

12 December 2022

Mr. Keith Ng
Planner, Major Projects
NSW Department of Planning and Environment

Dear Mr Ng

Re: Environmental Impact Statement SSI-10035 Parramatta Light Rail Stage 2

Thank you for the opportunity to provide you with this submission detailing our comments following review of the Environmental Impact Statement (EIS) for the proposed Parramatta Light Rail Stage 2 (PLR2). Whilst we are cognisant that the proposed development will have benefits for and impacts to various stakeholders, businesses and the general public, our submission is primarily focussed on perceived impacts to the RAS of NSW and its site located at Sydney Olympic Park being Sydney Showground over which the RAS has a 99 + 99 year lease to the Sydney Olympic Park Authority (SOPA).

The Royal Agricultural Society of NSW (RAS), a not for profit organisation, best known for owning, managing and operating the largest annual ticketed event in the Southern Hemisphere, the Sydney Royal Easter Show (SRES) to which we receive approximately 850,000 visitors annually over a 12 day event period, however it is important to note that we have a similar amount of visitors to our site outside the Show for business, sporting, music and cultural events as we do to the SRES.

EIS comments

To re-confirm, the RAS is a huge supporter of the PLR 2 project, however there are significant flaws and omissions in the EIS that we must bring to your attention as follows:

The RAS has had a collaborative relationship with Transport for NSW (TfNSW) in regard to the journey so far of the PLR2 project since 2016, however disappointingly, for the production of the EIS, no consultation occurred resulting in a document that, from our perspective is less than satisfactory. It is also noted that the RAS is not nominated as a relevant stakeholder for the future design and pre-construction activities as outlined in Technical Paper 2 Transport and Traffic (Section 8.2) despite being a significant leaseholder of government and venue operator for approximately 240 events annually for circa 1.8 million patrons.

The way that the EIS has been written, there is a perception that events at the Sydney Showground and SOP venues need to respond to the construction and operation of the light rail project rather than the opposite situation in which design and construction needs to respond to the current and future proposed environments and operations. In addition, there seems to be very little reference to day to day events in the precinct as if they don't matter and will be unaffected, particularly by construction. It should be emphasised that SOP is first and foremost an events precinct and all events have significant value as they provide both economic and social benefits to the area, and add to the visitor economy.

The scale of the event activity at the Sydney Showground is not acknowledged specifically in the EIS but rather bundled up with other venues at Sydney Olympic Park which understates the level of impact on our venue. The venue footprint and its influence on the PLR2 alignment and operations are different than that of an event at Accor Stadium or Qudos Bank Arena.

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As previously supplied information to the PLR2 project outlined, in 2018 (pre-covid) there were approximately 1.8 million visitors to 238 events at Sydney Showground with a peak daily visitation of 114,000 people. This is significantly more than Rosehill Gardens Racecourse which is addressed specifically as an event venue in the EIS.

The EIS does not reflect the fact that streets such as Showground Road, Grand Parade and Orana Parade regularly operate as internal venue roads (as opposed to public roads), are subject to regular road closures within the Sydney Showground site at the venues discretion and therefore cannot be relied upon for use as detour or construction routes whilst maintaining safe, consistent and effective venue operations. The EIS incorrectly describes New England Avenue as a road connecting people with places of employment. New England Avenue is an internal venue access road within the Showground. The EIS Technical Paper incorrectly describes the closure of Showground Road between Grand Parade and Murray Rose Avenue to facilitate the integration of Sydney Metro West. This should be correctly described as a closure between Dawn Fraser Avenue and Murray Rose Avenue.

Technical Paper 2 Transport and Traffic outlines a potential 6 year construction timeframe from 2025 to 2030/31. It is unclear why there is an extended period between peak construction in 2026/2027 and opening in 2031. The expectation of the RAS is that this construction timeframe be reduced in line with other light rail projects such as PLR1 and that the line is operating before Sydney Metro West in 2030 to reduce unnecessary additional bus movements in lieu of the delayed light rail service and concentrate all construction activities and cumulative disruption from TfNSW's projects. It is also expected that TfNSW would prioritise the construction in the SOP events precinct to ensure disruption to NSW's premier event precinct is minimised, in turn minimising detrimental impact to the economic benefit currently created to the state.

There is an expectation that TfNSW will bring all of the lessons learned from the planning, construction and operation of previous light rail projects in NSW to bear on this project to the benefit of all stakeholders and customers. The EIS documentation does not reflect this.

RAS Rights Over Australia Avenue & P6a Car Park

CARNIVAL SITE

"THE SITE IDENTIFIED AS SUCH ON PLAN ANNEXED TO THE DEED AS ANNEXURE A"

THE DEVELOPMENT CONSENT DESCRIBES THE LAND AS PART OF LOT 102 DP 849975 HOMEBUSH BAY

THE OCCUPATION PERIOD IS 14 DAYS BEFORE AND 7 DAYS AFTER THE CURRENT YEAR R.E.S.



The first and most vital complete omission from the EIS is in relation to RAS rights under the terms of our Lease to Government to occupy part of Australia Avenue and P6a for a period of up to 40 days annually, as detailed above in the snapshot from our Lease. This means, during the construction period of PLR2 as it relates to this land, all construction equipment, materials and anything related would need to be removed from site and the site made good so it can be used by the RAS as detailed above. This would include removing or covering any potential trip hazards including partially or fully

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constructed light rail tracks. Additionally, upon operation of PLR2 following its construction, for the same period, PLR2 would not be able to operate along the route within the RAS Carnival site for an ongoing annual period of approximately 40 days.

The RAS has articulated this information to and discussed it with TfNSW on a number of occasions and it is very disappointing that this critical information has been either ignored or omitted, especially when its existence and criticality has been acknowledged frequently by TfNSW.



The details above are from the RAS head lease and identifies the area that is required to be closed for the annual SRES. The image to the left demonstrates the clash of proposed PLR2 (the green line) when imposed over the SRES Carnival in operation in its current location.

See snapshot below from correspondence sent to the RAS by TfNSW in a letter dated 12th September 2016. This is one of a number of documents demonstrating acknowledgment of this issue by TfNSW.

Parramatta Light Rail Project – RAS Carnival Site

We refer to our previous discussions and consultation in relation the Project, including about the matter of the Royal Agricultural Society's (RAS) annual licence rights for the Easter Show Carnival over a portion of Australia Avenue and their implications for some of the proposed route alignment options for the Parramatta Light Rail (PLR) through Sydney Olympic Park (SOP) which are currently under consideration.

As discussed, we now propose that an initiative be undertaken in which RAS, Sydney Olympic Park Authority (SOPA) and Transport for NSW (TfNSW) work together, on a cooperative and without prejudice basis, to assess the feasibility of relocating the Easter Show Carnival away from Australia Avenue to enable the PLR to run along Australia Avenue between Murray Rose Avenue and Grand Parade. We acknowledge that a relocation would need to deliver value for money outcomes for all the parties, whilst achieving the best possible outcomes for each of parties customers, the community and Government.

According to annual independent surveys undertaken for the SRES, the Carnival is ranked second as a driver to attendance to the Show demonstrating its importance to this historic event.

The current carnival site is located on the P6a car park and part of Australia Avenue, land which is owned and operated by our Landlord, Sydney Olympic Park Authority (SOPA). The rights to the carnival site are provided under an annual license deed attached to our Head Lease with SOPA which commenced in 1997 and operates for 99 plus 99 years.

RAS Master plan

In 2019, in partnership with SOPA, the RAS completed a Final Business Case (FBC) in relation to the proposed upgrade of the NSW Government owned Sydney Showground which included a solution to

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relocate the SRES Carnival removing any constraints associated with the Carnival and PLR2. RAS has undertaken an analysis of the impact of relocating the carnival and can advise that every scenario tested results in a significantly detrimental outcome to the carnival and the event overall when compared to the base case i.e. no change. The RAS has a responsibility to ensure it maintains the welfare of the nation's largest annual ticketed event for all the stakeholders involved directly in the event and those that benefit from the outcomes it supports, particularly throughout regional and rural NSW. It would be irresponsible at best for the RAS to accept a relocation of carnival without seeking commensurate development on the site to offset this risk and enable it to continue to support agriculture in the State as required under the charter.

The Sydney Showground Master Plan is therefore intended to create further much needed assets including an Agricultural Centre of Excellence (think Sydney Fish Market for agriculture), a destinational venue supporting both agriculture and the visitor economy located adjacent to Olympic Boulevard and a new versatile convention/auditorium to complement the existing Exhibition Halls. These assets would create significant economic and social benefits for the State as well as driving patronage of PLR2. The convention/auditorium, targeting domestic business will also enable support for the International Convention Centre (ICC) at Darling Harbour with business events being able to be domiciled at SOP when ICC is unavailable rather than the state losing the events and their respective economic and social benefits interstate. This FBC was assured in 2019 through the Infrastructure NSW Investor Assurance Framework and cleared Gate 2 demonstrating excellent value for money and benefits well in excess of costs and is now awaiting funding.

An associated issue of the carnival site relocation is the potential impact on the Plaza Event Bus Terminal on Olympic Boulevard. This facility is activated for events in all Sydney Olympic Park venues with crowds of >50,000 spectators and operates for everyday of the SRES. It provides bus-based public transport for approximately 10-15% of the total crowd. Its location on Olympic Boulevard is the preferred site (being the least worst alternative location) for the carnival's relocation from Australia Avenue/P6. This ties the future of this important public transport facility which has been successfully operating for 24 years, to the PLR2 project. The relocation of the Plaza Event Bus Terminal to accommodate the Carnival site is currently not scoped or funded by government but remains an important element of the precinct event transport plan.

It should also be noted that, should RAS agree to relocate the SRES Carnival from Australia Avenue/P6, the P6 car park, which is currently constrained from development due to the RAS rights would effectively become unencumbered creating a future development site for Government of significant value. This 'value' could be used to forward fund the developments proposed by the RAS meaning the real cost to Government of development of its own assets could be minimised.

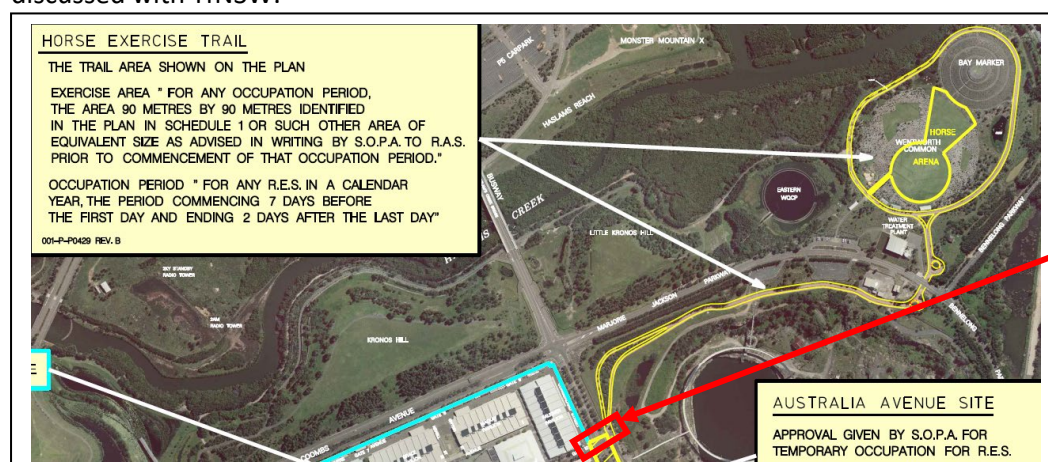
The artist's impression below demonstrates the proposed RAS master plan included as part of the aforementioned FBC including the proposed relocation of the SRES Carnival to Olympic Boulevard



The RAS's expectation is that this fundamental issue of the rights to the Carnival site and Australia Avenue and the opportunities for the NSW Agricultural Centre of Excellence and convention/auditorium be acknowledged and progressed by TfNSW as Stage 1 of the Sydney Showground Master Plan in coordination with other parts of government and in line with the Infrastructure NSW Investor Assurance Framework as part of the approval and delivery of PLR2.

Horse Exercise Access

Alongside the RAS Carnival Rights as detailed above, the RAS also holds annual rights in relation to the 'Horse Exercise Trail'. Whilst these rights don't appear to be compromised by the proposed PLR2 route, access to the trail through Sydney Showground Gate 10 must be maintained for an annual duration of 7 days prior to the SRES up to and including 2 days after the event as detailed in the snapshot below. The SRES, whilst currently operating for 12 event days means the current requirement will be for $7 + 12 + 2 = 21$ days, however under the terms of our Lease, the SRES is permitted to operate for 16 days leading to a 25 day requirement. Provision of a horse crossing across the light rail tracks on Australia Avenue needs to be incorporated into the design of PLR2 as previously discussed with TfNSW.



Gate 10 access to/from the horse trail to be maintained 7 days before up to and including 2 days after each annual SRES and for staff and contractor access for up to 40 days (14 days prior up to 7 days after the event).

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Proposed Potential Future Stop at Grand Parade

We note the proposed future Stop at Grand Parade and urge the proponent to seriously consider delivering this as part of the project. There is no clear explanation of the development trigger for this proposed Stop, so its future remains unclear as it appears to be the only future proofed stop on the route which suggests it is unlikely to be built independently years later. This Stop would enable patrons leaving such venues as Accor Stadium, Qudos Bank Arena and GIANTS Stadium in particular to exit by foot along Grand Parade and prevent a large proportion of an event crowd from adding to potential congestion in and around the current T7 Line train station and the future Sydney Metro West station. In addition, a future site development plan would see the introduction of a new convention/auditorium facility adjacent to this proposed future Stop that is forecast to produce significant economic impact for the State. Having a Stop located close to the new facility entrance will enhance this offering and is likely to increase patronage on the service. The expectation is that the proposed stop be included in the initial project and that wire-free operations be incorporated.



Closure of Showground Road from Murray Rose Avenue to Dawn Fraser Avenue and extension of Murray Rose Avenue from Showground Road to Olympic Boulevard

The EIS incorrectly describes the closure of Showground Road from Herb Elliott Avenue to Grand Parade. The RAS has no issue with the proposed closure of Showground Road from Murray Rose Avenue to Dawn Fraser Avenue, however, notes that for events including the annual SRES, the proposed extension of Murray Rose Avenue from Showground Road to Olympic Boulevard will need to be closed to traffic. In addition when Olympic Boulevard is closed to traffic to create the event pedestrian priority precinct for the stadium and arena and it is likely that this proposed extension will be automatically closed as there would be no access available at the intersection of Murray Rose Avenue and Olympic Boulevard. Further to this, the area in and around this extension is a heavily populated area for pedestrian traffic being the main thoroughfare for patrons walking to and from the existing T7 railway station to both Accor Stadium and Qudos Bank Arena.

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With the removal of traffic from Dawn Fraser Avenue between Australia Avenue and Olympic Boulevard and the prolonged light rail construction period envisaged, it is recommended that the extension of Murray Rose Avenue from Showground Road to Olympic Boulevard be included as part of the PLR2 project to maintain local road access to and from the west towards Carter Street from the streets around the T7 station. It would also allow Sydney Showground to operate independently as an event venue from other parts of SOP as is currently the case. This section should also be constructed as part of early works to maintain the access for the businesses located on Murray Rose Avenue and the flexibility of the local road network in the absence of access to the permanently closed section of Dawn Fraser Avenue.

Right turn into and out of Sydney Showground to and from Australia Avenue

Whilst the EIS advises that all current accesses to Sydney Showground from Australia Avenue will be maintained, it fails to confirm that a right hand turn in and out of all existing accesses will be maintained and this is critical to the operations of the Showground. The technical paper also does not acknowledge the freight movements by large articulated heavy vehicles into the loading docks at the venues in Sydney Olympic Park and Sydney Showground. In particular, Sydney Showground Gate 10 is the main access point for all contractors in relation to the SRES and Gate 13 is the loading dock access for all Sydney Showground events and exhibitions and often requires multiple stacking of articulated heavy vehicles along the Eastern side of Australia Avenue in readiness to turn right into the loading dock. This information has previously been provided to and acknowledged by TfNSW and, in fact, significant design work has been undertaken by TfNSW and presented to the RAS to demonstrate and facilitate this requirement, however the EIS has ignored it.

The expectation from RAS is that all existing access into the Sydney Showground site including all right turns in and out are maintained and incorporated into all project documentation as it is essential for the economic viability of the venue.



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Proposed Overhead Wiring

The project being powered by overhead wiring along Australia Avenue could be problematic for some of the larger articulated heavy vehicles that access Sydney Showground via this busy road. As Australia Avenue is the key access into Gates 10 to 13, the opportunity exists to introduce catenary free operation from the proposed potential light rail stop at Grand Parade. The operation of light rail with overhead wiring will create an unsightly eyesore at the intersection of Australia Avenue and Dawn

Fraser Avenue where the alignment turns 90 degrees requiring a significant number of poles and overhead wiring adjacent to an open space (Jacaranda Square).

Proposed Construction compounds 12 & 13

Construction compound 12 proposes to occupy approximately half the current P5a car park (200 spaces), however this car park is occupied in full for the SRES for a period of 15 days and will need to be vacated annually for this requirement during construction.

In addition, Construction compound 13 proposes to occupy a section of the P6a car park and again will need to be de-established for a period of approximately 40 days annually to enable occupation of the site for the SRES Carnival in compliance with the RAS lease rights

It is the expectation of the RAS that alternative locations for these construction compounds be found or that they are removed for the duration of the SRES unless of course the aforementioned relocation requirements have been agreed in full.

Cumulative impact of construction projects

The traffic assessment outlined in the EIS Working Paper does not appear to consider the cumulative impacts of several TfNSW projects planned for Sydney Olympic Park and how they would influence the construction and operation of the light rail. These include Sydney Metro West, Hill Road widening, Australia Avenue / Homebush Bay Drive upgrade, Silverwater Road / Holker Street upgrade.

Special Events

The EIS advises that the construction contractor(s) would be responsible for considering known special events in the construction program, see snapshot of section 7.7.6 Special Events from Chapter 7 Project Description – Construction. Understanding and pricing this element by contractors will be

complicated and expensive and the RAS urges the proponent to engage the services of SOPA to assist with this requirement. In addition, while the section advises regarding ‘known’ special events, it does not consider those ‘unknown’ at the time of tendering and contracting but some events do land on a short lead time.

It is the expectation of RAS that TfNSW will follow procedures put in place for the construction of the CSELR through the Moore Park events precinct. It is noted that the construction impacts the turning circle of the Aquatic Bus Terminal on Olympic Boulevard at the intersection with Herb Elliott Avenue. It is the expectation that the construction zone be adjusted to the north of this intersection to allow the event bus terminal to operate for the SRES and other stadium events. It is also expected that the construction adjacent to the westbound platforms of the T7 Olympic Park station be staged outside of major events such as SRES to allow side loading of the station to be maintained.

7.7.6 Special events

The construction contractor(s) would be responsible for considering known special events in the construction program and making appropriate arrangements to manage the impacts of construction (including traffic management and contingency arrangements) during these events. The traffic management requirements of special events may require adjustments to times of construction and routes used by heavy vehicles, as well as varying approved road occupancy license conditions for construction.

New signalised intersections are proposed at:

- Holker Busway/Kevin Coombs Avenue
- Australia Avenue/Grand Parade
- Australia Avenue/Murray Rose Avenue

The RAS acknowledges the signalised intersection plans as detailed above, however advises that prolonged full closure of these intersections for construction will not be compatible with events at Sydney Showground and its associated venues including GIANTS Stadium and will need to be managed as partial closures.

Proposed redirection of Bus Routes 525, 526, 533 & N81

The proposed redirection of these services during construction will not always be possible due to road closures associated with events. The RAS urges the proponent to consult with SOPA to be able to establish a series of alternate routes that could be employed to be compatible with the various road closures. In addition, the identification of Orana Parade as a possible route is flawed. For the intents and purposes of the EIS this is not a public road, cuts directly through the Showground site, is subject to closure for events and is not suitable for the proposed purposes being tantamount to a single lane track with no kerbs, gutters or line marking. In addition it is the responsibility of the RAS, under the terms of its Lease to maintain this accessway, however this could not be reasonably expected if it were to be used as a redirected Bus Route.

Conclusion

Thank you for the opportunity to provide this information. Whilst disappointed that our response has had to be so extensive and, frequently unnecessarily if all previously acknowledged and discussed matters had been addressed in the EIS, we look forward to our concerns being resolved and actioned in subsequent documentation.

Should you require anything further please do not hesitate to contact our Head of RAS Property & SRES Operations, Jonathan Seward.

Yours sincerely



Brock Gilmour
Chief Executive

Encl.

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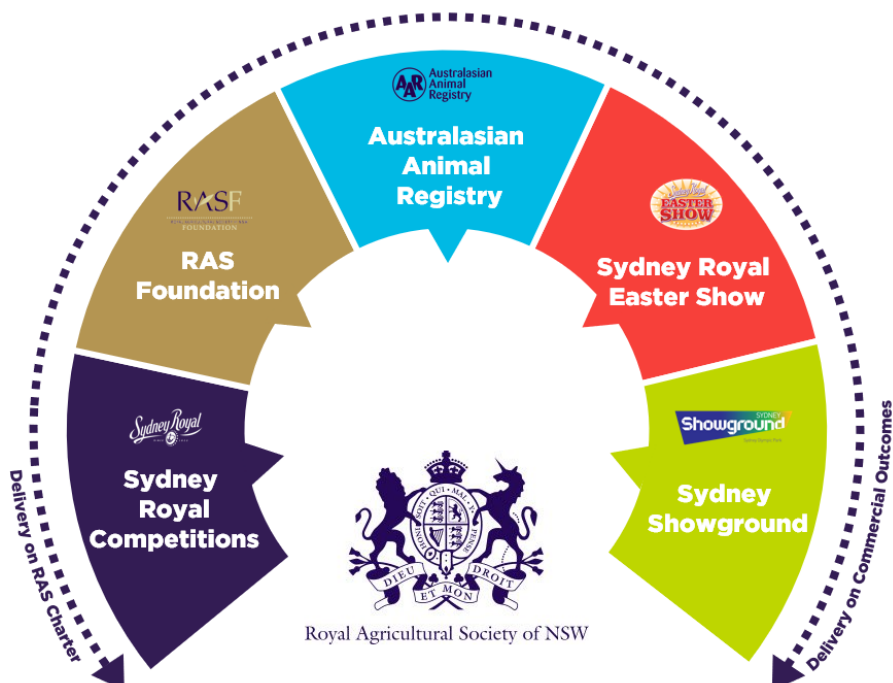
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About the Royal Agricultural Society of NSW

The Royal Agricultural Society of NSW (RAS) is a truly iconic Australian organisation and has been an influential force in the direction and development of Australian agriculture through competitions, education and events since its foundation in 1822.

In its role as an exponent for excellence in agriculture, the Royal Agricultural Society of NSW organises events, and competitions, acts as a guardian for the state's agricultural heritage, celebrates Australia's achievements in agriculture and works to promote the viability of rural communities by ensuring that Australia remains a thriving and innovative agricultural producer.

At the heart of the RAS is a not-for-profit commitment to support the development of agriculture in Australia whilst creating over \$616 million of annual economic contribution for the State of NSW, generated by events at Sydney Showground and 1 million hotel bed nights every year.



Revenue generated through the Sydney Showground activity and events such as the Sydney Royal Easter Show allows the RAS to invest \$11 million back into agricultural programs, competitions, education and youth initiatives, and rural communities annually.

Sydney Royal Easter Show

The Sydney Royal Easter Show (SRES) is Australia's largest annual ticketed event, attended by approximately 850,000 visitors including 54,000 unique out-of-state visitors when Sydney celebrates the vital role that agriculture plays in the health and wealth of our nation and applauds the highest achievers in agricultural excellence. Non-stop competitions, a thrilling entertainment program featuring international stars and innovative ideas are the highlights of this 12-day event.

Sydney Showground

Sydney Showground is at the heart of Sydney Olympic Park and is operated by the RAS on a long term 99 + 99-year lease from the Sydney Olympic Park Authority (SOPA).

Home to the RAS and the SRES, Sydney Showground provides a year-round exhibition and events venue that hosts a diverse range of activity, sporting events, corporate functions, conferences and concerts, attended by some 900,000 patrons. It is a complementary venue to the International Convention Centre at Darling Harbour catering to the domestic event market and is Western Sydney's

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number 1 event venue. Sydney Showground is also home to the AFL's Greater Western Sydney Giants and cricket's Sydney Thunder both playing out of GIANTS Stadium, Western Sydney's premier sporting oval.

Sydney Royal Wine, Dairy & Fine Food Shows

The Sydney Royal Wine, Dairy & Fine Food competitions showcase the best of Australia's food, wine and dairy and where the industries display their finest produce in head-to-head competitions, where a win represents the highest industry accolade. The award of a 'Sydney Royal' medal is a most sought-after prize and is a significant contributor to product demand both domestically and overseas.

RAS Foundation

The RAS also has a charitable arm of the business, the RAS Foundation (RASf). The RASf aims to build strong, vibrant rural communities in NSW through investment in education, training and skills development by providing grants and scholarships. The RAS contributes a significant amount annually to the RASf to invest in these programs. The RASf also receives donations from individuals, corporates and foundations.

Australasian Animal Registry

The Australasian Animal Registry (AAR) is Australia's largest and most comprehensive not-for-profit animal registration and recovery service, with a database of over 1,800,000 animals from across Australia and New Zealand.

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