection, with no visible dust noted during the audit site inspection. Refer OFI raised in relation to minor stockpile in Area 2 at Emu Plains (WHT13) - refer Section 2.2.5 Site Inspection of the Audit Report for further detail on observations including OFI raised; - WHT DPE Complaints Register recorded nil dust complaints in the audit period - also refer CoA B7/CoA B9 within this Audit Table; - Sighted dust monitoring register within the audit period, with readings below criterion for June - October 2025 for sites recorded, and exceedances at Cammeray (July and October 2025) and Emu Plains (October 2025); - Sighted sample dust investigation findings and management responses for exceedances at Cammeray (July 2025) and at Emu Plains (October 2025); - Emu Plains (October 2025) dust investigation findings and management responses notes (excerpts only - record to be read in full) within Section 1 that the dust gauge location will be assessed to ensure location is consistent with standards and site activities, Area 2 was not operated during the reporting month no material import was undertaken and management response includes that Area 2 will be resprayed with binder to ensure maximum dust suppression. - Regular external environmental inspections of the Project are conducted by the ER, with close-out of OFIs/issues by ACCIONA tracked within ER Inspections (refer ER Inspections and Monthly Reports under CoA A27 within this Audit Table). Auditees further indicated that dust gauge was to be relocated if the Emu Plains (WHT13) site received another high result, November result (outside this audit period) was in line with average reporting 2.3 g/m2 (not sighted) and that the current location is closest to potentially nearby affected residents (refer evidence). Also refer CoA C21 within this Audit Table for audit evidence and findings.
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Air Quality Community Consultative Committee

E2	Prior to finalising the detailed design of the CSSI and establishing the ambient air quality monitoring stations required under Condition E26, the Proponent must establish an Air Quality Community Consultative Committee (AQCCC) to provide advice prior to and during operation. The AQCCC must: (a) be comprised of at least: (i) two representatives from the Proponent and tunnel operator, (ii) one representative from each of the relevant councils, whose attendance is only required when considering matters relevant to their respective local government area, (iii) three representatives from each local community adjacent to each ventilation facility whose attendance is only required when considering matters relevant to their respective local area, and whose appointment has been approved by an expression of interest process conducted by the Proponent <u>and approved by the Planning Secretary</u>, and (iv) a Chair who is independent from the companies involved in the design, construction and operation of the CSSI put forward by the Proponent and approved by the Planning Secretary; (b) meet at least four times a year, or as otherwise approved by the Planning Secretary with consideration to advice from the Chair; (c) review and provide advice on the location of the ambient air quality monitoring stations required under Condition E26, and operational stage documents, compliance tracking reports, audit reports, and complaints, as they relate to ambient air quality; and (d) provide advice on the wider dissemination of monitoring results and other information on air quality issues. The AQCCC must operate for up to two years after commencement of operation, or as otherwise approved or directed by the Planning Secretary, following advice from the Chair. The AQCCC may comprise the same members of the AQCCC established under CSSI approvals for the WestConnex M4-M5 Link project (SSI 7485) in relation to the ventilation outlet located in the Rozelle Railyards. In the event that a tunnel operator has not been appointed prior to finalisation of the detailed design, its two representatives must be appointed to the AQCCC once the tunnel operator has been engaged. Note: the EPA may be invited as an observer to the AQCCC.	<u>Evidence outside this audit period:</u> - Approval Letter, DPHI to TfNSW, dated 30 August 2024 [Ref: SSI-8863-PA-790, WHT (SSI-8863) Air Quality Community Consultative Committee Chair Nomination (condition E2(a)(iv))] - Approval Letter, DPHI to TfNSW, dated 06 March 2025 [Ref:SSI-8863-PA-959, WHT (SSI-8863) Air Quality Community Consultative Committee – Community Representative Nominations (condition E2(a)(iii))] - 250414_Western Harbour Tunnel AQCCC Minutes - Meeting 1 - April 2025 - Final - Western Harbour Tunnel AQCCC - Meeting 1 - April 2025 (WHT Website) - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - https://caportal.com.au/rms/wht/aqccc <u>Meeting Minutes and Presentations:</u> - 250527_Western Harbour Tunnel AQCCC Minutes - Meeting 2 - May 2025 - Final - 250620_Western Harbour Tunnel AQCCC Minutes - Meeting 3 - June 2025 - Final - Western Harbour Tunnel AQCCC - Meeting 2 - May 2025 (WHT Website) - Western Harbour Tunnel AQCCC - Meeting 3 - June 2025 (Final)	C	<u>Outside this audit period:</u> DPHI approved (30 August 2024) TfNSW's nomination of Mr Ross Hornsey of Ethos Urban as Chair of the Air Quality Community Consultative Committee (AQCCC) for Western Harbour Tunnel, under condition E2(a)(iv) of SSI-8863 noting that TfNSW has provided evidence to demonstrate that the nominated Chair: - <i>"is suitably qualified and experienced;</i> - <i>is independent from the companies involved in the design, construction and operation of the project; and</i> - <i>meets the requirements of Seeking approval from the Department for the appointment of independent experts (DPIE, 2020)."</i> The AQCCC was established with first meeting held on 1 April 2025 (refer evidence), with following sighted: - DPHI approved Community Representative Nominations required under condition E2(a)(iii) on 06 March 2025 (refer evidence), noting that the nominated community representatives and alternative representatives have been: - <i>"selected by the AQCCC chair, Ross Hornsley; and</i> - <i>approved by an expression of interest process conducted by TfNSW.</i> - AQCCC section of the Project website established (Ref: https://caportal.com.au/rms/wht/aqccc), which notes that the AQCCC will meet around four times per year, starting early 2025. Meetings will continue for up to two years after WHT opens to traffic, expected by late 2028. Refer previous Independent Audit Reports for further audit evidence and findings, outside this audit period. <u>During this audit period, sighted below:</u> - Western Harbour Tunnel Air Quality Community Consultative Committee –Meeting #2 (7 May 2025) and Meeting Minutes (refer evidence) - Western Harbour Tunnel Air Quality Community Consultative Committee –Meeting #3 (4 June 2025) and Meeting Minutes (refer evidence) - Online Information Session - Tunnel Ventilation and Air Quality - July 2025 (available on https://caportal.com.au/rms/wht/aqccc) Meeting minutes available on the AQCCC section of the Project website established includes list of attendees (and any apologies) - DPHI approved Chair, Community Representatives, Council Representatives, TfNSW Representatives, AQIR, Operator Representatives (Ventia), WHT Contractor Representatives (ACCIONA) and EPA Representative (at Meeting #3)
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Air Quality Independent Reviewer

E3	The Proponent must engage an Air Quality Independent Reviewer (AQIR) who is independent of the project design and construction personnel and has appropriate skill and experience in road tunnel ventilation design, air quality monitoring design, and reporting. The AQIR must be approved by the Planning Secretary and engaged by the Proponent prior to the finalisation of the detailed design. Their appointment must be made publicly available. The AQIR cannot be the independent auditor required for the purposes of Condition A38. Nothing in this condition prevents the Proponent from engaging an AQIR who is expert in in tunnel ventilation and ventilation outlet design and one who is expert in ambient air quality monitoring.	- Approval Letter, DPE (now DPHI) to TfNSW, dated 20 June 2023 [Ref: SSI-8863-PA-398 WHT - SSI 8863 - Stages 3B and 3C - Nomination of Air Quality Independent Reviewer (AQIR), Condition E3] - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Interview with TfNSW and ACCIONA (30 October 2025)	C	<u>Outside this audit period:</u> DPE (now DPHI) approved (20 June 2023) TfNSW's nomination of Mr Gary Graham from Northstar Air Quality Pty Ltd as the AQIR for Stages 3B and 3C of Western Harbour Tunnel in accordance with condition E3, noting that TfNSW have provided evidence to demonstrate that AQIR is: - <i>"suitably qualified and experienced; and</i> - <i>is independent of the design and construction of the CSSI."</i> TfNSW submitted the nomination to DPE (now DPHI) on 15 May 2023, prior to actual construction commencement of WHT Stage 3B on 22 May 2023 and WHT Stage 3C on 20 May 2024; and prior to the finalisation of detailed design. Also refer CoA A36 within this Audit Table for audit evidence and findings. <u>During this audit period:</u> Auditees indicated no change to the approved AQIR in this audit period. The independent AQIR appointment is publicly available on the Project website.
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Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)																				
E4	Prior to commencing operation, the AQIR(s) must review and endorse the adequacy of the following as per the requirements of Conditions E11, E20, E22, E27, E28, E29, E33 and E36. (a) in-tunnel ventilation and ventilation outlet design; and (b) air quality monitoring.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - Evidence elsewhere within this Audit Table - refer CoA E20 and CoA E27 (for example) within this Audit Table for audit evidence	NT	<u>Outside this audit period:</u> AQIR engaged by TfNSW as per CoA E3 with operation commencing ~2029 (as per Staging Report, Rev 12, July 2025). Refer previous Independent Audit Reports for audit evidence and findings (correspondence/documentation provided to the AQIR for review/comment), outside this audit period. <u>During this audit period:</u> Sighted sample AQIR review / endorsements as referenced elsewhere within this Audit Table - refer CoA E20 and CoA E27 (for example) within this Audit Table for audit evidence and findings. Auditees also indicated that WHT Independent Certifier had certified Design Documentation - TV02, TV03 and TV04 (for example) (not sighted). Condition was not considered further in this sixth Independent Audit. NB: The scope of this audit does not extend to the verification of items requiring review, endorsement and verification by the AQIR/AQCCC as prescribed by this CoA and other CoAs within this Audit Table, under the SSI-8863 (as modified - the Approval) for e.g. E11, E20, E22, E27, E28, E29, E33 and E36.																				
AIR QUALITY GOALS																								
E5	In-Tunnel Air Quality Limits The tunnel ventilation system must be designed and operated so that the average concentrations of CO and NO2, calculated along the length of the tunnel, do not exceed the concentration limit specified for that pollutant in Table 1. Table 1: In-tunnel average limits along length of tunnel <table><tr><th colspan="4">Table 1: In-tunnel average limits along length of tunnel</th></tr><tr><th>Pollutant</th><th>Concentration Limit</th><th>Units of measurement</th><th>Averaging period</th></tr><tr><td>CO</td><td>87</td><td>ppm</td><td>Rolling 15-minute</td></tr><tr><td>CO</td><td>50</td><td>ppm</td><td>Rolling 30-minute</td></tr><tr><td>NO₂</td><td>0.5</td><td>ppm</td><td>Rolling 15-minute</td></tr></table>	Table 1: In-tunnel average limits along length of tunnel				Pollutant	Concentration Limit	Units of measurement	Averaging period	CO	87	ppm	Rolling 15-minute	CO	50	ppm	Rolling 30-minute	NO ₂	0.5	ppm	Rolling 15-minute	- Interview with ACCIONA (30 October 2025) - Tunnel Ventilation Control Design Report (WHTP2-ACOC-WHT-ME-TV03-RPT-000001, Revision: D dated 20 June 2025 - Final Design Documentation) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025)	NT	CoA E5 - CoA E7 are applicable to WHT Stages 3B and 3C for design and construction elements of these condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. During this audit period, Auditees indicated below: - Design package/report was updated and is in Final Design Documentation (FDD) phase (Design package reference: TV03 - Tunnel Ventilation Control - Design Report - refer evidence); - CoA E5 - CoA E7 captured in TV03 Design Report under Section 3.1.1 - Summary of quantified operating requirements and Section 3.1.11 - Air Quality Reporting System. Conditions E5 - E7 were not considered further in this sixth Independent Audit.
Table 1: In-tunnel average limits along length of tunnel																								
Pollutant	Concentration Limit	Units of measurement	Averaging period																					
CO	87	ppm	Rolling 15-minute																					
CO	50	ppm	Rolling 30-minute																					
NO ₂	0.5	ppm	Rolling 15-minute																					
E6	The concentration of CO as measured at any single point in the tunnel must not exceed the concentration limit specified in Table 2 under all traffic scenarios. Table 2: In-tunnel single point exposure limits <table><tr><th colspan="4">Table 2: In-tunnel single point exposure limits</th></tr><tr><th>Pollutant</th><th>Concentration Limit</th><th>Units of measurement</th><th>Averaging period</th></tr><tr><td>CO</td><td>200</td><td>ppm</td><td>Rolling 3-minute</td></tr></table>	Table 2: In-tunnel single point exposure limits				Pollutant	Concentration Limit	Units of measurement	Averaging period	CO	200	ppm	Rolling 3-minute	Same as CoA E5 (refer CoA E5 within this Audit Table for audit evidence)	NT	Same as CoA E5 (refer CoA E5 within this Audit Table for audit evidence and findings).								
Table 2: In-tunnel single point exposure limits																								
Pollutant	Concentration Limit	Units of measurement	Averaging period																					
CO	200	ppm	Rolling 3-minute																					
E7	The tunnel ventilation system must be designed and operated so that the visibility in the tunnel does not exceed the level specified in Table 3. Table 3: In-tunnel visibility limits along length of tunnel <table><tr><th colspan="4">Table 3: In-tunnel visibility limits along length of tunnel</th></tr><tr><th>Parameter</th><th>Average extinction co-efficient Limit</th><th>Units of measurement</th><th>Averaging period</th></tr><tr><td>Visibility</td><td>0.005</td><td>m⁻¹</td><td>Rolling 15-minute</td></tr></table>	Table 3: In-tunnel visibility limits along length of tunnel				Parameter	Average extinction co-efficient Limit	Units of measurement	Averaging period	Visibility	0.005	m ⁻¹	Rolling 15-minute	Same as CoA E5 (refer CoA E5 within this Audit Table for audit evidence)	NT	Same as CoA E5 (refer CoA E5 within this Audit Table for audit evidence and findings).								
Table 3: In-tunnel visibility limits along length of tunnel																								
Parameter	Average extinction co-efficient Limit	Units of measurement	Averaging period																					
Visibility	0.005	m ⁻¹	Rolling 15-minute																					
Emergency Discharge																								
E8	The limits specified in Conditions E5, E6, E7, E21 and E25 do not apply in an emergency relating to the operation of the CSSI. For the purpose of this condition, an emergency is an event that poses risk to human life associated with operation, but does not include an event related to traffic volume or speed or the operation of the broader road network.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.																				
Monitoring of In-Tunnel Air Quality																								
E9	The Proponent must continuously monitor (by sampling and obtaining results from analysis) the pollutants within the tunnel specified in Conditions E5, E6, and E7. Monitoring must commence on the first day of operation and continue throughout operation.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.																				
E10	The in-tunnel air quality monitoring system must undergo relative accuracy test audits at least every six months, or within another timeframe approved with the Planning Secretary.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.																				

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E11	The Proponent must develop a methodology for determining the number and location of monitoring stations inside the tunnel in consultation with the EPA. The number and location of monitoring stations must be determined prior to operation and permit the accurate monitoring and calculation of the pollutants listed in Conditions E5, E6, and E7. The number and location of monitoring stations must be independently verified by the AQIR prior to the operation of the CSSI. As a minimum, monitoring stations must be installed inside the tunnel near the base of the NSW Government 35 Department of Planning, Industry and Environment Western Harbour Tunnel & Warringah Freeway Upgrade (SSI-8863) ventilation outlets, at incoming fresh air vents, near the entry portals, exit portals, and at tunnel and ramp junctions, unless otherwise approved by the Planning Secretary.	<u>Evidence outside this audit period:</u> - Letter, ACCIONA to NSW EPA, dated 5 September 2024 [Subject: WHT (SSI-8863) – CoA E11 Consultation, including Letter from AQIR, dated 17 May 2024 as Attachment B] - Email (with above Letter attached), ACCIONA to NSW EPA, dated 6 September 2024 [Ref: WHT Consultation for planning approval condition E11 operational in tunnel air quality monitoring location method] - Letter, NSW EPA to ACCIONA, dated 16 October 2024 [Subject: WHT (SSI-8863) – CoA E11 Consultation In-Tunnel Monitoring Locations] - Tunnel Ventilation Equipment Design Report (WHTP2-ACOC-WHT-ME-TV02-RPT-000001, Revision: C, dated 7 November 2024, Final Design Documentation) - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Tunnel Ventilation Equipment Design Report (WHTP2-ACOC-WHT-ME-TV02-RPT-000001, Revision: F, dated 14 October 2025, Final Design Documentation) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025)	NT	<u>Outside this audit period:</u> ACCIONA consulted with NSW EPA in September 2024 (refer evidence) on the draft methodology developed to determine the number and location of the in-tunnel monitoring stations with correspondence to NSW EPA also including the following: - Attachment A: Methodology for determining the number and location of in-tunnel air quality monitoring stations; and - Attachment B: Letter from AQIR, dated 17 May 2024 (review of proposed methodology, locations of the in-tunnel AQS and support) EPA responded on 16 October 2024 (excerpt only) that <i>"the documentation provided generally meets the requirements of the Australian Standard AS3580.18:2017. The EPA raises no issue with the proposed methodology and is satisfied it has been adequately consulted on this matter."</i> - Design package TV02 includes Tunnel Ventilation Equipment (sighted - refer evidence). The number and location of monitoring stations is shown in the tunnel plant schematics of WHTP2-ACOC-WHT-ME-TV02-DRG-999999 [00] and detailed in technical memorandum WHTP2-ACOC-WHT-ME-TV02-MEM-000001[B], dated 24 January 2024 - AQIR has verified monitoring locations (Ref: AQIR review of proposed methodology, locations of the in-tunnel AQS and support; Ref: 23.1052.L3V1, dated 17 May 2024) Also refer previous Independent Audit Reports for further audit evidence and findings. <u>During this audit period,</u> Auditees indicated below: - No further changes to above consultation or AQIR verification; - Design package TV02 was updated (Section 2.4.4 -2.4.6 summarise the changes in the TV02 design); and - Monitoring stations are yet to be installed. Condition was not considered further in this sixth Independent Audit. NB: The scope of this audit does not extend to the verification of items requiring review, endorsement and verification by the AQIR/AQCCC as prescribed by this CoA and other CoAs within this Audit Table, under the SSI-8863 (as modified - the Approval) for e.g. E11, E20, E22, E27, E28, E29, E33 and E36.
E12	Air quality monitoring data from all in-tunnel monitoring stations must be made available in as close to real time as possible, under the reporting requirements of Condition E35.	<u>Evidence outside this audit period:</u> - Tunnel Ventilation Control Design Report (WHTP2-ACOC-WHT-ME-TV03-RPT-000001, Revision: C, dated 8 April 2025 - Final Design Documentation) - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Tunnel Ventilation Control Design Report (WHTP2-ACOC-WHT-ME-TV03-RPT-000001, Revision: D, dated 20 June 2025 - Final Design Documentation) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025)	NT	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period,</u> Auditees indicated below: - Design package/report was updated and is in Final Design Documentation (FDD) phase (Design package reference: TV03 - Tunnel Ventilation Control - Design Report - refer evidence); and - Captured in above TV03 Design Report under Section 3.1.11 Air Quality Reporting System. Condition was not considered further in this sixth Independent Audit.
Notification and Reporting on In-Tunnel Air Quality				
E13	The Proponent must notify the Planning Secretary, EPA and Ministry of Health of any recordings above the limits specified in Conditions E5, E6, and E7 as early as possible and within 24 hours of the recorded event. This notification must provide details of the circumstances of the event, including: (a) the nature and location of the event, including details relating to the cause; (b) the timing and duration of the event; (c) the extent and severity of the event; (d) the measures employed to minimise the concentration levels, and to improve visibility levels if visibility levels were above the specified limit; (e) the frequency of the event, including whether an event with the same or similar circumstances has occurred previously; and (f) the date when the Proponent will submit a Tunnel Air Quality Management Systems Effectiveness Report in accordance with Condition E14.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E14	A Tunnel Air Quality Management Systems Effectiveness Report must be prepared to detail the overall system performance, cause and major contributor of any exceedances. The report must include: (a) the overall performance and concentration levels in the tunnel for the preceding six month period, including average and maximum levels and time periods; (b) details of any instances throughout operation where pollutant concentration levels in the tunnel have exceeded the limits specified in Conditions E5, E6, and E7; and (c) consideration of improvements and proposed changes to the tunnel air quality management system. The report must be submitted to the Planning Secretary for information no later than 12 months following the commencement of operation of the CSSI and within one month of any request made by the Planning Secretary.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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Tunnel Air Quality Management

E15	Prior to operation, signage must be installed at each surface tunnel entrance and variable message signage provided at regular intervals throughout the tunnel to instruct tunnel users to close windows and turn on recirculated air. Relevant information about this instruction must also be provided on a website operated by the Proponent which is required to be maintained throughout operation	<u>Evidence outside this audit period:</u> - RD03 Project Wide – Road Furniture, Signs and Linemarking - Design Report (WHTP2-AAJV-NWW-FN-RD03-RPT-000001, Revision: D, 3 June 2024, Final Design Documentation 2) - Sighted sample evidence of signage in design package RD03 drawings for WHT Berry Street On- Ramp, Cammeray and Rozelle - WHTP2-AAJV-NWW-FN-RD03-DRG-001150 (Berry St) - WHTP2-AAJV-NWW-FN-RD03-DRG-001146 (Cammeray) - WHTP2-AAJV-NWW-FN-RD03-DRG-001102 (Rozelle) - Sighted extract evidence from Design Package ITS10 (Ref: IT10 Design Report Section 3.1.1.1.png and in JIRA) - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - RD03 Project Wide – Road Furniture, Signs and Linemarking - Design Report (WHTP2-AAJV-NWW-FN-RD03-RPT-000001, Revision: D, 3 June 2024, Final Design Documentation 2) - Intelligent Transport Systems (Tunnel)- Design Report (WHTP2-ACOC-WHT-CO-IT10-RPT-000001, Revision E, 10 March 2025, Final Design Documentation) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025)	NT	<u>Outside this audit period:</u> Auditees indicated below: - CoA requirement relating to 'signage must be installed at each surface tunnel entrance' addressed through Design package RD03 [Ref: Project Wide - Road Furniture, Signs, and Linemarking Design Report, at Final Design Documentation 2 (FDD 2)]. For example - refer Section 3.2.3.5, Appendix H and RDO3 design drawings extracts of signage included in design (refer evidence); and - CoA requirement relating to variable messaging signage captured under Design Package ITS10 - Intelligent Transport Systems (Tunnel) , which addresses in-tunnel signs, cameras and other intelligent systems. For e.g. Section 3.1.1.1 notes tunnel message signs (TMS) and their positioning in the mainline and all the entry and exit ramps (at nominally, 120m intervals) (sighted only extract evidence provided from Design Report). Refer previous Independent Audit Reports for further audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated below: - No further changes to design package RD03 during this audit period (refer evidence); and - Design Package ITS10 - Intelligent Transport Systems (Tunnel), renamed to IT10, which addresses in-tunnel signs, cameras and other intelligent systems. For e.g. Section 3.1.1.1 notes tunnel message signs (TMS) and their positioning in the mainline and all the entry and exit ramps at, nominally, 120m intervals (refer evidence); and - Signage not yet installed. Condition was not considered further in this sixth Independent Audit.
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Ventilation Outlets

E16	The tunnel ventilation outlets must be constructed at the location specified in Appendix B. Note: The ventilation outlet at the Rozelle ventilation facility is being constructed as part of the M4-M5 Link and the location is specified in Appendix C of the Instrument of Approval for SSI 7485.	<u>Evidence outside this audit period:</u> - Minister's Consent Conditions - SSI 8863 (as modified; the Approval) - refer Consolidated Conditions on the Project website - Air Monitoring System – Design Report (WHTP2-ACOC-WHT-ME-TV04-RPT-000001, Revision: C, 27 November 2024, Final Design Documentation) - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Air Monitoring System – Design Report (WHTP2-ACOC-WHT-ME-TV04-RPT-000001, Revision: C, 27 November 2024, Final Design Documentation) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025)	NT	<u>Outside this audit period:</u> - Modification 2 was approved on 27 January 2024 and CoA E17 amended (refer underlined text in Table); Auditees indicated below: - CoA E16 and CoA E17 are addressed as part of the TV04 design package (FDD) (Design package reference: TV04 - Air Monitoring System – Design Report) - refer Section 3.1.1 (Ventilation Outlets); - The Outlet for the southbound carriageway is located in the combined RIC/WHT Outlet building, vent outlet at Rozelle already constructed by the RIC contractor as part of the M4/M5 Link Project - The Outlet for the northbound carriageway is located on the Warringah Freeway at the Cammeray ventilation facility; construction works for Cammeray ventilation facility has commenced, with shaft excavation works underway and vent outlet structure not yet commenced - The design drawings for TV04: WHTP2-DESIN-CVS-AR-UD01-DRG-000501 demonstrates the ventilation outlet location matches the location in CoA E16 and Appendix B of the planning approval and Drawing WHTP2-DESIN-CVS-AR-UD01-DRG-003100 demonstrates the ventilation outlet matches the height requirement in CoA E17; - Refer previous Independent Audit Reports for further audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated no further change to design (design package TV04) during this audit period (refer evidence) and construction works for Cammeray ventilation facility ongoing. Conditions E16 - E17 were not considered further in this sixth Independent Audit.
E17	The ventilation outlets must be constructed to a tip height within the following ranges identified in Table 4	Same as CoA E16 (refer CoA E16 within this Audit Table for audit evidence)	NT	Same as CoA E16 (refer CoA E16 within this Audit Table for audit evidence and findings).

Table 4: Ventilation Outlet Heights	
Location	Outlet Height (metres AHD)
City West Link, Rozelle	the height of the ventilation facility at Rozelle was set in Condition E12 in the Instrument of Approval for WestConnex M4-M5 Link project SSI 7485
Warringah Freeway corridor to the north of Ernest Street, in Cammeray	Between 29 and 31 metres above ground elevation at the ventilation outlet site (102.0 to 104.1 AHD)

Design and Operation of Tunnel Ventilation System

E18	The tunnel ventilation systems must be designed, constructed and operated so as to only release emissions from ventilation outlets and not from the portals or the tunnel support facilities, except for emergency smoke management purposes in the event of a fire in the tunnel or periodic testing of the system as defined in the OEMP required by Condition D1 or an EMS required under Condition D2.	<u>Evidence outside this audit period:</u> - Tunnel Ventilation Control Design Report (WHTP2-ACOC-WHT-ME-TV03-RPT-000001, Revision: C, dated 8 April 2025 - Final Design Documentation) - Refer previous Independent Audit Reports for audit evidence and referred elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Tunnel Ventilation Control Design Report (WHTP2-ACOC-WHT-ME-TV03-RPT-000001, Revision: D dated 20 June 2025 - Final Design Documentation) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025)	NT	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated below: - Design package/report was updated and is in Final Design Documentation (FDD) phase (Design package reference: TV03 - Tunnel Ventilation Control - Design Report - refer evidence); and - Captured in above TV03 Design Report under Section 3.1.4.1 - Operating Principles and Section 3.1.4.6 - Northbound normal mode ventilation level diagram and Section 3.1.4.7 - Southbound normal mode ventilation level diagram (sighted-refer evidence). Condition was not considered further in this sixth Independent Audit.
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Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E19	All tunnels must be designed and constructed so as to allow for future modification of the ventilation system if required to facilitate air quality limits and goals, if required.	- Interview with ACCIONA (30 October 2025) Sighted below: - CoA E19 Report – Design Allowance for Future Ventilation System Modifications (Ref: WHTP2-ACOC-WHT-ME-TV04-RPT-000005[A], WHTP2-ACOC-WHT-ME-TV04-RPT-000005, Revision: A, 22 August 2025 - DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - Ref: WHT - Transmittal_ WHTP2-ACOC-TX-003587 - WHTP2 - Design Submission - TV04 - Air Monitoring S.pdf	NT	During this audit period, Auditees indicated that a separate technical memo for this Condition has been prepared and issued to the WHT Independent Certifier for information, with report concluding below (excerpt only): <i>"This Report demonstrates that the tunnel ventilation system has <u>been designed and constructed to allow for future modification, if required</u>. The modifications within Section 6 could be implemented in the future in the event in-tunnel, outlet or ambient air quality goals are tightened, or in the unlikely event that the Project is found to be a significant contributor to breaches of the air quality goals. The modifications identified within Section 6 require detailed design and modelling, and may potentially cause disruption if implemented, but are not specifically precluded from implementation for the Project."</i> Condition was not considered further in this sixth Independent Audit.
E20	The AQIR, must review the in-tunnel ventilation and ventilation outlet design of the project to verify that: (a) the final design achieves the in-tunnel and ventilation outlet limits for all traffic conditions including congestion; (b) the predicted impacts of the final design are no greater than predicted in the documents listed Condition A1 for the equivalent operating condition; and (c) the ventilation system design has been optimised to achieve effective and responsive treatment of in-tunnel air quality and efficient energy consumption. The operating scenarios used to model the final design should be the same as those used in the documents listed in Condition A1. Should the design review adopt a modelling program different to that used in the EIS, the EIS predictions must be re-modelled using the model adopted for the design review, to establish the predicted outcomes under part (b). This verification must be submitted to the Planning Secretary for information prior to operation.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referred elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) Sighted below: - Letter, DPHI to TfNSW dated 10 November 2025 [Ref: SSI-8863-PA-1140, Western Harbour Tunnel & Warringah Freeway Upgrade (SSI-8863) - Air Quality Independent Reviewer (AQIR) review of the in-tunnel ventilation and ventilation outlet design. (Condition E20)] - AQIR's verification letter, dated 16 September 2025 [Ref: 23.1052.L8V2 - Design and Operation of Tunnel Ventilation System, E20(a) and (b)] - AQIR's verification letter, dated 15 May 2025 [Ref: 23.1052.L7V1, Design and Operation of Tunnel Ventilation System, E20(c)] - DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx	NT	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated below: - AQIR verification of Condition E20a) and E20b) was submitted to the Planning Secretary and a request for further information from the Department was received on 21 October 2025 (refer evidence); - AQIR verification of Condition E20c) is planned to be submitted to the Planning Secretary (refer evidence). Sighted below (<u>received outside this audit period and yet to be placed on the Project website</u>): - Correspondence from the Department (received outside this audit period) dated 10 November 2025, in relation to the verification letter prepared by the Air Quality Independent Reviewer (AQIR) submitted to the Department for information in accordance with condition E20 of SSI-8863, noting that the AQIR's letter verifies that: - <i>"the final design achieves the in-tunnel and ventilation outlet limits for all traffic conditions including congestion;</i> - <i>the predicted impacts of the final design are no greater than those predicted in the Environmental Impact Statement; and</i> - <i>reviewed by Transport for NSW and no issues were raised."</i> Above correspondence noted that the Department has filed the AQIR's verification letter, Reference 23.1052.L8V2, dated 16 September 2025 under Condition E20 of SSI-8863 and to please ensure that the AQIR's letter regarding the in-tunnel ventilation and ventilation outlet design is placed on the project website at the earliest convenience.

Limits on Emissions from Ventilation Outlets

E21	The concentration of a pollutant discharged from the ventilation outlets must not exceed the respective limits specified for that pollutant in Table 5. Table 5: Ventilation Outlet Mass Pollutant Concentration <table><tr><th colspan="5">Table 5: Ventilation Outlet Mass Pollutant Concentration</th></tr><tr><th>Pollutant</th><th>100 percentile limit</th><th>Units of measurements</th><th>Averaging period</th><th>Reference conditions</th></tr><tr><td>Solid particles</td><td>1.1</td><td>mg/m³</td><td>1 hour, or the minimum sampling period specified in the relevant test method, whichever is the greater</td><td>Dry, 273K, 101.3kPa</td></tr><tr><td>NO₂ or NO or both, as NO₂ equivalent</td><td>20</td><td>mg/m³</td><td>1 hour block</td><td>Dry, 273K, 101.3kPa</td></tr><tr><td>NO₂</td><td>2.0</td><td>mg/m³</td><td>1 hour block</td><td>Dry, 273K, 101.3kPa</td></tr><tr><td>CO</td><td>40</td><td>mg/m³</td><td>1 hour rolling</td><td>Dry, 273K, 101.3kPa</td></tr><tr><td>VOC (as propane)</td><td>4.0</td><td>mg/m³</td><td>1 hour rolling</td><td>Dry, 273K, 101.3kPa</td></tr></table>	Table 5: Ventilation Outlet Mass Pollutant Concentration					Pollutant	100 percentile limit	Units of measurements	Averaging period	Reference conditions	Solid particles	1.1	mg/m ³	1 hour, or the minimum sampling period specified in the relevant test method, whichever is the greater	Dry, 273K, 101.3kPa	NO ₂ or NO or both, as NO ₂ equivalent	20	mg/m ³	1 hour block	Dry, 273K, 101.3kPa	NO ₂	2.0	mg/m ³	1 hour block	Dry, 273K, 101.3kPa	CO	40	mg/m ³	1 hour rolling	Dry, 273K, 101.3kPa	VOC (as propane)	4.0	mg/m ³	1 hour rolling	Dry, 273K, 101.3kPa	<u>Evidence outside this audit period:</u> - Tunnel Ventilation Control Design Report (WHTP2-ACOC-WHT-ME-TV03-RPT-000001, Revision: C, dated 8 April 2025 - Final Design Documentation) - Refer previous Independent Audit Reports for audit evidence and referred elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Tunnel Ventilation Control Design Report (WHTP2-ACOC-WHT-ME-TV03-RPT-000001, Revision: D dated 20 June 2025 - Final Design Documentation) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025)	NT	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated below: - Design package/report was updated and is in Final Design Documentation (FDD) phase (Design package reference: TV03 - Tunnel Ventilation Control - Design Report - refer evidence); and - Captured in above TV03 Design Report under Section 3.1.11 - Air Quality Reporting System. Condition was not considered further in this sixth Independent Audit.
Table 5: Ventilation Outlet Mass Pollutant Concentration																																							
Pollutant	100 percentile limit	Units of measurements	Averaging period	Reference conditions																																			
Solid particles	1.1	mg/m ³	1 hour, or the minimum sampling period specified in the relevant test method, whichever is the greater	Dry, 273K, 101.3kPa																																			
NO ₂ or NO or both, as NO ₂ equivalent	20	mg/m ³	1 hour block	Dry, 273K, 101.3kPa																																			
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Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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Monitoring of Ventilation Outlet Emissions

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Notification and Reporting of Ventilation Outlet Emissions

E23	The Proponent must notify the Planning Secretary, EPA and Ministry of Health of any recordings above the emission limits (Above-Emission Limit Recording) in Condition E21 as soon as possible and within 24 hours of the recording. This notification must provide details of the circumstances of the event, including: (a) the nature of the event; (b) the concentration levels that occurred; (c) the timing and duration of the event; and (d) the measures employed to minimise the concentration levels.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E24	Within one month of any notification of Above-Emission Limit Recording, the Proponent must prepare and submit to the Planning Secretary for information a Report on Above-Emission Limit Recording that details the cause of the exceedance, the effectiveness of any action(s) taken in response to the exceedance and the options available to prevent recurrence. The Report on Above-Emission Limit Recording must include consideration of improvements to the tunnel air quality management system so as to achieve compliance with the ventilation outlet emission limits.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.

AMBIENT AIR QUALITY

Maximum Concentrations for Ambient Air Quality

E25	Should ambient monitoring of air pollutants exceed the following maximum concentrations, the provisions of Conditions E29, E30 and E31 will apply: (a) CO – 8 hour rolling average of 9.0 ppm (NEPM); (b) NO₂ – one hour average of 0.12 ppm (245 µg/m³) (NEPM); (c) PM₁₀ – 24 hour average of 50 µg/m³ (NEPM); (d) PM_{2.5} – 24 hour average of 25 µg/m³ (NEPM); (e) PM₁₀ – annual average of 25 µg/m³ (NEPM); and (f) PM_{2.5} – annual average of 8 µg/m³ (NEPM). This condition does not apply to the ambient air quality changes caused by bushfires or other events unrelated to the operation of the tunnel, as endorsed by the AQIR. Note: The notification and reporting obligations under Conditions E29, E30 and E31 relating to ambient monitoring will begin at the commencement of operation. The first annual average concentrations for PM₁₀ and PM_{2.5} must be calculated on the first day the project has been in operation for 12 months and on a rolling basis thereafter.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
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Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
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HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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Monitoring of Ambient Air Quality

E26	The Proponent must monitor (by sampling and obtaining results by analysis) the pollutants and parameters specified in Table 7 using the sampling method, units of measure, and sampling frequency specified in the condition and table. Monitoring must be undertaken at the following locations as a minimum: (a) two ground level receptors near the Rozelle ventilation outlet, at locations suitable for detecting any impact on air quality from the outlet (these locations may be the same as those established under WestConnex M4-M5 Link project SSI 7485); and (b) two ground level receptors near the Cammeray ventilation outlet, at locations suitable for detecting any impact on air quality from the outlet. Table 7: Ambient Air Quality Monitoring Methodologies <table><tr><th colspan="5">Table 7: Ambient Air Quality Monitoring Methodologies</th></tr><tr><th>Pollutant</th><th>Units of measurement</th><th>Averaging Period</th><th>Frequency</th><th>Method¹</th></tr><tr><td>NO</td><td>pphm</td><td>1-hour</td><td>Continuous</td><td>AM-12</td></tr><tr><td>NO₂</td><td>pphm</td><td>1-hour</td><td>Continuous</td><td>AM-12</td></tr><tr><td>NO_x</td><td>pphm</td><td>1-hour</td><td>Continuous</td><td>AM-12</td></tr><tr><td>PM₁₀</td><td>µg/m³</td><td>24-hour</td><td>Continuous</td><td>AS3580 9.8-2008²</td></tr><tr><td>PM_{2.5}³</td><td>µg/m³</td><td>24-hour</td><td>Continuous</td><td>AS3580 9.13-2013³ or as otherwise agreed with the with the EPA</td></tr><tr><td>CO</td><td>ppm</td><td>1-hour,8-hour</td><td>Continuous</td><td>AM-6</td></tr><tr><th>Parameter⁴</th><th>Units of measurement</th><th>Averaging Period</th><th>Frequency</th><th>Method¹</th></tr><tr><td>Wind Speed @ 10 m</td><td>m/s</td><td>1-hour</td><td>Continuous</td><td>AM-2 & AM-4</td></tr><tr><td>Wind Direction @ 10 m</td><td>°</td><td>1-hour</td><td>Continuous</td><td>AM-2 & AM-4</td></tr><tr><td>Sigma Theta @ 10 m</td><td>°</td><td>1-hour</td><td>Continuous</td><td>AM-2 & AM-4</td></tr><tr><td>Temperature @ 2m</td><td>K</td><td>1-hour</td><td>Continuous</td><td>AM-4</td></tr><tr><td>Temperature @ 10 m</td><td>K</td><td>1-hour</td><td>Continuous</td><td>AM-4</td></tr><tr><th>Other</th><th>Units of measurement</th><th>Averaging Period</th><th>Frequency</th><th>Method¹</th></tr><tr><td>Siting</td><td>NA</td><td>NA</td><td>NA</td><td>AM-1 & AM-4</td></tr></table> Notes: - Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales (EPA, 2007) or as otherwise agreed by EPA. - AS3580 9.8-2008, Methods for the Sampling and Analysis of Ambient Air – Determination of Suspended Particulate Matter – PM₁₀ Continuous Direct Mass Method using Tapered Element Oscillating Microbalance Analyser (Standards Australia, 2008). - AS 3580 9.13-2013, Methods for the Sampling and Analysis of Ambient Air – Determination of Suspended Particulate Matter – PM_{2.5} Continuous Direct Mass Method using a Tapered Element Oscillating Microbalance Analyser (Standards Australia, 2013). - TBD - location for meteorological monitoring station(s) to be representative of weather conditions likely to occur near the Rozelleand Cammeray ventilation outlets. - Appropriately modified to include size selective inlet for PM_{2.5} or as otherwise approved by the EPA.	Table 7: Ambient Air Quality Monitoring Methodologies					Pollutant	Units of measurement	Averaging Period	Frequency	Method ¹	NO	pphm	1-hour	Continuous	AM-12	NO ₂	pphm	1-hour	Continuous	AM-12	NO _x	pphm	1-hour	Continuous	AM-12	PM ₁₀	µg/m ³	24-hour	Continuous	AS3580 9.8-2008 ²	PM _{2.5} ³	µg/m ³	24-hour	Continuous	AS3580 9.13-2013 ³ or as otherwise agreed with the with the EPA	CO	ppm	1-hour,8-hour	Continuous	AM-6	Parameter ⁴	Units of measurement	Averaging Period	Frequency	Method ¹	Wind Speed @ 10 m	m/s	1-hour	Continuous	AM-2 & AM-4	Wind Direction @ 10 m	°	1-hour	Continuous	AM-2 & AM-4	Sigma Theta @ 10 m	°	1-hour	Continuous	AM-2 & AM-4	Temperature @ 2m	K	1-hour	Continuous	AM-4	Temperature @ 10 m	K	1-hour	Continuous	AM-4	Other	Units of measurement	Averaging Period	Frequency	Method ¹	Siting	NA	NA	NA	AM-1 & AM-4	<u>Evidence outside this audit period:</u> - Letter, NSW EPA to ACCIONA, dated 28 October 2024 [Re: WHT (SSI-8863) – CoA 26 Consultation Alternative Monitoring Methodology Ambient Air PM10 and PM2.5] - Air Monitoring System – Design Report (WHTP2-ACOC-WHT-ME-TV04-RPT-000001, Revision: C 27 November 2024, Final Design Documentation) - Refer previous Independent Audit Reports for audit evidence and referred elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Air Monitoring System – Design Report (WHTP2-ACOC-WHT-ME-TV04-RPT-000001, Revision: C 27 November 2024, Final Design Documentation) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025) - Also refer CoA E27 (for example) within this Audit Table	NT	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings including AQIR and EPA consultation undertaken and response, outside this audit period. <u>During this audit period:</u> Auditees indicated below: - Captured in Design Report TV04 (Air Monitoring System – Design Report) in Section 3.1.6 (identifies locations of potential monitoring sites) and Section 3.1.7 - Ambient Air Monitoring Requirements (refer evidence); - No further change to above Design Report in this audit period. Also refer CoA E27 (for example) within this Audit Table for audit evidence and findings. Condition was not considered further in this sixth Independent Audit.
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Other	Units of measurement	Averaging Period	Frequency	Method ¹																																																																																
Siting	NA	NA	NA	AM-1 & AM-4																																																																																
E27	The monitoring locations must be selected with the objective of achieving a like-for-like comparison of monitoring results with available pre-construction data. The locations must also allow for the review of the predicted local air quality outcomes described in the EIS against the results of the air quality monitoring as part of the independent environmental audit required under Condition A38. The location of the monitoring stations must be informed by the AQCCC and subject to landowner's and occupier's agreement. The location of the monitoring stations must be verified by the AQIR, taking into consideration advice from the EPA, and provided to the Planning Secretary for information prior to their installation. The establishment and operation of the monitoring stations must be undertaken in accordance with recognised Australian standards and undertaken by an organisation accredited by NATA for this purpose. The quality of the monitoring results must be assured through a NATA accredited process prior to the data being considered as a basis for compliance/auditing purposes. The ambient air quality monitoring system must undergo relative accuracy test audits at least every six months, or within another timeframe approved with the Planning Secretary.	<u>Evidence outside this audit period:</u> - Air Monitoring System – Design Report (WHTP2-ACOC-WHT-ME-TV04-RPT-000001, Revision: C 27 November 2024, Final Design Documentation) - Refer previous Independent Audit Reports for audit evidence and referred elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Air Monitoring System – Design Report (WHTP2-ACOC-WHT-ME-TV04-RPT-000001, Revision: C 27 November 2024, Final Design Documentation) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025) Sighted below: - Letter, DPHI to TfNSW dated 29 October 2025 [Ref: SSI-8863-PA-1152, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI-8863) - Ambient Air Quality Monitoring Station Locations, condition E27] - DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Also refer CoA E2 and CoA E4 (for example) within this Audit Table for audit evidence	NT	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated below: - Captured in Design Report TV04 (Air Monitoring System – Design Report) in Section 3.1.6 (identifies locations of potential monitoring sites), with no further change to Design Report in this audit period; and - Ambient Air Quality Monitoring Station Locations submitted to the Planning Secretary under this Condition [Letter dated 22 September 2025 with Appendix A – Ambient Air Quality Monitoring Locations and Appendix B – Air Quality Independent Reviewer Verification Letter (Condition E27)]. - DPHI's Letter on 29 October 2025 (<u>outside the audit period</u>) noted that above Ambient Air Quality Monitoring Station Location submitted for information meets the requirements of Condition E27 and ; - <i>"has been prepared in consultation with the Air Quality Community Consultative Committee (AQCCC) and the NSW Environment Protection Authority (EPA);</i> - <i>has been reviewed by the proponent and no issues have been raised with the Department;</i> - <i>includes two appropriate locations within close distance to the Rozelle ventilation outlet and the Cammeray ventilation outlet; and</i> - <i>contains the information required by the conditions of approval."</i> Above DPHI Letter included that above document is made publicly available on the Project website at the earliest convenience. In response to RFI from Lead Auditor on 26/11/2025, Auditees made above DPHI Letter available on the Project website and further indicated that the approved locations are currently going through land access approval and Design Report/ design drawings will be updated post-IFC as part of the 'As-built drawings' (refer evidence to RFI on 26/11/2025, from Lead Auditor). Also refer CoA E2 and CoA E4 (for example) within this Audit Table for audit evidence and findings <u>including note</u>. Condition was not considered further in this sixth Independent Audit.																																																																																
E28	The AQIR must ensure that the operating procedures and equipment to monitor and acquire ambient air quality data, meteorological data and emission data and all reporting procedures comply with NATA (or equivalent) requirements where such requirements exist. The Proponent must commence monitoring for at least 12 continuous months prior to operation and continue monitoring for at least two years following the commencement of operation. At the end of the two year operational monitoring period, the Proponent must review the need for the continued use of ambient monitoring stations in consultation with the AQCCC and EPA. Closure or discontinued use of an ambient monitoring station will require the approval of the Planning Secretary.	Interview with TfNSW and ACCIONA (30 October 2025)	NT	Condition not triggered in this audit period - operation commences ~ 2029 (noting must commence monitoring for at least 12 continuous months prior to operation and continue monitoring for at least two years following the commencement of operation). Condition was not considered further in this sixth Independent Audit.																																																																																

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Notification and Reporting of Ambient Air Quality				
E29	The Proponent must prepare an Ambient Air Quality Protocol for evaluating a potential measurement that exceeds the maximum concentrations in Condition E25. The Ambient Air Quality Protocol must be developed by the Proponent in consultation with the AQCCC and endorsed by the AQIR at least three months prior to the commencement of operation. The Ambient Air Quality Protocol must include: (a) a process for notification of a recording above the ambient air quality maximum concentrations in Condition E25, subject to Condition E30; (b) the template that would be used for the Report on Above-Maximum Concentration Recording, required by Condition E31; and (c) a reporting process endorsed by the AQIR that facilitates a Report on Above-Maximum Concentration Recording. This condition does not apply to the ambient air quality changes caused by bushfires or other events unrelated to the operation of the tunnel.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E30	The Proponent must notify the Planning Secretary, EPA and Ministry of Health of any recordings above the maximum concentrations (Above-Maximum Concentration Recording) in Condition E25 as soon as possible and within 24 hours of the recording. This notification must provide details of the circumstances of the event, including: (a) the nature of the event; (b) the concentration levels that occurred; (c) the timing and duration of the event; (d) the measures employed to minimise the concentration levels; and (e) the date when the Proponent will submit a Report on Above-Maximum Concentration Recording in accordance with Condition E31.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E31	Within one month of any notification of Above-Maximum Concentration Recording, the Proponent must prepare and submit to the Planning Secretary, for information, a Report on Above-Maximum Concentration Recording that details the cause and major contributor of the exceedance, the effectiveness of any action(s) taken in response to the exceedance and the options available to prevent recurrence.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E32	Where the operation of the tunnel is identified to be a significant contributor to the recorded above-goal reading, the Report on Above-Maximum Concentration Recording must include consideration of improvements to the tunnel air quality management system so as to achieve compliance with the ambient air quality goals, including but not limited to installation of the additional ventilation management facilities allowed for under Condition E19.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
Tunnel Air Quality – General Reporting				
E33	The Proponent must develop and implement an Air Quality Reporting System for in-tunnel ventilation outlet emissions and ambient air quality prior to operation. The Air Quality Reporting System must be reviewed and verified by the AQIR prior to operation as meeting the requirements of Conditions E34 to E35. The Air Quality Reporting System and the AQIR verification must be made publicly available prior to operation.	<u>Evidence outside this audit period:</u> - Air Monitoring System – Design Report (WHTP2-ACOC-WHT-ME-TV04-RPT-000001, Revision: C 27 November 2024, Final Design Documentation) - Tunnel Ventilation Control - Design Report (WHTP2-ACOC-WHT-ME-TV03-RPT-000001, Revision: C 8 April 2025, Final Design Documentation) - Refer previous Independent Audit Reports for further audit evidence and referred elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Air Monitoring System – Design Report (WHTP2-ACOC-WHT-ME-TV04-RPT-000001, Revision: C 27 November 2024, Final Design Documentation) - Tunnel Ventilation Control Design Report (WHTP2-ACOC-WHT-ME-TV03-RPT-000001, Revision: D dated 20 June 2025 - Final Design Documentation)	NT	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period.</u> Auditees indicated below: - Captured in Design Report TV04 (Air Monitoring System – Design Report) under Section 3.1.8 - Air Quality Reporting System & Appendix M (Air Quality Reporting System Architecture) with no further change to TV04 (Air Monitoring System – Design Report) in this audit period (refer evidence); and - Preparation of the AQRS (air quality reporting system) captured in Design Report TV03 Section 3.1.11; Design Report TV03 was updated in the audit period (refer evidence) - Currently in progress with TfNSW/AM to confirm the data structure and process Condition was not considered further in this sixth Independent Audit.
E34	The Air Quality Reporting System must meet minimum analytical reporting requirements for air pollution monitoring stations as specified in the Approved Methods of Modelling and Assessment of Air Pollutants in NSW (EPA, 2007, or as updated).	Same as CoA E33 (refer CoA E33 within this Audit Table for audit evidence)	NT	Same as CoA E33 (refer CoA E33 within this Audit Table for audit evidence and findings).
E35	The Air Quality Reporting System must ensure that the following information is continually made publicly available, unless otherwise approved by the Planning Secretary: (a) results of hourly updated real-time monitoring and relevant meteorological data in an easy to interpret format. This data must be preliminary until a quality assurance check has been undertaken by a person or organisation, who is accredited by NATA for this purpose; and (b) annual report(s) on the results of the monitoring for the duration of the operation of the project. The first report must be made available within 15 months of the operation of the project and address the first 12 months of operation. Subsequent reports must address the previous 12 months of operation and be made publicly available no later than three months following the 12 month-period of operation which is the subject of the report. The reports must analyse and discuss the monitoring results, including any trends and variations in the data during the reporting period, and compare the results with previous reporting periods.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
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HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)												
Quality Assurance and Control																
E36	Quality assurance (QA) and quality control (QC) measures for air quality and ventilation outlet emission monitoring data must be prepared and undertaken. This must include, but not be limited to: accreditation/quality systems; staff qualifications and training; auditing; monitoring procedure; service and maintenance; equipment or system malfunction; and records/reporting. The QA/QC measures must be verified by the AQIR.	Not applicable - Operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.												
Future Development Guidance																
E37	Within 18 months of commencement of construction, the Proponent must provide data to councils detailing pollution concentrations at various heights and distances from the ventilation outlets to facilitate the planning of and assessment of new development in areas within a distance of 300 metres around the ventilation outlets which would be within a potential three-dimensional zone of affectation (buffer volume). As part of this process, the Proponent must meet all reasonable costs for any necessary amendments to planning instrument(s) required to implement the guidelines.	<u>Evidence outside this audit period:</u> - 241122 - CoA E37_ Submission of info to NSC - Future development Guidance E37 (Ref: WHTP2-ACOC-WHT-ME-TV04-MEM-000012_[A]_E37.pdf) including Cammeray FDD Plume Dispersion Analysis (Ref: WTHP2-ACOC-WHT-ME-TV04-MEM-000011) - North Sydney Council Comments - CONDITION E 137 MCOA - ACCIONA.pdf - WHT_response to NSC E37 memo - signed.pdf - Refer previous Independent Audit Reports for further audit evidence and referred elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025)	C	<u>Outside this audit period:</u> NSC was provided with technical memo - Future development Guidance E37 including the Cammeray FDD Plume Dispersion Analysis on 22 November 2024 noting that once the Final Detailed Design (expected by December 2024) has been reviewed by the Air Quality Independent Reviewer (AQIR) and endorsed, a complete local planning air quality assessment will be issued. On 11 February 2025, NSC provided comments and response acknowledging additional data provided on 20 December 2024 by The Project and noting that it augments the information submitted on 22 November 2024, in accordance with CoA E37; and that the submitted documentation, including the memo outlining pollution concentrations at various heights and distances from the ventilation outlet, has been noted and will be retained for Council's records. Auditees provided a further response and clarification to NSC's comments on 20 March 2025 in regard to CoA E37; with no further response from NSC during the audit period. Refer previous Independent Audit Reports for further audit evidence and findings. <u>During this audit period:</u> Auditees indicated below: - No further response received from NSC in this audit period since Auditees response provided to NSC's comments on 20 March 2025 (outside this audit period).												
BIODIVERSITY																
Species Credits																
E38	Prior to clearing of <i>Acacia terminalis</i> subsp. <i>terminalis</i> (Sunshine Wattle), the species credits in Table 8 must be retired. The retirement of credits must be carried out in accordance with the offset rules of the Biodiversity Conservation Act 2016 (BC Act). Table 8: Species credits <table><tr><th colspan="3">Table 8: Species credits</th></tr><tr><th>Species (only for the below)</th><th>Number of Credits</th><th>In the below IBRA subregions</th></tr><tr><td><i>Acacia terminalis</i> subsp. <i>terminalis</i> (Sunshine Wattle)</td><td>2</td><td>SYB07, Pittwater</td></tr></table>	Table 8: Species credits			Species (only for the below)	Number of Credits	In the below IBRA subregions	<i>Acacia terminalis</i> subsp. <i>terminalis</i> (Sunshine Wattle)	2	SYB07, Pittwater	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.			
Table 8: Species credits																
Species (only for the below)	Number of Credits	In the below IBRA subregions														
<i>Acacia terminalis</i> subsp. <i>terminalis</i> (Sunshine Wattle)	2	SYB07, Pittwater														
E38A	Prior to clearing PCT 4023 at the Emu Plains Ancillary Facility (WHT13), the species credits in Table 8A must be retired. The retirement of credits must be carried out in accordance with the offset rules of the Biodiversity Conservation Act 2016 (BC Act). Table 8A: Species credits <table><tr><th>Plant Community Type (PCT)</th><th>Number of Credits</th><th>In the below IBRA subregions</th></tr><tr><td><u>PCT4023: Coastal Valleys Swamp Oak Riparian Forest</u></td><td>9</td><td>Cumberland</td></tr><tr><th>Species (only for the below)</th><th>Number of Credits</th><th>In the below IBRA subregions</th></tr><tr><td><i>Myotis Macropus</i> (Southern Myotis)</td><td>11</td><td>Cumberland</td></tr></table>	Plant Community Type (PCT)	Number of Credits	In the below IBRA subregions	<u>PCT4023: Coastal Valleys Swamp Oak Riparian Forest</u>	9	Cumberland	Species (only for the below)	Number of Credits	In the below IBRA subregions	<i>Myotis Macropus</i> (Southern Myotis)	11	Cumberland	<u>Evidence outside this audit period:</u> - BCF666 - S.633 Certificate - SIGNED (Ref: Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation, with payment made by TfNSW on 6 February 2024) - Pre-Clearing Permit No.006 (dated 1/05/2024, with proposed commencement date: 06/05/2024) - TfNSW's hold point release for Pre-Clearing Permit No.006 (Ref: HPWP_HP_-_0386_PRW - ENV - PERM - G36-G38-G40 Hold Points Submissions) - Independent Audit No. 4 – Audit Report, Western Harbour Tunnel - Stage 3A (Southern Tunnel Works), Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) (October 2024) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025)	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> TfNSW provided evidence of Biodiversity credit retirement obligations satisfied by payment to the Biodiversity Conservation Fund on 6 February 2024 (refer CoA E39 requirements), for PCT 4023 - Coastal Valleys Swamp Oak Riparian Forest (Number of credits - 9) and <i>Myotis macropus</i> (Number of credits - 11). Clearing of PCT 4023 was undertaken following retirement of credits under Pre-Clearing Permit No.006 (sighted), with proposed commencement date for clearing as 06 May 2024. Auditees provided evidence of TfNSW's hold point release for clearing, under Pre-Clearing Permit No. 006 on 13 May 2024. Refer previous Independent Audit Report (No. 4) for further detail on audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated no change to above in the audit period. CoA addressed outside this audit period.
Plant Community Type (PCT)	Number of Credits	In the below IBRA subregions														
<u>PCT4023: Coastal Valleys Swamp Oak Riparian Forest</u>	9	Cumberland														
Species (only for the below)	Number of Credits	In the below IBRA subregions														
<i>Myotis Macropus</i> (Southern Myotis)	11	Cumberland														
E39	The requirement to retire credits in Condition E38 and E38A above may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the class and number of species credits, as calculated by the Biodiversity Offsets Payment Calculator.	<u>Evidence outside this audit period:</u> - BCF666 - S.633 Certificate - SIGNED (Ref: Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation, with payment made by TfNSW on 6 February 2024) - Independent Audit No. 4 – Audit Report, Western Harbour Tunnel - Stage 3A (Southern Tunnel Works), Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) (October 2024) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025)	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> TfNSW provided evidence of Biodiversity credit retirement obligations satisfied by payment to the Biodiversity Conservation Fund on 6 February 2024 for PCT 4023 - Coastal Valleys Swamp Oak Riparian Forest and <i>Myotis macropus</i> . Refer previous Independent Audit Report (No. 4) for further detail on audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated no change to above in the audit period. CoA addressed outside this audit period.												
E40	Evidence of the retirement of credits or payment to the Biodiversity Conservation Fund in satisfaction of Condition E38 must be provided to the Planning Secretary prior to the clearing of the <i>Acacia terminalis</i> subsp. <i>terminalis</i> (Sunshine Wattle).	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.												

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Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E40A	Evidence of the retirement of credits or payment to the Biodiversity Conservation Fund in satisfaction of Condition E38A must be provided to the Planning Secretary prior to clearing PCT 4023.	<u>Evidence outside this audit period:</u> - Letter, DPHI to TfNSW, dated 14 March 2024 [Ref: SSI-8863-PA-635, WHT and WFU (SSI 8863) - Evidence of Payment to the Biodiversity Conservation Fund (E40A)] - Independent Audit No. 4 – Audit Report, Western Harbour Tunnel - Stage 3A (Southern Tunnel Works), Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) (October 2024) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025)	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> Correspondence regarding the retirement of Biodiversity Offset Credits was submitted by TfNSW to the Planning Secretary on 16 February 2024, under condition E40A of SSI-8863 prior to clearing PCT 4023 (sighted). DPHI's Letter in response to above submission (dated 14 March 2024 - refer evidence), noted that <i>"the information provided confirms that all biodiversity credit retirement obligations required by condition E40A have been satisfied by payment to the Biodiversity Conservation Fund with payment received on the 06 February 2024. Accordingly, the Department acknowledges receipt of this information and has no further comments."</i> Refer previous Independent Audit Report (No. 4) for further detail on audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated no change to above in the audit period. CoA addressed outside this audit period.
Microbat Monitoring Program				
E41	A Microbat Monitoring Program must be prepared to address impacts, detail mitigation measures and monitoring of the Large Bent-winged Bat (<i>Miniopterus orianae oceanensis</i>) identified at the Balls Head Coal Loader. The Monitoring Program must include: (a) deleted (b) all reasonable measures to avoid potential impacts from construction; (c) deleted (d) details of monitoring techniques, timing, duration and frequency/intensity to be used; (e) deleted (f) ongoing monitoring and reporting requirements during construction; and (g) contingency measures to address impacts attributable to the construction of the CSSI. The plan must be developed in consultation with an independent and appropriately qualified expert in microbat biology and behaviour, EHG, North Sydney Council and be submitted to the Planning Secretary for approval prior to work that impacts microbats. The approved plan must be implemented during construction of the CSSI.	- Interview with TfNSW and ACCIONA (30 October 2025) - Microbat Monitoring Program (Rev 00, dated 27 August 2025) - Approval Letter, DPHI to TfNSW, dated 10 September 2025 [Ref: SSI-8863-PA-1084, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI-8863) – Microbat Monitoring Program, Condition E41] - TfNSW WHT construction portal (https://caportal.com.au/rms/whl)	C	<u>During this audit period:</u> The Microbat Monitoring Program was submitted to the Planning Secretary for approval under Condition E41 and approved by DPHI on 10 September 2025 (refer evidence). DPHI's Approval Letter noted that the Microbat Monitoring Program: - <i>"has been prepared in consultation with Environment Heritage Group and North Sydney Council"</i> - <i>has been reviewed by proponent and no issues have been raised with the Department, and</i> - <i>contains the information required by the conditions of approval."</i> DPHI's Approval Letter noted requirement to ensure that the document is made publicly available on the Project website at the earliest convenience. Above approved Microbat Monitoring Program was available on the Project website. Implementation of select (sample) requirements such as monitoring under Section 4 of the Microbat Monitoring Program was reviewed, with Auditees indicating below: - Tunnelling in the vicinity of the Balls Head Coal Loader has not yet commenced and scheduled to commence ~ December 2026 /January 2027; and - As such, Section 4 Monitoring requirements had not yet been triggered, with first monitoring (baseline monitoring) to be conducted before the TBM passes beneath the Coal Loader. Conditions E42 -E44 not triggered in this audit period and not considered further in this sixth Independent Audit.
E42	The Proponent must monitor microbats for the period specified in the Microbat Monitoring Program, until it is demonstrated, to the satisfaction of the Coordinator General EHG, that all potential impacts on the Large Bent-winged Bat (<i>Miniopterus orianae oceanensi</i>) have ceased.	Same as CoA E41 (refer CoA E41 within this Audit Table for audit evidence)	NT	Same as CoA E41 (refer CoA E41 within this Audit Table for audit evidence and findings).
E43	If by the end of the period of monitoring an unacceptable impact has occurred, and an assessment has determined that offsets are required, the Proponent must offset the impacts on the Large Bent-winged Bat. Offsets must be achieved by the retirement of biodiversity credits or payment to the Biodiversity Conservation Fund or the undertaking of other biodiversity conservation actions, as determined in consultation with and to the satisfaction of the Coordinator General EHG.	Same as CoA E41 (refer CoA E41 within this Audit Table for audit evidence)	NT	Same as CoA E41 (refer CoA E41 within this Audit Table for audit evidence and findings).
E44	The Proponent must prepare and submit to the Planning Secretary for information: (a) evidence confirming the class and number of biodiversity credits or other biodiversity conservation action required by Condition E43 within one month of receiving the notification of the satisfaction of the Coordinator General EHG a copy of the Credit Retirement Report; and (b) evidence of the retirement of credits (or payment to the Biodiversity Conservation Fund), or the transfer of funds to EHG for the purposes of undertaking the biodiversity action(s), required by Condition E43, within six months of receiving the notification of the satisfaction of the Coordinator General EHG.	Same as CoA E41 (refer CoA E41 within this Audit Table for audit evidence)	NT	Same as CoA E41 (refer CoA E41 within this Audit Table for audit evidence and findings).
Marine Ecology				
E45	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
E46	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
E47	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
Habitat Enhancement				
E48	Within three months of the removal of any native trees, the Proponent must consult with local community restoration/rehabilitation groups, Landcare groups, relevant councils, DPI Fisheries and any relevant public authorities to determine if there is an interest in the reuse of suitable timber and root balls for habitat enhancement and rehabilitation work. If there is an interest, native trees that are removed for the construction of the CSSI and that are greater than 25-30 centimetres in diameter and three metres in length must be salvaged and stored for a period of at least six weeks to enable collection by interested parties.	- Interview with TfNSW and ACCIONA (28 October 2025) <u>Sighted below sample evidence:</u> - Email correspondence between ACCIONA and Taronga Zoo, dated 22 May 2025 - 21 July 2025 (Ref: RE EXT Re WHT - Tree Donations.msg) - Images supplied by ACCIONA of Zoo collection 23072025 (Ref: IMG_0318.jpeg to IMG_0321.jpeg)	C	Sighted consultation correspondence between ACCIONA and Taronga Zoo (dated 22 May 2025 - 21 July 2025), prior to and in the lead up to clearing activities scheduled to commence on 21 July 2025 at Berrys Bay Foreshore Parklands, in the audit period. Sydney Zoo responded to the Project on 26 May 2025 confirming species the Zoo would be interested in (African olive, <i>Pittosporum undulatum</i> , <i>Glochidion ferdinandii</i> , <i>Acacia longifolia</i>) and further correspondence on 21 July 2025 confirming details of pick up from site (refer evidence sighted).

Item
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Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
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Result	Comment
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NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
FLOODING				
E49	Except as permitted by Condition E49A, the CSSI must be designed and implemented to limit changes to flood behaviour during the 1% AEP event as follows: (a) a maximum increase in inundation time of one hour; (b) a maximum increase of 10 mm in inundation at the habitable room floor level where habitable room floor levels are currently inundated; (c) a maximum increase of 50 mm in inundation of land zoned as residential, commercial or industrial where the land is not currently inundated; and (d) no inundation of habitable room floor levels which are not currently inundated. Measures identified in the documents listed in Condition A1 to not worsen flood characteristics or other measures that achieve the same outcomes, must be incorporated into the detailed design of the CSSI. The incorporation of these measures must be reviewed and endorsed by a suitably qualified and experienced person in consultation with directly affected landowners, EHG, NSW State Emergency Service (SES) and relevant councils.	<u>Evidence outside this audit period:</u> - DR01 - Hydrology and Flooding - Design Report (WHTP2-AAJV-NWW-SD-DR01-RPT-000001), Revision D, FDD 2, dated 19 February 2024 - Email, TfNSW to ACCIONA dated 31 January 2024 (Ref: WHTP2-TFNSW-ACOC-CORR-000695 MCoA E49 - DR01 for External parties consultation and CORR-WHTP2-TFNSW-ACOC-CORR-000695 - Portal Submission evidence) - Email, ACCIONA to SES dated 1 February 2024 (Ref: WHT Stage 2: Hydrology and Flooding Design Report issued to SES for consultation) - Ref: 240213 - NSC comments on DR01, dated 13 February 2024 - Emu Plains Flood Impact and Risk Assessment (FIRA) (23020338_R03_V03, 12 January 2024) - SES response [Ref: ID 2289, dated 14 February 2024] - IWC response [RE: (SSI-8863-PA619) DR01 – Hydrology and Flooding - Design Report for the WHT Project), dated 8 March 2024] - BCS response [Flood report PA -2 Feb 2024 and Flood & Hydro Design BCS response.msg] - Sighted ACCIONA Designer's review correspondence re DR01/SES response/recommendations (Ref: RE_DR01 and compliance with CoA E49 .msg, dated 17/12/2024) - Sighted Water Technology Area 2 flood modelling [Ref: Scenario 3 - 1% AEP - Developed (fill to 22.9m AHD) Change in Water Level, by Water Technology] - Email, Lead Auditor/ACCIONA ESM, dated 9 and 14 May 2025 (RE_EXT_Emu Plains - Area 2 - Site inspection - 9 May 2025.msg) / JIRA under CoA E49 <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Email, ACCIONA to Lead Auditor dated 30 October 2025 Ref: WHT E49 Update to DR01 Flooding Report.msg Sighted below: - DR01 - Hydrology and Flooding - Design Report (WHTP2-AAJV-NWW-SD-DR01-RPT-000001), Revision E, FDD 2, dated 28/02/2025 - Memo Pre-Cast Yard Stockpile Analysis, dated 08 September 2025, prepared by Egis (Ref: Area 2 - E49 Flooding Memo BIL- 1005003)	C	<u>Outside this audit period:</u> - Design Package DR01 (Hydrology & Flooding Report) was finalised and certified by the Independent Peer Reviewer. - Water Technology (WT) commissioned by Acciona undertook a detailed flood impact and risk assessment (FIRA) of Emu Plains site (WHT13), with report concluding that CoA E49 is satisfied (refer Section 8 - Conclusions for further detail); and this Report was included in CoA A1 g) under Modification 2 of the Approval (refer evidence). - DPHI approved ASEMP Emu Plains (WHT13) on 13 March 2025 with below direction: <i>"Direction 1: Area 2 cannot be used or operated until it is confirmed that the design of Area 2 will comply with the limits prescribed in condition E49, and the FEMP is updated to consider Area 2." The Approval Letter also noted that the flood limits imposed by condition E49 apply to the operation of Emu Plains Ancillary Facility (WHT13)";</i> - Auditees confirmed that further flood modelling was undertaken by Water Technology of a 1%AEP event to address DPHI's direction re Area 2 that the design of Area 2 will comply with the limits prescribed in Condition E49. The scenario modelled was proposed stockpiling of tunnel spoil in Area 2 in a 1% AEP event [Ref: Scenario 3 - 1% AEP - Developed (fill to 22.9m AHD) Change in Water Level, by Water Technology]. Refer previous Independent Audit Reports for further audit evidence (including consultation) and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated below: - DR01 – Hydrology and Flooding - Design Report Rev D (FDD2 19/2/24) was updated to Rev E (FDD3 28/2/25), outside this audit period to align the report with the requirements of Infrastructure Sustainability Council design and as built rating v1.2 Lan-4 Flooding credit - no changes were made that result in design changes, or the results of the flood impact assessment. - Revised flood modelling undertaken to consider a higher stockpile above that considered in March 2025 (22.9m AHD) at Emu Plains (WHT13) - Area 2, to show compliance with this Condition (refer evidence sighted). NB: It is not the responsibility of the Independent Auditor to verify compliance with detailed flood design provisions, which should be confirmed by qualified personnel responsible for undertaking detailed design, preparation of design reports, flood studies and memorandums; including personnel responsible for certification of design compliance to requirements.
E49A	Where Condition E49 cannot be achieved during operation of the Emu Plains Ancillary Facility (WHT13) within the Boral Emu Plains site, alternative changes to flood behaviour may be agreed to in writing with Boral Limited. Any written agreement must be obtained prior to Works that will result in Condition E49 not being met.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Refer CoA E49 within this Audit Table for evidence	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> Refer previous Independent Audit Reports for further audit evidence and findings. <u>During this audit period:</u> Refer CoA E49 within this Audit Table for audit evidence and findings. Condition not triggered in the Audit Period.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E49B	A Flood Emergency Management Plan (FEMP) for the Emu Plains ancillary facility (WHT13) must be prepared by a suitably qualified, chartered professional engineer with skills and experience in hydrology and flood emergency management. The FEMP must be prepared in consultation with the NSW Reconstruction Authority and the NSW State Emergency Service prior to the commencement of Construction, or where there is more than 20 personnel and visitors on-site at any one time at WHT13. The FEMP is to facilitate self-directed evacuation or evasion and must include details of the actions to be undertaken before, during, and after a flood, how warnings will be monitored, the triggers for different actions, and the evacuation procedures to be followed. Actions should cover different stages of the development, including site establishment, use of the facility, and decommissioning of the Emu Plains ancillary facility (WHT13). The plan must be updated during the operation of the facility if there are changes in use that would impact on evacuation. The FEMP must address the provisions of the Flood Risk Management Manual (DPE, 2023) and the associated Floodplain Risk Management Guidelines, consider the full range of flood risks, the proposed use of the site, site access constraints and local area evacuation routes, and include: (a) flood awareness/education for construction site workers; (b) flood warden delegation and responsibilities during establishment, use and decommissioning; (c) temporary evacuation signage including clearly labelled direction of travel in the event of a flooding emergency; and (d) timing provisions for FEMP review. All parties involved in the establishment, use and decommissioning of the site must be issued with a copy of the FEMP and be notified of flood evacuation responsibilities. The FEMP must be implemented during Construction and be submitted to the Planning Secretary upon request. Notes 1. The FEMP may be staged so that actions can be developed and implemented to cover different stages of the development such as site establishment, operation and decommissioning. 2. The reference to personnel and visitors does not include NSW government or Proponent representatives undertaking site inspections. 3. In the event that the FEMP is finalised prior to Construction, maximum personnel and visitor numbers may be increased beyond the 20 personnel/visitor limit.	<u>Evidence outside this audit period:</u> - Flood Emergency Management Plan (FEMP) – Stage 1 Site Establishment WHT13 Site, Emu Plains prepared by Water Technology (Ref:23020338_R04_V03.docx, dated 29/05/2024) - Flood Emergency Management Plan (FEMP) – Stage 2 -Operation WHT13 Site, Emu Plains prepared by Water Technology (Ref: 23020338_R05_V02a_Site_Operation_Final.docx, dated 20/3/25) <u>Consultation Evidence:</u> - Emails, ACCIONA - NSW Reconstruction Authority (RE: EXT: RE: WHT - Flood Emergency Management Plan Consultation, dated 18/06/2024) - Emails, ACCIONA - SES [RE: EXT: Response ID2351 RE: WHT Stage 2: Flood Emergency Management Plan (FEMP) issued to SES for consultation, dated 21 June 2024] - Emails, ACCIONA 240529_Emu Plains FEMP and IRP approval - Emails, ACCIONA 240531_ACA Flood evac signage.msg - Emu Plains Site Induction (1).pptx (last updated on 26/09/2024) - Emergency Flood Evac Route.JPG - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Flood Emergency Management Plan (FEMP) – Stage 2 -Operation WHT13 Site, Emu Plains prepared by Water Technology (Ref: 23020338_R05_V02a_Site_Operation_Final.docx, dated 20/3/25) - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>Outside this audit period:</u> - Flood Emergency Management Plan (FEMP) – Stage 1 Site Establishment WHT13 Site, Emu Plains was prepared by Water Technology commissioned by ACCIONA, in consultation with NSW Reconstruction Authority, the NSW State Emergency Service and finalised on 29 May 2024 by Water Technology. - The FEMP was updated to Revision 05 by Water Technology to include the operational phase and to include Area 2; addressing DPHI Direction 1 that the FEMP is updated to consider Area 2. - Section 2.1.1 of the FEMP states that "<i>the use of Area 2 would not increase the overall number of workers on the WHT13 site and thus not effect the evacuation analysis for the WHT13 site</i>" Refer previous Independent Audit Reports for further audit evidence and findings (including implementation). <u>During this audit period</u> Auditees indicated below(refer evidence): - For Emu Plains (WHT13) the main casting start date was 2 June 2025 and opening ceremony was on 14 June 2025; and - No further updates have been made to the FEMP (refer evidence) during this audit period.
E49C	Before Work commences at WHT13, the following is required: (a) establish a procedure for regularly monitoring water levels and flood warnings at the Nepean River at Penrith (Bureau of Meteorology Station Number 567047) (b) establish a procedure for immediately evacuating all personnel and visitors on site when the water level at that station reaches the minor flood level, or a warning for minor flooding at Penrith is issued (c) update the Incident Response Plan covering the WHT13 site to include these procedures. <i>Note: The requirements of Condition E49C only apply until the FEMP is finalised and implemented.</i>	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Flood Emergency Management Plan (FEMP) – Stage 2 -Operation WHT13 Site, Emu Plains prepared by Water Technology (Ref: 23020338_R05_V02a_Site_Operation_Final.docx, dated 20/3/25) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	NT	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> The requirements of Condition E49C only apply until the FEMP is finalised and implemented, which has been addressed outside this audit period. Auditees indicated no further updates have been made to the FEMP (refer evidence sighted) during this audit period.
ABORIGINAL CULTURAL HERITAGE				
E50	The Proponent must take all reasonable steps so as not to harm, modify or otherwise impact Aboriginal objects except as authorised by this approval.	- Interview with TfNSW and ACCIONA (30 October 2025) - Unexpected Finds Register, extract provided for audit period on 28 October 2025 (Ref: Unexpected Finds Register.xlsx) - WHT Environmental Incident register, extract provided for audit period on 28 October 2025 (Ref: WHT Environmental Incident register May - October 2025.xlsx) - Aboriginal Cultural Heritage Management Sub Plan (Rev 4.2, dated 09 September 2024) (Appendix H) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	NT	Section 7.1 of the Aboriginal and Cultural Heritage Management Sub Plan considers CoA E50 and describes reasonable steps to avoid harm. Section 7.1 states that "<i>As discussed in Section 8.1 of Appendix L (Technical working paper: Cultural heritage assessment report) of the EIS, through the process for selection of the preferred tunnel alignment and construction methodology, AHIMS site locations have been considered and avoided so as to minimise potential harm. As a result, and as discussed in Section 6.2 of this plan, no known Aboriginal heritage sites would be directly impacted by the Project. Potential impacts would be indirect impacts such as vibration and settlement. Construction impacts that have the potential to cause damage to Aboriginal heritage sites are mitigated through the REMMs provided in the MOD2 report (and this Plan) relating to vibration, unexpected finds and cultural heritage awareness training. Sensitive Area Plans have been prepared and included in Appendix A5 of the CEMP. These plans include the location of AHIMS sites from Table 5-1 of this plan and any no go zones that may arise if unexpected finds are encountered during construction. Cultural and historic heritage awareness training will be carried out for personnel engaged in work that may impact heritage items before commencing works for the project. Should any changes be required to the approved Project work boundaries (i.e., works to be undertaken beyond the bounds of the EIS study area) then further assessment following the PACHCI process (and the process outlined in Section 28.3 of the EIS) may be required to ensure the additional works will not cause impacts to Aboriginal heritage.</i>" Section 7.3 and Appendix H1 [TfNSW Management Procedure: Unexpected Heritage Items (2022)] of the Sub Plan sets out the unexpected finds and human remains procedure. Auditees indicated no heritage unexpected finds (UXFs) in the audit period in relation to this CoA. Further audit verification: - Above Sub Plan includes the Unexpected Finds and Human Remains Procedure, which has not been triggered in the audit period in relation to this CoA; and - ACCIONA's Incident and Unexpected Finds Registers had no records of heritage unexpected finds in the audit period nor incidents relating to this CoA.
NON-ABORIGINAL HERITAGE				
E51	The Lavender Street toll gantry must be designed to be consistent with the most recently endorsed Sydney Harbour Bridge Conservation Management Plan. The design must be undertaken in consultation with relevant stakeholders including Heritage NSW.	<i>Not applicable</i>	NT	<i>Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.</i>

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E52	Options for protecting and reusing salvaged heritage infrastructure from the former Woodleys Shipyard and BP Sites in the landscaping of Berrys Bay must be reviewed. The use of the items must be detailed in the Place, Design and Landscape Plan required by Condition E177.	- Interview with TfNSW and ACCIONA (30 October 2025) Draft PDLP addendum for WHT Berrys Bay - Part 2 sighted: - https://caportal.com.au/rms/wh/pd/p-part-2 and JIRA for public display dates - WHT - Berrys Bay, Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000011), Revision F dated 21 July 2025 - Fw EXT Have your say on the future Berrys Bay foreshore parkland design elements.msg - Also refer evidence elsewhere in this Audit Table for audit evidence	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. DesignInc have been engaged to prepare the PDLP addendum for WHT Berrys Bay (Part 2). The PDLP addendum for WHT Berrys Bay (Part 2) is currently in draft following stakeholder and community consultation (went on public display on 28 July 2025 and consultation closed on the 24 August 2025, with some consultation extension provided until 4 September 2025), refer evidence including draft PDLP sighted on the Project website. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation, this Condition was not considered further during this sixth Independent Audit.
Maritime Heritage				
E53	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
E54	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
E55	The potential to retain or minimise impacts to the NSW Torpedo Corps slipway within Woodleys Shipyard in the landscaping of Berrys Bay must be reviewed during detailed design. If reasonably practicable, the slipway must be retained or impacts minimised.	- Interview with TfNSW and ACCIONA (30 October 2025) Draft PDLP addendum for WHT Berrys Bay - Part 2 sighted: - https://caportal.com.au/rms/wh/pd/p-part-2 and JIRA for public display dates - WHT - Berrys Bay, Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000011), Revision F dated 21 July 2025 - Fw EXT Have your say on the future Berrys Bay foreshore parkland design elements.msg - Also refer evidence elsewhere in this Audit Table for audit evidence	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. DesignInc have been engaged to prepare the PDLP addendum for WHT Berrys Bay (Part 2). The PDLP addendum for WHT Berrys Bay (Part 2) is currently in draft following stakeholder and community consultation (went on public display on 28 July 2025 and consultation closed on the 24 August 2025, with some consultation extension provided until 4 September 2025), refer evidence including draft PDLP sighted on the Project website. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation, this Condition was not considered further during this sixth Independent Audit.
Archival Recording				
E56	Prior to potential physical impact, archival recording must be undertaken for the following heritage items: (a) St Leonards Park (including W. Tunks Memorial Fountain, War Memorial, and North Sydney Oval), North Sydney; and (b) North Sydney Sewer Vent. (c) deleted (d) deleted	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. NB: Condition addressed outside this audit period. For detailed audit evidence and findings outside this audit period, refer Independent Audit Report No. 2.
E57	Archival recording must be undertaken by a suitably qualified heritage specialist and prepared in accordance with NSW Heritage Office's How to Prepare Archival Records of Heritage Items (1998) and Photographic Recording of Heritage Items Using Film or Digital Capture (2006). A copy must be provided to Heritage NSW and the relevant Council and submitted as part of the Final Excavation Report required by Condition E62.	<u>Evidence outside this audit period:</u> - TfNSW to HNSW, Ref: Submission Evidence - HNSW, dated 20 December 2023 - TfNSW to NSC, Ref: Submission Evidence - NSC, dated 20 December 2023 - Refer Independent Audit Reports (No. 2- 4, for example) for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025)	NT	<u>Outside this audit period:</u> CoA addressed outside of this audit period. Sighted evidence of submission of stone kerbing photographic archival recording on 20 December 2023 to NSC and Heritage NSW, noting in submission that Final Excavation Report was not triggered. Also refer Independent Audit Reports No.2-4 (for example), for previous audit evidence and findings. <u>During this audit period:</u> Auditees indicated no additional archival recording has been required or undertaken during this audit period.
Excavation and Archaeology				
E58	Prior to the commencement of construction that has the potential to impact upon areas of archaeological significance as defined in the documents listed in Condition A1, a revised Archaeological Research Design and Excavation Methodology must be prepared in accordance with the Heritage Council of NSW guidelines and Heritage NSW comments on the EIS and RiS, to guide the archaeological program. The revised methodology must be prepared in consultation with Heritage NSW and submitted to the Planning Secretary for information.	<u>Evidence outside this audit period:</u> - Email, TfNSW to Lead Auditor, dated 5 November 2024 (Ref: IA4 Confirmation E149-150_ E58-62.msg) - Letter, HNSW to TfNSW, dated 18 April 2023 (Ref: HMS ID 2610, Consultation for Berry's Bay Site Archaeological Research Design and Excavation Methodology (ARDEM) (SSI-8863-PA-369) - DPHI Post Approval Document acknowledgement receipt email, dated 21 April 2023 [(Ref: WHT & WFU - Post Approval Document Received - (SSI-8863-PA-369)] - Independent Audit No. 4 – Audit Report, Western Harbour Tunnel - Stage 3A (Southern Tunnel Works), Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) (October 2024) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025)	NT	<u>Outside this audit period:</u> TfNSW provided correspondence from Heritage NSW (dated 18 April 2023) stating below (excerpt only): "The following documents have been provided to satisfy the conditions: - Berry's Bay Site Archaeological Research Design and Excavation Methodology, prepared by RPS Group, dated 28 March 2023. As delegate of the Heritage Council of NSW, I confirm that the above information sufficiently addresses the requirements of the following conditions: Excavation and Archaeology - E58 ..." Above Berry's Bay Site Archaeological Research Design and Excavation Methodology was prepared and provided to Heritage NSW and the Planning Secretary in 2023, outside of this audit period. Refer previous Independent Audit Report (No. 4) for audit evidence and findings - CoA addressed outside of this audit period. <u>During this audit period:</u> Auditees indicated no change to above.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E59	Prior to commencement of archaeological excavation, the Proponent must nominate a suitably qualified Excavation Director who complies with Heritage NSW's Criteria for Assessment of Excavation Directors (September 2019) to oversee and advise on matters associated with historical archaeology. The Excavation Director must be present to oversee excavation, advise on archaeological issues, advise on the duration and extent of oversight required during archaeological excavations consistent with the approved Archaeological Research Design and Excavation Methodology required by Condition E58.	<u>Evidence outside this audit period:</u> - Email, TfNSW to Lead Auditor, dated 5 November 2024 (Ref: IA4 Confirmation E149-150_ E58-62.msg) - Independent Audit No. 4 – Audit Report, Western Harbour Tunnel - Stage 3A (Southern Tunnel Works), Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) (October 2024) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025)	NT	<u>Outside this audit period:</u> TfNSW indicated that Wendy Thorpe was nominated to fulfil the role of Primary Excavation Director, outside of this audit period. Refer previous Independent Audit Report (No. 4) for audit evidence and findings - CoA addressed outside of this audit period. <u>During this audit period:</u> Auditees indicated no change to above.
E60	Following completion of archaeological excavation programs a Final Excavation Report must be prepared that includes: the details of any archival recording, further historical research undertaken to enhance the final reporting and results of archaeological excavations (including artefact analysis and identification of a final repository for finds). The report must be prepared in accordance with guidelines and standards required by Heritage NSW.	Refer CoA E61 and E62 within this Audit Table for audit evidence	NT	Refer CoA E61 and E62 within this Audit Table for audit evidence and findings.

Artefact Management				
E61	An Artefact Conservation Management Plan (ACMP) must be prepared to support the archaeological excavation programs and be prepared with the support of a conservator. The ACMP must include historical and maritime relics recovered by the project. Artefact specialists must be engaged to analyse and report on the different assemblages as part of the final reporting for the CSSI. This must include details of analysis, processing and management of the collection including its curation needs in the short and long term. The Plan must be included in the Maritime Heritage and Non-Aboriginal Heritage Management CEMP Sub-plans, required by Condition C4.	<u>Evidence outside this audit period:</u> - Email, TfNSW to Lead Auditor, dated 5 November 2024 (Ref: IA4 Confirmation E149-150_ E58-62.msg) - Letter, HNSW to TfNSW, dated 28 September 2023 (Ref: HMS ID 4546, CSSI 8863 WHT & WFU – Compliance with CoA E62 - Submission of Final Excavation Report – Berry's Bay Site) - DPHI Post Approval Document acknowledgement receipt email, dated 4 September 2023 [(Ref: WHT & WFU - Post Approval Document Received - (SSI-8863-PA-502)] - Independent Audit No. 4 – Audit Report, Western Harbour Tunnel - Stage 3A (Southern Tunnel Works), Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) (October 2024) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025)	NT	<u>Outside this audit period:</u> TfNSW provided the Western Harbour Tunnel – Berry's Bay Site, Final Excavation Report, prepared RPS Group, dated 11 August 2023, which contains the Artefact Conservation Management Plan in Appendix A. Report noted there were no artefacts recovered during the excavation programme (Section 2.4 and Section 4.1). Section 4.3 states <i>"The conclusion from this programme of test excavation is that no further archaeological work is required in this place for the reasons that little of any profile survives and it is unlikely to provide useful information or evidence for its primary period of association, the twentieth century refinery. The conclusions reached in the ARDEM have been confirmed by this programme of work."</i> Above Berry's Bay Site, Final Excavation Report, prepared RPS Group, dated 11 August 2023 was provided to Heritage NSW, Planning Secretary and NSC in 2023 (refer evidence). Also refer CoA E62 within this Audit Table for audit evidence and findings. Refer previous Independent Audit Report (No. 4) for audit evidence and findings - CoA addressed outside of this audit period. <u>During this audit period:</u> Auditees indicated no change to above.
E62	The Final Excavation Report must be submitted to the Planning Secretary, Heritage NSW and the relevant Council for information no later than 12 months after the completion of the work referred to in Condition E60. It must include details of any significant artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity. Copies of the Final Excavation Report must be provided to the Planning Secretary, Heritage NSW and to the relevant local Council's local studies unit.	<u>Evidence outside this audit period:</u> - Email, TfNSW to Lead Auditor, dated 5 November 2024 (Ref: IA4 Confirmation E149-150_ E58-62.msg) - Letter, HNSW to TfNSW, dated 28 September 2023 (Ref: HMS ID 4546, CSSI 8863 WHT & WFU – Compliance with CoA E62 - Submission of Final Excavation Report – Berry's Bay Site) - DPHI Post Approval Document acknowledgement receipt email, dated 4 September 2023 [(Ref: WHT & WFU - Post Approval Document Received - (SSI-8863-PA-502)] - Email, TfNSW to NSC, dated 4 September 2023 [Ref: Submission of Final Excavation Report and Related Documentation – WHTWFU CSSI 8863 and attachment - AU213007501_Western Harbour Tunnel - Berrys Bay Site_3_230811_Final Excavation Report.pdf] - Independent Audit No. 4 – Audit Report, Western Harbour Tunnel - Stage 3A (Southern Tunnel Works), Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) (October 2024) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025)	NT	<u>Outside this audit period:</u> TfNSW provided correspondence from Heritage NSW (dated 28 September 2023) stating below (excerpt only): <i>"The following documents have been provided to satisfy the conditions of consent:</i> <i>1. Western Harbour Tunnel – Berry's Bay Site, Final Excavation Report, prepared RPS Group, dated 11 August 2023.</i> <i>As delegate of the Heritage Council of NSW, I confirm that the above information sufficiently addresses the requirements of the following condition: E62..."</i> Above Berry's Bay Site, Final Excavation Report, prepared RPS Group, dated 11 August 2023 was provided to Heritage NSW, Planning Secretary and NSC in 2023 (refer evidence). Refer previous Independent Audit Report (No. 4) for audit evidence and findings - CoA addressed outside of this audit period. <u>During this audit period:</u> Auditees indicated no change to above.

Unexpected Heritage Finds				
E63	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 submitted to the Planning Secretary for information before the commencement of construction.	- Interview with TfNSW and ACCIONA (30 October 2025) - Unexpected Finds Register, extract provided for audit period on 28 October 2025 (Ref: Unexpected Finds Register.xlsx) - WHT Environmental Incident register, extract provided for audit period on 28 October 2025 (Ref: WHT Environmental Incident register May - October 2025.xlsx) - Aboriginal Cultural Heritage Management Sub Plan (Rev 4.2, dated 09 September 2024) (Appendix H) - Non-Aboriginal Heritage Management Sub Plan (Rev 10, dated 23 July 2025) (Appendix G) - Approval Letter, DPHI to TfNSW, dated 28 July 2025 [Ref: SSI-8863-PA-1035, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI 8863) – Non-Aboriginal Heritage Management Sub-Plan, Revision 10, 23 July 2025] - Also refer CoA C7 within this Audit Table for audit evidence - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	During this audit period, the Non-Aboriginal Heritage Management Sub Plan (NAHMP) was submitted to the Planning Secretary for approval under condition C4(h) and approved by DPHI on 28 July 2025 (refer evidence). DPHI's Approval Letter noted that the NAHMP (Revision 10, dated 23 July 2025): - <i>has been prepared in consultation with Heritage NSW and North Sydney Council;</i> - <i>has been endorsed by the Environmental Representative; and</i> - <i>has been reviewed by Transport for NSW and no issues have been raised with the Department."</i> - Section 7.3 and Appendix H1 [TfNSW: Unexpected Heritage Items Procedure (2022)] of the Aboriginal and Cultural Heritage Management Sub Plan sets out the unexpected finds and human remains procedure; and - Section 7.2 and Appendix G1 [TfNSW: Unexpected Heritage Items Procedure (2022)] of the of the Non-Aboriginal Heritage Management Sub Plan sets out the unexpected finds and human remains procedure. Also refer CoA C7 within this Audit Table - for Maritime Heritage Management Sub-plan approved by DPHI in the audit period. Above Sub-plans are available on the Project website.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E64	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of construction. 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.	- Interview with TfNSW and ACCIONA (30 October 2025) - Site Inspection (30 October 2025) - Unexpected Finds Register, extract provided for audit period on 28 October 2025 (Ref: Unexpected Finds Register.xlsx) - Event Only Report dated 29 September 2025 [Ref: TfNSW HER02-Berrys Bay (1)] - Email from ACCIONA to Extent, dated 3 October 2025 (Ref: BB - Lathe - Extent Heritage.jpg) - WHT Environmental Incident register, extract provided for audit period on 28 October 2025 (Ref: WHT Environmental Incident register May - October 2025.xlsx) - Aboriginal Cultural Heritage Management Sub Plan (Rev 4.2, dated 09 September 2024) (Appendix H) - Non-Aboriginal Heritage Management Sub Plan (Rev 10, dated 23 July 2025) (Appendix G) - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	Auditees indicated that during this audit period, a lathe was uncovered (unexpected find) behind a partition wall, during hazardous materials removal works within Woodleys Shed at Berrys Bay Foreshore Parkland and still pending heritage assessment and report from the Project Heritage Consultant (Extent) at the time of this audit. Sighted Unexpected Finds Register with record of above unexpected find (UXF) within the Engineering Workshop attached to Woodleys Shed at Berrys Bay - with following information recorded in the Register such as - date of UXF as 29 September 2025, location, notifications to the WHT Team, ER and Heritage Consultant Inspection Date (16 October 2025) with results and report still pending (TBC) from Project Heritage Consultant (Extent) (refer sample evidence of Report Only and email to Heritage Consultant sighted). Also refer Section 2.2.5 (Site Inspection) of Audit Report where the above UXF was sighted.
Noise and Vibration				
Land Use Survey				
E65	A detailed land use survey must be undertaken to confirm sensitive land user(s) (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration, construction ground-borne noise and operational noise. The survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of work which generates construction or operational noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Noise and Vibration CEMP Sub-plan required by Condition C4.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>During this audit period:</u> - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with TfNSW and ACCIONA (28 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Refer CoA A27 and CoA A34 within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings including DPHI approval of the Noise and Vibration Management Sub Plan (including the Land Use Survey, Monitoring Program and OOHV Protocol within Appendices of the Sub Plan). <u>During this audit period:</u> The Noise and Vibration Management Sub Plan has been further updated and endorsed by the ER and AA and is publicly available on the WHT Project website. Refer CoA A27 and CoA A34 within this Audit Table for audit evidence and findings. The land use survey is included in Appendix D1 of the Noise and Vibration Management Sub Plan.
Construction Hours				
E66	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 6:00pm Saturdays; and (c) at no time on Sundays or public holidays.	- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with TfNSW and ACCIONA (28 October 2025) Sighted below samples: - Site Specific Induction for Berrys Bay Foreshore Parkland Site (Ref: BERRYS~1.PPT, Site Specific Induction Western Harbour Tunnel, Berrys Bay Site, Last updated 21/10/2025) and Toolbox Talk - 24/10/2025 Berry's Bay Site and Attendance Western Harbour Tunnel – Berrys Bay Foreshore Parkland Site Establishment EWMS and sign on record dated 7 July 2025 [Ref: WHTP2-ACOC-WHT-EV-GE01-WMS-000014, Rev 00, dated 5/06/20250 and TBTREC~1] - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	Section 3.3 (Table 3-1) and Section 6.3 of the Noise and Vibration Management Sub-Plan reflects this CoA's requirements. Project approved construction hours, high noise and other restrictions specified within the Noise and Vibration Management Plan are communicated to staff/workers through various mechanisms (for example): - Project/Site-specific Inductions - Pre- Starts /Toolbox talks including following complaints as reminders (refer evidence elsewhere in this Audit Table) - EWMS - Signage with restrictions or requirements <u>Audit examined above for Berrys Bay Site establishment works in the audit period (as an example) - refer evidence:</u> - Site-specific Induction for sighted for Berrys Bay Foreshore Parkland Site including working hours, restrictions for highly noise-intensive works (includes concrete cutting, grinding, jackhammering) and respite 3 hours on and 1 hour off; and - EWMS for Berrys Bay Foreshore Parkland Site Establishment includes working hours, restrictions for highly noise-intensive works etc.
Highly Noise Intensive Works				
E67	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.	Same as CoA E66 (refer CoA E66 within this Audit Table for audit evidence)	C	Same as CoA E66 (refer CoA E66 within this Audit Table for audit evidence and findings).

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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Variation to Work Hours

E68	Notwithstanding Conditions E66 and E67 work may be undertaken outside the hours specified in any of the following circumstances: (a) Safety and Emergencies, including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm. On becoming aware of the need for emergency work in accordance with Condition E68(a)(ii), the Proponent must notify the AA, the ER, the Planning Secretary and the EPA of the reasons for such work. The Proponent must use best endeavours to notify all noise and/or vibration affected sensitive land user(s) of the likely impact and duration of those work. (b) Low impact, including: (i) construction that causes LAeq (15 minute) noise levels: - no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, or - no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); or (ii) construction that causes LAFmax (15 minute) noise levels no more than 15 dB(A) above the rating background level at any residence; or (iii) construction that causes: - continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC 2006), or - intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC 2006). (c) By Approval, including: (i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or (ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E69; or (iii) negotiated agreements with directly affected residents and sensitive land user(s). (d) By Prescribed Activity, including: (i) tunnelling (excluding cut and cover tunnelling and surface works) and tunnel fit out works (excluding surface works) are permitted 24 hours a day, seven days a week; or (ii) delivery of material that is required to occur outside of standard construction hours in Condition E66 to directly support tunnelling activities; or (iii) deleted (iv) spoil haulage from the Rozelle Rail Yards construction support site (WHT12) onto the City West Link; or (v) along the Warringah Freeway corridor in accordance with Condition E88.	- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with ER, AA (21, 24 October 2025) and ACCIONA (28 October 2025) - EPL #21791 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - Emu Plains EPL #21881 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - ER and AA Monthly Reports in audit period (refer CoA A27 and CoA A34 within this Audit Table for audit evidence)	C	Section 3.3 (Table 3-1) and Section 6.3 of the Noise and Vibration Management Sub-Plan reflects this CoA's requirements. The Project has EPL #21791 and EPL #21881 for EMU Plains site (WHT13), in force. Interviews with ER, AA and review of ER and AA Monthly Reports noted no document reviews / endorsements in relation to emergency works and OOHWA under the OOHWP (under CoA E69) during the audit period.
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Out-of-Hours Work Protocol - Works Not Subject to an EPL

E69	An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of work which is outside the hours defined in Conditions E66, and that are not subject to an EPL. The Protocol must be approved by the Planning Secretary before commencement of the Out-of-Hours Work. The Protocol must be prepared in consultation with the ER, AA and EPA. The Protocol must provide: (a) identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: (i) the ER and AA review all proposed out-of-hours activities and confirm their risk levels, (ii) low risk activities can be approved by the ER in consultation with the AA, and (iii) high risk activities that are approved by the Planning Secretary; (b) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria; (c) a process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of Condition E83. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land user(s) would be exposed to, including the number of noise awakening events; (d) procedures to facilitate the coordination of out-of-hours work including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided; and (e) notification arrangements for affected receivers for all approved out-of-hours works and notification to the Planning Secretary of approved low risk out-of-hours works. This condition does not apply if the requirements of Condition E68(b) are met.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Noise and Vibration Monitoring Program (Rev 03, dated 22 April 2024) incorporated as Appendix D2 within the Noise and Vibration Management Sub Plan - Out of Hours Works Protocol - Western Harbour Tunnel Package 2 Project (dated July 2024) included as Appendix D3 within the Noise and Vibration Management Sub Plan - Interview with ER, AA (21, 24 October 2025) and ACCIONA (30 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Refer CoA A27 and CoA A34 within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> Out-of-Hours Work (OOHW) Protocol prepared and included as Appendix D3 within the Noise and Vibration Management Sub Plan. Section 4.1 of the Noise and Vibration Management Sub Plan includes that the OOHW Protocol included in Appendix D3 has been developed and finalised in consultation with the EPA in accordance with CoA E69. Consultation with each agency, including responses received and how any issues raised were addressed in the development of this Plan has been provided to the Planning Secretary along with the relevant document for submission. Refer previous Independent Audit Reports for audit evidence and findings including DPHI approval of the Noise and Vibration Management Sub Plan (including the Land Use Survey, Monitoring Program and OOHW Protocol within Appendices of the Sub Plan). <u>During this audit period:</u> The Noise and Vibration Management Sub Plan has been further updated and endorsed by the ER and AA and is publicly available on the WHT Project website. The Out-of-Hours Work (OOHW) Protocol is included in Appendix D3 of the above endorsed Noise and Vibration Management Sub Plan. Interviews with ER, AA and ACCIONA confirmed no OOHW undertaken in the audit period, under the OOHW Protocol and as noted within the ER and AA Monthly Reports to DPHI. Refer CoA A27 and CoA A34 within this Audit Table for audit evidence and findings.
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Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Construction Noise Management Levels and Vibration Criteria				
E70	Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration objectives: (a) construction 'Noise affected' NML established using the Interim Construction Noise Guideline (DECC, 2009); (b) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); (c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives"; (d) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; (e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage; and (f) the project noise trigger levels as determined in accordance with the Noise Policy for Industry (EPA, 2017), for the operation of the Emu Plains construction ancillary facility (WHT13). Any work identified as exceeding the noise management levels and/or vibration criteria must be managed in accordance with the Noise and Vibration CEMP Sub-plan. <i>Note: The ICNG identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction NML.</i>	- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Site Inspection (28 October 2025) - Interview with ACCIONA (28 October 2025) Sighted below sample toolbox records for Site Establishment and Tunnelling EWMS - Cammeray Site: - Toolbox Talk - 10/10/2025 [Ref: 20251010113151 - Toolbox Talk (Surface) (1)] - Toolbox Talk - 10/10/2025 [Ref: 20251010113250 - Toolbox Talk (Tunnel) (1)] - Site establishment EWMS toolbox.pptx - Tunnelling EWMS toolbox.pptx - ER and AA Inspection Reports (refer CoA A27 and CoA A34 within this Audit Table for audit evidence)	C	Section 9 of the Noise and Vibration Management Sub Plan includes noise and vibration mitigation and management measures. Implementation of specific noise mitigation measures and practices such as no idling, no horns for signalling, no loud radios and no tonal reversing alarms on plant/vehicles operating were observed during the audit site inspection, with no issues or OFIs raised during the audit site inspection - refer Section 2.2.5 Site Inspection of the Audit Report. Following (samples) reviewed to verify implementation in audit period: - Toolbox talks of Site Establishment and Tunnelling EWMS sighted for Cammeray including for e.g. working hours, restrictions for highly noise-intensive works, respite and permitted 24/7 activities - including tunnel surface support activities within the acoustic shed (NML compliant) - refer evidence; - ER and AA Inspection Reports (refer CoA A27 and CoA A34 within this Audit Table for audit evidence and findings); and - Noise and vibration monitoring records (refer CoA C13 within this Audit Table for audit evidence and findings on implementation).
E71	Mitigation measures must be applied when the following residential ground-borne noise levels are exceeded: (a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and (b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A). The mitigation measures must be outlined in the Noise and Vibration CEMP Sub-plan, including in any Out-of-Hours Work Protocol, required by Condition E69.	- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Noise and Vibration Monitoring Program (Rev 03, dated 22 April 2024) incorporated as Appendix D2 within the Noise and Vibration Management Sub Plan - Out of Hours Works Protocol - Western Harbour Tunnel Package 2 Project (dated July 2024) included as Appendix D3 within the Noise and Vibration Management Sub Plan - Interview with ER, AA (21, 24 October 2025) and ACCIONA (28 October 2025) - WHT Tunnelling Works (Acciona) Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-7-6, Rev 6, 27 March 2025) - WHT DPE Complaint Register (as per audit evidence under CoA B7/ CoA B9 within this Audit Table) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) Sighted below samples of monitoring, specific notification and three-week lookaheads: - CNVIS Verification (Knownoise) Groundborne Noise and Vibration Monitoring Report, Rozelle - 02/06/2025 to 05/06/2025 (Ref: 250605 - Foucart St GBN monitoring report.pdf) - Ground-borne Noise Monitoring Event Report (Cheltenham St, Rozelle NSW 2039, 07/05/25 – 08/05/25, Ref: 250507 - Cheltenham Street GBN monitoring report) - Ground-borne Noise Monitoring Event Report (Brockley St, Rozelle NSW 2039, 08/05/25 – 09/05/25, Ref: 250508 - Brockley Street GBN monitoring report) - Email, ACCIONA to AA dated 23/10/2025, with GBN Monitoring Reports and raw data from two receiver locations in October 2025 at Woolcott Street, Waverton (Ref: GBN monitoring report from North.msg dated 23/10/2025) - 251007 - Woolcott Street GBN monitoring report (1) and 251009 - Woolcott Street GBN monitoring report (1) - Email, AA to Lead Auditor, dated 26 October 2025 (Re_ Sixth Independent Audit for WHT .msg) - WHT0497 - SP Notif - GBN and Vibration 23 Sept - 6 Oct.docx - 3WLA (Cammeray + Ridge St +Berry St) - GBN & V prediction (27/10) - 3WLA (Cammeray + Ridge St +Berry St) - GBN & V prediction (08/08/25) - Refer CoA A31 and A34 within this Audit Table for evidence	C	Section 6.4.3 of the Noise and Vibration Management Plan reflects the ground-borne noise (GBN) objectives in this CoA with noise mitigation measures outlined in Section 9 of the Plan and Section 9 in the OOHWP, when triggered. GBN has been assessed in Section 7 of CNVIS for Tunnelling works, which assesses the ground-borne noise for evening and night periods; with mitigation measures, monitoring etc outlined within Section 8. During this audit period: - Complaints recorded in the audit period predominantly related to ground borne noise and vibration from tunnelling and fit out works; including other noise complaints and issues raised - refer Section 3.6 of the Audit Report for summary of complaints; and - The Complaints Register indicates for ground borne noise and vibration complaints, that ACCIONA generally confirmed responses such as where no Project works had not been undertaken in the area, modelled impacts/validation of predictions, appropriate mitigation offered/implemented, monitoring offered/completed (where deemed required to confirm levels), reference to works notified and further work updates, clarification for AA not being offered (outside of noise predicted offer area) with further offer to monitor noise to validate noise being experienced against modelled predictions. The following high level qualitative assessment is provided based on GBN complaints, audit interviews (including discussions with the AA and ER), evidence provided and reviewed: - Noise levels are predicted by the Project's noise modelling software (KNOWnoise). - Three-week lookaheads reviewed for upcoming works to manage GBN and mitigation measures to be applied – such as general notifications, specific notifications, monitoring, alternate accommodation triggers and not scheduling works such as rock bolting during night shifts (where predictions trigger alternate accommodation) and communication of this requirement to the wider Project Team. Sighted sample correspondence in relation to alternate accommodation triggered by rock bolting around M110S between Miller St and Walker St (Wenona), with communication that rock bolting is not to be carried out at nighttime (22:00 to 07:00)]. - Section 2.2 of the Bi-annual Noise and Vibration Construction Monitoring Report (18 November 2024 – 31 May 2025) completed in the audit period, reviewed by the AA and published on the Project website notes that all ground borne noise monitoring results were compliant with the applicable criteria and/or in line with predictions confirming appropriate mitigation measures had been implemented. - Further sample ground borne noise and vibration monitoring records sighted in this audit period (including AA's review of records requested / provided by ACCIONA) indicate that monitoring results were compliant with the applicable criteria and/or in line with predictions. Sample GBNV monitoring records sighted below (refer evidence): - Ground-borne Noise (GBN) Monitoring Event Reports for Permit to Hammer additional mitigation measure verification at two locations in Rozelle during May 2025 (refer evidence); - CNVIS verification of GBNV predictions at Rozelle residence in June 2025 (refer evidence); with monitoring concluding that no exceedances of predicted GBN or vibration levels were observed that could be attributed to hammering works in the cut and cover area of the southern tunnels and below modelled predictions; - Following receipt of GBN complaints, AA requested and reviewed GBN Monitoring Reports and raw data from two receiver locations in October 2025 at Woolcott Street, Waverton and agreed with ACCIONA's conclusions and interpretation of the results. ACCIONA's correspondence to AA noted that that both residences were monitored for validation of KNOWnoise predictions, but the reports results were used as a response to the two complaints received on 9 October from Woolcott Street (Waverton) and results confirmed the tunnelling was in line with the predictions and not exceeding the 45dB AA trigger] (refer evidence); - Also refer CoA A31 for GBNV Monitoring records and data reviewed by AA within this Audit Table for audit evidence and findings. Interviews with the AA and ER raised no specific issues or concerns in relation to complaints management in the audit period. Further discussion with AA on noise and vibration related complaints noted that complaints had been dealt with appropriately by ACCIONA; as reported in Monthly AA Reports to DPHI (refer CoA A34 within this Audit Table for audit evidence and findings).
E72	Noise generating work in the vicinity of potentially-affected community, religious, educational institutions, noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) resulting in noise levels above the NMLs must not be timetabled within sensitive periods, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution.	- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with ACCIONA (28 October 2025) - 251014 CoA E72 noise management for sensitive receivers - Wenona	C	<u>During this audit period:</u> - Sighted correspondence between the Project Team ((dated 13 October 2025) to review trenching / hammering works and any outstanding works around the Wenona School (North Sydney) Influence Zone, prior to HSC commencement; and - Sighted correspondence from the Project Place Manager (dated 14 October 2025) re correspondence sent to Wenona re minor hammering across next two days in preparation for adjustments to planned activities during the HSC period to avoid noise impacts and to contact the Place Manager should they have any concerns or experience any issues.

Item
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NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E73	At no time can noise generated by construction exceed the National Standard for exposure to noise in the occupational environment of an eight-hour (8hr) equivalent continuous A-weighted sound pressure level of LAeq,8h of 85 dB(A) for any employee working at a location near the CSSI.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - WHT – Pre-cast Yard (Emu Plains) Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-8-9, Rev 9, dated 19 May 2025) - Ref: 20250825 WHT AA inspection report Emu Plains 20250730 - Interview with ACCIONA (28 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wh1)	C	The Project has several CNVIS' prepared/updated and endorsed by the AA for WHT Stages 3B and 3C - refer CoA E75 within this Audit Table for audit evidence and findings. Due diligence workplace health and safety exposure monitoring conducted for workers by Occupational Hygienist was sighted, outside of this audit period. Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period</u> , the Emu Plains site commenced operation and the following was sighted/reviewed, as an example: - Sighted CNVIS for EMU Plains (WHT13), which includes for example, predicted noise and vibration levels with Section 9 noting that no noise impacts are predicted from operation of WHT13 and that predicted noise levels are compliant with the day and night-time NMLs; - Sighted (sample) CNVIS validation monitoring conducted in the audit period for Emu Plains (WHT13) - refer CoA C13 within this Audit Table for evidence; - Sighted AA Inspection of Emu Plains (WHT13) - Precast Yard on 30 July 2025 to observe site set up and operations, carry out noise measurements of dominant noise sources, with AA Inspection Report noting (excerpts only): - Activities observed and associated monitoring results, with no measured levels exceeding predicted levels; - No actions or recommendations; and - All operations in line with Emu Plains Precast Yard CNVIS activities and works descriptions (Rev 9, May 2025, report ref 2203-NV-RP-8-9).
Construction Noise and Vibration Mitigation and Management				
E74	Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise levels are minimised. Practices must include, but are not limited to: (a) use of regularly serviced low sound power equipment; (b) early occupation and later release of road carriageways and construction sites; (c) scheduling of noisiest works before 11.00 pm Sunday to Thursday and before 12 midnight Friday and Saturday; (d) temporary noise barriers (including the arrangement of plant and equipment) around noisy equipment and activities such as rock hammering and concrete cutting; and (e) use of alternative construction and demolition techniques.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with ACCIONA (28 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wh1) <u>Below samples sighted:</u> - Berrys Bay EWMS [Ref: WHT BB Site Est EWMS Rev 01 (signed)] - OOHWP 288 - Rozelle - TBM Pressure testing combined.pdf - Noise blanket install images supplied by ACCIONA [Ref: IT01 Investigations noise barrier.jpg and 20 Oct 25 - Lamb Street noise barrier.JPG] - Trencher in use- Drainage shift report 26.06.2025	C	Noise and vibration mitigation and management measures are set out in Section 9.1 of the Noise and Vibration Management Plan and included in OOHW Permits/Pre-starts/EWMS (for example) - also refer evidence elsewhere in this Audit Table and previous Independent Audit Reports for audit evidence and findings, outside this audit period. Auditees indicated below: - Optimisation/selection of appropriate plant and equipment [for example, EWMS for Berrys Bay includes selection of least noisy equipment for tasks where possible and ensuring all equipment is maintained in an efficient condition (refer evidence for EWMS sighted)]; - Use of noise blankets (where required, in specific OOHW permits) - for example sighted in OOHW Permit 288 and example images provided for noise blankets installed for works (refer evidence sighted); - Alternative method/equipment - use of trencher in replacement of saw cutting / hammering along tunnel alignment (refer evidence sighted).
Ground borne noise mitigation – launch and receival chambers				
E74A	The use of rock breakers/hammers for the construction of the launch chamber at Birchgrove and receival chamber at Waverton is restricted to 7:00 am to 6:00 pm, Monday to Saturday, unless the works: (a) do not exceed the NML at sensitive receivers; or (b) are otherwise permitted through an Environment Protection Licence.	- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with ACCIONA (28 October 2025) <u>Sighted below sample evidence:</u> - WHT Tunnel Hammering permit covering period 1 October 2025 - 31 October 2025, Launch Caverns (Ref: Permit to Hammer 12 Rev 7 - LC October - APPROVED) - Pre Start - 26/09/2025 with attendance record (Ref: PTH 12 r 7 toolboxed 20250926044240)	C	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. Section 9 of the Noise and Vibration Management Sub Plan includes mitigation and management measure ID NVMP13. Auditees indicated requirements are communicated and managed via a WHT Tunnel Hammering Permit and regular meetings / toolbox (refer sample evidence sighted).
E75	Construction Noise and Vibration Impact Statements (CNVIS) must be prepared for any work that may exceed the noise management levels, vibration criteria and/or ground-borne noise levels specified in Condition E70 and Condition E71 at any residence outside construction hours identified in Condition E66, or where receivers will be highly noise affected. The CNVIS must include specific mitigation measures identified through consultation with affected sensitive land user(s) and the mitigation measures must be implemented for the duration of the works. A copy of the CNVIS must be provided to the AA and ER prior to the commencement of the associated works. The Planning Secretary may request a copy/ies of CNVIS.	<u>Samples of CNVIS' (new/updated) during this audit period:</u> - City West Link Integration works, Noise and vibration impact statement (Assessment Date 05/09/2025, Assessment Id RD04) - WHT – Pre-cast Yard (Emu Plains) Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-8-9, Rev 9, dated 19 May 2025) - WHT Cammeray Construction Support Site Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-2-9, Rev 9, dated 02 June 2025) - WHT White Bay (WHT3) Support Site Construction Noise and Vibration Impact Statement (Doc no. 22003-NV-RP-10-3, Rev 3, dated 9 July 2025) <u>AA Endorsements of CNVIS' in audit period:</u> - Refer CoA A34 within this Audit Table for audit evidence - TfNSW WHT construction portal (https://caportal.com.au/rms/wh1) - Interview with AA (24 October 2025) and ACCIONA (28 October 2025)	C	During this audit period, CNVIS' have been endorsed by the AA (refer evidence). Refer CoA A34 within this Audit Table for audit evidence and findings. Examples of provision of CNVIS' to the ER in this audit period has not been sighted (refer previous Independent Audits for audit evidence and findings, where sighted). AA Monthly Reports note review/endorsement of CNVIS' in audit period (as applicable) and endorsement letters from AA sighted/noted under CoA A34 within this Audit Table. Auditees indicated no request from DPHI for CNVIS copies in the audit period. CNVIS' are available on the WHT Project website.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E76	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 Noise and Vibration CEMP Sub-plan required by Condition C4 and the Community Communication Strategy required by Condition B1.	- Noise and Vibration Monitoring Program (Rev 03, dated 22 April 2024) incorporated as Appendix D2 within the Noise and Vibration Management Sub Plan - Interview with ACCIONA (28 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Berrys Bay Construction Noise and Vibration Impact Statement (Document no. 22003-NV-RP-11-1, Rev 1, dated 7 March 2025) - Vibration Monitoring Event Report for Berrys Bay Bund Wall (19 September 2025) (Ref: 250919 - Berrys Bay Bund Wall Vibration monitoring report) - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - Also refer CoA E75 (CNVIS') and CoA E79 (for example) within this Audit Table for audit evidence	NT	Project CNVIS' (examples sighted) include vibration impact assessment (cosmetic damage and human comfort), mitigation measures and monitoring, where required. Section 4 of the Noise and Vibration Monitoring Program includes vibration monitoring requirements. Auditees indicated below (refer e: - Properties that may be affected by the Project, either via noise or vibration, are included in the Land Use Assessment in the NVMP and generally captured in the notification process; - Potential impact is confirmed through the predictions included in the CNVIS' through vibration monitoring (cosmetic damage); and - For example, vibration monitoring was undertaken to determine the minimum working distances for preventing cosmetic damage to the bund wall (Berrys Bay site) and was also used to validate impacts on nearby receivers. The monitoring confirmed that recorded values were below the relevant criteria and confirmed the conclusions of the Berrys Bay CNVIS, indicating that no nearby properties are at risk of exceeding the cosmetic-damage screening criteria. No other vibration activities in line with the CNVIS were undertaken during the audit period. Also refer CoA E75 (CNVIS') and CoA E79 (for example) within this Audit Table for audit evidence and findings.
Construction Noise Mitigation - Acoustic Sheds				
E77	All surface-based tunnelling support activities that generate noise levels above the noise management levels in Condition E70 must occur within an acoustic shed.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with AA (24 October 2025) and ACCIONA (28 October 2025)	C	Acoustic Sheds at WHT10 (Cammeray) and WHT9 (Ridge Street) were completed outside this audit period - refer previous Independent Audit Reports for audit evidence and findings. Section 9 (Table 9-1) of the Noise and Vibration Management Plan reflects mitigation measure (NVMP17) that all surface based tunnelling support activities that generate noise levels above the noise management levels in Condition E70 must occur within an acoustic shed <i>or cut and cover structures (where there is no exceedance of the NMLs)</i>. During this audit period, Auditees indicated no change and that all surface based activities that are above NML occur with the acoustic shed at Cammeray and Ridge Street.
E78	All acoustic sheds must be designed and used so that activities carried out within them do not result in the exceedance of the NMLs.	- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with AA (24 October 2025) and ACCIONA (28 October 2025)	C	Section 9 (Table 9-1) of the Noise and Vibration Management Plan reflects mitigation measure (NVMP18) that all acoustic sheds <i>and excavation covers (i.e. cut and cover roof)</i> must be designed and used so that activities carried out within them do not result in the exceedance of the NMLs. Auditees indicated no additional acoustic sheds being designed in the audit period or proposed. Also refer CoA E77 within Audit Table for audit evidence and findings.
Construction Vibration Mitigation - Heritage				
E79	The Proponent must conduct vibration testing 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.	- Noise and Vibration Monitoring Program (Rev 03, dated 22 April 2024) incorporated as Appendix D2 within the Noise and Vibration Management Sub Plan - Interview with ACCIONA ((28 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) Sighted below: - Vibration Monitoring Event Report for Birchgrove Oval Groundskeeper house Heritage Building (30 July 2025) (Ref: 250730 - Birchgrove Oval Heritage.docx) - Vibration Monitoring Event Report for Berrys Bay Bund Wall (19 September 2025) (Ref: 250919 - Berrys Bay Bund Wall Vibration monitoring report) - Also refer CoA E75 within this Audit Table for CNVIS'	NT	Section 6 (Heritage-listed structures) of the Noise and Vibration Monitoring Program reflects this CoA's requirements. Project CNVIS' (examples sighted) include vibration impact assessment (cosmetic damage and human comfort), mitigation measures and monitoring, where required. Auditees indicated below: - Potential impact is confirmed through the predictions included in the CNVIS' - with vibration levels measured, below the adopted vibration criteria (refer evidence and examples sighted below in audit period of vibration monitoring); and - Condition has not been triggered in the audit period. Sighted below sample vibration monitoring records (refer evidence): - Vibration monitoring undertaken on 30 July 2025 at Birchgrove Oval to assess potential cosmetic damage of the groundskeeper house (Heritage Building) with monitoring record concluding that results indicate vibration levels remained below the relevant criteria; and - Vibration monitoring undertaken on 19 September 2025 for Heritage Bund Wall within Berrys Bay foreshore development site, for temporary ramp construction activities with monitoring record concluding that recorded values were below the relevant criteria.
E80	Advice from a heritage specialist must be sought on methods and locations for installing equipment used for vibration, movement and noise monitoring at heritage-listed structures.	- Noise and Vibration Monitoring Program (Rev 03, dated 22 April 2024) incorporated as Appendix D2 within the Noise and Vibration Management Sub Plan - Interview with ACCIONA (28 October 2025) - WHT Heritage Advice_vibration monitoring equipment_FINAL (prepared by EXTENT, dated 11 July 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	Section 6 (Heritage-listed structure) of the Noise and Vibration Monitoring Program reflects this CoA's requirements. During this audit period, Auditees indicated that advice has been sought from heritage specialist (EXTENT) in relation to the installation of vibration monitoring equipment on heritage listed structures and buildings (including Aboriginal and Non-Aboriginal cultural heritage) as part of the Western Harbour Tunnel work (refer evidence sighted).
E81	Before conducting at-property treatment at any heritage item identified in the documents listed in Condition A1, the advice of a suitably qualified and experienced built heritage expert must be obtained and implemented to ensure any such work does not have an adverse impact on the heritage significance of the item.	- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with ACCIONA (28 October 2025)	NT	Section 9.2 (At-property treatment) of the Noise and Vibration Management Sub Plan states that <i>"The Noise Insulation Program (NIP) is a requirement of MCoA E84 and is not applicable to the Project Stage 3B and 3C. As this is currently the responsibility of TfNSW to ensure compliance for the overarching WHT&WFU project as the Proponent. Should any additional at-property treatments be identified by the WHT Project for the management of construction or construction vehicle noise, that is at a heritage listed premise, this will be carried out in a manner to minimise heritage impact, and advice of a heritage conservation architect will be sought prior to undertaking the works. Any treatment will be sympathetic to the heritage values of the item, designed with heritage architect input and be reversible where feasible and reasonable."</i> Auditees indicated that Condition has not been triggered in this audit period.

Item
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Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Utility Coordination and Respite				
E82	All work undertaken for the delivery of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided. The Proponent must: (a) reschedule any work to provide respite to impacted noise sensitive land user(s) so that the respite is achieved in accordance with Condition E83; or (b) consider the provision of alternative respite or mitigation to impacted noise sensitive land user(s); and (c) provide documentary evidence to the AA in support of any decision made by the Proponent in relation to respite or mitigation. The consideration of respite must also include all other CSSI, SSI and SSD projects which may cause cumulative and/or consecutive impacts at receivers affected by the delivery of the CSSI.	- Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with ACCIONA (28 October 2025) Sample OOHW Permit including notification sighted for Utility Works: - OOHWP 288 (Ref: OOHWP 288 - Rozelle - TBM Pressure testing combined) including notification Water pressure testing in Rozelle Western Harbour Tunnel Update - September 2025 - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Also refer CoA E83, CoA E88 and CoA E154 (for example) for audit evidence	NT	Section 9.8 of the Noise and Vibration Management Sub-plan reflects this CoA's requirements with reference to further respite requirements outlined in Appendix D3 (the OOHW Protocol) for implementation. Utility Manager (Arthur Vassileras) appointed for the Project. During this audit period, Auditees indicated below: - Third party works relevant to E82 are managed as part of OOHW Permit process (respite coordination/implementation); - For example, OOHW for TBM Water Pipes on Lilyfield Road undertaken in audit period over 1 shift , for hydrostatic pressure testing of the newly installed TBM water feed piping system, utilising a compressor to verify system integrity under operational conditions (refer OOHW permit 288); and - Condition not triggered. Sighted OOHW permit 288 (refer evidence), which noted below(excerpts only): - Works proposed to occur over 1 shift on Wednesday 1October 2025 8:00pm to 2 October 2025 7:00am - Section 5 included justification for proposed OOHW and that Road Occupancy Licence is required to establish an exclusion zone around the work area, ensuring the activity can be carried out safely; - Section 6 outlined proposed noise mitigation measures such as noise barrier install, notification of works, engines turned off when vehicles are not in use, idling will be avoided, non-verbal communication methods, all machinery will be regularly maintained and serviced to ensure quiet and efficient operation etc; and - Section 19 of the OOHW Permit noted that Utility Coordination and Respite (CoA E82) was not triggered for above OOHW. Refer CoA E83, CoA E88 and CoA E154 (for example) within this Audit Table for audit evidence and findings.
Out-of-Hours-Work- Community Consultation on Respite				
E83	In order to undertake out-of-hours work outside the hours specified under Condition E66, the Proponent must identify appropriate respite periods for the out-of-hours work in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with: (a) a progressive schedule for periods no less than three months, of likely out-of-hours work; (b) a description of the potential work, location and duration of the out-of-hours work; (c) the noise characteristics and likely noise levels of the work; and (d) likely mitigation and management measures which aim to achieve the relevant noise management levels under Condition E70 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers). The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the AA, ER, EPA and the Planning Secretary. Note: Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the rating background noise level at any residence.	- Interview with TfNSW and ACCIONA (28 October 2025) - WHT Stage 3B and 3C MCoA E83 OOHW Consultation Summary (1 April to 30 June 2025) WHTP2-ACOC-WHT-EV-GE01-RPT-000030, Revision 01 Date: 23 September 2025 Sighted sample submission of E83 Report within audit period (1 April to 30 June 2025) to AA, ER, EPA and Planning Secretary: - TfNSW submission of WHT Stage 3BC E83 OOHW Consultation Summary 1 April - 30 June 25 to DPHI (Ref: DPHI Post Approval Form_20251001053749) (no date stamp) - Email, ACCIONA to EPA dated 1 October 2025 (Ref: WHT Stage 3BC MCoA E83 OOHW Consultation Summary 1 April - 30 June 25 -REV01, E83 EPA submission) - TeamBinder Email, ACCIONA to TfNSW with ER and AA copied on 1 October 2025 [Ref: Transmittal No: WHTP2-ACOC-TX-003722, Western Harbour Tunnel Stage 3B and 3C Ministerial Condition of Approval E83 Out of Hours Work Consultation Summary (1 April to 30 June 2025) - Rev 01.01]	C	The Project has prepared the following E83 Reports since the fifth Independent Audit: - WHT Stage 3B and 3C MCoA E83 - OOHW Consultation Summary (1 January to 31 March 2025) Date: 2 May 2025 (outside this audit period) - WHT Stage 3B and 3C MCoA E83 - OOHW Consultation Summary (1 April to 30 June 2025) Date: 23 September 2025 (within this audit period) For example, the OOHW Consultation Summary (1 April to 30 June 2025) Report within this audit period, includes: - Outcomes of community consultation activities (noting no specific feedback from the community in relation to WHT out of hours works was received from the 3 month progressive out of hours consultation); - Identified respite periods (noting that respite periods from WHT OOHWs are at a minimum all nights outside the three nights per week, with only two consecutive nights per week and no more than 10 nights per month and that for this reporting period from 1 April 2025 to 30 June 2025, respite night for WHT included all nights excluding the nights where above noise management level out of hours work were undertaken as described above); and - Scheduling of the likely OOH works. Sighted sample submission of E83 Report within audit period (1 April to 30 June 2025) to AA, ER, EPA and Planning Secretary - refer evidence.
Warringah Freeway Upgrade - Noise Mitigation Measures				
E84	The Proponent must implement the Noise Insulation Program (NIP) Should the NIP be progressively updated, the updated version must be provided to the Planning Secretary for information. Note: the implementation of temporary or permanent noise mitigation measures in accordance with NIP is considered as low impact work as defined in the definitions table Low Impact Work (d).	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E85	Landowners whose residential properties are eligible to receive at-property treatment in accordance with the NIP must be advised of the range of options that can be installed at or in their property and given a choice as to which of these they agree to have installed. A copy of all guidelines and procedures that will be used to determine at-property treatment at their residence must be provided to the landowner.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E86	The offer for at-property treatment or the application of other noise and vibration mitigation measures does not expire until the out-of-hours work affecting that property are completed, even if the landowner initially refuses the offer.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E87	The implementation of at-property treatment does not preclude the application of other noise and vibration mitigation and management measures including temporary and long term accommodation.	- Interview with TfNSW and ACCIONA (28 October 2025) - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D)	NT	Section 9.2 (At-property treatment) of the Noise and Vibration Management Sub Plan reflects this CoA's requirements. Auditees indicated that Condition has not been triggered in this audit period.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Warringah Freeway Upgrade - Out-of-Hours Work periods				
E88	Out-of-Hours Work along the Warringah Freeway corridor which results in an exceedance of the relevant NML at the same sensitive land user(s) may be undertaken in accordance with the following criteria: (a) two consecutive evenings and/or nights per week; or (b) three non-consecutive evenings and/or nights per week; or (c) 10 evenings and/or nights per month; or (d) except as identified by an EPL; or (e) in accordance with an agreement with a potentially impacted receiver(s) as required by Condition E68(c)(iii) or Condition E83. Note: These parameters may be increased subject to the development of a framework, which is prepared in consultation with the community and EPA and with consideration of the delivery of the NIP.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere in this Audit Table <u>Evidence during this audit period:</u> - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Interview with TfNSW and ACCIONA (28 October 2025) <u>Sighted sample correspondence to DPHI with OOHW schedule:</u> - Email, TfNSW to DPHI on 27 October 2025 with OOHW Schedule for week commencing 27/10/25 (Ref: WFU OOHW Schedule WC 27/10/25) - Email, RE_ WFU OOHW Schedule WC 27_10_25.msg (Correspondence between Lead Auditor and TfNSW, dated 18/11/2025) <u>Sighted sample evidence for coordination between WHT and WFU for OOHW:</u> - Email, WHT Senior Environmental Advisor and WFU OOHW Coordination Manager between 1 and 8 July 2025 for barrier reconfiguration and line marking works on the Berry St ramps during the WFU 56 hour shutdown on 11/7 – 14/-7 (Ref: WFU Coordination July Berry Street, RE: EXT: RE: WHT Berry St Works - WFU 56 hour shut down 11/07) - Also refer CoA E83 (for example) within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and findings, outside of this audit period. <u>During this audit period:</u> - Sighted sample correspondence of OOHW planning and coordination between WHT and WFU with proposed noise model provided by WHT to WFU on 1 July 2025 for barrier reconfiguration and line marking works on the Berry St ramps during the WFU 56 hour shutdown on 11/7/2025 – 14/7/2025 (refer evidence); and - Sighted sample joint weekly OOHW schedule (to track compliance with 2/3/10 rule for both WHT and WFU) provided to DPHI, ER and AA on a weekly basis by TfNSW (refer evidence). Also refer CoA E83 (for example) within this Audit Table for audit evidence and findings.
Emu Plains Ancillary Facility – At-property noise treatment				
E88A	The landowners of 17 and 19 Railway Street, Emu Plains must be advised that their residences are eligible for at-property noise treatments. The advice must be provided within one month of the commencement of Work at the Emu Plains ancillary facility, unless an alternative timeframe is agreed to by the Planning Secretary.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere in this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025)	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> Auditees indicated that at-property treatments for the two properties - 17 Railway Street and 19A Railway Street, Emu Plains have been completed; with final inspections of both properties completed on 18 December 2024 and Construction Certificates issued [prior to concrete casting at the Emu Plains ancillary facility (WHT13)] - refer evidence under CoA E88C within this Audit Table. CoA addressed outside this audit period; refer previous Independent Audit Reports for further audit evidence and findings. <u>During this audit period:</u> Auditees indicated no change to above in this audit period.
E88B	The noise treatment types to be provided must be developed in consultation with and agreed to by the affected landowners. The landowners must be advised of the range of options that can be installed at their property and be given a choice of mitigation to be installed. A copy of all guidelines and procedures that will be used to determine the type of noise treatment must be provided to the landowner.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere in this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025)	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> CoA addressed outside this audit period; refer previous Independent Audit Reports for further audit evidence and findings. <u>During this audit period:</u> Auditees indicated no change to above in this audit period.
E88C	Where a landowner accepts the offer for at-property noise treatment, the measures must be implemented prior to the commencement of concrete casting at the Emu Plains ancillary facility (WHT13), unless an alternative timeframe is agreed to by the landowner.	<u>Evidence outside this audit period:</u> Sighted TfNSW - Noise Insulation Program - Final Inspection Checklists and signed Schedule 3 - Completion Certificates: - TfNSW - Noise Insulation Program Final Inspection Checklist (Ref: SLR ID 12178, TfNSW ID: WHT2743, 17 RAILWAY STREET EMU PLAINS 2750 18 December 2024; 12178-WHT2743-17 RAILWAY STREET EMU PLAINS 2750_CR_v1.0.pdf) including signed Schedule 3 - Completion Certificate from Master Building Solutions Pty Ltd - TfNSW - Noise Insulation Program Final Inspection Checklist (Ref: SLR ID 12179, TfNSW ID: WHT2744, 19A RAILWAY STREET EMU PLAINS 2750, 18 December 2024; 12179-WHT2744-19A RAILWAY STREET EMU PLAINS 2750_CR_v1.0.pdf) including signed Schedule 3 - Completion Certificate from Master Building Solutions Pty Ltd - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere in this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025)	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> Auditees indicated that at-property treatments for the two properties - 17 Railway Street and 19A Railway Street, Emu Plains have been completed; with final inspections of both properties completed on 18 December 2024 and Construction Certificates issued [prior to concrete casting at the Emu Plains ancillary facility (WHT13)] - refer evidence sighted. CoA addressed outside this audit period; refer previous Independent Audit Reports for further audit evidence and findings. <u>During this audit period:</u> Auditees indicated no change to above in this audit period.
E88D	The offer for at-property treatment expires 18 months after concrete casting at the Emu Plains ancillary facility (WHT13) has commenced.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere in this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (28 October 2025)	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> At property-treatments offered and implemented outside this audit period and prior to concrete casting at the Emu Plains ancillary facility (WHT13). CoA addressed outside this audit period. Refer previous Independent Audit Reports for further audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated no change to above in this audit period.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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Operational Noise Mitigation Measures

E89	The Proponent must prepare an Operational Noise Review (ONR) to confirm noise control measures that would be implemented for the operation of the CSSI. The ONR must be prepared in consultation with the Planning Secretary, relevant council(s), and the EPA and must: (a) confirm the appropriate operational noise objectives and levels for surrounding development, including existing sensitive land user(s); (b) confirm the operational noise predictions based on the final design. Confirmation must be based on an appropriately calibrated noise model (which has incorporated noise monitoring, and concurrent traffic counting, where necessary for calibration purposes). The assessment must specifically include verification of noise levels at all fixed facilities, based on noise monitoring undertaken at appropriately identified noise catchment areas surrounding the facilities; (c) confirm the operational noise impacts at adjoining development based on the final design of the CSSI, including operational daytime LAeq,15 hour and night-time LAeq, 9-hour traffic noise contours; (d) review the suitability of the operational noise mitigation measures identified in the documents listed in Condition A1 and, where necessary, investigate and identify additional noise and vibration mitigation measures required to achieve the noise criteria outlined in the NSW Road Noise Policy (DECCW, 2011) and NSW Noise Policy for Industry (EPA, 2017) as relevant, including the timing of implementation; (e) include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures; and (f) procedures for the management of operational noise and vibration complaints. The ONR must be verified by an independent acoustic expert. The ONR must be undertaken at the Proponent's expense and submitted to the Planning Secretary within 12 months of the commencement of construction unless otherwise agreed by the Planning Secretary. The Proponent must implement the identified noise and vibration control measures and make the ONR publicly available. Note: The design of noise barriers and the like must be undertaken in consultation with the community as part of the Place Design and Landscape Plan required under Condition E177.	<u>Evidence outside this audit period:</u> - Letter, DPHI to TfNSW dated 28 May 2024 [(Ref: SSI-8863-PA-721, WHT – Stage 3B (SSI-8863): Operational Noise Review (ONR) – Extension of Time Request (Condition A8)] - Approval Letter, DPHI to TfNSW (Ref:SSI-8863-PA-839, dated 15 October 2024) [WHT and WFU (SSI 8863) - Operational Noise Review (ONR) - Staging Request (condition A15) and Extension of Time (condition E89)] - Letter, DPHI to TfNSW dated 28 January 2025 [(Ref: SSI-8863-PA-869, WHT and WFU (SSI 8863) Operational Noise Review (condition E89)] - WFU and WHT Operational Noise Review (ONR) (Ref: 610.30202-R09-v2.0, 4 September 2024, SLR Consulting Australia Pty Ltd) - ONR Independent Acoustic Verification Letter (Ref: S240692LT1, dated 19 December 2024) - Also refer previous Independent Audit Reports for further audit evidence and referenced elsewhere in this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - WFU and WHT Operational Noise Review (ONR) (Ref: 610.30202-R09-v2.0, 4 September 2024, SLR Consulting Australia Pty Ltd) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Agreement Letter, DPHI to TfNSW, dated 30 September 2025 [(Ref:SSI-8863-PA-1131, Western Harbour Tunnel and Warringah Freeway Upgrade (SSI 8863) Request for Extension to Operational Noise Review (Condition E89)] - Also refer CoA E90 within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> - DPHI approved (Letter dated 28 May 2024) request for extension for submission of the Operational Noise Review (ONR) until 22 September 2024; and - DPHI approved (Letter dated 15 October 2024) request to stage the submission of the WHT ONR under Condition A15 and for an extension of time under Condition E89 noting that the Project has requested to submit the ONR on a progressive basis to ensure the delivery of the Project in an efficient manner including an extension of time to both stages: - "Stage 1: Tunnel and Surface Road Corridor – to be submitted by 31 December 2024; and - Stage 2: Fixed Operational Facilities – to be submitted by 30 September 2025." - DPHI (Letter dated 28 January 2025) acknowledged receipt of the Operational Noise Review (ONR) Revision 2, dated 4 September 2024 which was submitted to the Planning Secretary in accordance with Condition E89 of SSI 8863, <i>noting that ONR Revision 2:</i> - "has been updated to incorporate the Western Harbour Tunnel portion of the project; - has been verified by an independent acoustic expert, Andrew Parker from Resonate; - has been reviewed by Transport for NSW and no issues have been raised; and - contains the information required by the conditions of approval." DPHI also noted that the final design of noise barrier WFNB_010a is still to be completed and will be included in an ONR amendment report; that the ONR is being staged and that a separate ONR will be prepared for the WHT fixed operational facilities and to ensure the ONR is publicly available on the project website. Also refer previous Independent Audit Reports for further audit evidence and findings, outside this audit period (including noise walls observed at Berry Street site). <u>During this audit period:</u> Auditees indicated below: - No update to ONR Stage 1 submitted to the Department previously, outside this audit period (refer evidence); - The Project submitted an extension of time request to the Planning Secretary under this Condition for ONR Stage 2 - Fixed Operational Facilities; with request for an extension until 19 December 2025. DPHI agreed to the extension of time until 19 December 2025 to complete the Stage 2 ONR review required to be submitted to the Department (refer evidence); - The Project has submitted ONR Stage 2 to the EPA, IWC and NSC for consultation (not sighted/verified, at this stage); and - Noise walls at Berry Street site expected to be fully completed in December 2025. ONR Stage 2 is due for submission outside this audit period and has not been considered further in this sixth Independent Audit. Also refer CoA E90 within this Audit Table for audit evidence and findings.
E90	Operational noise mitigation measures as identified in Condition E89 that will not be physically affected by work, must be implemented within six months of submitting the ONR, unless otherwise agreed by the Planning Secretary. Where implementation of operational noise mitigation measures are not proposed to be implemented in accordance with this requirement, the Proponent must submit to the Planning Secretary a report providing justification as to 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 endorsed by the AA and submitted to the Planning Secretary within six months of submitting the ONR. Note: Not having finalised detailed design is not sufficient justification for not implementing the proposed mitigation measures.	<u>Evidence outside this audit period:</u> - WFU and WHT Operational Noise Review (ONR) (Ref: 610.30202-R09-v2.0, 4 September 2024, SLR Consulting Australia Pty Ltd) - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere in this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - WFU and WHT Operational Noise Review (ONR) (Ref: 610.30202-R09-v2.0, 4 September 2024, SLR Consulting Australia Pty Ltd) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Also refer CoA E89 within this Audit Table for audit evidence	NT	<u>Outside this audit period:</u> Further to CoA E89 audit evidence within this Audit Table, Section 7.4 of the ONR (Implementation of Operational Noise Mitigation Measures not affected by the Works) submitted to DPHI notes below (excerpts only): - "At-Source Mitigation – low noise pavements have not been adopted for this project (see Section 7.1). <u>As such there is no requirement to implement at-source mitigation within six months of submitting the ONR.</u> - <u>In-Corridor Mitigation – the majority of existing noise barriers in the study area are being retained (see Section 7.2). Where existing noise barriers require modification due to the works physically affecting them, or where construction of new noise barriers is required, access to carry out the work will only be available after the widening work commences under the relevant traffic switch. Early implementation of noise barrier construction is therefore not possible due to traffic staging access constraints and space limitations within the road corridor. Additionally, the new and modified existing noise barriers are physically affected by the work meaning Minster's Condition of Approval E90 does not apply.</u> - <u>At-Property Mitigation – TfNSW has developed the NIP to deliver at-property noise treatment to mitigate the impact of operational and construction noise from the project at eligible properties. TfNSW took this approach to allow at-property noise treatments to be implemented as early as possible (see Section 5.2.3.1 for details of the NIP and Section 7.3 for details of eligible properties)"</u> Also refer previous Independent Audit Reports for further audit evidence and findings, outside this audit period. <u>During this audit period:</u> No update to ONR Stage 1 submitted to the Department previously, outside this audit period (refer evidence). Also refer CoA E89 within this Audit Table for audit evidence and findings.
E91	In the absence of an ONR required under Condition E89, the following can be undertaken: (a) provision of at-property noise mitigation measures required in the NIP under Condition E84; and (b) construction of the Massey to Amherst Street, Cammeray noise barrier / wall as identified in Appendix C. Note: Notwithstanding the provision of this condition, should the ONR identify the need for further mitigation the Proponent may be required to amend the design of already installed noise mitigation measures.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
Operational Noise Validation				
E92	Within 12 months of the commencement of operation of the CSSI, the Proponent must undertake monitoring of operational noise to compare actual noise performance of the CSSI against the noise performance predicted in the review of noise mitigation measures required by Condition E89.	Interview with TfNSW and ACCIONA (30 October 2025)	NT	Condition not triggered in audit period.

Item
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Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Operational Noise Compliance Report				
E93	An Operational Noise Compliance Report (ONCR) must be prepared to document the findings of the operational noise monitoring carried out under Condition E92. The ONCR must be prepared in accordance with the Model Validation Guideline (RMS, 16 May 2018 Version 1.1) and must address the following: (a) compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under Condition E89; (b) compliance with the operational noise levels in terms of criteria and noise goals established in the NSW Road Noise Policy (DECCW, 2011) and NSW Noise Policy for Industry (EPA, 2017); (c) methodology, location and frequency of noise monitoring undertaken, including monitoring sites at which CSSI noise levels are ascertained, with specific reference to locations indicative of impacts on receivers; (d) pavement corrections for light and heavy vehicles and an assessment of the acoustic performance of different pavement types over their design life; (e) details of any 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; (f) any required recalibrations of the noise model taking into consideration factors such as noise monitoring and actual traffic numbers and proportions; (g) an assessment of the performance and effectiveness of applied noise mitigation measures together with a review and if necessary, reassessment of mitigation measures; and (h) identification of additional measures to those identified in the review of noise mitigation measures required by Condition E89, that are to be implemented with the objective of meeting the criteria outlined in the NSW Road Noise Policy (DECCW, 2011) and NSW Noise Policy for Industry (EPA, 2017), when these measures are to be implemented and how their effectiveness is to be measured and reported to the Planning Secretary and the EPA. The Operational Noise Compliance Report must be submitted to the Planning Secretary and the EPA within 60 days of completing the operational noise monitoring and made publicly available.	Interview with TfNSW and ACCIONA (30 October 2025)	NT	Condition not triggered in audit period.
Maintenance of Low Noise Road Pavements				
E94	Low noise road pavements must be maintained to ensure that they continue to contribute to the compliance of mitigated noise levels identified in the ONR (Condition E89) throughout the life of the project.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
Blasting				
E95	Blasting associated with the CSSI must only be undertaken during the following hours: (a) 9:00am to 5:00pm, Monday to Friday, inclusive; (b) 9:00am to 1:00pm 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.	- Interview with ACCIONA (30 October 2025) - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	NT	Auditees indicated below: - The requirements of this Condition have not been triggered yet; and - WHT Stages 3B and 3C are not expected to require Blasting, a Blast Management Strategy would be prepared if blasting was required. Section 9.9 of the Noise and Vibration Management Sub Plan notes following, should blasting be required for the Project: - 'a standalone Blast Management Strategy will be prepared in consultation with the EPA in accordance with the requirements of CoA E96 to E98'; Section 9.9 also includes this condition's requirements (i.e. CoA E95) and CoA E99 requirements.
Blasting Management Strategy				
E96	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.	Same as CoA E95 (refer CoA E95 within this Audit Table for audit evidence)	NT	Same as CoA E95 (refer CoA E95 within this Audit Table for audit evidence and findings)
E97	The Blast Management Strategy must be endorsed by a suitably qualified and experienced person.	Same as CoA E95 (refer CoA E95 within this Audit Table for audit evidence)	NT	Same as CoA E95 (refer CoA E95 within this Audit Table for audit evidence and findings)
E98	The Blast Management Strategy must be prepared in accordance with relevant guidelines and in consultation with the EPA, in order to ensure that all blasting and associated activities are carried out so as not to generate unacceptable noise and vibration impacts or pose a significant risk to sensitive land user(s).	Same as CoA E95 (refer CoA E95 within this Audit Table for audit evidence)	NT	Same as CoA E95 (refer CoA E95 within this Audit Table for audit evidence and findings)
E99	The Blast Management Strategy must be submitted to the Planning Secretary for information no later than one month before the commencement of blasting. The Strategy as submitted to the Planning Secretary, must be implemented for all blasting activities.	Same as CoA E95 (refer CoA E95 within this Audit Table for audit evidence)	NT	Same as CoA E95 (refer CoA E95 within this Audit Table for audit evidence and findings)
SOCIO-ECONOMIC, LAND USE AND PROPERTY				
E100	The Proponent must identify the utilities and services (hereafter "services") potentially affected by construction 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 Activity are avoided where practical and advised to customers.	- Interview with ACCIONA (30 October 2025) - Utilities Register.xlsx (sighted) <u>Interface Meeting Minutes / Notifications (samples sighted):</u> - Ref: SWC Interface 20250828 (Meeting Minutes Interface - Western Harbour Tunnel & Sydney Water) - Ref: 62. WHT - 33kV Construction Power Supply Meeting Minutes - 250918 - Work notification - Temporary water supply installation - Rozelle, Notification No. #136, Date published: 26 Aug 2025 - Utilities maintenance - Bay Road and Balls Head Road, Waverton Notification No. #WHT400, Date published: 1 Jul 2025 - Also refer CoA E82, CoA E88 and CoA E154 (for example) for audit evidence	C	Utility Coordination Manager (Arthur Vassileras) appointed for the Project and Utilities Management Plan in place (sighted in previous Independent Audits); Auditees indicated below: - Utilities Register maintained to capture impacts (or potential impacts) to existing services that may need adjusting or protecting;and - Ongoing consultation with the relevant utility service providers are undertaken prior to disruption / works (for e.g. Ausgrid and Sydney Water). Sighted sample interface meeting minutes and notifications (refer evidence). Also refer CoA E82, CoA E88 and CoA E154 (for example) for audit evidence and findings.

Item
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Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Cammeray Golf Course				
E101	The design and establishment of an altered Cammeray Golf Course must provide an equivalent standard golf course or the provision of works to offset the loss in standards. This must be undertaken in consultation with and at no cost to Cammeray Golf Club.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
Settlement				
E102	A geotechnical model of representative geological and groundwater conditions must be prepared prior to excavation (that may pose a settlement risk) and tunnelling to identify geological structures and groundwater features. The model must include details of proposed excavations and tunnels, construction staging, and identify surface and sub-surface structures, including any specific attributes, which may be impacted by the CSSI. The Proponent must use this model to assess the cumulative predicted settlement, ground movement, stress redistribution and horizontal strain profiles caused by excavation and tunnelling, including groundwater drawdown and associated impacts, on adjacent surface and sub-surface structures.	<u>Evidence outside this audit period:</u> <u>Ref: GT02 (HIR)</u> - Project Wide Hydrogeological Interpretive Report (HIR) (WHTP2-AAJV-NWW-GE-GT02-RPT-000001, Revision C, FDD, dated 24 June 2024) <u>Ref: GT03 (GIR)</u> - GT03 – Project Wide Geotechnical Interpretive Report (GIR), WHTP2-AAJV-NWW-GE-GT03-RPT-000001, Revision C, FDD, dated 14 February 2024 <u>Ref: GT04</u> - GT04 – Project Wide – Settlement Analysis and Impact Assessment – Report (WHTP2-AAJV-NTW-GE-GT04-RPT-000001, Revision C, FDD2, dated 12 March 2024) - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere in this Audit Table <u>Evidence during this audit period:</u> <u>Ref: GT02 (HIR)</u> - Project Wide Hydrogeological Interpretive Report (HIR) (WHTP2-AAJV-NWW-GE-GT02-RPT-000001, Revision C, FDD, dated 24 June 2024) <u>Ref: GT03 (GIR)</u> - GT03 – Project Wide Geotechnical Interpretive Report (GIR), WHTP2-AAJV-NWW-GE-GT03-RPT-000001, Revision C, FDD, dated 14 February 2024 <u>Ref: GT04</u> - GT04 – Project Wide – Settlement Analysis and Impact Assessment – Report (WHTP2-AAJV-NTW-GE-GT04-RPT-000001, Revision C, FDD2, dated 12 March 2024) - Interview with ACCIONA (30 October 2025) <u>Sighted below:</u> <u>Ref: GT09</u> - GT09 - Impact Assessment Report for New VF02 and VF03 Ventilation Facilities (WHTP2-PELSM-STW-TU-GT09-RPT-000001, Revision B, FDD, 15 October 2025) - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025)	C	<u>Outside this audit period:</u> - GT02 - GT04 Reports developed outside this audit period (refer evidence). - Project Wide Settlement Analysis and Impact Assessment Report provides background on the Settlement Analysis and Impact Assessment associated with the Project work included in individual design packages (at various design stages), such as below design packages: - 8 individual primary support (excavation and support)(‘PS’ series – PS01 to PS08) design packages for sections of the tunnel with its own geotechnical memo as an Appendix summarising ground conditions etc, instrumentation and monitoring plan; and - A Stage 3 Assessment undertaken for any potential impact assessed as greater than ‘very slight’ and included in the Impact Assessment Appendix of the relevant primary support package. - Project Wide Settlement Analysis and Impact Assessment Report (Ref: GT04) includes (not limited to): - Within Appendix D - Appendix D1 (MCoA and SWTC Compliance Register) includes MCoAs/REMMs and where addressed - Section 3.1.3 refers to Project Wide GIR (GT03) and HIR (GT02) reports that define the inputs used for assessment of the excavation induced settlement and groundwater drawdown-induced settlement (CoA E102) - Section 3.3.2 identifies that the appropriate criteria as being limiting tensile strain, in the case of buildings (CoA E103/E104) - Section 3.3.2 identifies that the appropriate criteria as being angular distortion in the case of roads, parking areas and parks (CoA E103/E104) - Section 4.4 states that: " <i>the Project Wide Instrumentation and Monitoring Plan details requirements for a tunnel-wide instrumentation and monitoring strategy and trigger level philosophy. The review and re-calibration of tunnel induced settlement and groundwater drawdown induced settlement have been undertaken conform to Conditions E102 and E105 requirements. A monitoring program is proposed to control ground movements induced by WHT P2 construction activities to be within Acceptable Effects and is installed as per the Instrumentation and Monitoring Drawings in the individual Tunnel Primary Support and Cut-and-Cover Design Packages and typically comprises the following:</i> - Building optical prisms - Inclinometers - Surface settlement monitoring"; <i>Monitoring of Actual Effects to ensure that existing buildings, utilities and structures are within Acceptable Effects is undertaken based on the Trigger Alarm Response Plan (TARP) shown in Figure 4-1. As described in Design Package GT06, the Actual Effects are reviewed as follows:</i> - The ACCIONA construction team will review the monitoring data on a live web-based database as works progresses and prior to the Permit to Tunnel (PTT). - The Construction Phase Services team monitoring review meeting will be held on a regular basis to review trends and identify any concerns or need for further action per the observational method. <i>A final report detailing the Predicted Effects, Acceptable Effects and Actual Effects as stipulated in SWTC Main Body 4.1 (k) is to be submitted a minimum of six months prior to the date of opening completion by the Contractor (ACCIONA)."</i> - Section 5 outlines the assessment’s summary and conclusions. Auditees also indicated in addition to above, that a Project Wide Instrumentation and Monitoring Report (not sighted) has been developed and in accordance with MCoA E105, identified exceedances of the relevant criteria established by MCoA E103 and E104 will be monitored through the settlement instrumentation and monitoring program. Where monitoring indicates groundwater drawdown or settlement is substantially different to predictions or in excess of the limits, then MCoA E102 to E105 to be revisited in accordance with MCoA E106. Where required, management and mitigation measures will be identified, considered, and implemented in compliance with MCoA E105, REMMs SG1 and SG4. Refer previous Independent Audit Reports for further audit evidence and findings outside this audit period. <u>During this audit period,</u> Auditees indicated below: - No change to GT02 - GT04 Reports in this audit period (refer evidence and CoA E219 within this Audit Table for audit evidence and findings); and - A stand alone GT09 - Impact Assessment Report for New VF02 and VF03 Ventilation Facilities has been prepared to address the new facilities (refer evidence). NB: It is not the responsibility of the Independent Auditor to verify compliance with detailed HIR, GIR and Settlement Analysis and Impact Assessment Report provisions, which should be confirmed by qualified specialists or those responsible for undertaking detailed geotechnical modelling, implementation of the above Reports and IC verification.
E103	The Proponent must undertake a review of surface and sub-surface structures at risk from damage to determine appropriate criteria to prevent damage, prior to excavation and tunnelling works that may pose a settlement risk. Criteria for surface and sub-surface structures which are not included in Condition E104 (Table 9) must be determined in consultation with the owner(s) of the surface and sub-surface structures prior to commencement of any excavation or tunnelling works potentially affecting the surface and sub-surface structures.	Same as CoA E102 (refer CoA E102 within this Audit Table for audit evidence)	C	Same as CoA E102 (refer CoA E102 within this Audit Table for audit evidence and findings).

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NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)																				
E104	In the case of buildings, roads, parking areas and parks, the appropriate criteria which govern the greatest risk of damage are to be selected from Table 9 unless the Proponent has determined more stringent criteria as a result of Condition E103. Table 9: Settlement Criteria <table><tr><th>Surface and Sub-Surface Structures</th><th>Maximum Settlement</th><th>Maximum Angular Distortion</th><th>Limiting Tensile Strain (percent) *</th></tr><tr><td>Buildings – Low or non-sensitive properties (i.e., ≤ 2 levels and carparks)</td><td>30 mm</td><td>1 in 350</td><td>0.1</td></tr><tr><td>Buildings and pools – High or sensitive properties (i.e., ≥ 3 levels and heritage items)</td><td>20 mm</td><td>1 in 500</td><td>0.1</td></tr><tr><td>Roads and parking areas</td><td>40 mm</td><td>1 in 250</td><td>n/a</td></tr><tr><td>Parks</td><td>50 mm</td><td>1 in 250</td><td>n/a</td></tr></table> Note: * As defined in Burland et al. 'Building response to tunnelling – Case studies from construction of the Jubilee Link Extension', London, Thomas Telford (2001)	Surface and Sub-Surface Structures	Maximum Settlement	Maximum Angular Distortion	Limiting Tensile Strain (percent) *	Buildings – Low or non-sensitive properties (i.e., ≤ 2 levels and carparks)	30 mm	1 in 350	0.1	Buildings and pools – High or sensitive properties (i.e., ≥ 3 levels and heritage items)	20 mm	1 in 500	0.1	Roads and parking areas	40 mm	1 in 250	n/a	Parks	50 mm	1 in 250	n/a	Same as CoA E102 (refer CoA E102 within this Audit Table for audit evidence)	C	Same as CoA E102 (refer CoA E102 within this Audit Table for audit evidence and findings).
Surface and Sub-Surface Structures	Maximum Settlement	Maximum Angular Distortion	Limiting Tensile Strain (percent) *																					
Buildings – Low or non-sensitive properties (i.e., ≤ 2 levels and carparks)	30 mm	1 in 350	0.1																					
Buildings and pools – High or sensitive properties (i.e., ≥ 3 levels and heritage items)	20 mm	1 in 500	0.1																					
Roads and parking areas	40 mm	1 in 250	n/a																					
Parks	50 mm	1 in 250	n/a																					
E105	Should the geotechnical model in Condition E102 identify exceedances of the relevant criteria established by Conditions E103 and E104, the Proponent must implement an instrumentation and monitoring program to measure settlement, distortion or strain as required. The Proponent must also identify and implement appropriate mitigation measures in consultation with the owner(s) of the relevant surface and sub-surface structures prior to excavation and tunnelling works to ensure where possible that the surface and sub-surface structures will not experience exceedances of the relevant criteria. The adopted criteria do not remove any responsibility from the Proponent for the protection of existing surface and sub-surface structures or for rectifying any damage to surface and sub- surface structures resulting from the CSSI.	Same as CoA E102 (refer CoA E102 within this Audit Table for audit evidence)	C	Same as CoA E102 (refer CoA E102 within this Audit Table for audit evidence and findings).																				
E106	Where monitoring indicates groundwater drawdown or settlement is substantially different to predictions or in excess of the limits specified in this approval, the requirements of Conditions E102 to E105 inclusive must be undertaken again within three months. Model input parameters must be adjusted to calibrate the model so that predictions are better aligned with actual observations	- Interview with ACCIONA (30 October 2025) - Also refer CoA E102 and CoA C14 within this Audit Table for audit evidence	NT	Auditees indicated Condition not triggered in this audit period. Also refer CoA E102 (including Lead Auditor Note) and CoA C14 for Groundwater Monitoring Report results, within this Audit Table for audit evidence and findings.																				
Condition Survey																								
E107	The Proponent must offer pre-construction surveys and must undertake and prepare Pre-construction Condition Survey Reports where the offer is accepted, on the current condition of surface and sub-surface structures identified as at risk from settlement or vibration by the geotechnical model described in Condition E102 and the CNVIS required by Condition E75 or as directed by the Independent Property Impact Assessment Panel (IPIAP) established under Condition E111. The Pre-construction Condition Survey Reports must be prepared by a suitably qualified and experienced person(s) and must be provided to the owners of the surface and sub-surface structures for review prior to the commencement of potentially impacting works.	<u>Evidence outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - WHT Property Pre PCS Register (October 2025) (as provided by ACCIONA) Sample PCS Offer Letter - Waverton: - Third Offer – Property Condition Survey Western Harbour Tunnel Stage 2 (Ref: WHTP2 Final Offer Letter - Zone 5, dated 4 August 2025) Sample Pre-Construction Condition Survey for Properties in Waverton - Pre-Construction Condition Survey by Aus Dilaps (Ref: WHTP2-ACOC-WHT-PP-GE01-RPT-001623 Rev 00, Inspection Date - 22 July 2025) - Pre-Construction Condition Survey by Aus Dilaps (Ref: WHTP2-ACOC-WHT-PP-GE01-RPT-001630 Rev 00 Inspection Date - 1 August 2025)	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings outside this audit period. <u>During this audit period, Auditees indicated below:</u> - Pre-condition survey (PCS) offers being released and completed progressively; - Zone 5 Waverton PCS offers completed in September 2025 (for example), with tunnelling in area scheduled late November 2025; - Completed PCS Reports are sent to TfNSW and to owner/agents in accordance with CoA E107 and details recorded in the Project's PCS Register for tracking and recording (refer evidence of Register sighted); and - No particular property surveys have been directed by IPIAP. The following samples were sighted during this audit: - Third PCS Offer Letter (Waverton) for WHT Stage 2 (dated 4 August 2025), with letter outlining previous letters sent for PCS on 7 July 2025 and 21 July 2025 (refer evidence); - WHT Property Pre PCS Register (October 2025) (as provided by ACCIONA, refer evidence),with tracking of offers made, offer status (such as awaiting owners response, no response, completed) etc																				
E108	Where pre-construction surveys have been undertaken in accordance with Condition E107, subsequent post-construction surveys must be undertaken to assess damage to the surface and sub-surface structures that may have resulted from construction within three months of landowner(s) requests.	- Interview with ACCIONA (30 October 2025) - TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D)	NT	Section 9.5 of the Noise and Vibration Management Sub Plan and Section 13.1 of the CCS outlines the Property Survey and Issue Rectification requirements and Table 10 (in Appendix A) of the CCS reflects CoA E107 to CoA E111 requirements. Condition not triggered in this audit period. No post-construction survey undertaken during this audit period; with Auditees indicating post condition surveys are scheduled to commence around February 2026.																				

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E109	The results of the post-construction surveys undertaken under Condition E108 must be documented in Post-construction Condition Survey Reports for each surface and sub-surface structure surveyed. The Post-construction Condition Survey Reports must be prepared by a suitably qualified and experienced person(s). Copies of the Post-construction Condition Survey Reports must be provided to the owner(s) of the structures surveyed no later than four months following the completion of construction activities that have the potential to impact on the subject surface / subsurface structure.	- Interview with ACCIONA (30 October 2025) - TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D)	NT	Section 9.5 of the Noise and Vibration Management Sub Plan and Section 13.1 of the CCS outlines the Property Survey and Issue Rectification requirements and Table 10 (in Appendix A) of the CCS reflects CoA E107 to CoA E111 requirements. Condition not triggered in this audit period.
E110	Where damage has been determined to occur as a result of the project, the Proponent must carry out rectification at its expense and to the reasonable requirements of the surface and sub-surface structure owner(s) within 12 months of completion of construction unless another timeframe is agreed with the owner of the affected surface or sub-surface structure.	- TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) Sighted below for audit period only: - WHT Property Damage Claim Register (October 2025) (extract provided by ACCIONA) - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx	NT	Section 9.5 of the Noise and Vibration Management Sub Plan and Section 13.1 of the CCS outlines the Property Survey and Issue Rectification requirements and Table 10 (in Appendix A) of the CCS reflects CoA E107 to CoA E111 requirements. Auditees indicated below: - No post-construction condition survey reports completed by the Project yet, to determine if damages have occurred as a result of the Project; - Damage claims have been received by the Project with claims under review and assessment; the claimant is then provided with the outcome (accepted/rejected) and next steps; - Properties with works nearby are left as open until the post-construction condition report is completed to understand the extent of the damage before processing with the claims process; - Sighted property damage claims register (refer evidence, for extract provided relating to audit period) with details such as - claim status (open, potential, settled, closed), claim outcome, date claim form received, type of damage, date of WHT Inspection etc.
E111	The Proponent must establish an IPIAP before works that have the potential to result in property impacts commence. The IPIAP must comprise geotechnical and engineering experts independent of the design and construction team. The IPIAP will be responsible for independently reviewing Pre- and Post-construction Condition Survey Report templates prepared under Conditions E107 and E109, any Pre- and Post-construction Condition Survey Reports where there is a dispute, and the resolution of property damage disputes, and the establishment of ongoing settlement and vibration monitoring requirements. The Planning Secretary must be notified of the members of the IPIAP prior to the commencement of any works which may potentially result in property impacts.	- TfNSW WHT and WFU Community Communication Strategy (WHTWFU CCS, Rev 11, dated 29 May 2025) - Noise and Vibration Management Sub Plan (Rev 4.7, dated 03 June 2025) (Appendix D) - Independent Property Impact Assessment Panel for M6S1, WHT P2, WFU and WHT EW, Terms of Reference, TfNSW (approved version 1.0, dated 28 June 2023) - Email, DPE (now DPHI) to TfNSW, dated 22 May 2023 acknowledging receipt of the WHT Stage 3B and 3C IPIAP Members (E111 - Nomination of IPIAP Panel for WHT & WFU) - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - Interview with TfNSW and ACCIONA (30 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	TfNSW has established an Independent Property Impact Assessment Panel (IPIAP) in accordance with the CoA E111 and submitted WHT Stage 3B and 3C IPIAP Members to DPHI, outside of this audit period. Refer previous Independent Audit Reports, for further audit evidence and findings. Section 9.5 of the Noise and Vibration Management Sub Plan and Section 13.1 of the CCS outlines the Property Survey and Issue Rectification requirements. Auditees indicated below: - IPIAP has provided comments on Post Condition Survey Template, which is currently under review/finalisation (not sighted); - One complaint has been referred to the IPIAP in this audit period by the complainant, with claim still under assessment by IPIAP.
E112	Either the affected owner or the Proponent may refer unresolved disputes arising from potential and/or actual property impacts to the IPIAP for resolution. All costs incurred in establishing and implementing the IPIAP must be borne by the Proponent regardless of which party makes a referral to the IPIAP. The findings and recommendations of the IPIAP are final and binding on the Proponent.	- Independent Property Impact Assessment Panel for M6S1, WHT P2, WFU and WHT EW, Terms of Reference, TfNSW (approved version 1.0, dated 28 June 2023) - Interview with TfNSW and ACCIONA (30 October 2025) - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	NT	Auditees indicated one complaint has been referred to the IPIAP in this audit period by the complainant, with claim still under assessment by IPIAP. Given the claim was still under assessment by IPIAP, the Condition was not considered further in this sixth Independent Audit.
E113	The governance framework for the IPIAP must be made publicly available on the CSSI's project page as required by Condition B15.	- Independent Property Impact Assessment Panel for M6S1, WHT P2, WFU and WHT EW, Terms of Reference, TfNSW (approved version 1.0, dated 28 June 2023) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	Independent Property Impact Assessment Panel for M6S1, <u>WHT P2</u> , WFU and WHT EW (Terms of Reference) is publicly available on the Project website.

SOILS				
E114	Prior to the commencement of any work, erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'.	- Soil and Surface Water Management Sub Plan (Rev 3.5, dated 16 May 2025) (Appendix E) - Site Inspection (28 October 2025) - Interview with TfNSW and ACCIONA (30 October 2025) <u>External Site Inspection / review of PESCPs (samples):</u> - Email, SEEC to ACCIONA dated 11 August 2025 (Ref: Berrys Bay - Demolition ERSED Plan Rev05 - SEEC Review) - Berrys bay ESCP - Demo Rev 05 (2).pdf - RE_EXT_RE_Emu Plains Area 2 PESCP - Rev02 .msg - Emu Plains ESCP Rev02 Area 2 Stockpile Designs_approved <u>ER Inspections:</u> - ER Inspection Reports and Monthly Reports (refer CoA A27 within this Audit Table for audit evidence)	C	Implementation of this CoA including Soil and Water Management Sub Plan requirements (select samples) were verified during the audit site inspection, with summary below and OFIs raised included in further detail under Section 2.2.5 (Site Inspection) and Table 6 of the Audit Report: - Emu Plains site (WHT13): Some of the controls/mitigation measures observed include - stabilised areas, hardstands, landscaping, site access/egress maintained - no tracking, clean water diversions installed, appropriate ERSED controls installed, temporary sediment basin on-site for surface water management, detention ponds in Area 2 constructed and evidence of application of soil binder in Area 2. - Berrys Bay Foreshore Parklands site: Some of the controls/mitigation measures observed include - appropriate ERSED controls installed [for e.g. silt curtains, sediment filtration barrier controls (haybales wrapped in geofabric)], evidence of application of soil binder on exposed surfaces, batters and stockpiles and site access/egress maintained - no tracking. In addition to above, sighted sample examples of Independent Reviews/Inspections of the Project across the audit period: - PESCPs are prepared by ACCIONA environment team and reviewed by CPESCP from SEEC (refer sample evidence sighted for SEEC reviews of Berrys Bay and Emu Plains PESCPs); - Regular external environmental inspections of the Project are conducted by the ER. Issues raised by the ER were predominantly in relation to soil and water across the WHT Stage 3B and 3C sites, in the audit period as presented in Figure 1 of the Monthly ER Report submitted to the Planning Secretary, with close out by ACCIONA documented/tracked within the ER Inspection Reports (refer ER Inspections and Monthly Reports under CoA A27 within this Audit Table). Also refer CoA A27 within this Audit Table, Section 2.2.5 (Site Inspection) and Table 6 of the Audit Report for audit evidence and findings.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Contaminated sites				
E115	Prior to the commencement of any work that would result in the disturbance of moderate to high risk contaminated sites as identified in the documented listed in Condition A1, a Detailed Site Investigations must 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.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Soil and Surface Water Management Sub Plan (Rev 3.5, dated 16 May 2025) (Appendix E) - Interview with TfNSW and ACCIONA (30 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/whl) Sighted below: - Berrys Bay Detailed Site Investigation, prepared by ERM for TfNSW (Part 1, May 2023) (Ref: Detailed Site Investigation 1A Balls Head Road, Berrys Bay, Waverton, NSW, 18 May 2023, Rev 04) - Berrys Bay Supplementary Investigation, prepared by ERM (Part 2, March 2024) (Ref: Supplementary Investigation 1A Balls Head Road, Berrys Bay, Waverton, NSW, 25 March 2024, Rev 03) DPHI's correspondence to TfNSW to withdraw Berrys Bay DSI submitted and request to consolidate / resubmit DSI reports under new PAs based on the site areas: - WHTWFU - DSI - Berrys Bay - More Information Required.msg (10/01/2025) - FW_ WFU DSI Close out.msg (09/01/2025)	NT	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings outside this audit period. <u>During this audit period:</u> Section 5.6 of the Soil and Surface Water Management Subplan notes that the Project conditions (CoA E115 - E123) require any site within the Project area deemed as 'moderate or high risk' for contamination as identified in the EIS to be further investigated and, where appropriate, managed in accordance with a Remediation Action Plan and validated by a NSW EPA accredited site auditor. Figures included in Section 5.6 identifies those areas of moderate to high risk per the approved Project EIS and MOD2 Report. Auditees indicated below: - Berrys Bay Detailed Site Investigation (DSI) and Supplementary Investigation were both completed in 2023 and 2024, respectively (<u>outside this audit period</u>). - Above DSI (ERM, 2023) and Supplementary Site Investigation (ERM, 2024) reports the results of soil and groundwater sampling and analysis to characterise current site conditions and to inform the remedial strategy [refer evidence and CoA E118 within this Audit Table for Remediation Action Plan (RAP) for Berrys Bay finalised]; - DPHI's correspondence to TfNSW to withdraw Berrys Bay DSI submitted and request to consolidate / resubmit the DSI reports under new PAs based on the site areas (refer evidence sighted). Given above and that Berrys Bay DSI and Supplementary Investigation were both completed in 2023 and 2024, respectively (outside this audit period), this Condition and CoA E116-E117 were not considered further in this sixth Independent Audit.
E116	A Detailed Site Investigation Report must be prepared and submitted to the Planning Secretary for information following the completion of Detailed Site Investigations required by Condition E115. The report must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (NSW) and 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. Nothing in this condition prevents the Proponent from preparing individual Site Contamination Reports for separate sites.	Same as CoA E115 (refer CoA E115 within this Audit Table for audit evidence)	NT	Same as CoA E115 (refer CoA E115 within this Audit Table for audit evidence and findings).
E117	The Detailed Site Investigation Report must provide details on: (a) primary sources of contamination, for example potentially contaminating activities, infrastructure (such as underground storage tanks, fuel line, sumps or sewer lines) or site practices; (b) contaminant dispersal in air, hazardous ground gases, surface water, groundwater, soil vapour, separate phase contaminants, sediments, infrastructure (e.g. concrete), biota, soil and dust; (c) contaminant characterisation and behaviour (volatility, leachability, speciation, degradation products and physical and chemical conditions on-site which may affect how contaminants behave); (d) potential effects of contaminants on human health, including the health of occupants of built structures (for example arising from risks to service lines from hydrocarbons in groundwater, or risks to concrete from acid sulphate soils) and the environment; (e) potential and actual contaminant migration routes including potential preferential pathways; (f) the adequacy and completeness of all information available for use in the assessment of risk and for making decisions on management requirements, including an assessment of uncertainty; (g) the review and update of the conceptual site model from the preliminary and detailed site investigations; (h) nature and extent of any existing remediation (such as impervious surface cappings); and/or; (i) whether the land is suitable (for the intended final land use) or can be made suitable through remediation.	Same as CoA E115 (refer CoA E115 within this Audit Table for audit evidence)	NT	Same as CoA E115 (refer CoA E115 within this Audit Table for audit evidence and findings).
E117A	Disturbance to the existing landfill through the site establishment and operation of the proposed Wicks Road Construction Support Site (Mod 1), as described in Condition A1, is prohibited unless a site auditor agrees to any disturbance.	Not Applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E118	Should remediation be required to make land suitable for the final intended land use, a Remediation Action Plan must be prepared 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 Contaminated Land Management Act 1997 and must include measures to remediate the contamination at the site to ensure the site will be suitable for the proposed use when the Remedial Action Plan is implemented. The Remedial Action Plan must be submitted to the Planning Secretary for information prior to undertaking remediation.	- Interview with TfNSW and ACCIONA (30 October 2025) Sighted below: - Remediation Action Plan prepared by ERM (Ref: 0673939_Berrys Bay RAP_Final_01.09.25) - Draft Section B Site Audit Report [Ref: AU124144 SAR215 21Oct25 V1 Draft to Client, prepared by Geosyntec Consultants, Issue 1 (V1, dated 21 October 2025)] - Also refer CoA E115 of this Audit Table for audit evidence	NT	Auditees indicated below: - Remediation Action Plan (RAP) for Berrys Bay finalised in the audit period and is scheduled to be submitted to the Planning Secretary for information prior to undertaking remediation (scheduled outside of this audit period); and - Draft Site Audit Report and associated Site Audit Statement issued by Geosyntec Consultant to Auditees, currently under review / finalisation. As such, this Condition and CoA E119- E122 were not considered further in this sixth Independent Audit. Also refer CoA E115 within this Audit Table for audit evidence and findings.
E119	The Remediation Action Plan must include measures to remediate the contamination at the site to ensure the site will be suitable for the proposed use and detail how the environmental and human health risks will be managed during the disturbance, remediation and/or removal of contaminated soil/sediment or groundwater. Nothing in this condition prevents the preparation of individual Remediation Action Plans for separate sites.	Refer CoA E115 and CoA E118 of this Audit Table for audit evidence	NT	Refer CoA E115 and CoA E118 of this Audit Table for audit evidence and findings.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
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Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E120	Prior to commencing remediation, a Section B Site Audit Statement(s) must be prepared by an NSW EPA-accredited Site Auditor that certifies that the Remediation Action Plan is appropriate and that the site can be made suitable for the proposed use. The Remedial Action Plan must be implemented and any changes to the Remedial Action Plan must be approved in writing by the NSW EPA accredited Site Auditor. Nothing in this condition prevents the Proponent from engaging the Site Auditor to prepare Site Audit Statements for separate sites.	Refer CoA E115 and CoA E118 of this Audit Table for audit evidence	NT	Refer CoA E115 and CoA E118 of this Audit Table for audit evidence and findings.
E121	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 Council prior to 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.	Refer CoA E115 and CoA E118 of this Audit Table for audit evidence	NT	Refer CoA E115 and CoA E118 of this Audit Table for audit evidence and findings.
E122	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.	Refer CoA E115 and CoA E118 of this Audit Table for audit evidence	NT	Refer CoA E115 and CoA E118 of this Audit Table for audit evidence and findings.
E123	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 submitted to the Planning Secretary for information.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (28 October 2025) - Unexpected Finds (UXF) of Contaminated Land Procedure incorporated as Appendix E4 of the Soil and Surface Water Management Sub Plan (Rev 3.5, dated 16 May 2025) (Appendix E) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Also refer CoA A27 and CoA E124 within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings outside this audit period, including DPHI approval of the Soil and Surface Water Management Sub Plan (including the Monitoring Program, the Unexpected Finds of Contaminated Land Procedure incorporated as Appendix E4 within the Sub Plan). <u>During this audit period:</u> During this audit period, the Soil and Surface Water Management Sub Plan has been further updated and endorsed by the ER - refer CoA A27 within this Audit Table for audit evidence and findings. The Soil and Surface Water Management Sub Plan including the Unexpected Finds of Contaminated Land Procedure is publicly available on the WHT Project website. Also refer CoA E124 within this Audit Table for audit evidence and findings.
E124	The Unexpected Finds Procedure for Contamination must be implemented throughout construction.	- Interview with ACCIONA (28 October 2025) - Unexpected Finds (UXF) of Contaminated Land Procedure incorporated as Appendix E4 of the Soil and Surface Water Management Sub Plan (Rev 3.5, dated 16 May 2025) (Appendix E) - Unexpected Finds Register, extract provided for audit period on 28 October 2025 (Ref: Unexpected Finds Register.xlsx) - Ref: 40-18226-03-CL.pdf and 40-18226-04-CL.pdf - Ref: Incident_EVE-019110_20250718_1126.pdf - Ref: DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx	C	Sighted ACCIONA's Unexpected Finds Register, which had record of unexpected asbestos in the audit period. Clearance certificate(s) requested for unexpected find relating to asbestos at Berrys Bay site on 14 July 2025 - refer evidence sighted.
SUSTAINABILITY				
E125	A Sustainability Strategy must be prepared to achieve a minimum 'Excellent' 'Design' and 'As built' rating under the Infrastructure Sustainability Council of Australia infrastructure rating tool.	<u>Evidence outside this audit period:</u> - Sustainability Strategy (Rev B, dated 17 April 2023) - Letter, DPE (now DPHI) to TfNSW dated 29 May 2023 [Ref: SSI-8863-PA-401, WHT and WFU - WHT Stage 3B - Sustainability Management Plan (E126)] - Sustainability Strategy (WHTP2-ACOC-WHT-EV-PLN-000016, Rev 02.01, dated 21 May 2024) - (Sighted) Email from TfNSW to ACCIONA, dated 05 June 2024 (Ref: Transmittal No. WHTP2 - TfNSW -TX-002067) and Ref: E125 Sustainability Stratrgy.msg from ACCIONA to Lead Auditor - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence from this audit period:</u> - Interview with ACCIONA (30 October 2025) - Sustainability Strategy (WHTP2-ACOC-WHT-EV-PLN-000016, Rev 02.01, dated 21 May 2024) - Sighted Letter, DPHI to TfNSW, dated 01 July 2024 (ref: SSI-8863-PA-733, Western Harbour Tunnel – Stage 2 Sustainability Strategy Revision 02.01) acknowledging Sustainability Strategy Revision 02.01 (dated 21 May 2024) submission to the Planning Secretary for information. - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>Outside this audit period:</u> Sustainability Strategy for WHT Stage 3B prepared and submitted to DPE (now DPHI) for information, outside of this audit period. DPE (now DPHI) responded to TfNSW on 29 May 2023 referring to the Sustainability Management Plan Revision B (dated 17 April 2023), which was <u>submitted to DPE (now DPHI) for information as required under condition E126 of SSI 8863</u> and noting that the Sustainability Management Plan, Revision B: " - has been prepared to achieve a minimum 'Excellent' 'Design' and 'As Built' rating under the ISCA infrastructure rating tool; and - has been reviewed by Transport for NSW and no issues were raised." The Sustainability Strategy for WHT Stage 2 was further updated to include Modification 2 changes, reviewed by TfNSW and submitted to DPHI for information by TfNSW, on 04 June 2024 (only TfNSW email confirming submission to DPHI sighted, refer evidence). Refer previous Independent Audit Reports for audit evidence and findings outside this audit period. <u>During this audit period:</u> Auditees indicated no further changes to the Sustainability Strategy for WHT Stage 2 (Rev 02.01, dated 21 May 2024) during this audit period (refer evidence including DPHI's Letter sighted acknowledging submission and filing of Sustainability Strategy Revision 02.01 (dated 21 May 2024). Above Sustainability Strategy for WHT Stage 2 is publicly available on the Project website.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E126	The Sustainability Strategy must be submitted to the Planning Secretary for information before the commencement of construction and must be implemented throughout construction and operation.	<u>Evidence outside this audit period:</u> - Sustainability Strategy (Rev B, dated 17 April 2023) - Letter, DPE (now DPHI) to TfNSW dated 29 May 2023 [Ref: SSI-8863-PA-401, WHT and WFU - WHT Stage 3B Sustainability Management Plan (E126)] - Sustainability Strategy (WHTP2-ACOC-WHT-EV-PLN-000016, Rev 02.01, dated 21 May 2024) - (Sighted) Email from TfNSW to ACCIONA, dated 05 June 2024 (Ref: Transmittal No. WHTP2 - TfNSW -TX-002067) and Ref: E125 Sustainability Stratrgy.msg from ACCIONA to Lead Auditor - WHT Annual Sustainability Report 2024 (WHTP2-ACOC-WHT-EV-GE01-RPT-000002 - Annual Sustainability Report - 2024, Rev 02, dated 01 November 2024) (for period 01 September 2023 to 31st August 2024) - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence from this audit period:</u> - Interview with ACCIONA (30 October 2025) - Sustainability Strategy (WHTP2-ACOC-WHT-EV-PLN-000016, Rev 02.01, dated 21 May 2024) - Monthly Progress Report 34 September 2025 (Ref: Monthly Progress Report 34 September 2025, Rev 00, Dated 8 October 2025) - Sighted Letter, DPHI to TfNSW, dated 01 July 2024 (ref: SSI-8863-PA-733, Western Harbour Tunnel – Stage 2 Sustainability Strategy Revision 02.01) acknowledging Sustainability Strategy Revision 02.01 (dated 21 May 2024) submission to the Planning Secretary for information. - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>Outside this audit period:</u> Sustainability Strategy for WHT Stage 3B prepared and submitted to DPE (now DPHI) for information, outside of this audit period and prior to construction commencement of WHT Stage 3B on 22 May 2023. DPE (now DPHI) responded to TfNSW on 29 May 2023 referring to the Sustainability Management Plan Revision B (dated 17 April 2023), which was submitted to DPE (now DPHI) for information as required under condition E126 of SSI 8863 and noting that the Sustainability Management Plan, Revision B: <i>" - has been prepared to achieve a minimum 'Excellent' 'Design' and 'As Built' rating under the ISCA infrastructure rating tool; and</i> <i>- has been reviewed by Transport for NSW and no issues were raised."</i> The Sustainability Strategy for WHT Stage 2 was further updated to include Modification 2 changes, reviewed by TfNSW and submitted to DPHI for information by TfNSW, on 04 June 2024 (only TfNSW email confirming submission to DPHI sighted, refer evidence). Refer previous Independent Audit Reports for further audit evidence and findings outside this audit period. <u>During this audit period,</u> Auditees indicated below: - No further changes to the Sustainability Strategy for WHT Stage 2 (Rev 02.01, dated 21 May 2024) during this audit period (refer evidence including DPHI's Letter sighted acknowledging submission and filing of Sustainability Strategy Revision 02.01 (dated 21 May 2024); and - WHT Annual Sustainability Report 2025 (for period 01 September 2024 to 31 August 2025) outlining WHT's objectives and targets and status is currently under draft. Sighted latest September 2025 Monthly Progress Report (refer evidence) to TfNSW. Section 9 (Sustainability) of the Report includes Highlights, ISC Rating Status, Areas for Improvement and Sustainability Dashboard with summary of the Project's tracking status against Objectives and Targets (such as waste, greenhouse gas and energy use, water use, materials etc).
E127	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. A copy of the Water Reuse Strategy must be made publicly available. Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational phases of the CSSI.	<u>Evidence outside this audit period:</u> - WHT Water Reuse Strategy (Rev C, dated 11 April 2023) - Email, DPE (now DPHI) to TfNSW dated 26 May 2023 [Ref: WHT and WFU - E127 Water Reuse Strategy - Stage 3B WHT] confirming submission of - E127 Water Reuse Strategy - Stage 3B WHT - WHT Water Reuse Strategy (WHTP2-ACOC-WHT-EV-PLN-000015, Rev 02.01, dated 7 May 2024) - WHT Annual Sustainability Report 2024 (WHTP2-ACOC-WHT-EV-GE01-RPT-000002 - Annual Sustainability Report - 2024, Rev 02, dated 01 November 2024) (for period 01 September 2023 to 31st August 2024) - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence from this audit period:</u> - Site Inspection (28 October 2025) - Interview with ACCIONA (30 October 2025) - Monthly Progress Report 34 September 2025 (Ref: Monthly Progress Report 34 September 2025, Rev 00, Dated 8 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>Outside this audit period:</u> WHT Water Reuse Strategy prepared and submitted to DPE (now DPHI), outside of this audit period. DPE (now DPHI) acknowledged receipt of the WHT Water Reuse Strategy on 26 May 2023 and that <i>"the Department has no comments on the document at this time."</i> The Water Reuse Strategy was further updated to include Modification 2 changes, reviewed by TfNSW (refer document revision history table). Refer previous Independent Audit Reports for audit evidence and findings outside this audit period. <u>During this audit period:</u> Auditees indicated no further changes to the WHT Water Reuse Strategy (Rev 02.01, dated 7 May 2024) during this audit period. Above WHT Water Reuse Strategy is publicly available on the Project website. Auditees indicated below: - Rainwater tanks installed for reuse in site office toilets (as sighted in previous audits); - Treated water from Water Treatment Plants (WTPs) at Cammeray and Ridge St sites reused in tunnels; and - WTP operational at EMU Plains with 100% water reuse on-site, for example for dust suppression. Sighted latest Monthly Progress Report 34 (refer evidence) to TfNSW - Section 9 (Sustainability) of the Report includes a Sustainability Dashboard with summary of the Project's tracking status against Objectives and Targets including tracking of percentage of non-potable water demand which is sourced from non-potable water sources during construction, percentage of water (rainwater, stormwater, wastewater, groundwater) generated/collected during construction which is reused/recycled or reclaimed. Also refer Section 2.2.5 Site Inspection of the Audit Report.
TRAFFIC AND TRANSPORT				
Construction traffic management				
E128	Access to all utilities and properties must be maintained during construction, where practicable, unless otherwise agreed with the relevant utility owner, landowner or occupier.	- Site Inspection (28 October 2025) - Interview with ACCIONA (30 October 2025) - WHT DPE Complaint Register (as per CoA B7, CoA B9 audit evidence within this Audit Table) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - Also refer CoA E138, CoA E141, CoA B7 and CoA B9 (for example) within this Audit Table for audit evidence	C	Section 6.13 /Table 6-4 of the Traffic, Transport and Access Management Sub-Plan, includes this CoA's requirements and CoA E129 for implementation. There was no blocked or restricted access to utilities or properties observed during the audit site inspection - no issues / OFIs raised (refer Section 2.2.5 Site Inspection of Audit Report). Auditees indicated no property accesses were affected physically by the works (per CoA E129). Also refer CoA E138, CoA E141, CoA B7 and CoA B9 (for example) within this Audit Table for audit evidence and findings.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E129	Any property access physically affected by the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier.	Same as CoA E128 (refer CoA E128 within this Audit Table for audit evidence)	C	Same as CoA E128 (refer CoA E128 within this Audit Table for audit evidence and findings).
E130	Access to the ancillary facility WHT3 construction support site at White Bay by construction vehicles (including light vehicles) must only be via The Crescent/City West Link and James Craig Road. No vehicle associated with the CSSI is permitted to access the site via Robert Street, Rozelle, unless required in the event of an emergency.	- Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - Sighted Vehicle Movement Plan (VMP) (Ref: ACAWHT-VMP-0009 Rev01 - Glebe Island access egress.pdf)	C	Section 6.5 of the Traffic, Transport and Access Management Sub-Plan, outlines the construction traffic routes/access to WHT3 (White Bay) and Section 6.16 (Table 6-4) includes mitigation measure ID #TTAMP03 to address this CoA. Auditees indicated that the Project no longer requires the northern portion of WHT3 construction support site, with no need for vehicles to access the site via Robert Street, Rozelle. Sighted Vehicle Movement Plan for the site - refer evidence.
E131	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
E132	Local roads proposed to be used by heavy vehicles to directly access the construction boundary and ancillary facilities that are not shown in Figure 5-7 to 5-22 inclusive of Appendix F of the EIS, and Figure 7-1 of the Modification 1 Report and Figure 9.2 of the Modification 2 Report, as described in Condition A1, must be approved by the Planning Secretary and included in the Traffic, Transport and Access Management CEMP Sub-plan.	<u>During this audit period:</u> - Interview with ER (21 October 2025) - Interview with TfNSW and ACCIONA (28 October 2025) - WHT Environmental Incident register (including non-compliances), extract provided for audit period on 28 October 2025 (Ref: WHT Environmental Incident register May - October 2025.xlsx) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - Also refer CoA A45 within this Audit Table; Section 3.2, Table 6, Sections 3.7 (including DPHI Consultation Scope) and 3.8 of the Audit Report for audit evidence	NC	Section 6.5.1 of the Traffic, Transport and Access Management Sub-Plan states that <i>"The construction vehicle routes outlined in Section 6.5 have been developed to avoid local roads outside the construction footprint, where possible, maximising the use of state and regional roads. However, some construction site and work areas can only be accessed from local roads. Current local roads proposed to be used include those listed in Table 6-3 and shown in the relevant Heavy Vehicle Route diagrams located in Appendix B2. These align with those local roads identified in Figure 5-7 to 5-22 of Appendix F of the EIS and Section 9.1 of the MOD2 report. If during construction additional local roads are identified as necessary for the Project, a request will be made to the Secretary under MCoA E132 and E133, and once approved will be appended to this Plan (Refer to Appendix B3)."</i> Auditees indicated no new HVLR requests in this audit period - also refer CoA E133 within this Audit Table for audit evidence and findings. During this audit period, the following non-compliances were self-reported and notified to the Planning Secretary: - IA6 – NC01: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC03: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC04: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC05: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC06: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) - IA6 – NC07: One non-compliance in relation to one heavy vehicle using unapproved local roads (CoA E132) TfNSW submitted non-compliance notifications for above (refer evidence under CoA A45 within this Audit Table), to the Planning Secretary and response from DPHI in relation to these non-compliances were sighted, where provided (refer Table 6 of the Audit Report for audit evidence). Also refer CoA A45 within this Audit Table; Section 3.2, Table 6, Sections 3.7 (including DPHI Consultation Scope and related IA6-OFI01) and 3.8 of the Audit Report for further details of the non-compliances including dates and times, verification and close-out of actions raised to address the non-compliances.
E133	All requests to the Planning Secretary under Condition E132 must include the following: a) a swept path analysis; b) demonstration that the use of local roads by heavy vehicles for the CSSI will not compromise the safety of pedestrians and cyclists or the safety of two-way traffic flow on two-way roadways; c) provide details as to the date of completion of the road dilapidation surveys for the subject local roads; d) measures that will be implemented to avoid where practicable the use of roads past schools, aged care facilities and childcare facilities during their peak operation times; and e) written advice from an appropriately qualified professional on the suitability of the proposed heavy vehicle route which takes into consideration items (a), (b), (c), and (d) of this condition.	- Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - Refer CoA A27 evidence in this Audit Table, for ER endorsement of above Sub-Plan in the audit period - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	NT	Section 6.5.1 of the Traffic, Transport and Access Management Sub-Plan states that <i>"If during construction additional local roads are identified as necessary for the Project, a request will be made to the Secretary under MCoA E132 and E133, and once approved will be appended to this Plan (Refer to Appendix B3)."</i> Auditees indicated no new HVLR requests in this audit period. Condition not triggered in this audit period.
E134	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
E135	The locations of all heavy vehicles used for spoil haulage must be monitored in real time and the records of monitoring be made available electronically to the Planning Secretary and the EPA upon request for a period of no less than one year following the completion of construction. Note: Refer to Condition A47 in relation to vehicle identification.	- Site Inspection (28 October 2025) - Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - Also refer CoA E132/CoA E139 within this Audit Table for audit evidence	C	Section 6.3/Table 6-4 of the Traffic, Transport and Access Management Sub-Plan includes that the locations of all heavy vehicles used for spoil haulage will be monitored in real time and the records of monitoring be made available electronically to the Planning Secretary and the Environment Protection Authority (EPA) upon request for a period of no less than one year following the completion of construction. During the audit site inspection on 28 October 2025, no spoil haulage trucks were observed (refer Section 2.2.5 Site Inspection of the Audit Report). Auditees indicated below: - ACCIONA operates an online tool (LinkedSite program), which provides for visual real-time GPS tracking and monitoring of spoil trucks accessible to the traffic management and engineering team; - Online tool (LinkedSite program) includes geofencing to set up approved routes, other no-go zones and approved waste disposal sites (pre-approved by the ACCIONA Environment Team); - Online tool (LinkedSite program) issues notifications to ACCIONA for e.g. spoil truck departures from approved routes; and - No requests from DPHI or EPA in relation to real time monitoring electronic records in the audit period. Also refer CoA E132/CoA E139 within this Audit Table for further audit evidence and findings.

Item
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Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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Construction traffic – Ridge Street, North Sydney

E135A	The number of spoil haulage trucks and concrete trucks exiting from the Ridge Street construction ancillary facility (WHT9) between the hours of 10:00 pm and 7:00 am, Monday to Sunday and travelling westbound along Falcon Street, is limited to a total of 100 vehicles per night unless an alternative number of vehicle movements is permitted through an Environment Protection Licence. Measures must be put in place to monitor the number of spoil and concrete trucks making this movement. Details on the number of movements must be provided to the EPA and the Planning Secretary on request, within one week of the EPA and the Planning Secretary making the request.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>During this audit period:</u> - Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) <u>Sample records sighted:</u> - Falcon St - evidence of last loads hauled from Falcon St.png Concrete agi movements May 25 - October 25 - Ref: 202505 May HMA Truck movements 2200 to 0700.xlsx to 202510 October HMA Truck movements 2200 to 0700.xlsx - RRef: E135a - tracking of agi movements email	C	<u>Outside this audit period:</u> Condition was included following approval of Modification 2 and is applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. Refer previous Independent Audit Reports for audit evidence and findings outside this audit period. <u>During this audit period:</u> Section 6.3 of the Traffic, Transport and Access Management Sub-Plan includes that the locations of all heavy vehicles used for spoil haulage will be monitored in real time and that daily heavy vehicle numbers will be recorded during the hours of 10pm and 7am either by a gate warden or a electronic system to ensure the 100 vehicle limit is not exceeded. Auditees indicated below: - Spoil trucks are tracked through Online tool (LinkedSite program), with no spoil haulage from WHT 9 Ridge Street post 11 April 2025 (outside this audit period); and - Concrete trucks tracked using a tracking sheet. Sighted extract records for tracking of spoil and concrete trucks at WHT9 - Ridge Street during the audit period (refer evidence, for extracts provided) indicating compliance with this Condition's requirements. No complaints nor non-compliances recorded in relation to this Condition - refer evidence elsewhere within this Audit Table.
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Pedestrian and Cyclist Access

E136	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. 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 one month prior to the road being used by heavy vehicles associated with the CSSI.	- Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B)	NT	Section 6.6 (Road restoration) of the Traffic, Transport and Access Management Sub-Plan, includes the requirements of this CoA for implementation. Auditees indicated no road condition surveys were carried out in this audit period. Condition not triggered during this audit period.
E137	If damage to roads occurs as a result of the CSSI, the Proponent must either (at the relevant road authority's discretion): (a) compensate the relevant road authority for the damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-works as identified in the Road Dilapidation Report(s).	- Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - WHT DPE Complaints Register (as per audit evidence under CoA B7, CoA B9 within this Audit Table)	NT	Section 6.6 (Road restoration) of the Traffic, Transport and Access Management Sub-Plan, includes the requirements of this CoA for implementation. Auditees indicated below: - No damage claims have been raised in this audit period; and - Negotiations still ongoing with Inner West Council for permanent reinstatement works (following 33kV Rozelle Power supply works). Also refer CoA B7 and CoA B9 within this Audit Table for audit evidence and findings (for any complaints in the audit period and management).

Pedestrian and Cyclist Access

E138	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.	- Site Inspection (28 October 2025) including temporary pedestrian detour signage installed - Interview with TfNSW and ACCIONA (30 October 2025) - WHT DPE Complaint Register (as per CoA B7, CoA B9 audit evidence within this Audit Table) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) <u>Sighted below sample work notification:</u> - Berrys Bay work notification - Site establishment work update, Date published: 4 Jul 2025 (noted there will be temporary access changes for pedestrians until the parkland reopens to the public) - Evidence elsewhere within this Audit Table (for notifications)	C	Section 6.11 of the Traffic, Transport and Access Management Sub-Plan, includes this CoA and outlines requirements that would be implemented. Auditees indicated below - Instances where pedestrian and cyclist access have been restricted or removed due to construction activities; - Alternative routes have been provided; with these alternative routes shown in the relevant TMPs and Traffic Guidance Schemes (TGS); and - TMP/TGS are subject to approval from TfNSW's CJP or local council and implemented once TMP/TGS are approved. Berrys Bay site establishment works occurred in the audit period and was examined during the audit as an example, including during the audit site inspection: - Observed temporary pedestrian detour signage installed near Berrys Bay site (refer Section 2.2.5 Site Inspection of the Audit Report); and - Sighted Berrys Bay work notification - Site establishment work update (refer evidence), which noted that there will be temporary access changes for pedestrians until the parkland reopens to the public, including locations with changed access, dates and times [the foreshore pathway and Council Beach area (from Balls Head Road to the south of the former Woodley's Boatyard)]; with no access changes to the Coal Loader, Balls Head Reserve (including former Quarantine Depot) or Carradah Park, Waverton. Also refer CoA B7 and CoA B9 within this Audit Table for audit evidence and findings (for any complaints in the audit period and management).
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Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Construction Parking Management				
E139	Vehicles (including light and heavy vehicles) associated with the CSSI must be managed to: (a) minimise parking on public roads; (b) minimise idling and queueing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive land user(s); (d) not block or disrupt access across pedestrian or shared user paths at any time; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the Traffic, Transport and Access Management CEMP Sub-plan.	- Site Inspection (28 October 2025) - Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) Sighted below sample toolbox records (including following complaints): - WHT Weekly Toolbox Talk 20250516.pptx - Toolbox Talk - 16/05/2025 [Ref: 250516 (1)] - Toolbox Talk - 16/05/2025 [Ref: 250516 (2)] - Toolbox Talk - 10/10/2025 [Ref: 20251010113151 - Toolbox Talk (Surface) (1)] - Toolbox Talk - 10/10/2025 [Ref: 20251010113250 - Toolbox Talk (Tunnel) (1)] - Site establishment EWMS toolbox.pptx - Tunnelling EWMS toolbox.pptx - CAM Site Induction (See slide 23).pptx and CAM VENT Site Induction (See slide 31).pptx - Also refer CoA E132, CoA E140 (CPAS implementation and monitoring), CoA B7 and CoA B9 (for any complaints in the audit period and management) within this Audit Table for audit evidence	C	Auditees indicated below: - Ongoing monitoring to ensure construction vehicles are adhering to CPAS/TTAMP (refer CoA E140 within this Audit Table); - Online tool (LinkedSite) used for real-time GPS tracking and monitoring of spoil trucks, which includes geofencing; and - Online tool (LinkedSite) issues alert notifications to ACCIONA for e.g. truck departures from approved routes (refer non-compliances self-reported against CoA E132 within this Audit Table for audit evidence and findings). No OFIs/ issues identified in relation to this CoA during the audit site inspection (refer Section 2.2.5 Site Inspection of the Audit Report) - with summary of observations below at the time of the audit site inspection: - Provision of on-site parking and available spaces observed at Emu Plains (WHT13); - No queuing or idling or marshalling activities observed near site access/egress; and - No identifiable WHT Project branded worker vehicles parked near worksites. Worker parking complaints at Cammeray in the Audit period were further discussed, with toolbox records requested (including following complaints): - Sighted toolbox record including requirement that parking on local roads is not permitted and attendance records dated 16 May 2025 at Cammeray Site (Tunnel Civil Works and Buildings) – refer evidence - Sighted Enviro toolbox of tunnelling EWMS and Site Establishment EWMS including text - use only authorised roads and no parking on local roads and attendance records dated 10 October 2025 at Cammeray Site (Tunnel Civil Works and Buildings) – refer evidence Further to above, Auditees provided evidence of Cammeray Site Specific Inductions including - do not park on private property or local roads (refer evidence sighted). Also refer CoA E132, CoA E140 (CPAS implementation and monitoring), CoA B7 and CoA B9 (for any complaints in the audit period and management) within this Audit Table for audit evidence and findings.
E140	A Construction Parking and Access Strategy must be prepared to identify and mitigate impacts resulting from on- and off-street parking changes during construction of the CSSI. The Strategy must include, but not necessarily be limited to: (a) achieving the requirements of Condition E139; (b) confirmation and timing of the removal of on- and off-street parking associated with construction of the CSSI; (c) parking surveys of all parking spaces to be removed or occupied by the CSSI workforce to determine current demand during peak, off-peak, school drop off and pickup, weekend periods and during special events; (d) consultation with affected stakeholders utilising existing on- and off-street parking stock which will be impacted as a result of construction; (e) assessment of the impacts to on- and off-street parking stock taking into consideration, occupation by the CSSI workforce, outcomes of consultation with affected stakeholders and considering the impacts of special events; (f) identification of mitigation measures to manage impacts to stakeholders as a result of on- and off-street parking changes including, but not necessarily limited to, staged removal and replacement of parking, provision of alternative parking arrangements, managed staff parking arrangements and working with relevant council(s) to introduce parking restrictions adjacent to work sites and compounds or appropriate residential parking schemes; (g) where residential parking schemes already exist, off-road parking facilities must be provided for the CSSI workforce; (h) mechanisms for monitoring, over appropriate intervals, to determine the effectiveness of implemented mitigation measures; (i) details of shuttle bus service(s) to transport the CSSI workforce to construction sites from public transport hubs and off-site car parking facilities (where these are provided) and between construction sites; (j) provision of contingency measures should the results of mitigation or monitoring indicate implemented measures are ineffective; and (k) provision of reporting of monitoring results to the Planning Secretary and relevant council(s) at three monthly intervals. The Construction Parking and Access Strategy must be submitted to the Planning Secretary for approval at least one month before the commencement of any construction that reduces the availability of existing parking. The approved Strategy must be implemented before impacting on on-street parking and incorporated into the Traffic, Transport and Access Management CEMP Sub-plan.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>During this audit period:</u> - Site Inspection (28 October 2025) - Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) includes below CPAS' in Appendices: - Construction Parking and Access Strategy North Rev 10, dated 28 June 2024 - Construction Parking and Access Strategy South Rev 8, dated 3 July 2025 - Construction Parking and Access Strategy West Rev 1.2, dated 5 November 2024 - Construction Parking and Access Strategy Berrys Bay Rev 01, dated 27 May 2025 - Approval Letter, DPHI to TfNSW, dated 5 June 2025 [Ref: SSI-8863-PA-1020, Western Harbour Tunnel (SSI-8863) Construction Parking and Access Strategy: Berrys Bay (Condition E140)] - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) <u>Sighted sample submission of CPAS Quarterly Report for North (Apr to Jun 2025) in the audit period under E140k)</u> - Construction Parking and Access Strategy – Performance Report (North) (Apr to Jun 2025), Revision B, dated 12 August 2025 - Acknowledgement email receipt, DPHI to TfNSW dated 19 August 2025 [Ref: Western Harbour Tunnel & Warringah Freeway Upgrade - Post Approval Document Received - (SSI-8863-PA-1108)] - Letter, DPHI to TfNSW dated 02/09/2025 [Ref: SSI-8863-PA-1108, Subject: Western Harbour Tunnel and Warringah Freeway Upgrade (SSI-8863) E140 Construction Parking and Access Strategy Monitoring Report, April to June 2025] - WHT CPAS North Performance Report Q2 2025.msg (ACCIONA submission to NSC on 22 August 2025) Also refer CoA E139, CoA B7/ CoA B9 within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> CPAS Berrys Bay Revision 01 was approved by DPHI on 5 June 2025 (refer evidence) noting that: "- details the Project's parking impacts associated with Berrys Bay foreshore parklands works; - includes construction parking mitigation measures to mitigate the loss of on-street parking; - has been prepared in consultation with affected stakeholders including North Sydney Council, HMAS Waterhen, and affect residents and businesses; and - has been reviewed by Transport for NSW and no issues have been raised with the Department." Above Approval Letter from DPHI noted that the approved plan is placed on the project website in accordance with condition B15 and reminder to continue to consult with North Sydney Council, HMAS Waterhen and the affected local community, and management of any unforeseen parking impacts in accordance with the mitigation measures outlined in the CPAS. Above CPAS, other CPAS' are available on the Project website and included in the TTAMP as Appendices. CPAS Performance Reports for North, South and West (Apr to Jun 2025) were also sighted on the Project website. <u>Audit site inspection</u> No OFIs/ issues identified in relation to this CoA during the audit site inspection (refer Section 2.2.5 Site Inspection of the Audit Report) - with summary of observations below at the time of the audit site inspection: - Signage observed for WHT temporary parking space closure – Balls Head Road cul de sac (Berrys Bay site); - No identifiable WHT Project branded worker vehicles parked near worksites - Provision of on-site parking and available spaces observed at Emu Plains (WHT13); <u>Sighted sample Construction Parking and Access Strategy – Performance Report and submission under E140k)</u> - Construction Parking and Access Strategy – Performance Report (North) (Apr to Jun 2025) is available on the Project Website - Sighted evidence of submission to DPHI (including acknowledgement Letter from DPHI on 2 September 2025) and submission to NSC on 22 August 2025 (refer evidence sighted). Also refer CoA E139, CoA B7/ CoA B9 within this Audit Table and Section 3.6 of the Audit Report for complaint management and resolution.
E141	During construction, all reasonably practicable measures must be implemented to maintain pedestrian 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 minimised, alternative pedestrian and vehicular access, and parking arrangements must be developed in consultation with affected businesses and implemented prior to the disruption. Adequate signage and directions to businesses must be provided prior to, and for the duration of, any disruption.	- Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - WHT DPE Complaint Register (as per CoA B7, CoA B9 audit evidence within this Audit Table)	NT	Section 6.13/Table 6-4 of the Traffic, Transport and Access Management Sub-Plan, includes this CoA and outlines requirements that would be implemented. Berrys Bay site establishment works occurred in the audit period and was examined during the audit as an example; with Auditees indicating that Condition was not triggered in this audit period. Also refer CoA B7 and CoA B9 (for example) within this Audit Table for audit evidence and findings.

Item
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Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Reinstatement of Car Parking on Alfred Street North				
E142	The Proponent must mitigate the loss of on-street parking in Alfred Street North (specifically between Wyagdon Street and Whaling Road), Neutral Bay during construction and operation of the CSSI, with the objective of having no impact to resident parking during operation, by: (a) confirming existing capacity and the parking requirements of the residents by survey; (b) investigating options to mitigate the loss of on-street parking that meet the parking needs of the residents of Alfred Street North and adjacent streets; (c) consulting with the residents at locations where on-street parking would be lost to confirm the preferred parking options; and (d) identifying the parking measures to be implemented. A report on the outcomes of this condition must be documented and submitted to the Planning Secretary for approval within six months of construction commencing.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E143	The parking measures identified by Condition E142, must be delivered prior to impact, unless otherwise agreed by the Planning Secretary. Note: Identified mitigation measures may need to be further assessed under the <i>Environmental Planning and Assessment Act, 1979</i> .	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
Road Safety				
E144	The CSSI must be designed to meet relevant design, engineering and safety guidelines, including the Austroads Guide to Traffic Management for new or modified local roads, parking, pedestrian and cycle infrastructure.	<u>Evidence outside this audit period:</u> - RD02 - Project Wide - Road Alignment and Geometry - Design Report (WHTP2-AAJV-NWW-RW-RD02-RPT-000001, Revision D, dated 23 February 2024, Final Design Documentation) - (Sighted) RD01 – Local Road Upgrades –Design Report (WHTP2-AAJV-NWW-RW-RD01-RPT-000001, Revision D, 6 December 2023, Final Design Documentation) - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere within this Audit Table <u>During this audit period:</u> - Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - RD02 - Project Wide - Road Alignment and Geometry - Design Report (WHTP2-AAJV-NWW-RW-RD02-RPT-000001, Revision D, dated 23 February 2024, Final Design Documentation) - (Sighted) RD01 – Local Road Upgrades –Design Report (WHTP2-AAJV-NWW-RW-RD01-RPT-000001, Revision F, 15 October 2025, Post IFC Revision 2) - Design Package Status and Request for WHT for IEA#6.xlsx	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> Section 6.16 of the Traffic, Transport and Access Management Sub-Plan includes mitigation measure (ID TTAMP18) reflecting this CoA's requirements. Auditees indicated below: - Design Report RD01 has been updated in the audit period, with Section 2.3 outlining Standards and Specifications and Sections 2.5.1 to 2.5.6 outlining changes between revisions (refer evidence sighted); - For the purpose of construction/temporary works, there have been no new or modifications to existing local road, parking, pedestrian or cycle access to date. Should this be required, Road Safety Audits (RSAs) would be undertaken as part of the Traffic Management Plans for temporary works; - For permanent works, RSA completed (by AECOM and Aurecon) as part of Design package reference RD02 for the detailed design development trigger (RSA in appendix to this Report); and - Design Package (RD02 - Project Wide - Road Alignment and Geometry - Design Report) references 'Standards and Specifics' in Section 2.3 and Road Safety Audit in Section 4.3 and Appendix J, required by CoA E145 during detailed design development (refer evidence sighted). NB: It is not the responsibility of the Independent Auditor to verify compliance with detailed design provisions to meet this Condition's requirements, which should be confirmed by qualified personnel responsible for undertaking detailed design, preparation of design reports; including any personnel responsible for certification of design compliance to requirements.
E145	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 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.	- Interview with ACCIONA (30 October 2025) - Traffic, Transport and Access Management Sub-Plan (Rev 5.11, dated 03 June 2025) (Appendix B) - Also refer CoA E144 (refer CoA E144 within this Audit Table for audit evidence	NT	Section 6.7 and Section 6.16 of the Traffic, Transport and Access Management Sub-Plan includes mitigation measure (ID TTAMP19) reflecting this CoA's requirements. Also refer CoA E144 (refer CoA E144 within this Audit Table for audit evidence, findings and note).
Access from Mount Street Interchange to Alfred Street North				
E146	Direct vehicular access must be provided from Mount Street, North Sydney to Alfred Street North, Neutral Bay. Access must be provided in both directions.	Interview with ACCIONA (30 October 2025)	NT	Auditees indicated below: - To date, no works have been undertaken that would result in vehicular access from Mount Street, North Sydney to Alfred Street North, Neutral Bay and not intending to, as outside ACCIONA footprint of works. Condition not triggered in this audit period.

Item
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Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Road Network Performance				
E147	The Proponent must prepare a Road Network Performance Plan in consultation with the relevant council(s). The Plan must incorporate operational traffic modelling results from the operation of major motorways including but not limited to WestConnex M4-M5 Link (SSI 7485) and WestConnex M8 (SSI 6788) projects (including any Road Network Performance Plan or Operational Road Network Performance Review prepared) and include: (a) consideration of movement and place analysis and local initiatives, such as local area improvement strategies, potential land use changes, and any traffic changes as a result of other major projects in the vicinity of the project area; (b) an updated analysis, including modelling of traffic impacts to the adjoining road network (including impacts on local roads from rat-running), as a consequence of the CSSI; (c) an assessment of the performance of the road network, including: (i) potential "pinch-points" where the merging of tunnel exit traffic and surface traffic would occur at Rozelle or along the Warringah Freeway; (ii) traffic movements and congestion at various intersections in North Sydney, Cammeray and Rozelle/Annandale; (iii) results of the Public Transport Review as required by Condition E153; and (d) mitigation measures to manage predicted traffic performance impacts including local area traffic management and bus priority measures as relevant. The Road Network Performance Plan must be submitted to the Planning Secretary and relevant council(s) for information six months prior to the operation of the CSSI. The mitigation measures in the Plan must be implemented by the Proponent before the operation of the CSSI. The Proponent is responsible for the implementation of identified measures under (c) above. Note: Identified mitigation measures may need to be further assessed under the <i>Environmental Planning and Assessment Act, 1979</i>. Work will need to meet relevant design standards and be subject to independent road safety audits.	Not applicable - operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E148	The Proponent must prepare an Operational Road Network Performance Review, within 12 months and again within five years after the commencement of operation of the CSSI. The Review must address road network performance and review the effects of the CSSI on the adjoining road network. The Review must confirm whether the mitigation measures identified in the Road Network Performance Plan required under Condition E147 are adequate. The Review must be undertaken in consultation with relevant council(s) and be completed within six months of the review timeframes. The Review must be provided to the Planning Secretary within 60 days of its completion. The identification of further mitigation measures, if required, must be included in the Review. The Proponent is responsible for the implementation of the identified measures. Note: Identified mitigation measures may need to be further assessed under the <i>Environmental Planning and Assessment Act, 1979</i>. Work will need to meet relevant design standards and subject to independent road safety audits.	Not applicable - operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
Public Transport - Construction				
E149	Where bus stops are required to be temporarily closed, such closure must not occur until relocated bus stops that comply with relevant standards, are functioning, have similar capacity and amenity and are relocated within a 400 metre walking distance of the existing bus stop. Closures and relocation of bus stops during construction must be undertaken in consultation with relevant council(s). Wayfinding signage must be provided directing commuters to adjacent or relocated bus stops. Footpaths and (where required) road crossing facilities must be provided to any relocated bus stops such that accessibility and safety standards are met.	- Not applicable - Refer previous Independent Audit Reports for audit evidence	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. Refer previous Independent Audit Reports for audit evidence and findings.
E150	Prior to the commencement of operation, all bus stops temporarily closed must be reinstated in a manner that complies with relevant standards, provides equal or improved capacity, amenity and accessibility (including footpaths and road crossings) in consultation with relevant council(s).	- Not applicable - Refer previous Independent Audit Reports for audit evidence	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. Refer previous Independent Audit Reports for audit evidence and findings.
E151	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
E152	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
Public Transport – Operational Performance Measures				
E153	A Public Transport Review must be prepared that identifies the following matters: (a) confirmation and comparison of journey times during peak periods, within the year of opening and 10 years post opening, associated with bus routes that will interact with the CSSI (including those that operate within or across the project footprint or along strategic bus corridors that would have changed journey times resulting from the CSSI), with and without the CSSI; and (b) measures that have been or can be implemented so that when compared to the without CSSI journey times, the CSSI would assist in: (i) improved or maintained bus journey times on opening of the CSSI; and (ii) maintaining bus journey times 10 years post-opening. A report of the Public Transport Review must be made publicly available six months prior to operation of the CSSI.	Not applicable - operational condition	NT	Not applicable to WHT Stages 3B and 3C - Operational condition as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.

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HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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UTILITIES MANAGEMENT

Utility Coordination Manager

E154	A Utility Coordination Manager must be appointed for the duration of the CSSI Work. The role of the Utility Coordination Manager must include, but not be limited to: (a) the management and coordination of all utility Work associated with the delivery of the CSSI, to ensure respite is provided to the community; (b) providing advice to the Public Liaison Officer(s) regarding upcoming utility Work, including the scope of the work and the responsibility for the Work; and (c) investigating complaints received from the Community Complaints Mediator or the Public Liaison Officer(s) relating to utility Work and providing a response to the Community Complaints Mediator or Public Liaison Officer(s).	<u>Evidence outside this audit period:</u> - Utilities Services Management Plan (WHTP2-ACOC-WHT-CX-PLN-000011, Revision B, Dated 26 April 2023) <u>Evidence during this audit:</u> - Interview with ACCIONA (30 October 2025) - Complaints Register (as per audit evidence under CoA B7/ CoA B9 within this Audit Table) - Also refer CoA E82, CoA E83 and CoA E88 (for example) within this Audit Table for audit evidence	C	Utility Coordination Manager (Arthur Vassileras) appointed for the Project. During this audit period, Auditees indicated below: - Respite coordination managed and implemented as part of OOHW Permit process; and - OOHW planning and coordination undertaken with WFU and WHT Stages 3B and 3C. Also refer CoA B7/CoA B9 (for any complaint management and resolution), CoA E82, CoA E83 and CoA E88 (for example) within this Audit Table for audit evidence and findings on OOHW process, coordination and respite.
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PLACE DESIGN AND VISUAL AMENITY

Construction Ancillary Facilities

E155	The CSSI must be constructed in a manner that minimises visual impacts of construction sites, including providing temporary landscaping and vegetative screening of the construction sites, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located.	- Site Inspection (28 October 2025) - WHT DPE Complaint Register (as per audit evidence under CoA B7/CoA B9 within this Audit Table) - OOHWP 288 (Ref: OOHWP 288 - Rozelle - TBM Pressure testing combined) including notification Water pressure testing in Rozelle Western Harbour Tunnel Update - September 2025 - Also refer evidence elsewhere within this Audit Table for audit evidence, for example CoA A27 (ER site inspections), CoA B7/B9 (for any complaint management and resolution), CoA A20 re boundary screening.	C	Auditees indicated that for Berrys Bay site established during the audit period (sighted Images in JIRA E155-1.jpeg and E155-3.jpeg to E155-5.jpeg): - Vegetation was retained wherever possible to provide screening to nearby sensitive receivers along Balls Head Road and the pedestrian walkway; - No external light has been installed on the security hut to prevent light spill; and , - Treatment for the site hoarding has just been approved, however the hoarding treatment has not yet been installed (currently being manufactured). The hoarding treatment has been designed to reflect the history context of Berrys Bay and would be installed once available. Auditees indicated impacts are also monitored via ACCIONA internal site inspections and temporary work lighting for nightworks is managed through the OOHW process and permits with mitigation measures to minimise light spill. For example, sighted OOHW Permit 288 in the audit period. Section 9 of OOHW Permit noted that to minimise light spill and reduce impact on surrounding areas, directional lighting will be focused solely on the active work zone. Existing street lighting will be utilised where appropriate to avoid the need for additional temporary lighting infrastructure. No issues / OFIs raised during the audit site inspection - refer Section 2.2.5 Site Inspection of the Audit Report including status of hoarding installation works at Berrys Bay. Also refer evidence elsewhere within this Audit Table for audit evidence and findings, for example CoA A27 (ER site inspections), CoA B7/B9 (for any complaint management and resolution), CoA A20 re boundary screening.
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Place, Design and Visual Amenity

E156	The place making, design and landscape outcomes of the CSSI must be informed by and be consistent with Appendix V of the EIS, including but not limited to the objectives and design principles, requirements and opportunities.	<u>Evidence outside this audit period:</u> - Approval Letter, DPHI to TfNSW (Ref:SSI-8863-PA-779, dated 19 August 2024) [WHT – Stage 3 (SSI-8863): Staging of the Place Design and Landscape Plan] - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] <u>Main WHT PDLP - Part 1 sighted:</u> - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025 - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) <u>Draft PDLP addendum for WHT Berrys Bay - Part 2 sighted:</u> - https://caportal.com.au/rms/wht/pdlp-part-2 and JIRA for public display dates - WHT - Berrys Bay, Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000011), Revision F dated 21 July 2025 - Fw EXT Have your say on the future Berrys Bay foreshore parkland design elements.msg - Also refer CoA A15, CoA E157, CoA E177 - CoA E179 (for example) within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> DPHI approved request to stage the WHT Place Design and Landscape Plan (PDLP), in letter dated 19 August 2024 (outside of this audit period). Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period,</u> refer below for status of the Project PDLP, which is being staged: - The WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) - approved by DPHI on 10 June 2025 (refer evidence); - PDLP addendum for WHT Berrys Bay (Part 2) - currently in draft following stakeholder and community consultation (went on public display on 28 July 2025 and consultation closed on the 24 August 2025, with some consultation extension provided until 4 September 2025), refer evidence including draft sighted on Project website; and - PDLP addendum for WHT Cammeray Parkland PDLP (Part 3) – in early planning phase. Condition E156 is referenced in Section 1.4 (for example 1.4.1), Section 1.5 and where addressed within the approved WHT Place, Design and Landscape (Main WHT PDLP - Part 1, refer evidence). Also refer CoA A15, CoA E157, CoA E177 - CoA E179 (for example) within this Audit Table for audit evidence and findings. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation and WHT Cammeray Parkland PDLP (Part 3) is still in early planning phase; they were not considered further during this sixth Independent Audit.
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NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E157	The CCSI must result in a net increase in usable open space. Replacement space must be in the general vicinity of the loss, unless agreed to by the Planning Secretary.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] <u>Main WHT PDLP - Part 1 sighted:</u> - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025 - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period,</u> refer below for status of the Project PDLP, which is being staged: - The WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) - approved by DPHI on 10 June 2025 (refer evidence); - PDLP addendum for WHT Berrys Bay (Part 2) - currently in draft following stakeholder and community consultation (went on public display on 28 July 2025 and consultation closed on the 24 August 2025, with some consultation extension provided until 4 September 2025), refer evidence including draft sighted on Project website; and - PDLP addendum for WHT Cammeray Parkland PDLP (Part 3) – in early planning phase. Condition E157 is referenced in Section 1.5 and where addressed within the approved WHT Place, Design and Landscape (Main WHT PDLP - Part 1, refer evidence), stating below: <i>"The project provides a net increase in usable open space for the public through the creation of numerous public domain spaces along the alignment. These include:</i> - <i>reinstatement of impacted St Leonards Park atop the cut and cover structure at Falcon Street</i> - <i>creation of a landscaped public domain zone on Ernest Street Bridge, including a cycle track, active transport corridor, and footpath, integrating a tree canopy to enhance the green spine connection between Anzac Park and Cammeray Park</i> - <i>creation of a public park at the corner of Ernest Street and the new Cammeray Ventilation Building access drive; the design of this park is ongoing, pending community input as documented in Section 5.3</i> <i>More broadly, the scope of works associated with the WHT delivery includes the redevelopment of Berrys Bay from ex-industrial land to a waterfront park. This sits outside of the scope of this PDLP, but forms part of the overall project."</i> NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation and WHT Cammeray Parkland PDLP (Part 3) is still in early planning phase; they were not considered further during this sixth Independent Audit.
Specific Design Outcomes				
E158	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
E159	The Falcon Street bus on ramp must be refined during detailed design to mitigate visual and amenity impacts in consultation with those affected residential property owners of lots adjacent to where ramps extend beyond the existing (as at the date of this approval) top edge of the eastern rockface of the of the Warringah Freeway and to the satisfaction of the Planning Secretary. The final design of the Falcon Street bus on ramp must form part of the PDLP. Note: When seeking the Planning Secretary's satisfaction, the design must demonstrate how visual and amenity impacts (including: bulk, views, light spill, headlight glare and noise impacts) have been mitigated in consultation with the impacted residents. The submission must include how residents' comments have been addressed and any agreement with the residents on the final design.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E160	Following the completion of the use of the St Leonards Park for ancillary facility WHT9, the site must be returned to public open space in consultation with North Sydney Council, to maximise usable open space	- Interview with TfNSW and ACCIONA (30 October 2025) - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] Main WHT PDLP - Part 1 sighted: - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025	NT	WHT9 is currently in use by the Project. The Condition is referenced in Section 1.5 and where addressed in the approved WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) noting that the site will be returned to public use after construction (refer evidence). Condition not triggered during this audit period.
E161	The existing Ridge Street Lookout must form part of the design of the replacement Ridge Street Shared User Bridge.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
North Sydney CBD				
E162	The CSSI must not preclude the delivery of the objectives proposed by the North Sydney Integrated Transport Program in consultation with the Government Architect NSW and North Sydney Council.	- Interview with TfNSW and ACCIONA (30 October 2025) - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] Main WHT PDLP - Part 1 sighted: - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025	C	The Condition is referenced in Section 1.5 of the approved WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) noting that the Western Harbour Tunnel and Warringah Freeway Upgrade Project design does not preclude the North Sydney Integrated Transport Program.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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Lighting and Security

E163	The Proponent must construct and operate the CSSI with the objective of minimising light spillage to surrounding properties. All lighting associated with the construction and operation of the CSSI must be consistent with the requirements of AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting and relevant Australian Standards in the series AS/NZ 1158 – Lighting for Roads and Public Spaces. Additionally, the Proponent must provide mitigation measures to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.	<u>Evidence outside this audit period:</u> - LI01 – Street Lighting (Surface) - Design Report, Document Number: WHTP2-AAJV-NWW-LV-LI01-RPT-000001 Revision: D 19 March 2025 Post-IFC resubmission - LT01 - Tunnel Lighting - Design Report, Document Number: WHTP2-ACOC-WHT-EL-LT01-RPT-000001 Revision: E 17 December 2024 Final Design Documentation - LT02 - Non-Roadway Lighting - Design Report, Document Number: WHTP2-ACOC-WHT-EL-LT02-RPT-000001 Revision: F 29 April 2025 Final Design Documentation - LT03 - External & Feature Lighting - Design Report, Document Number: WHTP2-ACOC-WHT-EL-LT03-RPT-000001, Revision: E 11 April 2025 - Ref: Initial RFI IA5_Response.docx - Also refer previous Independent Audit Reports for further audit evidence and referenced elsewhere within this Audit Table <u>During this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - LI01 – Street Lighting (Surface) - Design Report, Document Number: WHTP2-AAJV-NWW-LV-LI01-RPT-000001 Revision: D 19 March 2025 Post-IFC resubmission - LT01 - Tunnel Lighting - Design Report, Document Number: WHTP2-ACOC-WHT-EL-LT01-RPT-000001 Revision: E 17 December 2024 Final Design Documentation - LT02 - Non-Roadway Lighting - Design Report, Document Number: WHTP2-ACOC-WHT-EL-LT02-RPT-000001 Revision: F 29 April 2025 Final Design Documentation - LT03 - External & Feature Lighting - Design Report, Document Number: WHTP2-ACOC-WHT-EL-LT03-RPT-000001, Revision: E 11 April 2025 - Ref: Consistency of Lighting Design Report LT03 with AS4282 Standards (WHTP2-ACOC-WHT-EL-LT03-MEM-000001, 28/08/2025, Revision A) - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] Main WHT PDLP - Part 1 sighted: - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025 - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025)	C	<u>Outside this audit period:</u> The Project has developed the following lighting design packages -LI01, LT01, LT02 and LT03 (refer evidence). Also refer previous Independent Audit Report for further audit evidence and findings, outside this audit period including IA5-OFI04 raised as part of IEA#5. <u>During this audit period:</u> - Auditees indicated no changes to lighting design packages -LI01, LT01, LT02 and LT03 (refer evidence); - Main WHT PDLP - Part 1 approved by DPHI (refer evidence); and - For previous IEA #5 - IA5-OFI04 observation and recommendation, the Proponent's Action to recommendation was submitted to DPHI with the IEA#5 Audit Report noting below: - Seek technical advice by 29 August 2025 to determine if the LT03 design package for the purposes of construction and operation is consistent with AS 4282:2019. That is, do the revisions in AS4282:2023 affect the construction or operation of the Project. - If the LT03 design package is not consistent with AS 4282:2019, prepare a report noting the changes relevant to the Project and their implications for submission to the Planning Secretary by 26 September 2025 seeking a direction under condition A4(g). Sighted memo prepared, which outlines the consistency of the LT03 lighting design report with both the 2023 and 2019 versions of AS4282, <i>Control of the Obtrusive Effects of Outdoor Lighting with (Ref: Consistency of Lighting Design Report LT03 with AS4282 Standards (WHTP2-ACOC-WHT-EL-LT03-MEM-000001, 28/08/2025, Revision A)</i> . Memo developed states below (excerpts only): - "LT03 report does not involve any "sensitive areas" as defined in either version of the standard. Therefore, the clarified definition in AS4282:2023 has no impact on the design outcome or compliance - AGI32 Lighting calculations for LT03 were performed using AGI32, which is based on the 2019 version of AS4282. Given the unchanged technical framework between the two versions, results generated using AGI32 remain valid and compliant with AS4282:2023 - The LT03 lighting design report is fully consistent with both AS4282:2019 and AS4282:2023. The update to the standard does not affect the technical basis or compliance of the design." Previous IEA #5 - IA5-OFI04 observation was considered closed, as part of this audit.
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Design Review Panel

E164	The Proponent must establish an independent Design Review Panel which must operate during detailed design and during construction. The process for the operation of the Panel, including the Panel's Terms of Reference and frequency of meetings, must be agreed to with the NSW Government Architect prior to the establishment of the Design Review Panel. The Terms of Reference must be consistent with the State Design Review Panel.	- Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Also refer CoA E165 and CoA E174 for audit evidence	C	Design Review Panel established by TfNSW outside of this audit period. The WHT State Design Review Panel - Extended Sessions- Terms of Reference for Stage 3 and the Berrys Bay Masterplan of the WHTWU Program were sighted and available on the project website. The Terms of Reference set out the panel's scope of review and meeting frequency set "at least 5 times throughout the design and design development of the Western Harbour Tunnel project stage 3 and at least 2 times during the development of the Berrys Bay Masterplan. " Panel composition and role of participants are set out in Sections 4 and 6; with review session attendance set out in Section 8 including following participants: - SDRP Chair and panel - GANSW Senior Design Advisor - Transport for NSW Project Advisor - Transport for NSW Team members - Project design team members The TfNSW Project Advisor will be invited to attend the panel pre-briefing and debriefing sessions. The following observers will be invited to attend the panel pre-briefing and debriefing sessions: - DPE (now DPHI) representatives - North Sydney Council representatives Also refer CoA E165 and CoA E174 for audit evidence and findings.
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Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E165	The Design Review Panel must provide advice and recommendations on the detailed design. The responsibilities of the Design Review Panel include: (a) provide advice and recommendations for consideration in the development of the Place, Design and Landscape Plan (PDLP) required by Condition E177; (b) provide advice on the application of the objectives to key design elements in relation to place making, architecture, heritage, urban and landscape design and artistic aspects of the CSSI; and (c) provide advice on structures including bridges and flyovers (including the Alfred Street flyover and walking and cycling bridges across the Warringah Freeway). The Panel's advice must be consistent with the CSSI as approved.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams <u>GANSW Letter of Review from the seventh session (sighted):</u> - Government Architect NSW (GANSW) Letter dated 19 May 2025 [Project: Western Harbour Tunnel, Berry's Bay-Woodleys Shed; RE: RE: State Design Review Panel – 8 May 2025 – Review 7] - Woodleys DRP Presentation - 2025-05-08_As Presented - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] Main WHT PDLP - Part 1 sighted: - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025	C	The purpose and scope of review is defined in Sections 2 and 3 of the SDRP Terms of Reference and aligns with the requirements of Condition E165 and E177. The Terms of Reference (Section 9) states that the <i>"role of the Panel will cease once the PDLP for the WFU has been finalised and in agreement with the panel members and GANSW. Notwithstanding this, key design issues may arise during construction resulting in PDLP amendments and revisions that require review by the Panel. Review in this instance includes the option of out-of-session review by the Chair."</i> <u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period including details of DRP sessions / presentations completed, review letters and submissions (including separate CoA A5 Consultation Report PDLP Part 1) to the Planning Secretary for approval of the WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1). <u>During this audit period:</u> - The WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) was approved by DPHI on 10 June 2025 (refer evidence and also Sections 1.5 and 1.7.5 of the PDLP, for example); - DRP Session related to Berry's Bay- Woodleys Shed was held on 8 May 2025; the GANSW letter following DRP Session 7 (Review 7) with summary of advice and recommendations arising from the meeting on 8 May 2025 was sighted (refer evidence); and - Above letter requested addressing of above advice as part of the Place Design and Landscape Plan (PDLP) submission. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation and WHT Cammeray Parkland PDLP (Part 3) is still in early planning phase; they were not considered further during this sixth Independent Audit.
E166	The Design Review Panel must be chaired by the NSW Government Architect (or its nominee), and must be comprised of, where relevant, a suitably qualified, experienced and independent professional in each of the fields of: (a) urban design and place making (including active transport); (b) landscape architecture; (c) architecture; and (d) Aboriginal cultural heritage, non-Aboriginal cultural heritage. The Panel may seek advice from suitably qualified, experienced independent professionals in other fields as required.	- Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachment: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams <u>GANSW Letter of Review from the seventh session (sighted):</u> - Government Architect NSW (GANSW) Letter dated 19 May 2025 [Project: Western Harbour Tunnel, Berry's Bay-Woodleys Shed; RE: RE: State Design Review Panel – 8 May 2025 – Review 7]	C	DRP panel members include architects/urban designers; with DPHI, Council, TfNSW and ACCIONA and DesignInc representatives in attendance (refer GANSW review letters, which includes list of attendees). Participants are set out in Section 8 of the WHT SDRP Terms of Reference and include: - SDRP Chair and panel - GANSW Senior Design Advisor - Transport for NSW Project Advisor - Transport for NSW Team members - Project design team members. GANSW letter following <u>Review 7</u> includes list of attendees.
E167	Panel members must be sourced from the State Design Review Panel Pool, approved by the Government Architect NSW (or its nominee). These panel members must be involved in the development and review of the PDLP required by Condition E177.	- Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachment: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams <u>GANSW Letter of Review from the seventh session (sighted):</u> - Government Architect NSW (GANSW) Letter dated 19 May 2025 [Project: Western Harbour Tunnel, Berry's Bay-Woodleys Shed; RE: RE: State Design Review Panel – 8 May 2025 – Review 7] - Also refer CoA E165, CoA E177 - CoA E179 (for example), within this Audit Table for audit evidence	C	DRP panel members include architects/urban designers; with DPHI, Council, TfNSW and ACCIONA and DesignInc representatives in attendance (refer GANSW review letters, which includes list of attendees). Participants are set out in Section 8 of the WHT SDRP Terms of Reference and include: - SDRP Chair and panel - GANSW Senior Design Advisor - Transport for NSW Project Advisor - Transport for NSW Team members - Project design team members. The Panel and Advisors include: - Dillon Kombumerri (GANSW Chair) - Darlene van der Breggen (GANSW Alternate Chair) - Four members and specialist advisors (refer Section 8) - GANSW Design Advisor- Dr Barnaby Bennett - TfNSW Advisor Gareth Collins - Director Urban Design - Roads and Waterway The Terms of Reference states that the <i>"role of the Panel will cease once the PDLP for the WFU has been finalised and in agreement with the panel members and GANSW. Notwithstanding this, key design issues may arise during construction resulting in PDLP amendments and revisions that require review by the Panel. Review in this instance includes the option of out-of-session review by the Chair."</i> During this audit period, DRP Session related to Berry's Bay- Woodleys Shed was held on 8 May 2025; the GANSW letter following DRP Session 7 (Review 7) with summary of advice and recommendations arising from the meeting on 8 May 2025 was sighted (refer evidence). Also refer CoA E165, CoA E177 - CoA E179 (for example), within this Audit Table for audit evidence and findings. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation and WHT Cammeray Parkland PDLP (Part 3) is still in early planning phase; they were not considered further during this sixth Independent Audit.
E168	Advice letters by the Design Review Panel Members and logs which demonstrate how each piece of advice is considered and addressed, must be included when submitting the PDLP to the Planning Secretary for approval.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) <u>GANSW Letter of Review from the seventh session (sighted):</u> - Government Architect NSW (GANSW) Letter dated 19 May 2025 [Project: Western Harbour Tunnel, Berry's Bay-Woodleys Shed; RE: RE: State Design Review Panel – 8 May 2025 – Review 7] - Woodleys DRP Presentation - 2025-05-08_As Presented - Also refer CoA E165, CoA E177 - CoA E179 (for example), within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period including details of DRP sessions / presentations completed, review letters and submissions (including separate CoA A5 Consultation Report PDLP Part 1) to the Planning Secretary for approval of the WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1). <u>During this audit period:</u> - The WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) was approved by DPHI on 10 June 2025 - refer evidence and also Sections 1.5 and 1.7.5 of the PDLP, for example. Also refer CoA E165, CoA E177 - CoA E179 (for example), within this Audit Table for audit evidence and findings. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation and WHT Cammeray Parkland PDLP (Part 3) is still in early planning phase; they were not considered further during this sixth Independent Audit.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E169	The Proponent must nominate an appropriately qualified and experienced representative of Transport for NSW to act as advisor to the Design Review Panel. The advisor must be invited to attend all meetings of the Panel. The advisor may also be invited by the Panel to assist with decisions regarding the Panel's recommendations.	- Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams <u>GANSW Letter of Review from the seventh session (sighted):</u> - Government Architect NSW (GANSW) Letter dated 19 May 2025 [Project: Western Harbour Tunnel, Berry's Bay-Woodleys Shed; RE: RE: State Design Review Panel – 8 May 2025 – Review 7]	C	TfNSW Advisor Gareth Collins (Director Urban Design - Roads and Waterway) has been nominated as advisor to the DRP. As per the SDRP Terms of Reference, a Transport for NSW Project Advisor is listed as a panel member. "<i>The Transport for NSW Project Advisor will be invited to attend the panel pre-briefing and debriefing sessions</i>". GANSW Letter following Review 7 in this audit period, includes Gareth Collins in the list of attendees.
E170	Other representatives of the Proponent and its contractor(s) may be invited to attend the Panel meetings as observers or to provide technical advice.	- Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams <u>GANSW Letter of Review from the seventh session (sighted):</u> - Government Architect NSW (GANSW) Letter dated 19 May 2025 [Project: Western Harbour Tunnel, Berry's Bay-Woodleys Shed; RE: RE: State Design Review Panel – 8 May 2025 – Review 7]	C	The Design Team typically includes the following and may be invited to attend the Panel meetings as observers or to provide technical advice: - TfNSW - ACCIONA - DesignInc GANSW Letter following Review 7 in this audit period, includes list of attendees from TfNSW, ACCIONA and DesignInc.
E171	The relevant council may be invited to the meetings of the Panel as observers or to provide feedback on key design elements of the CSSI.	- Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams <u>GANSW Letter of Review from the seventh session (sighted):</u> - Government Architect NSW (GANSW) Letter dated 19 May 2025 [Project: Western Harbour Tunnel, Berry's Bay-Woodleys Shed; RE: RE: State Design Review Panel – 8 May 2025 – Review 7]	C	Section 8 of the WHT SDRP Terms of Reference sets out observers to be invited to attend the panel pre-briefing and debriefing sessions, including: - DPHI representatives - North Sydney Council representatives. GANSW Letter following Review 7 in this audit period, includes list of attendees: - DPE (now DPHI) Representatives - Sarah Kamarudin, Andrew Beattie, Ingrid Berzins - Council Representatives - David Banbury, Alicja Batorowicz, Gary Parsons
E172	Observers and the Proponent's representative should not be present while the Panel is deciding upon its recommendations unless requested by the Panel.	- Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams	C	Noted. DRP Terms of Reference Section 8 includes "<i>The Chair, at their discretion, may invite observers to attend panel pre-briefing and debriefing sessions</i>".
E173	The Proponent must provide independent secretarial resources to the Panel.	Interview with TfNSW and ACCIONA (30 October 2025)	C	Noted and paid by TfNSW.
E174	Once the Design Review Panel is formed, a Design Review Panel Terms of Reference is to be developed and endorsed by all panel members. The Terms of Reference must be submitted to the Planning Secretary for information and: (a) establish governance and protocols for the operation of the Design Review Panel; (b) include a Code of Conduct; (c) outline the agreed frequency of Design Review Panel meetings, coordinated with the Proponent's program requirements, to ensure timely advice and design adjustment; (d) outline secretariat functions and administration including the recording and storing of meeting agendas, minutes and actions; and (e) identify cessation arrangements.	<u>Evidence outside this audit period:</u> - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams - TfNSW initial and final submissions to DPHI, following an RFI [Ref: RE_ Western Harbour Tunnel & Warringah Freeway Upgrade - Post Approval Document Received - (SSI-8863-PA-877).msg] - DPHI acknowledgement correspondence to TfNSW, dated 24 July 2024 (Re: WHT and WFU - E174 WHT Terms of Reference) <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams	C	The WHT State Design Review Panel - Extended Sessions- Terms of Reference for Stage 3 and the Berrys Bay Masterplan of the WHTWFU Program has been prepared and is available on the project website. a) and b) WHT Terms of Reference are supplementary to the NSW SDRP Terms of Reference (SDRP ToR) and should be read in conjunction with the SDRP ToR included as attachments (links were inaccessible). c) to e) WHT Terms of Reference includes frequency of meetings, as set out in Section 7; administrative requirements, as set out in Section 7 and cessation arrangements, as set out in Section 9. Previous #IA3 – OFI03 observation raised was addressed by TfNSW and closed-out. TfNSW submitted the Terms of Reference to the Planning Secretary - refer evidence including RFIs and DPHI acknowledgement correspondence to TfNSW, dated 24 July 2024. Also refer previous Independent Audit Reports (No. 3-4, for example), for audit evidence and findings, outside of this audit period. <u>Evidence during this audit period:</u> Auditees indicated no change to above.
E175	The Design Review Panel must be operated and managed in accordance with the approved Design Review Panel Terms of Reference and in accordance with the NSW Government Boards and Committees Guidelines (Department of Premier and Cabinet, September 2015).	- Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams	C	Noted. As per audit evidence and findings under CoA E164-CoA E174 within this Audit Table.

Item
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Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E176	The Proponent must provide to the Design Review Panel the design development schedule, including details of when relevant elements of the detailed design will be available for review by the Panel. The schedule must be updated every three months until the detailed design process is complete.	- Interview with TfNSW and ACCIONA (30 October 2025) - WHT State Design Review Panel - Extended Sessions- Terms of Reference (on the WHT Project website) including reference to below attachments: - NSW State Design Review Panel Terms of Reference - GANSW Advisory Note NSW SDRP program: Guidelines for Project Teams <u>Example sighted:</u> - Woodleys DRP Presentation - 2025-05-08_As Presented	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings outside this audit period. <u>During this audit period:</u> DRP Session 7 related to Berrys Bay - Woodleys Shed was held on 8 May 2025. The DRP Presentation outlines key design updates, design progression and overall PDLP scope such as: - Design Drivers - Heritage Frameworks (Heritage Reports / Heritage Design Principles) - Program and Considerations - Collaboration and Research - Design Development [for example only - Woodley's Design Progression and key changes from Concept Design (April) to Ongoing Design Development] - Overall Design Development
Place, Design and Landscape Plan				
E177	A PDLP must be prepared to inform the final design of the CSSI and to give effect to the outcomes informed by Condition E156 and design review. The Plan does not apply to work, which for technical, engineering, or ecological requirements, or other requirements as agreed by the Planning Secretary, do not allow for alternative design outcomes.	<u>Outside this audit period</u> - Letter, DPHI to TfNSW, dated 12 March 2024 [Ref: SSI-8863-PA-575, WHT (SSI-8863) – Permanent Built Works PDLP Dispensation Request (Condition E177)] - Approval Letter, DPHI to TfNSW (Ref.SSI-8863-PA-779, dated 19 August 2024) [WHT – Stage 3 (SSI-8863): Staging of the Place Design and Landscape Plan] - Refer previous Independent Audit Reports for further audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October2025) - Approval Letter, DPHI to TfNSW dated 28 May 2025 [Ref.SSI-8863-PA-976, Western Harbour Tunnel – Stage 3 (SSI-8863): Place Design and Landscape Plan - Updated addendum staging timeframes (condition A15)] - Letter, DPHI to TfNSW, dated 26 May 2025 [Ref: SSI-8863-PA-1011, Western Harbour Tunnel (SSI-8863) – Permanent Built Works PDLP Dispensation Request –Berrys Bay Master Plan (Condition E177)] - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref.SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] Main WHT PDLP - Part 1 sighted: - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025 Draft PDLP addendum for WHT Berrys Bay - Part 2 sighted: - https://caportal.com.au/rms/wht/pdlp-part-2 and JIRA for public display dates - WHT - Berrys Bay, Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000011), Revision F dated 21 July 2025 - Fw EXT Have your say on the future Berrys Bay foreshore parkland design elements.msg - Also refer CoA A15 and CoA E179 (for example) within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> - A Permanent Built Works PDLP Dispensation Request (E177) was submitted to DPHI on 22 November 2023 with plan to undertake works described in "Table 1 - Works not subject to the PDLP". DPHI responded on 12 March 2024 (refer evidence), noting that: <i>"These works are technical and engineering in nature or are required to be consistent with the WestConnex Rozelle Interchange approved PDLP, and do not allow for alternative design outcomes; and therefore, the Place, Design and Landscape Plan (PDLP) does not apply to these works."</i> - DPHI approved request to stage the WHT Place Design and Landscape Plan (PDLP), in letter dated 19 August 2024 (refer evidence) Refer previous Independent Audit Reports for further audit evidence and findings. <u>During this audit period:</u> - Further request to update the staging timeframes of the Stage 3 WHT Place Design and Landscape Plan addendums was approved by DPHI on 28 May 2025 (refer evidence). - Permanent Built Works PDLP Dispensation Request fo Berrys Bay was agreed to by DPHI on 26 May 2025 (refer evidence) noting that these works described in Table 1 (within the Letter) (excerpts only): - <i>"mostly are technical and engineering in nature and do not allow for alternative design outcomes; and</i> - <i>where there are associated design elements or elements that are not considered technical or engineering in the above listed works, the PDLP will be applicable to these elements as outlined in the revised memo titled Berrys Bay Place, Design & Landscape Plan Dispensation Memorandum, Revision C dated 20/05/2025; and</i> - <i>The Department has also considered advice from the Design Review Panel who raised no issues with the request to undertake the works in Table 1 and as detailed in the submission."</i> <u>Refer below for status of the Project PDLP, which is being staged:</u> - The WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) - approved by DPHI on 10 June 2025 (refer evidence); - PDLP addendum for WHT Berrys Bay (Part 2) - currently in draft following stakeholder and community consultation (went on public display on 28 July 2025 and consultation closed on the 24 August 2025, with some consultation extension provided until 4 September 2025), refer evidence including draft sighted on Project website; and - PDLP addendum for WHT Cammeray Parkland PDLP (Part 3) – in early planning phase. Also refer CoA A15 and CoA E179 (for example) within this Audit Table for audit evidence and findings. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation and WHT Cammeray Parkland PDLP (Part 3) is still in early planning phase; they were not considered further during this sixth Independent Audit.
E178	The PDLP must be prepared by a suitably qualified and experienced person in consultation with relevant councils, the community and affected landowners and businesses. The PDLP must include: (a) outcomes from the Design Review Panel as required by Condition E165; (b) an analysis of the built, natural and community context and the urban design objectives, principles and standards for the CSSI; (c) the design of the CSSI elements including their form, materials and detail, with a focus on high quality bridge design, public space, and integrated art; (d) the design of the project landform and earthworks; (e) the design of usable open space; (f) the location of existing vegetation, areas of vegetation to be retained and proposed planting and seeding details, including the use of local indigenous species for revegetation activities; (g) the location of existing heritage items; (h) details of how Aboriginal and non-Aboriginal heritage (including maritime) interpretation and public art are incorporated within the design of built features, having regard to the results of any archaeological investigations; (i) visual screening requirements; (j) design of the Falcon Street bus on ramp as required by Condition E159; (k) developed visuals, cross sections and plans showing the proposed design outcome; (l) details of strategies to rehabilitate, regenerate or revegetate disturbed areas; and (m) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design and landscape outcomes.	Same as CoA E179 - refer CoA E179 within this Audit Table for audit evidence	C	Same as CoA E179 - refer CoA E179 within this Audit Table for audit evidence and findings. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation and WHT Cammeray Parkland PDLP (Part 3) is still in early planning phase; they were not considered further during this sixth Independent Audit.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E179	The PDLP, and any sub-plans, must be reviewed by the Design Review Panel. The Proponent must respond to the outcomes of the Design Review Panel's review and submit the PDLP (including evidence of response to the Design Review Panel's advice) to the Planning Secretary for approval no later than one month before the construction of permanent work that is the subject of the PDLP (s) (in the area to which the PDLP applies).	- Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] Main WHT PDLP - Part 1 sighted: - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025 - Interview with TfNSW and ACCIONA (30 October 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>During this audit period:</u> The WHT – Place, Design and Landscape Plan (PDLP) (Main WHT PDLP - Part 1) for Stages 3B and 3C (Revision 00 dated 25 May 2025), submitted to the Planning Secretary for approval under Condition E179 of SSI-8863 was approved by DPHI on 10 June 2025 noting that the WHT PDLP is to be delivered in three stages to enable efficient development and delivery of PDLP elements and allow adequate time for collaboration with key stakeholders and that PDLP, Rev 00 is the first Stage to be delivered and contains the design and landscape elements for the main WHT PDLP including all built elements relevant to the WHT Project. DPHI's Approval Letter also noted that PDLP, Rev 00: - " <i>Details the design of the CSSI elements including the design of Cammeray facilities, tunnel interiors, tunnel exteriors, landscape design, and how Aboriginal and non-Aboriginal heritage interpretation and public art are incorporated into designs;</i> - <u>responds to the Design Review Panel's review;</u> - <u>has been prepared in consultation with affected stakeholders including North Sydney Council, and the local community;</u> and - <i>has been reviewed by Transport for NSW and no issues have been raised with the Department."</i> Above Letter also included requirement to ensure that the approved plan is placed on the Project website in accordance with condition B15. WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) was available on the Project website. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation and WHT Cammeray Parkland PDLP (Part 3) is still in early planning phase; they were not considered further during this sixth Independent Audit.
E180	Unless otherwise agreed with the Planning Secretary, construction of permanent built work or landscaping that are the subject of the PDLP must not be commenced (in the area to which the PDLP applies) until the PDLP has been approved by the Planning Secretary, after considering advice received from the Design Review Panel.	<u>Evidence outside this audit period:</u> - Agreement Letter, DPHI to TfNSW, dated 06 December 2024 [Ref:SSI-8863-PA-885, WHT (SSI-8863) – Berry Street On-ramp and Portal Permanent Built Works - PDLP Dispensation Request (Condition E180)] - Also refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - Refer CoA E177 and CoA E179 (for example) within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> Berry Street On-ramp and Portal Permanent Built Works - PDLP Dispensation Request (Condition E180) was submitted to DPHI on 13 November 2024 seeking agreement to commence construction of permanent built works (installation of the anti-throw screens and noise walls) that are the subject of the WHT PDLP, prior to the approval of the PDLP in accordance with CoA E180. DPHI responded on 06 December 2024 (refer evidence) agreeing to the works commencing prior to the approval of PDLP, outside this audit period. Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) was approved by DPHI on 10 June 2025 - refer CoA E179 within this Audit Table for audit evidence and findings. Also refer to CoA E177 within this Audit Table for PDLP dispensation request from the Auditees and DPHI's agreement in audit period .
E181	The PDLP, as approved by the Planning Secretary, must be implemented during construction and operation.	- Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] Main WHT PDLP - Part 1 sighted: - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025 - Interview with TfNSW and ACCIONA (30 October 2025)	NT	Auditees indicated condition not triggered in this audit period.
Operational Noise Barriers Design				
E182	Operational noise barriers must be designed to minimise visual and amenity impacts and be designed in accordance with the Noise wall design guideline – Design guideline to improve the appearance of noise walls in NSW (RMS, March 2016).	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with TfNSW and ACCIONA (30 October 2025) - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] <u>Main WHT PDLP - Part 1 sighted:</u> - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025	C	Applicable to WHT Stage 3B as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> The WHT Place, Design and Landscape Plan (Main WHT PDLP - Part 1) was approved by DPHI on 10 June 2025. Excerpts from the PDLP are listed below: - Section 1.4.2 refers to "Transport for NSW Urban Design Guidelines - Noise Wall Design Guidelines - Design Guidelines to improve the appearance of noise walls in NSW, 2016 and 2023"; and - Section 1.5 MCoA (Under MCoA E182) states: "Operational noise barriers must be designed to minimise visual and amenity impacts and be designed in accordance with the Noise Wall Design Guideline – design guideline to improve the appearance of noise walls in NSW (RMS, March 2016). The noise wall at Berry Street has been designed to minimise impacts, and in accordance with the Guideline."
E183	The construction of the Massey to Amherst Street, Cammeray noise barrier / wall as identified in Appendix C does not form part of the PDLP.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.

Item
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Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
Tree Removal, Replacement Plantings and Rehabilitation				
E184	The CSSI must be designed to retain as many existing trees as possible. Replacement trees and plantings must be provided at a ratio of 2:1 and deliver an increase in tree canopy and aim to enhance the relevant council's position in respect of the Sydney Green Grid, unless otherwise agreed by the Planning Secretary.	- Flora and Fauna Management Sub-Plan (Rev 6.7, dated 03 June 2025) (Appendix C) - Interview with TfNSW and ACCIONA (30 October 2025) - Arboricultural Review Western Harbour Tunnel – Berrys Bay Open Parklands prepared by our garden path (Rev 6, dated 28/05/2025) - Also refer evidence elsewhere within this Audit Table, for example CoA C6, CoA E185 -E187 within this Audit Table for further audit evidence and findings.	NT	Section 7.5 and Section 7.6 of the Flora and Fauna Management Sub Plan, sets out the tree retention and replacement planting process. Auditees indicated below: - Tree replacement has not commenced; - Prior to clearing, detailed design and construction methodology undertaken to retain trees where possible; - Clearing permit process in place prior to tree pruning/removal to ensure all required considerations have been met; - Arboricultural Review Western Harbour Tunnel – Berrys Bay Open Parklands included an assessment of tree retention and removal at substantial detailed design (refer evidence sighted); and - Hold Point released by TfNSW, prior to clearing and grubbing at Berrys Bay site establishment works in the audit period (refer CoA C6 within this Audit Table for further audit evidence and findings). Also refer CoA E185 -E187 within this Audit Table for further audit evidence and findings.
E185	Replacement trees must: (a) be located on public land and prioritised within 500 metres of the Construction Boundary, that delivers increased shading to footpaths, pedestrian and cycle paths; (b) be of a species suitable to the location, having regard for local ecology and existing street trees; (c) meet the requirements for quality tree stock specified in the AS2303:2018: Tree Stock for Landscape Use; (d) be provided no later than six months following the commencement of operation; and (e) have a minimum pot size consistent with the relevant council's plans / programs / strategies for vegetation management, street planting, or open space landscaping, or as agreed by the relevant council(s).	- Flora and Fauna Management Sub-Plan (Rev 6.7, dated 03 June 2025) (Appendix C) - Interview with TfNSW and ACCIONA (30 October 2025) - Also refer CoA E187 within this Audit Table for audit evidence	NT	Section 7.5 and Section 7.6 of the Flora and Fauna Management Sub Plan, sets out the replacement planting process. Auditees indicated tree replacement has not commenced. Also refer CoA E187 within this Audit Table for further audit evidence and findings.
E186	Replacement and enhancement of vegetative screening along the project corridor must be undertaken in a progressive manner during construction to allow for the early establishment of vegetative screening.	- Flora and Fauna Management Sub-Plan (Rev 6.7, dated 03 June 2025) (Appendix C) - Interview with TfNSW and ACCIONA (30 October 2025) - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] Main WHT PDLP - Part 1 sighted: - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025	NT	Section 7.5 and Section 7.6 of the Flora and Fauna Management Sub Plan, sets out the replacement planting process. Section 1.5 of the approved Main WHT PDLP (Part 1) reflects this Condition and where addressed within the PDLP document (Section 5.1.3) - Where possible, the Project will provide replacement trees in a progressive manner during construction to allow for early establishment of vegetation screening. Auditees indicated tree replacement has not commenced; with no opportunity for vegetation screening to be planted at this stage along the Project corridor.
E187	A Landscape Strategy Report must be prepared which details the type, size, number and location of replacement trees. The report must demonstrate how any replacement plantings are consistent with the requirements of Condition E184 and Condition E185. The report must be submitted to the Planning Secretary for information no later than nine months following the commencement of operation.	- Flora and Fauna Management Sub-Plan (Rev 6.7, dated 03 June 2025) (Appendix C) - Interview with TfNSW and ACCIONA (30 October 2025) - WHTWU Tree Replacement Strategy (June 2023) - Approval Letter, DPHI to TfNSW, dated 10 June 2025 [Ref:SSI-8863-PA-793, Western Harbour Tunnel, Stages 3B & 3C (SSI-8863) - Place, Design and Landscape Plan (PDLP), Condition E179] Main WHT PDLP - Part 1 sighted: - WHT Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000001), Revision 00 dated 25 May 2025	NT	Section 7.7 of the Flora and Fauna Management Sub Plan, includes this CoA's requirements. Section 5.1.3 of the approved PDLP outlines tree replacement and rehabilitation including the Tree Replacement Strategy prepared by Transport for NSW, which is available on the project website (refer evidence sighted) and delivery of the Strategy; with PDLP including landscaping, plant and material schedule, monitoring and maintenance procedures for the built elements. Above PDLP also outlines within Section 5.1.3 that the Landscape Strategy Report (CoA E187) will be developed independently to this PDLP. Condition not triggered during this audit period (report must be submitted to DPHI no later than nine months following commencement of operation).
Yurulbin Park				
E188	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
Berrys Bay				
E189	The Proponent must engage a suitably qualified and experienced landscape architect to develop the design of the open space at Berrys Bay. The design must be provided as part of the PDLP.	<u>Evidence outside this audit period:</u> - Approval Letter, DPHI to TfNSW (Ref:SSI-8863-PA-779, dated 19 August 2024) [WHT – Stage 3 (SSI-8863): Staging of the Place Design and Landscape Plan] - Refer previous Independent Audit Reports for audit evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) PDLP addendum for WHT Berrys Bay - Part 2 sighted: - https://caportal.com.au/rms/wht/pdlp-part-2 and JIRA for public display dates - WHT - Berrys Bay, Place, Design and Landscape Plan (WHTP2-DESIN-NWW-AR-UD08-RPT-000011), Revision F dated 21 July 2025 - Fw EXT Have your say on the future Berrys Bay foreshore parkland design elements.msg - Also refer evidence elsewhere in this Audit Table CoA A15, CoA E156 - E157 (for example) for audit evidence	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. <u>Outside this audit period:</u> DPHI approved request to stage the WHT Place Design and Landscape Plan (PDLP), in letter dated 19 August 2024 (outside of this audit period). DesignInc have been engaged to prepare the PDLP addendum for WHT Berrys Bay (Part 2). Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period.</u> PDLP addendum for WHT Berrys Bay (Part 2) is currently in draft following stakeholder and community consultation (went on public display on 28 July 2025 and consultation closed on the 24 August 2025, with some consultation extension provided until 4 September 2025), refer evidence including draft PDLP sighted on the Project website. - Also refer evidence elsewhere in this Audit Table CoA A15, CoA E156 - E157 (for example) for audit evidence and findings. NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation, this Condition was not considered further during this sixth Independent Audit.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E190	The design required by Condition E189 must include an extended path along the foreshore between Carradah Park and Balls Head Road, using the same or similar materials to those used for pathways within Carradah Park to ensure continuity along the foreshore in this location.	Interview with ACCIONA (30 October 2025)	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. Same as CoA E189 (refer CoA E189 within this Audit Table for audit evidence and findings). NB: As the WHT Berrys Bay PDLP (Part 2) is yet to be submitted to the Planning Secretary for approval following stakeholder and community consultation, this Condition was not considered further during this sixth Independent Audit.
E191	Public domain works as required by Condition E189 and E190 must be completed prior to the operation of the tunnel unless otherwise agreed by the Planning Secretary.	Interview with ACCIONA (30 October 2025)	NT	Applicable to WHT Stage 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. Noted. Condition not triggered during the audit period. Also refer CoA E189 - E190 within this Audit Table for audit evidence and findings.
Operational Maintenance				
E192	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 PDLP, required by Condition E178. <u>The Planning Secretary must be advised of the date of transfer of the asset(s) to the relevant authority.</u>	Interview with TfNSW and ACCIONA (30 October 2025)	NT	Condition not triggered during this audit period.
E193	Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species unless it is determined by a suitably qualified person that a different species is more suitable for that location	Interview with TfNSW and ACCIONA (30 October 2025)	NT	Condition not triggered during this audit period.
E194	Management and routine maintenance for design elements and landscaping work (including weed management) to ensure the success of the design and landscape outcomes must be undertaken for the life of the CSSI.	Interview with TfNSW and ACCIONA (30 October 2025)	NT	Condition not triggered during this audit period.
Active Transport Network				
E195	An Active Transport Network Review must be prepared in consultation with relevant Councils, Bicycle NSW and Bike North. The Active Transport Network Review must review active transport infrastructure within at least 500m of the Warringah Freeway corridor component of the CSSI and include: (a) an analysis of the existing cycling network, including the identification of routes between existing and potential trip generators; (b) an analysis of existing and expected patronage levels of current and proposed routes; (c) identification of capacity constraints or missing links in the existing and proposed networks, including consideration of both State and Council cycling strategies and maps (including draft strategies) and expected demand; (d) a calculation of pedestrian crowding and the suitability of shared facilities; and (e) a list of recommendations and the timeframes for implementation to address the findings of (a), (b), (c) and (d) above. The Review must be provided to the Planning Secretary for approval within 12 months of commencement of construction. Note: Implementation timeframes must be reasonable, reflect network needs, and the objective of offsetting open space impacts (particularly in relation to open space impacts at Cammeray).	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E196	The recommendations identified in Condition E195(e) must be implemented by the Proponent in the timeframes approved by the Planning Secretary	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E197	An active transport link through Cammeray Golf Course between Ernest Street and Warringa Road / Bells Avenue, Cammeray must be provided prior to the removal of the existing path.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E198	An active transport link from Cammeray Golf Course to Primrose Park, must be considered as part of the Active Transport Network Review as required by Condition E195.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E199	A level extension of the existing footpath along the eastern side of the Cahill Expressway from the top of the stairs near the former toll gantry in Kirribilli, to the existing pedestrian crossing on High Street, North Sydney must be considered as part of the Active Transport Network Review required by Condition E195.	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
E200	The Proponent must investigate alternative crossings of the Falcon Street diverging diamond interchange, including but not limited to consideration of an overpass, reduction in the number of crossings or priority phasing of traffic lights for pedestrians and cyclists. The investigations must be provided as a report and submitted to the Planning Secretary for approval, within six months from the commencement of construction. The findings of the investigations must be implemented following Planning Secretary approval	Not applicable	NT	Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.
WASTE				
E201	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.	- Waste and Resource Management Sub-Plan (Rev 03, dated 26 March 2024) (Appendix J) - Interview with ACCIONA (30 October 2025) - EPL #21791 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - Emu Plains EPL #21881 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - Monthly Progress Report 34 September 2025 (Ref: Monthly Progress Report 34 September 2025, Rev 00, Dated 8 October 2025)	C	The requirements of CoA E201 are reflected in Section 6.1 of the Waste and Resource Management Sub Plan, which identifies waste avoidance, resource recovery and disposal requirements. The Sub-Plan's document history notes update of the document to include EPL mandated content, EPA review comments and update for Stage 3C works. Sighted latest September 2025 Monthly Progress Report (refer evidence) to TfNSW. Section 9 (Sustainability) of the Report includes Highlights, ISC Rating Status, Areas for Improvement and Sustainability Dashboard with summary of the Project's tracking status against Objectives and Targets (such as <u>waste including spoil</u> , greenhouse gas and energy use, water use, materials etc). Also refer CoA E203 within this Audit Table for audit evidence and findings

Item
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Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E202	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the conditions of the current EPL for the CSSI, or be done in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , as the case may be.	- Waste and Resource Management Sub-Plan (Rev 03, dated 26 March 2024) (Appendix J) - Interview with ACCIONA (30 October 2025) - EPL #21791 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - Emu Plains EPL #21881 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) Sighted below: - Ref: Exemption Letter - Acciona (from cr plus Pty Ltd, dated 03 October 2025)	C	Project EPLs (refer evidence) in force have Condition O5.5, which states <i>"The licensee must not cause, permit or allow any waste generated outside the licensed premises to be received at the licensed premises, except:</i> <i>a) virgin excavated natural material;</i> <i>b) as expressly permitted by a condition of this licence; or</i> <i>c) a resource recovery order and/or resource recovery exemption under the Protection of the Environment Operations (Waste) Regulation 2014."</i> ACCIONA indicates that waste is managed in accordance with this requirement and imported material is validated prior to acceptance and evidence provided to the Project Environment Team. Auditees indicated aggregate material imported in this audit period, for example (refer evidence sighted).
E203	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 <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , or to any other place that can lawfully accept such waste.	- Waste and Resource Management Sub-Plan (Rev 03, dated 26 March 2024) (Appendix J) - Site Inspection (28 October 2025) - EPL #21791 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - Emu Plains EPL #21881 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - Interview with ACCIONA (30 October 2025) Sighted below: <u>Sample Tunnel Spoil Compliance Assessments against RRO by ADE Consulting Group for Rozelle and Cammeray sites:</u> - 23.0643 CAM-MAC23-SEPT25_v1f (1) (dated 12/09/2025 - Section 3.1 notes compliant under 'The Western Harbour Tunnel Stage 2 tunnelling material Order February 2024') - 23.0643 ROZ-MAC07-SEP25_v1f (dated 12/09/2025 - Section 3.1 notes compliant under 'The Western Harbour Tunnel Stage 2 tunnelling material Order February 2024'. <u>Sample waste disposal dockets for Lead Waste - Berrys Bay site</u> - Ref:TipDockets_1491 - Cleanaway on 29 September 2025 - Ref:Delta-Waverton-WB-MC-15102025 - Cleanaway on 15 October 2025 - EPL - Ref: EPL 20271 <u>Sample waste disposal dockets for Asbestos Waste - Berrys Bay site</u> - Ref:20250902 - XO54WC - Ref:20250909 - Blacktown Waste Services (LM) - Ref: EPL 11497 Sample Waste Classification Report - Balls Head Road, Waverton - Waste Classification Report - Balls Head Road, Waverton (Ref: 16526-ER-1-41, Date: 5/08/2025) Sample TfNSW Hold Point Release: - Ref: HP-_2610_PRW - Seymour Whyte - Ref: HP 2610 TfNSW corro - Ref: HPWP_HP-_2610_PRW - ENV - PERM - Seymour Whyte - G36-G38-G40 Hold Points Submissions - Ref: Mamre road docket 240925.jpg	C	Section 6.6 - 6.8 of the Waste and Resource Management Sub Plan, outlines indicative waste streams, spoil, likely waste classification, exemptions that maybe applicable, transportation and record keeping requirements. The Project has an approved RRO - The WHT Stage 2 Tunnelling Material Order February 2024 (valid until 15 February 2026). Routine Tunnel Spoil Compliance Assessments against RRO conducted by an external consultant (refer sample evidence requested/sighted confirming compliance with the RRO). Auditees indicated no change to the WHT Stage 2 Tunnelling Material Order February 2024 during this audit period. Below sample evidence requested/sighted for waste removal during the audit: - Waste Classification Report - Balls Head Road, Waverton (Ref 16526-ER-1-41, Date: 5/08/2025) - Lead and asbestos waste removal from Berrys Bay (refer evidence sighted) - No spoil trucks sighted in the audit site inspection at Berrys Bay or Emu Plains (refer Section 2.2.5 Site Inspection - Audit Report) Sample docket/hold point release from TfNSW sighted between ACCIONA and TfNSW for approval of WHT RRO/E material to be sent to Seymour Whyte Mamre Road Upgrade: - Hold point released by TfNSW to Seymour White, on 23 September 2025 with further evidence provided in relation to RFI from lead Auditor on 26/11/2025 - Spoil truck destination was noted as Mamre Road Upgrade, on 24 September 2025 (Ref: Mamre road docket 240925)
E204	Deleted	Deleted	NT	Deleted - This requirement was removed as a result of WHT Modification 2
E205	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	- Waste and Resource Management Sub-Plan (Rev 03, dated 26 March 2024) (Appendix J) - EPL #21791 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - Emu Plains EPL #21881 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - Interview with ACCIONA (30 October 2025) - Refer CoA E203 for sample waste dockets sighted, audit evidence	C	Refer CoA E203 for sample waste dockets sighted, audit evidence and findings within this Audit Table.

Item
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Result	Comment
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Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
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Water

E206	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.	<u>Evidence outside this audit period:</u> Sighted Trade Waste Agreements for Ridge Street and Cammeray (during IEA#5): - 53965_ACCIONA CONSTRUCTION AUSTRALIA Cammeray 2025 - 53966_ACCIONA CONSTRUCTION AUSTRALIA North Sydney 2025 - Refer previous Independent Audit Reports for further evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - EPL #21791 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - Emu Plains EPL #21881 (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit) - WHT – EPL 21791 Monitoring Report (Reporting Period: October 2025) (Western Harbour Tunnel, WHTP2-ACOC-WHT-EV-GE01-RPT-000002, Rev 00, dated 15/10/2025) - Soil and Surface Water Management Sub Plan (Rev 3.5, dated 16 May 2025) (Appendix E) - Groundwater Management Sub Plan (Rev 3.6, dated 15 October 2025) (Appendix F) - Groundwater Monitoring Program (Rev 2.1, dated 14 November 2024) incorporated as Appendix F1 within the Groundwater Management Sub Plan - Six Monthly Groundwater Data Report (1 December 2024 – 31 May 2025, Rev 01, dated 13 August 2025) - Interview with ACCIONA (30 October 2025) - Ref: Sydney Water Invoice - CAM - Sep-25_rev1 and Ref: Sydney Water Invoice - Falcon - Jul-25 - Ref: Ridge St. September 25 (Flowmeter reading to Sw) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht), also Project's website has link to current EPL - Also refer CoA C14 (Groundwater Monitoring) for example, within this Audit Table for audit evidence including Section 3.8 of the Audit Report.	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> - EPL #21791 and Emu Plains related EPL #21881 have been varied - refer evidence for latest EPLs at the time of this Audit; - EPL #21791 specifically provides discharge criteria for water quality; - EPL #21881 for Emu Plains (WHT13) prescribes no discharge criteria; - EPL Monitoring Report (refer evidence) is available on the Project's website, which also includes a link to both EPLs; - Six -Monthly Groundwater includes Sydney Water Discharges (1 December 2024 – 31 May 2025) - refer evidence and CoA C14 within this Audit Table; - Next Quarterly Groundwater Data Report (1 June 2025 – 31 August 2025) was due outside of this audit period. <u>EPA Scope Consultation - Groundwater treatment and management:</u> Auditees indicated: - No groundwater discharges from Water Treatment Plants (WTPs) at WHT9 (Ridge Street Site) and WHT10 (Cammeray Golf Course site) to EPL Monitoring Points 5 and 3 in the audit period; with last discharges as noted within the EPL Monitoring Report - refer evidence sighted and further below under 'EPL Monitoring Report'; - Treated water from the WTPs at WHT9 (Ridge Street Site) and WHT10 (Cammeray Golf Course site) continues to be routed predominantly for tunnel reuse activities; with remainder of the treated water discharged to Sydney Water assets via Trade Waste Agreements (TWA) obtained from Sydney Water. - WTP from Stage 1 Contractor handed over to ACCIONA (refer EPL #21791), now decommissioned. - WTP at Motorway Operations Centre (MOC), Rozelle is operational (refer EPL #21791). <u>Sighted EPL Monitoring Report, with high-level review of groundwater discharge / monitoring points only, as part of this audit (refer evidence and see note below):</u> As per the published EPL Monitoring Report (for reporting period within this audit period), the following was noted (excerpts only) relating to groundwater: <u>Ridge Street Site (WHT 9)</u> - No groundwater discharges to Monitoring Point 5 – Ridge Street (WHT 9) since last discharge in July 2024 (last sampling date noted as 11 July 2024), outside this audit period. <u>Cammeray Site (WHT 10)</u> - No groundwater discharges to Monitoring Point 3 – Cammeray Site (WHT 10) since last discharge in June 2024 (last sampling date noted as 6 June 2024 and non-compliant for Total Nitrogen), outside this audit period. <u>Discharge / Monitoring Point 8 – WTP Discharge Point</u> - No groundwater discharges to Monitoring Point 8 – WTP Discharge Point within this audit period, with Auditees indicating this WTP has been decommissioned. <u>Discharge / Monitoring Point 9 – Rozelle (WHT12) WTP Discharge Point</u> - Groundwater discharges noted from WTP at the MOC (Rozelle) in this audit period to EPL Monitoring Point 9. No exceedance of EPL criteria as per results noted in the EPL Monitoring Report; and - Above WTP at the MOC is subject to further EPL sampling requirements such as proof of performance (under EPL Condition U2 - Performance of the Construction WTP at the Rozelle MOC). Auditees further indicated that discussions with the EPA are ongoing in relation to groundwater treatment and management: - For WTPs in the North (Ridge Street, Cammeray), internal water sampling is continuing to ascertain if water quality would meet prescribed EPL criteria; however, high nitrogen remains a concern. Treated water continues to be reused or discharged via trade waste agreement with Sydney Water. - For WTP in the South at the MOC (Rozelle), an initial three- month proof of performance has been submitted to the EPA at this stage, with the WTP currently meeting EPL criteria and six-month proof of performance due to the EPA (following six months of operation, ~ mid-November 2025). Also refer CoA C14 (Groundwater Monitoring) for example, within this Audit Table for audit evidence and findings including Section 3.8 of the Audit Report. NB: Compliance assessment with EPL requirements or TWAs is not within the scope of this Independent Environmental Audit (or previous ones conducted).
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WATER

E207	The Proponent must consider the Guidelines for controlled activities on waterfront land Riparian corridors (Department of Industry 2018) when carrying out work within 40 metres of a watercourse, including its bed.	- Interview with ACCIONA (30 October 2025) - Soil and Surface Water Management Sub Plan (Rev 3.5, dated 16 May 2025) (Appendix E) - Also refer CoA A27 within this Audit Table for audit evidence and previous Independent Audit Reports for audit evidence and referenced elsewhere in this Audit Table	NT	Applicable to WHT Stage 3C and not applicable to WHT Stage 3B (there will be no Works on riparian corridors) as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025. CoA E207 referenced in Table 3-1 of the approved Soil and Surface Water Management Sub Plan states that <i>"this CoA is not applicable; no works occurring within 40m of a watercourse, with the exception of Glebe Island (WHT3) construction support site. However, there are no riparian corridor or vegetated area between the site and the nearest watercourse."</i> ER Inspections of WHT3 sighted in the audit period - refer CoA A27 within this Audit Table for audit evidence and findings.
E208	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from construction water treatment plants to surface waters must not exceed: (a) the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG 2018) default guideline values for toxicants at the 90 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000; and (c) for bio accumulative and persistent toxicants, the ANZG 2018 values at a minimum of 95 per cent species protection level. Where the ANZG 2018 does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG 2018 for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	- EPL #21791 in force - Interview with ACCIONA (30 October 2025) - Same as CoA E206 - refer CoA E206 within this Audit Table for audit evidence	C	EPL #21791 in force with discharge criteria prescribed. Same as CoA E206 - refer CoA E206 within this Audit Table for audit evidence and findings.

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HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E209	A replacement stormwater harvesting storage facility / dam must be provided within the boundaries of Cammeray Golf Course in consultation with North Sydney Council and Cammeray Golf Club (at no cost to either party). Should the new stormwater harvesting storage facility not be operational prior to the dewatering of the existing dam, the Proponent must pay all water usage costs (associated with the use of the harvesting storage facility / dam) incurred by Council or the golf club until the replacement facility is operational. Note: Condition C6(f) provides requirements for relocating native fauna species within and around the stormwater harvesting storage facility / dam.	<i>Not applicable</i>	NT	<i>Not applicable to WHT Stages 3B and 3C as per Appendix A, Table 4 of the Staging Report, Rev 12, July 2025.</i>
E210	If construction stage stormwater discharges are proposed, 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 a level of detail commensurate with the potential water pollution risk.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for further evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Sighted EPA Notice of Variation of Licence No. 21791 (dated 27-Jun-2025 - Notice No. 1650158) - no WPIA noted - EPL #21791 in force (link to EPL available from Project website) (Licence version date: 27-Jun-2025, at the time of this audit)	C	<u>Outside this audit period:</u> Water Pollution Impact Assessments (WPIAs) prepared and submitted to the EPA (not sighted) outside of this audit period and inform EPL in force. Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> Auditees indicated no new WPIAs prepared in audit period. An EPL variation was sought to include a new surface water discharge point—Discharge Point 10; with this point proposed to be transferred from the Warringah Freeway Upgrade (WFU) project (formerly Discharge Point 5 under EPL 21619), following the scheduled land handover of the Cammeray cut and cover ramps on 30 June 2025. Sighted EPA Notice of Variation of Licence No. 21791 (dated 27-Jun-2025 - Notice No. 1650158) and variations made to WHT EPL, which included background to the variation (refer evidence and below excerpts only from the notice): "- All existing concentration limits and monitoring requirements currently applicable to Discharge Point 5 under WFU's EPL 21619 are proposed to be transferred in full EPL 21791, ensuring continuity in environmental compliance and monitoring." - Under Condition R4.5, the licensee is required to submit a monthly surface water discharge report to the EPA. This report must include all monitored parameters under Conditions M2.1 for Discharge Point 10, assessed against the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (2018) criteria."
Operational Requirements				
E211	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from operation water treatment plants to surface waters must not exceed: (a) the ANZG 2018 default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ, 2000); and (c) for bio accumulative and persistent toxicants, the ANZG 2018 guideline values at a minimum of 99 per cent species protection level. Where the ANZG 2018 does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG 2018 for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	Interview with TfNSW and ACCIONA (30 October 2025)	NT	Condition not triggered in this audit period.
Dredging				
E212	<i>Deleted</i>	<i>Deleted</i>	NT	<i>Deleted - This requirement was removed as a result of WHT Modification 2</i>
E213	<i>Deleted</i>	<i>Deleted</i>	NT	<i>Deleted - This requirement was removed as a result of WHT Modification 2</i>
E214	<i>Deleted</i>	<i>Deleted</i>	NT	<i>Deleted - This requirement was removed as a result of WHT Modification 2</i>
E215	<i>Deleted</i>	<i>Deleted</i>	NT	<i>Deleted - This requirement was removed as a result of WHT Modification 2</i>
Groundwater				
E216	The Proponent must take measures to limit operational groundwater inflows into each tunnel to no greater than one litre per second across any given kilometre (1L/s/km). Compliance with this condition cannot be determined by averaging groundwater inflows across the length of the tunnel(s).	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Groundwater Management Sub Plan (Rev 3.6, dated 15 October 2025) (Appendix F) - Groundwater Monitoring Program (Rev 2.1, dated 14 November 2024) incorporated as Appendix F1 within the Groundwater Management Sub Plan - Six Monthly Groundwater Data Report (1 December 2024 – 31 May 2025, Rev 01, dated 13 August 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Also refer CoA C14, CoA C21, CoA E102, CoA E219 and CoA E221 within this Audit Table for audit evidence	C	The requirements of CoA E216 are reflected in the Groundwater Monitoring Program in Section 4.5.3; Sections 3.3 and 7.2 of the Groundwater Management Sub Plan. <u>Outside this audit period:</u> - Refer previous Independent Audit Reports for audit evidence and findings, outside this audit period. <u>During this audit period:</u> - Quarterly and Six-Monthly reporting requirements completed; and - Annual reporting requirement, not triggered at the time of this audit. Key points from the published Six -Monthly Groundwater Data Report (1 December 2024 – 31 May 2025) are as follows (excerpts only): - Section 1.2 states " <i>This report documents groundwater monitoring undertaken on the Western Harbour Project (the Project) from 1st December 2024 – 31st May 2025 and covers the quarterly and 6-monthly reporting requirements under the CoA</i> "; - Section 2.1 notes that for Ridge Street and Cammeray, groundwater treated and discharged to Sydney Water Sewer under a trade waste agreement, which came into effect on 24 January 2025; this Section and Appendix A includes the volume discharged to trade waste only during the reporting period from both sites; - Section 2.5 states " <i>Groundwater inflows are generally low with most of the water introduced to the tunnel face for dust mitigation and cooling of the machinery being from a potable source - estimated groundwater flow at present across 4.5km of excavated tunnel is 0.75 L/s/km</i> "; - Section 2.6 states " <i>The results have been reviewed by the Projects Geotech and confirm that all monitoring is within the expected groundwater predictions accounted for in the Groundwater Model</i> "; - Section 2.7 states " <i>Negligible groundwater inflow is observed within the excavated tunnels. No additional mitigation measures were required to stem groundwater flow</i> "; - Section 2.8 states " <i>Annual reporting was conducted in CMR report 4 (Dec 2024-Feb 2025). As such annual reporting in line with E221 will occur in Q4 2025.</i> " Next Quarterly Groundwater Data Report (1 June 2025 – 31 August 2025) was due outside of this audit period (therefore not sighted in this audit). Also refer CoA C14, CoA C21, CoA E102, CoA E219 and CoA E221 within this Audit Table for audit evidence and findings.

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NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E217	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.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Groundwater Management Sub Plan (Rev 3.6, dated 15 October 2025) (Appendix F) - Groundwater Monitoring Program (Rev 2.1, dated 14 November 2024) incorporated as Appendix F1 within the Groundwater Management Sub Plan - GT02 - Project Wide Hydrogeological Interpretive Report (HIR) (WHTP2-AAJV-NWW-GE-GT02-RPT-000001, Revision C, FDD, dated 24 June 2024) - Also refer CoA C14 and CoA C21 within this Audit Table for audit evidence	NT	Outside this audit period, TfNSW engaged GHD to assess the viability of potentially impacted groundwater bores (GW107764, GW108991 and GW109209) that are in the vicinity of the Project, prior to construction to confirm there are no impacted GW users (Groundwater bore viability report, Ref: 12563606, dated 14 November 2022). Section 5.6.3 of the approved Groundwater Management Sub Plan notes that REMM SG2 requires that the viability of domestic bores GW109209, GW107764, and GW108991 be confirmed prior to construction, and if drawdown at the bores exceeds two metres (in accordance with the Aquifer Interference Policy), 'make good' measures will be implemented. In accordance with this requirement, a Groundwater Bore Viability Report (GHD, 2022) has been prepared for TfNSW, which notes the following (summarised): - Groundwater bore GW107764 is no longer used. It is therefore considered that there will be no impact to this bore from the project and no further action is required; - Groundwater bore GW108991 could not be located despite an extensive search and therefore assumed to no longer exist. No further action is required; and - Groundwater bore GW109209 was found to be a functional well which is used for water supply. Considering the shallow nature of the well and likely source connection to infiltration from rainwater, connection to the regional groundwater table is considered unlikely. It is considered that impacts to the bore from the project are likely to be minimal and therefore no further action is required. Section 5.6.3 of the updated Groundwater Management Sub Plan also notes that no groundwater wells were identified at the Emu Plains (WHT13) construction ancillary facility, however the MOD2 assessment reviewed groundwater wells listed within 1km of the site which indicates that groundwater is expected to be present at approximately 15 metres to 20 metres below natural ground level. Section 6 of the Groundwater Monitoring Program sets out the review and improvement process including make good provisions for groundwater users. Also refer previous Independent Audit Reports for further audit evidence and findings. <u>During this audit period, Auditees indicated below</u> - Ongoing launch cavern tunnelling in Birchgrove; - HIR incorporates trigger levels and responses to a trigger level exceedance for key monitoring locations - including registered groundwater bore GW109209 located in Birchgrove (refer HIR for evidence - Section 9.2.3 Monitoring Trigger Levels and Section 9.2.4 Monitoring Trigger Responses); and - Condition not triggered during this audit period. Also refer CoA C14 and CoA C21 within this Audit Table for audit evidence and findings (refer Six Monthly Groundwater Data Report).
E218	Further modelling must be undertaken of groundwater drawdown, tunnel inflows and saline water migration (using particle tracking) prior to finalising the detailed design of the tunnels and undertaking any works that would impact on groundwater flows or levels. The modelling must be undertaken in consultation with DPIE Water and include the results and hydrogeological analyses of at least 12 continuous months of current baseline groundwater monitoring data.	Same as CoA E219 (refer CoA E219 within this Audit Table for audit evidence)	C	Same as CoA E219 (refer CoA E219 within this Audit Table for audit evidence and findings).

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E219	The results of the modelling required by Condition E218 must be documented in a Groundwater Modelling Report. The Groundwater Modelling Report must be finalised in accordance with the Australian Groundwater Modelling Guidelines (National Water Commission, 2012), be independently peer reviewed by an expert (agreed to by DPIE Water), and prepared in consultation with DPIE Water. The Groundwater Modelling Report must include, but not be limited to: (a) modelling for groundwater flow for one, three and 12 months following the commencement of construction in each kilometre of tunnel and during operation; (b) justification for the conceptual model adopted and layer choice; (c) a more representative distribution of rock mass permeability than the modelling results detailed in the documents referred to in Condition A1; (d) a revised distribution of rock mass permeability with transient drawdown predictions during excavation and dewatering assessed for sensitivity to assumed values of aquifer confinement and storage (specific storage and specific yield); (e) specification and justification of the grid based hydraulic conductivity and storage parameters (specific yield and specific storage) assigned to each layer and/or zone with reference to those values determined from data analyses and the literature; (f) an explanation of how groundwater flow was simulated within each model layer with reference to confined, unconfined or variably saturated flow solutions; (g) an explanation and justification of the drain-cell conductance term(s) applied to the tunnel boundaries to limit tunnel inflows; (h) an explanation and justification of the groundwater recharge values applied across the model domain, including around the modelled specific yield values and the water table fluctuations observed within the monitoring data in response to rainfall-fed groundwater recharge; (i) details (including figures) of the expected changes in groundwater flow directions in the vicinity of landfills, groundwater wells and surface water receptors; (j) cross-section diagrams of geology showing baseline groundwater levels in the monitoring piezometers, and for the predicted baseline condition groundwater levels in 2030 and 2100; (k) statistical evaluation of the model's calibration; (l) details of the groundwater monitoring data inputs (levels and quality); (m) details of the proposed groundwater model update and validation as additional data is collected; (n) assessment of impacts of groundwater drawdown, taking into consideration the NSW Aquifer Interference Policy (DPI, 2012), including potential impacts on licensed bores and groundwater dependent ecosystems; (o) references to the differences between modelled and observed groundwater impacts for previous tunnelling projects in the Sydney Basin including the WestConnex New M5 (M8), the WestConnex M4 East and the WestConnex M4-M5 Link projects (where the information can be made available); (p) a comparison of the results with the modelling results detailed in the documents referred to in Condition A1; (q) documentation of any additional measures that would be implemented to manage and/or mitigate groundwater impacts not previously identified or identified but at a smaller scale; (r) a quantitative assessment of model predictive uncertainty at locations of primary importance for predictions of drawdown induced settlement, contaminant mobilization, and impact to surface water systems; and (s) quantitative predictions of contaminant mobilization risk by providing groundwater model based predictions of the changes in groundwater gradient magnitude and direction at identified contaminant sites due to construction and operation or particle tracking simulations. A copy of the Groundwater Modelling Report (including the independent peer review) must be submitted to the Planning Secretary <u>for information prior to finalising the tunnel design</u>. The Groundwater Modelling Report must include details of consultation with DPIE Water. The calibration and modelling to be provided to the independent peer reviewer and DPIE Water must be in an electronic quality controlled data ready-to-use format. Note: The new modelling results could include analysis of the available field data and existing model calibration residuals to infer the differences between rock mass primary permeability (low) and secondary permeability (high) in areas where valley uplift has occurred and where dykes have intruded through weaker rock. The numerical model calibration could then be revised to potentially improve the calibration to observed data and local-scale predictions.	<u>Evidence outside this audit period:</u> - Project Wide Hydrogeological Interpretive Report (HIR) (WHTP2-AAJV-NWW-GE-GT02-RPT-000001, Revision B, FDD, dated 2 April 2024) including below memo in Appendix H: - Memorandum, Doug Anderson (Peer Reviewer), dated 2 April 2024 [Re: WHT Package 2 HIR (FDD) Independent Checking Engineering and Groundwater Modelling Review] - Letter, DPE Water to TfNSW (Ref:OUT23/18792, dated 15 November 2023) [WHT Package 2 (SSI 8863) – Groundwater Modelling Report Independent Peer Reviewer] - HIR Portal Submission for Consultation.JPG - Email, ACCIONA to DPE Water (now DCCEEW) (Ref: Correspondence to DPI Water 21.11.24 and letter attachment WHT Response 14.11.24 to DCCEEW Water advice on HIR) Sighted: - GT02 - Project Wide Hydrogeological Interpretive Report (HIR) (WHTP2-AAJV-NWW-GE-GT02-RPT-000001, Revision C, FDD, dated 24 June 2024) - Submission of HIR to DPHI (Ref: Post Approval Form_20241217051939.pdf, no date stamp) - Email, DPHI to TfNSW, dated 12 May 2025 [Ref: Western Harbour Tunnel - E219 WHT Groundwater Modelling Report(SSI-8863-PA-685) - Due Date Change Request Decision] - Letter, DPHI to TfNSW (Ref:SSI-8863-PA-685, dated 25 March 2025; Subject: Western Harbour Tunnel, WHT Tunnels and Mechanical and Electrical Fitout, GT02- Hydrogeological Interpretive Report – Request for Additional Information) - DPIE Comments Table SSI-8863-PA-685.docx - Also refer previous Independent Audit Reports for further audit evidence <u>Evidence during this audit period:</u> - Interview with ACCIONA and TfNSW (30 October 2025) - Letter, DPHI to TfNSW dated 31 July 2025 [Ref:SSI-8863-PA-685, dated 31 July 2025, Western Harbour Tunnel, Stage 3B & 3C, WHT Tunnels and Mechanical and Electrical Fitout, GT02 – Project Wide Hydrogeological Interpretive Report (HIR), condition E219] Sighted: - GT02 - Project Wide Hydrogeological Interpretive Report (HIR) (WHTP2-AAJV-NWW-GE-GT02-RPT-000001, Revision C, FDD, dated 24 June 2024) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	C	<u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings; including Auditees indicating (8 May 2025, Audit Interview) that tunnel design was yet to be finalised (expected to be finalised for Mainline Tunnels by ~ end December 2025). <u>During this audit period:</u> DPHI's acknowledgement receipt dated 31 July 2025 (refer evidence) referred to the WHT, GTO2, Project Wide Hydrogeological Interpretive Report (HIR)' Revision C dated 24 June 2024, submitted for information in accordance with conditions E218 and E219 of SSI 8863 and acknowledged response to the Department's review comments, request for additional information and noted that the HIR, Revision C: - <i>"has been prepared in consultation with NSW DCCEEW Water.</i> - <i>has been reviewed by Transport for NSW and no issues have been raised with the Department."</i> DHPI acknowledged the receipt of the WHT Stage 3B and 3C, Project Wide Hydrogeological Interpretative Report, Revision C dated 24 June 2024, under condition E219 of SSI8863 and that the document is made publicly available on the Project website as soon as possible. Above HIR is available on the Project website. NB: It is not the responsibility of the Independent Auditor to verify results of the modelling required by Condition E218 and compliance of Groundwater Modelling Report (HIR) provisions, which should be confirmed by qualified personnel responsible for undertaking modelling, preparation of the report and expert(s) engaged to conduct independent peer reviews.
E220	The groundwater model must be updated once 24 months of groundwater monitoring data are available and the results of the updated modelling (assessed against all predicted outcomes of the Groundwater Modelling Report that accompanied the final detailed design of the tunnels) be provided to the Planning Secretary and DPIE Water in an updated Groundwater Modelling Report.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Groundwater Management Sub Plan (Rev 3.6, dated 15 October 2025) (Appendix F) - Groundwater Monitoring Program (Rev 2.1, dated 14 November 2024) incorporated as Appendix F1 within the Groundwater Management Sub Plan - WHT_24 Month Groundwater Model Review DPIE Water Presentation_11Aug25 - 24 Month Groundwater Review DPI Water minutes 11.8.25 - TfNSW WHT construction portal (https://caportal.com.au/rms/wht)	NT	Section 7.8 of the HIR, Section 9.2 of the Groundwater Management Sub Plan and Section 6.1.2 of the Groundwater Monitoring Program reflects this CoA's requirements for implementation. <u>Outside this audit period:</u> Refer previous Independent Audit Reports for audit evidence and findings; including Auditees indicating (8 May 2025, Audit Interview) that groundwater model update expected in Q3 2025. <u>During this audit period:</u> Auditees indicated meeting held with DPIE Water on 11 August to present groundwater data and discuss content of the 24 month groundwater model review (sighted presentation and meeting minutes - refer evidence), with drafting and then distribution of the groundwater model review scheduled. As such, this Condition (whilst triggered) was not considered further in this sixth Independent Audit.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E221	The total incidental groundwater take from the tunnel should be measured at a minimum monthly and totalled yearly for the life of the CSSI. These volumes must be reported to DPIE Water annually.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - Groundwater Management Sub Plan (Rev 3.6, dated 15 October 2025) (Appendix F) - Groundwater Monitoring Program (Rev 2.1, dated 14 November 2024) incorporated as Appendix F1 within the Groundwater Management Sub Plan - Six Monthly Groundwater Data Report (1 December 2024 – 31 May 2025, Rev 01, dated 13 August 2025) - TfNSW WHT construction portal (https://caportal.com.au/rms/wht) - Also refer CoA C14 and CoA C21 within this Audit Table for audit evidence	C	The requirements of CoA E221 are reflected in the Groundwater Monitoring Program (Section 5). <u>During this audit period:</u> - Quarterly and Six-Monthly reporting requirements completed; and - Annual reporting requirement, not triggered at the time of this audit. Key points from the published Six -Monthly Groundwater Data Report (1 December 2024 – 31 May 2025) are as follows (excerpts only): - Section 1.2 states <i>"This report documents groundwater monitoring undertaken on the Western Harbour Project (the Project) from 1st December 2024 – 31st May 2025 and covers the quarterly and 6-monthly reporting requirements under the CoA"</i>; - Section 2.1 notes that for Ridge Street and Cammeray, groundwater treated and discharged to Sydney Water Sewer under a trade waste agreement, which came into effect on 24 January 2025; this Section and Appendix A includes the volume discharged to trade waste only during the reporting period from both sites; - Section 2.5 states <i>"Groundwater inflows are generally low with most of the water introduced to the tunnel face for dust mitigation and cooling of the machinery being from a potable source - estimated groundwater flow at present across 4.5km of excavated tunnel is 0.75 L/s/km"</i>; - Section 2.6 states <i>"The results have been reviewed by the Projects Geotech and confirm that all monitoring is within the expected groundwater predictions accounted for in the Groundwater Model"</i> - Section 2.7 states <i>"Negligible groundwater inflow is observed within the excavated tunnels. No additional mitigation measures were required to stem groundwater flow"</i>; - Section 2.8 states <i>"Annual reporting was conducted in CMR report 4 (Dec 2024-Feb 2025). As such annual reporting in line with E221 will occur in Q4 2025."</i> Next Quarterly Groundwater Data Report (1 June 2025 – 31 August 2025) was due outside of this audit period (therefore not sighted in this audit). Also refer CoA C14 and CoA C21 within this Audit Table for audit evidence and findings.
Stormwater Drainage				
E222	The Proponent must undertake further hydrological and hydraulic modelling based on the detailed design of the CSSI to determine the ability of the receiving drainage systems to effectively convey pavement drainage from the CSSI and include wastewater flows from operational water treatment plants where it is proposed to discharge these flows to the receiving drainage systems. The modelling must be undertaken in consultation with the relevant council(s) and Sydney Water and the outcomes documented in the Stormwater Drainage Report required under Condition E223.	<u>Evidence outside this audit period:</u> - Refer previous Independent Audit Reports for evidence and referenced elsewhere within this Audit Table <u>During this audit period:</u> - Interview with ACCIONA (30 October 2025) - Also refer CoA E49 and CoA E223 within this Audit Table for audit evidence	C	<u>Outside this audit period:</u> - Design Package DR01 (Hydrology & Flooding Report) was finalised and certified by the Independent Peer Reviewer, outside this audit period (refer CoA E49). - Design Package DR02 (Project Wide - Drainage and Rising Mains Report) at FDD2 (IFC status) developed and certified by the WHT Independent Certifier, outside this audit period (refer CoA E223). Also refer previous Independent Audit Reports for further audit evidence and findings, outside this audit period. CoA E222 requires that the modelling must be undertaken in consultation with the relevant council(s) and Sydney Water and the outcomes documented in the Stormwater Drainage Report required under Condition E223. Refer consultation / response status with Sydney Water, Inner West and North Sydney Council under CoA E223 within this Audit Table for audit evidence and findings. NB: It is not the responsibility of the Independent Auditor to verify compliance with modelling provisions, which should be confirmed by qualified personnel responsible for undertaking required modelling, detailed design, preparation of design reports including personnel responsible for certification of design compliance to requirements.

Item
Project Name: SSI 8863 Western Harbour Tunnel - Stage 3B and Stage 3C (Stage 2)
Auditees: WHT Stages 3B and 3C (ACCIONA); Transport for NSW (TfNSW)
Auditors: Swathi Gowda (Lead Auditor); Healthy Buildings International
Audit Details: IA6 - WHT Stages 3B and 3C (Stage 2 or Package 2)
HBI Project No. 230405 TfNSW_WFU_WHT Audit

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence - WHT Stages 3B and 3C (Stage 2)	Compliance Status	Independent Audit Findings and Recommendations - WHT Stages 3B and 3C (Stage 2)
E223	The Stormwater Drainage Report must be prepared at least one month prior to the commencement of any new permanent drainage works, modifications or connections to existing drainage works, construction of hard surfaces that are associated with the operation of the project and would result in runoff to existing stormwater drainage systems, and the discharge of wastewater flows from operational water treatment plants to existing stormwater drainage systems. The Stormwater Drainage Report must: (a) assess the potential impacts of pavement drainage discharges from the CSSI drainage systems and wastewater flows from operational water treatment plants on the receiving environment and capacity of council or Sydney Water drainage infrastructure; (b) identify all mitigation measures to be implemented where pavement drainage from the CSSI drainage systems or wastewater flows from operational water treatment plants are predicted to adversely impact on the receiving environment or capacity of council or Sydney Water drainage infrastructure; and (c) set out a clear time frame for the implementation of mitigation measures. Nothing in this condition prevents the Proponent from preparing separate Stormwater Drainage Reports for pavement discharges or wastewater discharges from operational water treatment plants to the drainage system provided that each report is prepared at least one month prior to the subject works/discharges commencing.	<u>Evidence outside this audit period:</u> - DR02 Project Wide - Drainage and Rising Mains (Ref: WHTP2-AAJV-NWW-SD-DR02-RPT-000001, Revision D, 11 July 2024, Final Design Documentation 2) - Independent Certifier's Design Certificate dated 30 July 2024 (Ref: Certificate No.: WHTP2-APP-NWW-SD-DR02-CER-000001_Rev00, including limitations) - TeamBinder Correspondence from ACCIONA to IWC on 10 April 2025 [Reference No.: WHTP2-ACOC-IWCL-CORR-000022, Project Wide design for drainage and rising mains (DR02)- for IWC review and comment - TeamBinder Correspondence from ACCIONA to NSC on 10 April 2025 [Reference No.:WHTP2-ACOC-NSCL-CORR-000014, Project Wide design for drainage and rising mains (DR02) - for NSC review and comment] - Correspondence from ACCIONA to Sydney Water on 30 April 2025 [ref: EXT: GEN#9512: WHTP2 Project Stormwater Drainage DoPA and Deed Requirements [K3.1.1#12E41F9.F0BDD77] - Initial RFI IA5_Response.docx - Refer previous Independent Audit Reports for further evidence and referenced elsewhere within this Audit Table <u>Evidence during this audit period:</u> - Interview with ACCIONA (30 October 2025) - DR02 Project Wide - Drainage and Rising Mains (Ref: WHTP2-AAJV-NWW-SD-DR02-RPT-000001, Revision D, 11 July 2024, Final Design Documentation 2) - Independent Certifier's Design Certificate dated 30 July 2024 (Ref: Certificate No.: WHTP2-APP-NWW-SD-DR02-CER-000001_Rev00, including limitations) - Meeting Minutes Interface - Western Harbour Tunnel & Sydney Water, dated 14/08/2025; Section 10.1 notes SWC have issued to relevant departments pending confirmation/acceptance - to send through confirmation - Design Package Status and Request for WHT for IEA#6.xlsx (Evidence of Design Package Status as provided to Lead Auditor by ACCIONA on 27 October 2025) - DPHI Independent Audit Oct 2025 RFI 26.11.2025.xlsx	C	<u>Outside this audit period:</u> - Design Package DR02 (Project Wide - Drainage and Rising Mains Report) at FDD2 (IFC status) developed and certified by the WHT Independent Certifier (refer evidence and below) - DR02 provided to NSC, IWC on 10 April 2025, requesting comments or feedback from Council by 8 May 2025 and Sydney Water for review/acceptance on 30 April 2025 (refer evidence) - with no consultation response received from Sydney Water, Inner West or North Sydney Council; - Independent Certifier's (IC) Design Certificate provided (refer evidence sighted) states that the IC verifies that the attached Design Documentation (including limitations): <i>a) "is appropriate for construction; and</i> <i>b) complies with the Contract including the SWTC and, in particular, the durability requirements in section 5.10 and the Design Life requirements in section 5.9 of the SWTC."</i> Refer previous Independent Audit Reports for further audit evidence and findings, outside this audit period. <u>During this audit period,</u> Auditees indicated below: - No further change to Design Package DR02 (Project Wide - Drainage and Rising Mains Report) during this audit period (refer evidence); - Permanent drainage works subject to DR02 has commenced in audit period (Berry St, Falcon St and WF connection); - No comments received to date from EPA (not sighted submission), Sydney Water, Councils (Inner West, North Sydney Councils) to date; with follow-up with Sydney Water seeking comments on 14 August 2025 (refer evidence sighted); and - Should comments be received, the Project will provide a response and update the design report appropriately, if required. NB: It is not the responsibility of the Independent Auditor to verify compliance with modelling provisions, which should be confirmed by qualified personnel responsible for undertaking required modelling, detailed design, preparation of design reports including personnel responsible for certification of design compliance to requirements.
E224	All new or modified drainage systems associated with the CSSI must be designed to: (a) meet the capacity constraints of any council's drainage system to receive and convey the proposed flows from the CSSI, or otherwise upgrade council's drainage system at the Proponent's expense, in consultation with the relevant council(s); (b) minimise impacts on the receiving environment at the final outflow point resulting from any additional flow volume (including, but not limited to scour, flooding, water quality impacts, and impacts on riparian vegetation, aquatic ecology and property); and (c) ensure mitigation measures are implemented where increased flows through cross drainage systems adversely impact on council or Sydney Water drainage infrastructure and the receiving environment.	Same as CoA E223 (refer CoA E223 within this Audit Table for audit evidence)	C	Same as CoA E223 (refer CoA E223 within this Audit Table for audit evidence and findings <u>including note</u>).

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HBI

Healthy Buildings International

APPENDIX B – AGREEMENT OF INDEPENDENT AUDITORS



Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-8863-PA-1125

Rob Owens

Transport for NSW

Via the Major Projects Portal

15/09/2025

Subject: Western Harbour Tunnel and Warringah Freeway Upgrade (SSI 8863) – Stage 3B and 3C - Agreement to independent auditors

Dear Rob

I refer to your submission dated 5 September 2025 (SSI-8863-PA-1125) requesting the Planning Secretary's agreement to suitably qualified, experienced, and independent persons to conduct independent audits of Stage 3B and 3C of Western Harbour Tunnel and Warringah Freeway Upgrade (**Project**), submitted under SSI-8863 as modified (the **approval**).

The NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition A37 of the approval and the NSW Planning's *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I agree to the following:

- Swathi Gowda, Healthy Buildings International Pty Ltd (HBI), as lead auditor
- Rui Henriques, HBI, as alternate lead auditor

Please note:

- This correspondence must be appended to the independent audit reports.
- The independent audits must be prepared, undertaken, and finalised in accordance with the conditions of approval and the NSW Planning *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- This agreement applies to the duration of construction of Stage 3B and 3C of the Project. NSW Planning reserves the right to request an alternate auditor or audit team at any time.
- Any change to the auditors or auditors' roles must be agreed upon by the Planning Secretary prior to the audits commencing.
- At least one of the lead auditors must attend the site inspection and interview component of the audits.

Department of Planning, Housing and Infrastructure

- 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.
- Per the Planning Secretary's agreement dated 7 August 2023, audit site inspections must be undertaken by the end of each May and/or November (SSI-8863-PA-465).

Should you wish to discuss the matter further, please contact Alfarid Hussain, Senior Compliance Officer, on compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "Gabriel Abi-Saab".

Gabriel Abi-Saab
A/Team Leader Compliance - Government Projects
Compliance

As nominee of the Planning Secretary

Department of Planning and Environment

Our ref: SSI-8863-PA-465

Transport for NSW
via Major Projects Portal

7 August 2023

Attention: Mark Russell, Senior Environment & Sustainability Manager

Subject: Western Harbour Tunnel & Warringah Freeway Upgrade (SSI-8863) – ongoing construction phase independent audit frequency

Dear Mark

I refer to your letter dated 25 July 2023 (PA-465) requesting the Planning Secretary's agreement to revise the ongoing construction phase independent audit frequency for the Western Harbour Tunnel and Warringah Freeway Upgrade project (SSI 8863).

The *Independent Audit Post Approval Requirements* require ongoing construction phase independent audits at intervals no greater than 26 weeks, or as otherwise agreed by the Planning Secretary. As set out in your letter, the Planning Secretary agreed to extend the timeframe specified in the *Independent Audit Post Approval Requirements* for the fourth construction phase independent audit, being the fourth audit of the Warringah Freeway Upgrade stages (PA-350) and the first audit of the Western Harbour Tunnel stages (PA-391), until 31 May 2023.

Consequently, I can advise that under condition A38 of SSI-8863 the Planning Secretary agrees to your request to regularise the frequency of the ongoing construction phase independent audits so that the audit site inspection must be undertaken each May and November, with the next audit site inspection due no later than **30 November 2023**.

As set out in condition A41 of SSI-8863, the independent audit report and the proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the audit site inspection.

Please ensure this letter is appended to each independent audit report submitted under this regularised frequency.

Should you wish to discuss the matter further, please contact Thomas Minchin, Senior Compliance Officer.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alex McGuirk".

Alex McGuirk
A/Team Leader Compliance – Government Projects

As delegate of the Planning Secretary



HBI

Healthy Buildings International

APPENDIX C – AUDIT PLAN AND ATTENDANCE RECORDS



Audit Plan



HBI

Healthy Buildings International Pty Ltd

A.C.N. 03 270 693

A.B.N. 39 003 270 693

Audit Site/Project: <u>Western Harbour Tunnel (WHT):</u> Stage 3B (Northern Tunnelling and Integration work) and Stage 3C (Sydney Harbour Crossing works) <u>Application Number:</u> SSI 8863 (as modified; the Approval) <u>Proponent:</u> Transport for NSW (TfNSW) <u>Approval Authority:</u> Minister for Planning and Public Spaces <u>Determination Date:</u> 21 January 2021		Company Client: TfNSW Auditee/s or Project Team: - TfNSW (the Proponent) - Stage 3B and Stage 3C Contractor - ACCIONA
Stage of works: This Audit Plan provides a summary of the proposed sixth Independent Audit scheduled to commence with a site inspection on 28 October 2025 and pertains to post-approval requirements and compliance during Construction of the following stage: - WHT: Stage 3B –Northern Tunnelling and Integration work (commencement of construction 22 May 2023) - WHT: Stage 3C - Sydney Harbour Crossing works (commencement of construction 20 May 2024)		
Key Auditee/s or Project Team Representatives and Contact Details: TfNSW: Simon Pigozzo Environment & Sustainability Manager 0467 151 091 simon.pigozzo@transport.nsw.gov.au ACCIONA: Charles Scarf Environment & Sustainability Manager 0438 247 725 charles.scarf.ext@acciona.com		Audit Identification: Independent Audit No. 6 – WHT Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works) Audit Dates and Indicative Program: Day 1 – 28 October 2025 (Tuesday) Day 2 – 30 October 2025 (Thursday) - Indicative Audit Program - Refer Appendix A
Proposed Audit Schedule		
Time	Audit Attendees	Scope (Conditions of Approval)
Day 1 28 October 2025 (Tuesday) 08:30 –17:00 (lunchbreak 12:30 - 13:00) - Opening Meeting - Site Inductions (as required) - Site Inspections - Interviews / Verification of evidence	TfNSW ACCIONA including relevant Site Supervisor(s) for Site Inspection Areas ACCIONA (relevant personnel TBC further in Opening Meeting and Community Stakeholder and Engagement)	<u>Opening Meeting /Site Inductions (as required)</u> <u>Site Inspections only:</u> - Emu Plains (WHT13) - Berrys Bay <u>Interviews / Verification of evidence:</u> - Consultation Scope (DPHI/EPA at this stage) - Part A (Administrative Conditions) - Part B (Community Information and Reporting) - Part C (Construction Environmental Management) - An assessment of incidents, non-compliances and complaints that occurred or were made during the audit period - Review of findings and close-outs from the last audit

Audit Plan



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A.B.N. 39 003 270 693

Day 2 – 30 October 2025 (Thursday) 09:00 - 17:00 (lunchbreak 12:30 - 13:00) - Interviews / Verification of evidence - Initial Closing Meeting	TfNSW ACCIONA relevant personnel – such as Design, Traffic, Spoil, Design and Property / Interface Management Teams	<u>Interviews / Verification of evidence:</u> • Part E (Key Issues Conditions) <u>Initial Closing Meeting</u> • Informal closing meeting to provide preliminary summary of the audit findings. • A formal closing meeting will be held once all evidence has been reviewed - refer Appendix A.
<u>Audit Team:</u> • Lead Auditor: Swathi Gowda (Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C-442234) • Alternate Lead Auditor: Rui Henriques (Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C-486435)		
<u>Audit Objective:</u> This Independent Audit has been prepared to satisfy Condition A38 of State Significant Infrastructure (SSI) 8863 of the Project planning approval and aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs).		
<u>Audit Reference Documents:</u> • <i>Independent Audit Post Approval Requirements (DPIE, 2020)</i> • <i>ISO 14001: 2015 Environmental Management Systems</i> • <i>AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems</i> • Evidence submitted for review during the audit		
<u>Audit Period:</u> The temporal period covered by the audit is from the date of the site inspection of the fifth Independent Audit (IA5, 6 May 2025), to the date of the site inspection (28 October 2025) of this Independent Audit of WHT Stages 3B and 3C. <u>Audit Scope:</u> The audit will comprise four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance, and Reporting. The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs: • an assessment of compliance with SSI 8863 (as modified; the approval) Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to Stage 3B (WHT Northern Tunnelling and Integration works) and Stage 3C (WHT Sydney Harbour Crossing works) of the project, as identified in Appendix A of the Staging Report; • an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; • a review of the environmental performance of the development, including but not necessarily limited to, an assessment of: - actual impacts compared to predicted impacts documented in the environmental impact assessment; - the physical extent of the development in comparison with the approved boundary; - incidents, non-compliances and complaints that occurred or were made during the audit period; - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period; • the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect); • a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate. • any other matters considered relevant by the auditor or the Department taking into account relevant regulatory		

requirements and legislation and knowledge of the development's past performance.

During the consultation period, the following feedback received to date is appended below, in relation to the audit scope:

- The Department provided the following feedback in relation to the audit scope:

"Further to the proposed scope detailed in HBI letter (dated 23 September 2025), NSW Planning requests that the audit includes the following:

An assessment of management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Walker Street, North Sydney; and

Review of complaints that has required escalation during the reporting period and whether the escalation procedures were adequately implemented in accordance with the Community Communication Strategy of the Project and whether outstanding issues were appropriately closed out.

NSW Planning requests particular focus on the following construction support sites and associated works:

- Berrys Bay
- Emu Plains

As per previous audits, NSW Planning requests you consult with the NSW EPA and North Sydney Council (NSC), Inner West Council and Penrith City Council. NSW Planning also requests that consultation with NSC is coordinated with the consultation for the next Warringah Freeway Upgrade (WFU) Independent Audit, i.e., a single consultation with NSC covering both the WHT and WFU."

- The EPA has provided the following feedback in relation to the audit scope:

"The priority areas for the EPA on this project include:

- Groundwater treatment and management
- Noise and vibration management from tunnelling operations
- Materials storage at the Emu Plains support site"

Evaluation of compliance will be carried out in accordance with Sec 3.7 of the IAPARs and documented in an Audit Table, which will include the conditions of SSI 8863. The compliance status of each compliance requirement in the Audit Table will be determined using the relevant descriptors in Sec 3.8, Table 2 of the IAPARs. As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the Project.

The Audit Table maybe updated to incorporate Project-specific requirements where necessary.

Documentation and Records: The following list provides a high-level indication of documentation and records that may be requested for review prior to and during the audit (but not limited to):

- MAFs and Consistency Assessments
- Construction Monitoring Reports
- Construction Environmental Management Plan and associated sub-plans
- Relevant supporting correspondence from the Department, other agencies and stakeholders
- Erosion and Sediment Control Plans
- Out of Hours Works Applications and Permits
- Specialist Reports including (but not limited to):
 - Soil and Groundwater technical reports, including waste classification reports (and disposal records)
 - Heritage Assessments and clearance reports
 - Noise and Vibration Assessments and monitoring data
 - Water quality assessments and monitoring data
 - Ecological / Flora and Fauna / Tree Protection (Arborist) Reports
- Evidence of close-out of previous Environmental Independent Audit actions
- Any other applicable approvals, permits or Project-specific environmental requirements
- Evidence of submission of documents and records to agencies
- ER Inspection Reports and Monthly Reports
- Complaints Registers and complaint response records

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- Incident and Non-Compliance Registers/Reports, evidence of action close-out

Applicable Site Safety Rules/Inductions required: To be advised by the Auditees

PPE Requirements: To be advised by the Auditees

Any Special Conditions or Requirements: To be advised by the Auditees

Prepared By:

Swathi Gowda
Lead Auditor
Healthy Buildings International Pty Ltd
21 October 2025

Appendix A –Indicative Audit Program

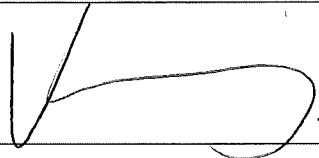
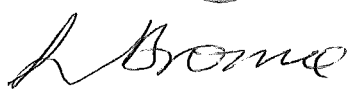
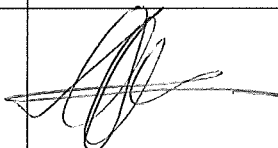
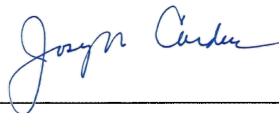
Independent Audit - WHT Stages 3B and 3C – Task/Details	Proposed Dates
STAKEHOLDER CONSULTATION	
DPHI scope consultation commenced	23/09/2025
DPHI scope consultation received	1/10/2025
Other stakeholder [NSW EPA/Councils (IWC/NSC/PCC)] scope consultation - commenced following receipt of DPHI scope consultation	3/10/2025
Other stakeholder consultation period finishes	17/10/2025
Interviews with ER and AA (including scope consultation)	21 and 24/10/2025
<u>AUDIT PLANNING/PRELIMINARY DOCUMENT REVIEW (AVAILABLE INFORMATION)</u>	
Pre audit planning	01/10/2025 to 27/10/2025
<u>SITE VISIT/INTERVIEWS</u>	
Opening Meeting, Site Inspection, Audit Interviews and Verification of evidence (Parts A, B, C)	28/10/2025
Audit Interviews and Verification of evidence (Part E and Appendix A) and initial Closing Meeting	30/10/2025
<u>POST SITE VISIT VERIFICATION</u>	
Follow up period for verification of evidence (desktop) - It is the responsibility of the auditee representatives to provide all information within timeframes requested by the Lead Auditor/Alternate Lead Auditor	31/10/2025 to 04/12/2025
Closing Meeting - Final (TBC)	04/12/2025
<u>DRAFT REPORTING</u>	
Draft Consolidated Audit Report including Audit Table - WHT Stages 3B and 3C	04/12/2025
<u>REVIEW PERIOD</u>	
Auditee Review Period (TfNSW/Contractor): - Comments back within one week (One set of consolidated comments is requested from review of Draft Audit Report). - The Draft Audit Report may only be revised in instances where Auditors are satisfied that the additional information or evidence provided is sufficient to determine that an error of fact or misunderstanding has taken place.	11/12/2025
<u>FINAL REPORTING</u>	
Final Consolidated Audit Report - WHT Stages 3B and 3C, issued to TfNSW	18/12/2025

SSI 8863 WESTERN HARBOUR TUNNEL STAGE 3B AND 3C, INDEPENDENT AUDIT No. 6

INDEPENDENT LEAD AUDITOR:

Swathi Gowda

ON-SITE OPENING MEETING – ATTENDEES RECORD SHEET – 28 October 2025

NAME, ROLE/POSITION	COMPANY	Signature
Charles Scarf Environment & Sustainability VERITY AVERA	Acciona	
SENIOR ENVIRONMENTAL ADVISOR	ACA	
Lochlan Browne Senior environmental adviser	ACA	
LATA MUMKELA ENVIRONMENTAL COORDINATOR	ACA	
Scott Thomson Enviro coordinator	ACA	
Simon Pigozzo TfNSW ENV. & SUS. MANAGER	TfNSW	
James Greig Enviro Coordinator	ACA	
Christian Del Castillo Environmental Advisor	ACA	
Joseph Cacadac Observer for the IC	APP-SMEC	

1. Summary

Meeting title	Placeholder IEA#6 Closing Meeting
Attended participants	10
Start time	12/04/25, 11:17:11 AM
End time	12/04/25, 11:42:38 AM
Meeting duration	25m 26s
Average attendance time	12m 45s

2. Participants

Name	First Join
Swathi Gowda	12/04/25, 11:28:00 AM
Christian Del Castillo Macedo	12/04/25, 11:29:37 AM
Lotta Nummela	12/04/25, 11:29:37 AM
Nilda Soto (External)	12/04/25, 11:29:37 AM
Christian Grinberg Menini	12/04/25, 11:29:39 AM
Simon Pigozzo (External)	12/04/25, 11:30:01 AM
Browne, Lochlan	12/04/25, 11:30:20 AM
Charles Scarf	12/04/25, 11:30:21 AM
Rob Owens (External)	12/04/25, 11:30:32 AM
Verity Avery	12/04/25, 11:30:35 AM

3. In-Meeting Activities

Name	Join Time
Swathi Gowda	12/04/25, 11:28:00 AM
Christian Del Castillo Macedo	12/04/25, 11:29:37 AM
Lotta Nummela	12/04/25, 11:29:37 AM
Nilda Soto (External)	12/04/25, 11:29:37 AM
Christian Grinberg Menini	12/04/25, 11:29:39 AM
Simon Pigozzo (External)	12/04/25, 11:30:01 AM
Browne, Lochlan	12/04/25, 11:30:20 AM
Charles Scarf	12/04/25, 11:30:21 AM
Rob Owens (External)	12/04/25, 11:30:32 AM
Verity Avery	12/04/25, 11:30:35 AM



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APPENDIX D – CONSULTATION RECORDS



Swathi Gowda

From: Alfarid Hussain <alfarid.hussain@planning.nsw.gov.au>
Sent: Wednesday, 1 October 2025 4:15 PM
To: Swathi Gowda
Cc: Rui Henriques; HBI Frontdesk; Astrid Christensen
Subject: FW: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - DPHI Consultation
Attachments: DPHI Consultation WHT Stage 3B and 3C_Final.pdf

Hi Swathi,

Thank you for consulting with the NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) in relation to the **attached** scope for the sixth Independent Audit of Western Harbour Tunnel Stage 3A and 3B (**WHT**) of the Western Harbour Tunnel and Warringah Freeway Upgrade project (**Project**) approved under SSI-8863 as modified (**Approval**).

Further to the proposed scope detailed in your letter, dated 23 September 2025, NSW Planning requests that the audit includes the following-

- An assessment of management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Walker Street, North Sydney; and
- Review of complaints that has required escalation during the reporting period and whether the escalation procedures were adequately implemented in accordance with the Community Communication Strategy of the Project and whether outstanding issues were appropriately closed out.

NSW Planning requests particular focus on the following construction support sites and associated works:

- Berrys Bay
- Emu Plains

As per previous audits, NSW Planning requests you consult with the NSW EPA and North Sydney Council (**NSC**), Inner West Council and Penrith City Council. NSW Planning also requests that consultation with NSC is coordinated with the consultation for the next Warringah Freeway Upgrade (**WFU**) Independent Audit, i.e., a single consultation with NSC covering both the WHT and WFU.

Please do not hesitate to give me a call if you have any questions.

Kind regards,

Alfarid Hussain
Senior Compliance Officer

NSW Planning | Department of Planning, Housing and Infrastructure

T 02 9274 6456 | M 0436 681 733 | E Alfarid.Hussain@planning.nsw.gov.au

dphi.nsw.gov.au

Locked Bag 5022|Parramatta NSW 2124

Working days Monday to Friday, 09:00am - 5:00pm



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all Aboriginal and Torres Strait Islander staff working with the NSW Government.

From: Swathi Gowda <swathi.gowda@hbi.com.au>

Sent: Tuesday, 23 September 2025 8:44 AM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Cc: Astrid Christensen <astrid.christensen@planning.nsw.gov.au>; HBI Frontdesk <hbi@hbi.com.au>

Subject: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - DPHI Consultation

Dear Alfarid,

RE: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - DPHI Consultation.

As the independent auditor engaged by Transport for NSW for the Western Harbour Tunnel (WHT) project (SSI 8863-as modified; Approval), I am consulting with DPHI on the scope of the **sixth** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

Please refer to the details in the attached letter. Also included for information, is the DPHI Auditor Agreement with respect to the SSI 8863 Independent Audit.

We look forward to hearing from you before **6 October 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements.

Please respond to:

Attention: Swathi Gowda (Independent Lead Environmental Auditor, HBI)

Email: Swathi.Gowda@hbi.com.au

Cheers,

Swathi Gowda

Principal Environmental Consultant

Swathi.Gowda@hbi.com.au

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 0436 451 153 | W: www.hbi.com.au



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23 September 2025

Alfarid Hussain
Senior Compliance Officer
Department of Planning, Housing and Infrastructure
compliance@planning.nsw.gov.au

Ref: 230405 WHT STAGE 3B & 3C

Dear Alfarid

RE: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - Consultation

As the independent auditor engaged by Transport for NSW for the Western Harbour Tunnel (WHT) project (SSI 8863-as modified; Approval), I am consulting with DPHI on the scope of the sixth Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Western Harbour Tunnel & Warringah Freeway Upgrade | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **28 October 2025** and pertains to post-approval requirements and compliance during Construction of the following stages:

- Stage 3B – WHT Northern Tunnelling and Integration works (commencement of construction 22 May 2023)
- Stage 3C – WHT Sydney Harbour Crossing works (commencement of construction 20 May 2024)

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 8863 (as modified; the approval) Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to Stage 3B (WHT Northern Tunnelling and Integration works) and Stage 3C (WHT Sydney Harbour Crossing works) of the project, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;



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- the physical extent of the development in comparison with the approved boundary;
- incidents, non-compliances and complaints that occurred or were made during the audit period;
- the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
- feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that DPHI confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you before **6 October 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Swathi Gowda (Independent Lead Environmental Auditor, HBI) on Swathi.Gowda@hbi.com.au

Also please find attached auditor agreement from DPHI.

Yours sincerely

Swathi Gowda

Principal Environmental Consultant /Lead Auditor

Encl. Auditor agreement from DPHI

cc. Simon Pigozzo (simon.pigozzo@transport.nsw.gov.au)

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-8863-PA-1125

Rob Owens

Transport for NSW

Via the Major Projects Portal

15/09/2025

Subject: Western Harbour Tunnel and Warringah Freeway Upgrade (SSI 8863) – Stage 3B and 3C - Agreement to independent auditors

Dear Rob

I refer to your submission dated 5 September 2025 (SSI-8863-PA-1125) requesting the Planning Secretary's agreement to suitably qualified, experienced, and independent persons to conduct independent audits of Stage 3B and 3C of Western Harbour Tunnel and Warringah Freeway Upgrade (**Project**), submitted under SSI-8863 as modified (the **approval**).

The NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition A37 of the approval and the NSW Planning's *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I agree to the following:

- Swathi Gowda, Healthy Buildings International Pty Ltd (HBI), as lead auditor
- Rui Henriques, HBI, as alternate lead auditor

Please note:

- This correspondence must be appended to the independent audit reports.
- The independent audits must be prepared, undertaken, and finalised in accordance with the conditions of approval and the NSW Planning *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- This agreement applies to the duration of construction of Stage 3B and 3C of the Project. NSW Planning reserves the right to request an alternate auditor or audit team at any time.
- Any change to the auditors or auditors' roles must be agreed upon by the Planning Secretary prior to the audits commencing.
- At least one of the lead auditors must attend the site inspection and interview component of the audits.

Department of Planning, Housing and Infrastructure

- 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.
- Per the Planning Secretary's agreement dated 7 August 2023, audit site inspections must be undertaken by the end of each May and/or November (SSI-8863-PA-465).

Should you wish to discuss the matter further, please contact Alfarid Hussain, Senior Compliance Officer, on compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "Gabriel Abi-Saab".

Gabriel Abi-Saab
A/Team Leader Compliance - Government Projects
Compliance

As nominee of the Planning Secretary

Swathi Gowda

From: Indi Stuart <indi.stuart@epa.nsw.gov.au>
Sent: Tuesday, 7 October 2025 3:22 PM
To: Swathi Gowda
Cc: Ian Sharpe; Greg Frost
Subject: RE: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - NSW EPA Scope Consultation

Good afternoon Swathi,

Thank you for your email regarding consultation for the upcoming independent audit of the Western Harbour Tunnel (SSI-8863). I am now the primary officer on this licence so if you could please direct future correspondence to me that would be appreciated.

The priority areas for the EPA on this project include:

- Groundwater treatment and management
- Noise and vibration management from tunnelling operations
- Materials storage at the Emu Plains support site

If you have any questions or would like to discuss, please let me know.

Kind regards,

Indi Stuart

Operations Officer
Regulatory Operations – South West Sydney & Illawarra
NSW Environment Protection Authority
T 02 8275 1621 | M 0486 050 343 | www.epa.nsw.gov.au

Working days: Monday to Friday

Join us on our mission to
protect tomorrow together.



The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

I work on Burramattagal Country of the Dharug Nation.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: Swathi Gowda <swathi.gowda@hbi.com.au>
Sent: Friday, 3 October 2025 8:00 AM
To: Greg Frost <Greg.Frost@epa.nsw.gov.au>

Cc: Ian Sharpe <ian.sharpe@epa.nsw.gov.au>

Subject: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - NSW EPA Scope Consultation

Good Morning,

As the independent auditor engaged by Transport for NSW for the Western Harbour Tunnel (WHT) project (SSI 8863-as modified; Approval), I am consulting with **EPA** on the scope of the **sixth** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Western Harbour Tunnel & Warringah Freeway Upgrade | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **28 October 2025** and pertains to post-approval requirements and compliance during Construction of the following stages:

- Stage 3B – WHT Northern Tunnelling and Integration works (commencement of construction 22 May 2023)
- Stage 3C – WHT Sydney Harbour Crossing works (commencement of construction 20 May 2024)

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 8863 (as modified; the approval) Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to Stage 3B (WHT Northern Tunnelling and Integration works) and Stage 3C (WHT Sydney Harbour Crossing works) of the project, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;

- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been conducted with DPHI, and the following has been requested:

“ Further to the proposed scope detailed in HBI letter (dated 23 September 2025), NSW Planning requests that the audit includes the following:

- *An assessment of management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Walker Street, North Sydney; and*
- *Review of complaints that has required escalation during the reporting period and whether the escalation procedures were adequately implemented in accordance with the Community Communication Strategy of the Project and whether outstanding issues were appropriately closed out.*

NSW Planning requests particular focus on the following construction support sites and associated works:

- *Berrys Bay*
- *Emu Plains*

As per previous audits, NSW Planning requests you consult with the NSW EPA and North Sydney Council (NSC), Inner West Council and Penrith City Council.”

In providing input to the scope, we kindly request that **EPA** confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **17 October 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Swathi Gowda (Independent Lead Environmental Auditor, HBI) on Swathi.Gowda@hbi.com.au

Cheers,

Swathi Gowda

Principal Environmental Consultant | Independent Lead Environmental Auditor

M: 0436 451 153 | E: Swathi.Gowda@hbi.com.au

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5344 | W: www.hbi.com.au



*Exemplar Global Certified - Lead Environmental Auditor
Infrastructure Sustainability Accredited Professional*

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Swathi Gowda

From: Anne Sacco <Anne.Sacco@penrith.city>
Sent: Thursday, 9 October 2025 1:09 PM
To: Swathi Gowda
Cc: Ari Fernando; Stephen Masters; Robert Craig
Subject: RE: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - Penrith City Council - Scope Consultation

Hi Swathi,

Thank you for reaching out to us in Ari's absence.

Ari has asked Stephen Masters (cc'd) to provide a response to you in his absence. I understand Stephen is currently collating data and will respond within the requested timeframe.

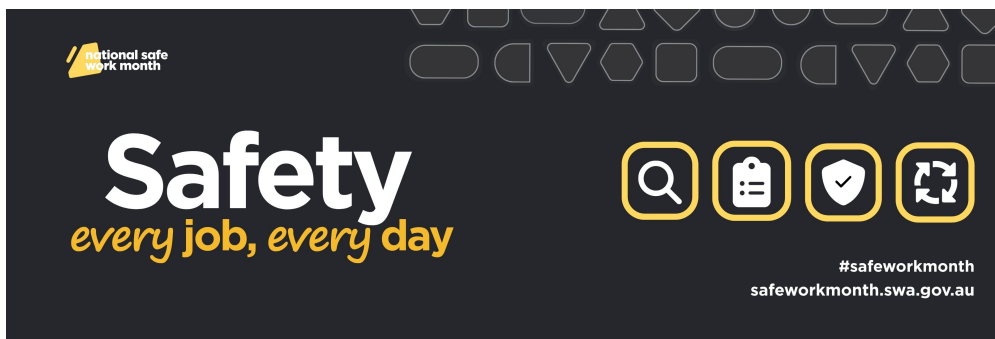
Thanks,
Anne

Anne Sacco
Head of Design
Design and Projects

E Anne.Sacco@penrith.city
T +61247328124 | M +61448201940
PO Box 60, PENRITH NSW 2751
www.visitpenrith.com.au
www.penrithcity.nsw.gov.au



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From: Swathi Gowda <swathi.gowda@hbi.com.au>
Sent: Thursday, 9 October 2025 12:46 PM
To: Robert Craig <Robert.Craig@penrith.city>; Anne Sacco <Anne.Sacco@penrith.city>
Cc: Ari Fernando <ari.fernando@penrith.city>
Subject: FW: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - Penrith City Council - Scope Consultation

Hi Robert/Anne - forwarding on below Scope Consultation correspondence, as I've received Ari's out of office correspondence.

Cheers,
Swathi Gowda
Principal Environmental Consultant

M: 0436 451 153 | E: Swathi.Gowda@hbi.com.au

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5344 | W: www.hbi.com.au



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From: Swathi Gowda
Sent: Friday, 3 October 2025 8:07 AM
To: Ari Fernando <ari.fernando@penrith.city>
Subject: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - Penrith City Council - Scope Consultation

Good Morning,

As the independent auditor engaged by Transport for NSW for the Western Harbour Tunnel (WHT) project (SSI 8863-as modified; Approval), I am consulting with **Penrith City Council** on the scope of the **sixth** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Western Harbour Tunnel & Warringah Freeway Upgrade | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **28 October 2025** and pertains to post-approval requirements and compliance during Construction of the following stages:

- Stage 3B – WHT Northern Tunnelling and Integration works (commencement of construction 22 May 2023)
- Stage 3C – WHT Sydney Harbour Crossing works (commencement of construction 20 May 2024)

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 8863 (as modified; the approval) Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to Stage 3B (WHT Northern Tunnelling and Integration works) and Stage 3C (WHT Sydney Harbour Crossing works) of the project, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been conducted with DPHI, and the following has been requested:

“Further to the proposed scope detailed in HBI letter (dated 23 September 2025), NSW Planning requests that the audit includes the following:

- *An assessment of management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Walker Street, North Sydney; and*
- *Review of complaints that has required escalation during the reporting period and whether the escalation procedures were adequately implemented in accordance with the Community Communication Strategy of the Project and whether outstanding issues were appropriately closed out.*

NSW Planning requests particular focus on the following construction support sites and associated works:

- *Berrys Bay*
- *Emu Plains*

As per previous audits, NSW Planning requests you consult with the NSW EPA and North Sydney Council (NSC), Inner West Council and Penrith City Council.”

In providing input to the scope, we kindly request that **Penrith City Council** confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **17 October 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Swathi Gowda (Independent Lead Environmental Auditor, HBI) on Swathi.Gowda@hbi.com.au

Cheers,

Swathi Gowda

Principal Environmental Consultant | Independent Lead Environmental Auditor

M: 0436 451 153 | E: Swathi.Gowda@hbi.com.au

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Swathi Gowda

From: Swathi Gowda
Sent: Friday, 3 October 2025 8:07 AM
To: arvind.narwal@innerwest.nsw.gov.au
Subject: Sixth Independent Audit - SSI 8863 - Western Harbour Tunnel Stage 3B and 3C - Inner West Council - Scope Consultation

Good Morning,

As the independent auditor engaged by Transport for NSW for the Western Harbour Tunnel (WHT) project (SSI 8863-as modified; Approval), I am consulting with **Inner West Council** on the scope of the **sixth** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Western Harbour Tunnel & Warringah Freeway Upgrade | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **28 October 2025** and pertains to post-approval requirements and compliance during Construction of the following stages:

- Stage 3B – WHT Northern Tunnelling and Integration works (commencement of construction 22 May 2023)
- Stage 3C – WHT Sydney Harbour Crossing works (commencement of construction 20 May 2024)

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 8863 (as modified; the approval) Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to Stage 3B (WHT Northern Tunnelling and Integration works) and Stage 3C (WHT Sydney Harbour Crossing works) of the project, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;

- incidents, non-compliances and complaints that occurred or were made during the audit period;
- the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
- feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been conducted with DPHI, and the following has been requested:

“ Further to the proposed scope detailed in HBI letter (dated 23 September 2025), NSW Planning requests that the audit includes the following:

- *An assessment of management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Walker Street, North Sydney; and*
- *Review of complaints that has required escalation during the reporting period and whether the escalation procedures were adequately implemented in accordance with the Community Communication Strategy of the Project and whether outstanding issues were appropriately closed out.*

NSW Planning requests particular focus on the following construction support sites and associated works:

- *Berrys Bay*
- *Emu Plains*

As per previous audits, NSW Planning requests you consult with the NSW EPA and North Sydney Council (NSC), Inner West Council and Penrith City Council.”

In providing input to the scope, we kindly request that **Inner West Council** confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **17 October 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Swathi Gowda (Independent Lead Environmental Auditor, HBI) on Swathi.Gowda@hbi.com.au

Cheers,
Swathi Gowda

Principal Environmental Consultant | Independent Lead Environmental Auditor

M: 0436 451 153 | E: Swathi.Gowda@hbi.com.au

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Swathi Gowda

From: Swathi Gowda
Sent: Monday, 27 October 2025 8:30 AM
To: Brendan Askey-Doran
Cc: Rui Henriques
Subject: RE: NSC Joint Consultation - Sixth Independent Audit - SSI 8863 – WHT Stages 3B & 3C and Ninth Independent Audit - SSI 8863 – WFU

Morning Brendan – thanks for below email.

We typically aim to send the scope consultation requests in the first two weeks of April (for the Audit scheduled in May) and first two weeks of October (for the Audit scheduled late October/first week November).

Above is also dependent on the Department of Planning and Housing Infrastructure's scope consultation request and response timeframes.

Have a good week ahead.

Cheers,
Swathi Gowda
Principal Environmental Consultant

M: 0436 451 153 | E: Swathi.Gowda@hbi.com.au

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From: Brendan Askey-Doran <Brendan.Askey-Doran@northsydney.nsw.gov.au>
Sent: Friday, 24 October 2025 5:30 PM
To: Swathi Gowda <swathi.gowda@hbi.com.au>; Rui Henriques <rui.henriques@hbi.com.au>
Subject: RE: NSC Joint Consultation - Sixth Independent Audit - SSI 8863 – WHT Stages 3B & 3C and Ninth Independent Audit - SSI 8863 – WFU

Hi Swathi and Rui,

I appreciate you can only give two weeks to provide information in relation to the audit; however, would it be possible for you to provide the next date that this two-week pre-audit collection period will commence from approximately?

This will allow us to schedule better and prepare information in advance, so we can more easily meet your timeframes.

Hope you have a good weekend.

Kind regards,
Brendan



Brendan Askey-Doran

Business Support and Performance Coordinator

P +61 2 9936 8415

Brendan.Askey-Doran@northsydney.nsw.gov.au



From: Swathi Gowda <swathi.gowda@hbi.com.au>

Sent: Thursday, 23 October 2025 2:41 PM

To: Brendan Askey-Doran <Brendan.Askey-Doran@northsydney.nsw.gov.au>; Rui Henriques <rui.henriques@hbi.com.au>

Subject: RE: NSC Joint Consultation - Sixth Independent Audit - SSI 8863 – WHT Stages 3B & 3C and Ninth Independent Audit - SSI 8863 – WFU

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Hi Brendan – thanks again for reaching out and understand you’ve had a further discussion with Rui.

We look forward to NSC’s inputs to the scope consultation process in the next six-monthly audit of both WHT and WFU. We’ll reach out as per the usual scope planning and consultation process for these Independent Audits.

Cheers,

Swathi Gowda

Principal Environmental Consultant

M: 0436 451 153 | E: Swathi.Gowda@hbi.com.au

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From: Rui Henriques <rui.henriques@hbi.com.au>

Sent: Thursday, 23 October 2025 11:37 AM

To: Brendan Askey-Doran <Brendan.Askey-Doran@northsydney.nsw.gov.au>; Swathi Gowda <swathi.gowda@hbi.com.au>

Subject: RE: NSC Joint Consultation - Sixth Independent Audit - SSI 8863 – WHT Stages 3B & 3C and Ninth Independent Audit - SSI 8863 – WFU

Hi Brendan,

This is Rui Henriques (WFU Independent Auditor).

It sounds like it will be easier if you call me on my mobile – my contact details are below.

Kind regards

Rui Henriques

Independent Environmental Auditor

M: 0404031391 | E: rui.henriques@hbi.com.au

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From: Brendan Askey-Doran <Brendan.Askey-Doran@northsydney.nsw.gov.au>

Sent: Thursday, 23 October 2025 11:33 AM

To: Swathi Gowda <swathi.gowda@hbi.com.au>

Cc: Rui Henriques <rui.henriques@hbi.com.au>

Subject: RE: NSC Joint Consultation - Sixth Independent Audit - SSI 8863 – WHT Stages 3B & 3C and Ninth Independent Audit - SSI 8863 – WFU

Hi Swathi and Rui,

I haven't received any missed calls on my mobile; it may be out of network range. Landline may be better if possible. Would you like me to call you?

Thanks,
Brendan



Brendan Askey-Doran

Business Support and Performance Coordinator

P +61 2 9936 8415

Brendan.Askey-Doran@northsydney.nsw.gov.au



From: Swathi Gowda <swathi.gowda@hbi.com.au>

Sent: Thursday, 23 October 2025 11:30 AM

To: Brendan Askey-Doran <Brendan.Askey-Doran@northsydney.nsw.gov.au>

Cc: Rui Henriques <rui.henriques@hbi.com.au>

Subject: RE: NSC Joint Consultation - Sixth Independent Audit - SSI 8863 – WHT Stages 3B & 3C and Ninth Independent Audit - SSI 8863 – WFU

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Hi Brendan – thanks for the chat.

Rui and myself just tried to call you back, to discuss further. Rui Henriques the Lead Auditor on WFU, will call you back on your mobile.

Rui – Brendan's contacts are 042 022 9365 and 9936 8415

Cheers,
Swathi Gowda
Principal Environmental Consultant

M: 0436 451 153 | E: Swathi.Gowda@hbi.com.au

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From: Brendan Askey-Doran <Brendan.Askey-Doran@northsydney.nsw.gov.au>

Sent: Thursday, 23 October 2025 11:08 AM

To: Swathi Gowda <swathi.gowda@hbi.com.au>

Cc: Rui Henriques <rui.henriques@hbi.com.au>

Subject: RE: NSC Joint Consultation - Sixth Independent Audit - SSI 8863 – WHT Stages 3B & 3C and Ninth Independent Audit - SSI 8863 – WFU

Hello Swathi,

North Sydney Council would be keen to make a submission in relation to this independent audit; however, I understand the deadline was on 17 October. Would it be possible for us to still make a submission for the audit?

We've had quite significant interactions with WFU/WHT Team on these projects and there have been several complaints from residents and the Councillors in relation to the way some of these works were conducted and/or consulted on. Unfortunately, the TfNSW Liaison role at Council has been vacant for the last 6-months following de-funding by TfNSW. While TfNSW have recently finalised an agreement with Council to fund this role again for 6-months, we're currently in the process of recruitment.

Given our current vacancies and the volume of communications and interaction with this project to review, we would have been unable to conduct a thorough review and meet the 17 October deadline in the two-weeks' notice for this audit submission received on 3 October.

To help us limit the scope of this request, could you also please confirm/advise whether there is a date range that we should limit our review & submission to (i.e. date of a previous audit or project milestone date)?

I called earlier but got your voicemail.

Kind regards,
Brendan



Brendan Askey-Doran

Business Support and Performance Coordinator

P +61 2 9936 8415

Brendan.Askey-Doran@northsydney.nsw.gov.au



From: Swathi Gowda <swathi.gowda@hbi.com.au>

Sent: Friday, 3 October 2025 8:07 AM

To: Open Space & Infrastructure <OpenSpace_Infrastructure@northsydney.nsw.gov.au>

Cc: Rui Henriques <rui.henriques@hbi.com.au>

Subject: NSC Joint Consultation - Sixth Independent Audit - SSI 8863 – WHT Stages 3B & 3C and Ninth Independent Audit - SSI 8863 – WFU

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ATTN to: Gary Parsons, Director of Open Space and Infrastructure

Good Morning,

As the independent auditors engaged by Transport for NSW for the Western Harbour Tunnel and Warringah Freeway Upgrade (WHTWU) project (SSI 8863 - as modified; the Approval), we are jointly consulting with **North Sydney Council** on the scope of the **sixth** Independent Audit for WHT and **ninth** Independent Audit for WFU in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Western Harbour Tunnel & Warringah Freeway Upgrade | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **28 October 2025** and pertains to post-approval requirements and compliance during Construction of the following stages:

- Stage 3B – WHT Northern Tunnelling and Integration works (commencement of construction 22 May 2023)
- Stage 3C – WHT Sydney Harbour Crossing works (commencement of construction 20 May 2024)
- Main Works: Stage 2 – WFU Main works (commencement of construction 23 May 2022)

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 8863 (as modified; the Approval) Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to Stage 3B (WHT Northern Tunnelling and Integration works), Stage 3C (WHT Sydney Harbour Crossing works) and Stage 2 -WFU Main works of the project, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been conducted with DPHI, and the following has been requested, for each Project:

WHT

“Further to the proposed scope detailed in HBI letter (dated 23 September 2025), NSW Planning requests that the audit includes the following:

- *An assessment of management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Walker Street, North Sydney; and*
- *Review of complaints that has required escalation during the reporting period and whether the escalation procedures were adequately implemented in accordance with the Community Communication Strategy of the Project and whether outstanding issues were appropriately closed out.*

NSW Planning requests particular focus on the following construction support sites and associated works:

- *Berrys Bay*
- *Emu Plains*

WFU

Further to the attached proposed scope detailed in HBI letter (dated 23 September 2025), NSW Planning requests that the audit gives particular consideration to:

- 1. The management of out-of-hours works (OOHW) under the OOHW protocol prepared as per Condition E69 of the Approval.*
- 2. The management of heavy vehicle movements with regard to local road usage as per Condition E132 of the Approval, including a review of the adequacy of management measures implemented to prevent heavy vehicles using unapproved local roads, particularly Lytton Street, Cammeray.*
- 3. The management of construction parking with regard to Condition E139 of the Approval, focussing on the adequacy of management measures implemented during the reporting period to minimise construction parking on local roads.*

NSW Planning requests you to consult with the NSW EPA , Inner West Council, Penrith City Council and North Sydney Council (i.e. single consultation with NSC covering both the WHT and WFU). ”

In providing input to the scope, we kindly request that **North Sydney Council** confirm any key issues it would like examined (including specific details around which Project, location and condition of approval that it applies to), relating to post-approval requirements and compliance.

We look forward to hearing from you before **17 October 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements.

Please contact Swathi Gowda (Independent Lead Environmental Auditor, HBI) on swathi.gowda@hbi.com.au and Rui Henriques (Independent Lead Environmental Auditor, HBI) on rui.henriques@hbi.com.au

Cheers,

Swathi Gowda

Principal Environmental Consultant | Independent Lead Environmental Auditor

M: 0436 451 153 | E:Swathi.Gowda@hbi.com.au

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HBI

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APPENDIX E – SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS





Table E: Site Inspection and Sample Photographs – WHT Stages 3B and 3C



Observation #01 WHT13 (Emu Plains) construction support site, 28 October 2025:

- Site access/egress (Railway Street, Emu Plains) observed to be satisfactory – no tracking at the time of the audit site inspection.
- No spoil trucks observed at the time of the site inspection.



Observation #02 WHT13 (Emu Plains) construction support site, 28 October 2025: ACCIONA reports

- Energisation works completed and spray grass applied at kiosk area.



Observation #03 WHT13 (Emu Plains) construction support site, 28 October 2025:

- ACCIONA reports Water Treatment Plant (WTP) is operational with 100% reuse on-site, for example for dust suppression (refer Image 1).
- Chemical storage observed under cover; with secondary containment (bunds / drip tray) (refer Image 2).





Observation #04 WHT13 (Emu Plains) construction support site, 28 October 2025:

Sprinklers operational (along segment storage yard) and evidence of internal roads wet down observed. Refer example Images 1 and 2.



Observation #05 WHT13 (Emu Plains) construction support site, 28 October 2025: ACCIONA reports

- Landscaping works completed.

Refer example Images.



Observation #06 WHT13 (Emu Plains) construction support site, 28 October 2025: ACCIONA reports

- Swale along section of Boral perimeter landscaped (turf / grass seed spray), with controls in place to slow down flow; some scouring observed in sections of swale.
- Sediment fence and bund established behind sediment fence, to manage surface water run-off from Boral's site (refer Images 2 and 3), addressing previous IA5 OFI (i.e. **IA5-OFISI03**).
- Swale drains to the sediment basin on-site.

06/11/2025 - Lead Auditor Response: Previous IA5 OFI closed (i.e. **IA5-OFISI03**).



Observation #07 WHT13 (Emu Plains) construction support site, 28 October 2025:

- Temporary sediment basin on-site for surface water management; with some scouring observed on batters and sediment build-up.
- Emergency spill kit observed on fence (adjacent to pumphouse).
- Standpipe installed (ACCIONA indicated for water cart refill and reuse for dust suppression on-site).

IA6-OFISI01 - WHT13 (Emu Plains):

Recommend review of sediment basin batters for some scouring for repair and maintenance (including removal of sediment build-up), as required.

ACCIONA provided following response (06/11/2025) – “scouring of retention pond to continue to be monitored. Maintenance of pond to be investigated pending safety of access for people / plant and the potential destabilisation of the banks. Maintenance can only be undertaken once pond is empty/ drained which is likely to occur during warmer drier months.”

04/12/2025 - Lead Auditor Response: Open.



Observation #08 WHT13 (Emu Plains) construction support site, 28 October 2025:

- Rock scour line, fencing and tree protection zone signage noted (refer Images 2 and 3).



Observation #09 WHT13 (Emu Plains) construction support site, 28 October 2025:

AREA 2

- Refuelling area with spill kit.
- Gate installed and locked, restricting Boral's access to Area 2, in use for stockpiling TBM2 spoil (refer Image 2).



Observation #10 WHT13 (Emu Plains) construction support site, 28 October 2025:

Area 2

- Observed soil binder applied on TBM spoil stockpiled in Area 2 and some unsealed surfaces; with exception of small stockpile of material from detention pond construction works (refer Images 2 and 3). Auditees indicated material had been recently excavated.
- No spoil trucks or vehicle movements observed o at the time of the inspection at Area 2. ACCIONA indicated no spoil haulage since September 2025 and not scheduled to occur for approximately next 4 to 6 weeks, at this stage.
- No vehicle movements observed in Area 2 and no spoil trucks observed during the audit site inspection at Emu Plains. Auditees (ACCIONA) indicated no spoil haulage activities at Emu Plains site since September 2025 and not scheduled to occur for approximately next 4 to 6 weeks, at this stage.
- No visible dust noted during the audit site inspection.

IA6-OFISI02 Area 2 - WHT13 (Emu Plains):

Recommend application of polymer (soil binder) on small stockpile of material from detention pond construction works.

ACCIONA provided evidence of close-out (06/11/2025) – with Image of stockpile being sprayed.

04/12/2025 - Lead Auditor Response: Closed.



Observation #11 WHT13 (Emu Plains) construction support site, 28 October 2025:

Area 2

- Rumble grid and wheelwash installed at exit from Area 2. Rumble grid observed to have some material build-up.
- No spoil trucks or vehicle movements observed o at the time of the inspection. ACCIONA indicated no spoil haulage since September 2025 and not scheduled to occur for approximately next 4 to 6 weeks, at this stage.

IA6-OFISI04 Area 2 - WHT13 (Emu Plains):

Recommend maintenance of rumble grid (clean out of material build-up) before spoil haulage recommences from Area 2, to restore further capacity.

ACCIONA provided response on 2 December 2025 that - *"Rumble grid will be monitored and cleanouts will occur when soil is impacting the effectiveness of the rumble grid or presents a containment risk."*

04/12/2025 - Lead Auditor Response: Open.

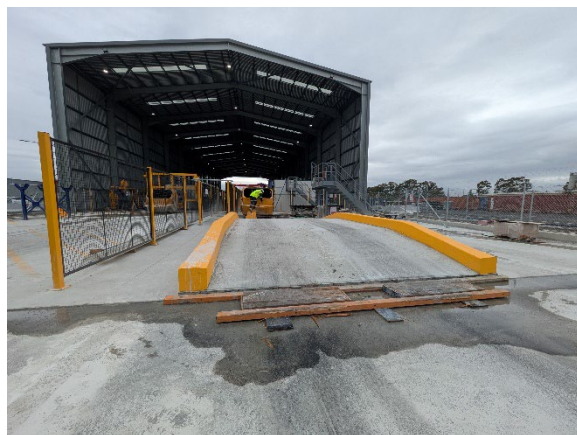


Observation #12 WHT13 (Emu Plains) construction support site, 28 October 2025:

Chemical storage observed under cover; with secondary containment (bunds / drip tray) and spill kits in area.

Refer example Images.

	
  	Observation #13 WHT13 (Emu Plains) construction support site, 28 October 2025: • Culvert pre-cast facility operational. • Chemical storage observed within Culvert pre-cast facility, with secondary containment and spill kit in area. Refer example Images.



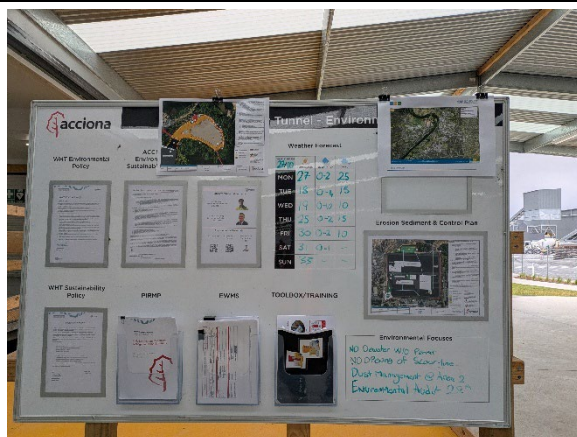
Observation #14 WHT13 (Emu Plains) construction support site, 28 October 2025:

- Operator observed washing out kibble (hardstand area, outside culvert facility); with discussion held to review kibble wash down area including extending bund to contain wash out water.

IA6-OFISI03 WHT13 (Emu Plains site): Recommend reviewing kibble wash down area and extending bund to contain wash out water – refer Image 1 and 2.

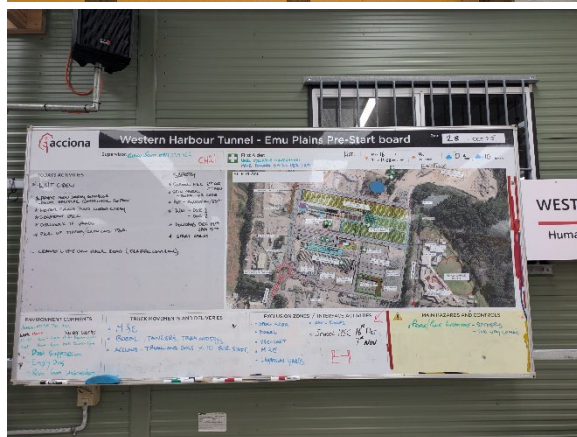
ACCIONA provided evidence of close-out (06/06/2025) – “Extension of bund being installed for culvert facility washdown area.”

04/12/2025 - Lead Auditor Response: Closed.



Positive Observation #15 WHT13 (Emu Plains) construction support site, 28 October 2025 regarding WHT Environment Board display and Pre-start board observed with environmental content – refer example Images.

- Environment Board includes environmental content – for example Emu Plains Flood Evacuation Route, PESCP and Environmental Focuses
- Pre-Start Board – notes Environmental comments and School HSC dates.





Observation #16 Berrys Bay foreshore parkland site, 28 October 2025:

Following signage observed:

- WHT temporary parking space closure – Balls Head Road cul de sac.
- Temporary pedestrian detour.
- Project signage on site hoarding.

Observation #17 Berrys Bay foreshore parkland site, 28 October 2025: ACCIONA reports

- Preparatory works underway for hoarding installation.



Observation #18 Berrys Bay foreshore parkland site, 28 October 2025:

- Delineation fencing, flagging, bollards and signage observed for exclusion and environmental protection / no-go zones.
- Spill kits observed.

Refer example Images.



Observation #19 Berrys Bay foreshore parkland site, 28 October 2025:

- Sandstone blocks salvaged for potential reuse in design, heritage winches and lathe (unexpected find during demolition of Woodleys Shed) covered / wrapped in plastic and stored on-site (refer Images 1-3).
- Signage installed 'Heritage Protection Area No Go Zone.'
- ACCIONA indicated the lathe (unexpected find during demolition of Woodleys Shed) is pending assessment and advice from Heritage Consultant (refer Image 3).
- Bollards with signage installed around bund wall (refer Image 4)



Observation #20 Berrys Bay foreshore parkland site, 28 October 2025:

- Silt curtains installed
 - Sediment filtration barrier controls (haybales wrapped in geofabric) installed at boundary.
- Refer example Images.



Observation #21 Berrys Bay foreshore parkland site, 28 October 2025:

- ERSERD controls installed and polymer (soil binder) applied on exposed surfaces, batters and stockpiles.
 - ACCIONA indicated stockpiles are awaiting testing and waste classification, prior to load out.
 - No visible dust observed at the time of the site inspection; with water cart observed on standby.
- Refer example Images.





HBI

Healthy Buildings International

APPENDIX F – DECLARATIONS



Appendix F: Independent Audit Report Declaration Form

Independent Audit Report Declaration Form

Project Name	Western Harbour Tunnel and Warringah Freeway Upgrade
Consent Number	SSI 8863
Description of Project	Development for the purposes of the Western Harbour Tunnel and Warringah Freeway Upgrade project, being a new multi-lane road link connecting the M4-M5 Link at Rozelle with the Warringah Freeway at North Sydney, including: • a new crossing of Sydney Harbour approximately 6.5 kilometres of twin multilane tunnels linking Rozelle to North Sydney; • stub tunnels and ramps for connections to the Gore Hill Freeway and proposed Beaches Link tunnels; • connections to stub tunnels at Lilyfield and Rozelle; • connections with existing roads at Rozelle, North Sydney and Cammeray; • associated works to upgrade the surrounding road network, bridges, interchanges, and ramps to provide cycle and pedestrian pathways; • upgrade and integration works along the existing Warringah Freeway; and • ancillary development.
Project Address	Land in the suburbs of Annandale, Artarmon, Balmain, Birchgrove, Cammeray, Crows Nest, Kirribilli, Lilyfield, Milsons Point, Naremburn, Neutral Bay, North Sydney, Rozelle and Waverton
Proponent	Transport for NSW
Title of Audit	Independent Audit No. 5, Western Harbour Tunnel (WHT) - Stage 3B (Northern Tunnelling and Integration Works) and Stage 3C (Sydney Harbour Crossing Works)
Date	15 December 2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

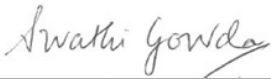
- the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019)
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- 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 Auditor	Swathi Gowda
Signature	
Qualification	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-442234)
Company	Healthy Buildings International Pty Ltd.
Company Address	Unit 2.06, 29-31 Solent Circuit, Norwest NSW 2153