

# Independent Environmental Audit on the Environmental Representative role

## Final Report

**Contract works: Sydney Metro City and Southwest – Project wide ER role**  
**Scope: ER obligations, responsibilities and service provision**

**Reference: SM18.19-073A-CSW-HBI-ENV**

17/12/2018

<b>Audit Organisation:</b>	QEM Consulting	<b>Audit Date:</b>	3 December 2018
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## 1. Executive Summary

### 1.1 Introduction

The purpose of this audit was to assess the compliance of Environmental Representative (ER) services provided by Healthy Buildings International (HBI) with the relevant Planning and Assessment Approvals and Sydney Metro requirements.

### 1.2 Background

Planning Approvals issued by the Department of Planning & Environment require Sydney Metro (formerly Transport for NSW) to develop an Environmental Audit Program for independent annual environmental auditing against the terms of the City and Southwest project Critical State Significant Infrastructure (CSSI) approval.

QEM Consulting Pty Ltd have been engaged by Sydney Metro Delivery Office (SMDO) Safety, Sustainability & Environment (SSE) to deliver a program of Independent Environmental Audits. As required by Critical State Significant Infrastructure Approval SSI 15\_7400 Condition A39 and the associated Environmental Audit Program, an Independent Environmental Audit was undertaken to assess Healthy Buildings Australia (HBI) compliance with relevant Planning Approvals Sydney Metro requirements documented within the Service Delivery Plan and the HBI Services Management Plan.

The audit focused on the delivery of services in relation to the Sydney Metro City & Southwest project, however also considered the ER role on the Sydney Metro North West.

### 1.3 Objective and Scope



The objective of this audit is to provide assurance that ER services provided by HBI on the Sydney Metro City and Southwest project are being performed in accordance with the following:

- Ministers Conditions of Approval (MCoA) of the Project Planning Approval CSSI 15\_7400 (conditions A22 and A24 (a-l))
- Key obligations and requirements of the Sydney Metro Services Brief and the HBI ER Service Management Plan Rev 3

*\* Documents and records assessed at the time of audit are indicated in Appendix 1.*

## 1.4 Summary of Findings

The table below provides a summary of key findings noted in this audit and the priority assigned to these findings.

Ref	Description	Priority*
Positive OBS 1	The ERs demonstrated a thorough understanding of the ER role requirements and effective communication and collaboration was noted as a positive.	
1	An opportunity for improvement was identified in regards to the ER inspection reports to facilitate consistency and clarity of ER undertaking the inspection.	

2. \* Priority Definition enclosed as Appendix 2

## 1.6 Overall Assessment

This section summarises the outcomes of the Independent Environmental Audit of the ERs against relevant Planning and Assessment Approvals. The assessment was conducted on 3 December 2018 at the HBI Offices in Norwest.

Based on the documentation and information sampled, the assessment noted that appropriate systems and processes were developed and implemented to ensure ongoing compliance with the MCoAs, and commitments made in the Services Management Plan relevant to the scope of this audit.

A review of documents and records, and interviews with the ERs indicated extensive communications and consultation with various stakeholders. The document review process was found to be adequate and appropriate, with evidence presented to demonstrate that endorsements were formalised only once all comments and concerns had been satisfactorily considered and addressed.

Inspection reports, monthly ER reports to DP&E, and monthly & quarterly reports to Sydney Metro provided evidence of ongoing and timely monitoring and measuring of the performance of the project.

Overall, the outcome of this audit was positive, with no areas on non-compliance identified.

### Report certified by:

*Julie Dickson*

Exemplar Global certified Lead Auditor (13573).

## 2. Detailed Findings and Agreed Action Plan

### 2.1 Audit Findings & Action Plan

The following section of this report provides details of audit findings and the agreed action plan, including allocation of responsibility and timeframes.

Ref	Audit Finding	Risk/Impact	Priority*	Agreed Action Plan
	<i>Positive observations / strengths:</i>			
Obs1	A thorough understanding of the conditions of approval, Sydney Metro and ER role requirements were demonstrated at this audit, together with evidence of effective communications and collaboration with key stakeholders.	None	Observation	N/A
	<i>Audit findings requiring action:</i>			
1	<p>Some inconsistencies were noted in the format of the TSE ER Inspection reports compared with the Appendix C Template in the Service Management Plan and in the SSJ, NCW and CSMW reports.</p> <p>Whilst both the formats cover the inspection requirements, the format used in the template provides clearer summary information including a field for the author of the report. The TSE inspection report format lists the ER who undertook the inspection only in the "attended by" panel.</p> <p>Consideration could be given to either modifying the summary page of the TSE reports or adopting the format of the template for TSE in future.</p>	Clarity	OFI	<p><b>HBI Proposed Action:</b></p> <p>The summary page of the TSE reports will be modified to match the template to better indicate the author of the report. (i.e. will match the SMP template in this regard).</p> <p><b>Responsible person:</b></p> <p>Michael Woolley</p> <p><b>Due date:</b></p> <p>21 Dec 2018</p>

\* Priority Definition enclosed as Appendix 2

## 2.2 Assessment Details

This audit assessed the ERs in fulfilling their role as defined by the Conditions of Approval, the Sydney Metro Services Brief and the HBI Services Management Plan. The following section of this report provides an overview of the outcomes of the audit, based on a review of core processes, information, records, documentation, communications, and outputs.

### Approval of ERs (CoA A22)

Evidence was provided to demonstrate that all ERs engaged on the City and South West and Sydney Metro North West project were appropriately approved and endorsed by the Department of Planning and Environment.

### Communications and Interfaces with key stakeholders (CoA A24a, b, g, h and SMP Sec 5.1- 5.4, 6.4)

Extensive communications with various stakeholders including Department of Planning and Environment, Sydney Metro, Community Complaints Commissioner, the Acoustic Advisor, and construction contractor teams, were demonstrated through meeting agendas and minutes, appointments, correspondence, inspection reports, focus areas spreadsheet, time-sheet entries and verbal discussions.

### Document Reviews, endorsements, minor amendments (CoA A24 d, i, j, k),

The document review process by the ER is closely aligned with the DP&E Approvals process, as documents cannot be approved without ER review and endorsement. The assessment focused on the initial CEMP and sub-plan reviews and endorsements and also examined the processes that resulted in conditional endorsements where reviews identified initial sub-optimal outcomes. Evidence was provided to demonstrate that endorsements were formalised only once all comments and concerns had been satisfactorily considered and addressed. Reviews of draft consistency assessments, consideration of minor CEMP and sub-plan and monitoring program amendments and assessments of the impacts of ancillary facilities was also satisfactorily demonstrated.

### Monitoring and Reporting

#### Inspections (CoA c, e and SMP Sec 6.3)

Inspections are undertaken regularly and at least weekly in accordance with the requirements of the CoA, Services Brief and Services Management Plan as a key mechanism to monitor and report on effective ongoing implementation of documents. Inspection reports were noted to be detailed (including photos) and evidence was provided that issues identified during the inspections were appropriately followed up and closed out.

#### Monthly Reporting to DP&E (CoA A24 I)

It was confirmed that monthly ER Reports have been prepared and submitted to DP&E within the required timeframes of “within seven (7) days following the end of each month” and detailed ER’s actions and decisions on matters for which the ER was responsible in the preceding month as required by the condition of approval.

#### Monthly and Quarterly Reporting to Sydney Metro (SMP Sec. 7.2, 6.5.1)

Monthly Progress Reports detailing the matters relevant to the carrying out of the ER role including (but not limited to) site inspection reports, non-compliances, incidents, outcomes of document review and endorsement / approvals and key risk areas are prepared and submitted in accordance with the Services Management Plan (SMP). The contract requires that the ER report is submitted within 7 days following the end of the month, however the SMP reflects changes to this arrangement to streamline CoA 24 DP&E reporting, with the process now stating that the report will be issued following DP&E but before the Sydney Metro meeting.

#### Review of incidents and complaints - CoA A24 f, A41, SMP Sec 6.5.6

ERs are copied in on incident correspondence and notifications of all incidents when a contractor environmental incident occurs and details are reported within the Incident / non-compliance section of the monthly reports. Evidence was provided that the proponents notifications of incidents were reviewed, and that as a result of a review of the process, Sydney Metro was advised on required improvements and amendments to their Incident procedure. Complaints are reviewed and are followed up at subsequent site inspections.

## Appendix 1: Audit information

The following indicates key systems, documents, reports, information and records that were reviewed, accessed or sighted during the audit process:

Documentation	Information / Records
1. Approval of ERs (CoA A22)	
	Letter from Director Infrastructure – Post Approvals dated 17 Feb 2017 – Sydney Metro City and Southwest – Chatswood to Sydenham (SSI 15_7400) Condition A22 Environmental Representative. Approval of ERs - Michael Woolley, Annabelle Reyes, Alice Pryke and Jo Robertson
	Letter from Director Infrastructure date 17/7/2017 – Sydney Metro Northwest – Stations, Rail Infrastructure and Systems (SSI-5414) and Rapid Transit Rail Facility (SSI-5931) - Approval of replacement Environmental Representative under condition E32 and E 37. Approval of Peter Hatton as replacement ER.
2. General (CoA A24)	
170108 HBI ER SMP SMCSW Rev 3.0 Final Oct 2018. Sydney Metro City & Southwest Chatswood to Sydenham Sydney Metro Service Management Plan – Environmental Management Representative.	
Services Brief – City and Southwest Independent Environmental Representative Rev 1 (draft 216)	
3. Communications and Interfaces	
	Meeting Agendas: Department of Planning and Environment fortnightly meetings 23/11/2018, 9/11/18, 26/10/18 (attended by Sydney Metro, Acoustic Advisor, DP&E compliance team etc),
	C&SW Post approval Tracking Register dated up to 23/11/18
	Fortnightly environmental approval meetings (various in files): Northern Corridor works 27/11/18 minutes – Laing O'Rourke TSE monthly contractor meeting minutes 17/10/18
	Appendix B – Core Focus Area Summaries (key summary of issues relevant to Sydney Metro) August, Sept and October 2018



Documentation	Information / Records
4. Review of documentation (A24d, f, j), endorsements and notification of incidents	
	12.01 SMCSW Document Review Register (live document updated when documents are reviewed) – 1037 documents reviewed to date.
	Central Station – Annabelle- AA Endorsement CSMW CNVIS – 3 August. Endorsed by AA, approved by ER (Annabelle Reyes).
	SMC&SW HBI Document Review (DRR-TSE-CHMP-ER-COMMENTS 280617) Comments Register
	Initial CEMP review TSE – for CEMP and sub-plans – one endorsement for each sub-plan
	TSE Heritage Plan Spreadsheet with all CoA and all REMMS – date of Issue 4/7/17 – providing log of comments, compliance status of reviewed documents
	DRR-CSMW- CEMP ER 300518 –Review of the CSMW CEMP – by ER (AR). Highlighted area not compliant, addressed in endorsed CEMP.
	Conditional endorsement example: Early Works Business Management Plan – 08/06/17 17108 BMP R0.2 ER Conditional Endorsement. – 4 conditions to be satisfied
	Endorsement of SM Martin Place ISD CCS 9-19 Elisabeth Street Demolition
5. Monitoring and Reporting (A24 e, c, l, SMP)	
	SMCSW-CTP-TSE- 2018-Q3 Final - Planning Approvals Compliance Report 2018 Q3 Tunnels and Excavations (TSE) dated 21 Nov – MW
	SMCSW-CTP-SSJ-2018-Q3– Planning Approvals Compliance Report 2018 Q3 Sydenham Station and Junction Works (SSJ) dated 23 Nov 201 - AR
	SMCSW-CTP—NCWP7A – 2018-Q3 Planning Approvals Compliance Report 2018 Q3 Northern Corridor Works Portion 7A (NCW-P7A) dated 23 Nov 2018 AR
	SMCSW-CTP-Q3 SYAB –2017–Q3 Planning Approvals Compliance Report 2017 Q3 Sydney Yard Access Bridge (SYAB) dated 25 Oct 2017
	SMCSW-CTP-Q3 SYAB –2018–Q1 Planning Approvals Compliance Report 2017 Q1 Sydney Yard Access Bridge (SYAB) dated 4 May 2018 (Final)
	SM_CSW ER Monthly Report to DPE - October 2018 - Demo_ TSE _USP Final. Accompanying Letter to DP&E dated 7 <sup>th</sup> November 2018

Documentation	Information / Records
	SM_CSW ER Monthly Report to DPE - October 2018 - SYAB SSJ CS NCW IW Final. Letter to DP&E dated 7 <sup>th</sup> November 2018
	SM_CSW ER Monthly Report to DPE - September 2018 - Demo_ TSE _USP FinalRev2. Letter to DP&E dated 7 <sup>th</sup> November 2018.
6. Environmental Inspections of Contractor work sites (SMP)	
	ER Inspections reports 71, 72, 73 and 74 for TSE (30/10/18 to 20/11/2018)
	ER Inspection reports 1, 2, 3, 4 for Sydenham Station and Junction (27/09/18 to 22/11/18)
	ER Inspection reports 6, 7, 8, 9, 10 and 11 – Central Station Main Works (18/09/18 to 21/11/2018)

## Appendix 2: Priority Definition

The priority for findings raised in this report is described in the table below.

Priority	Definition	Guidelines for Implementing Actions
<b>Very High</b>	A significant control weakness / issue or fundamental non-compliance that exposes the project or area under review to a very high level of risk	Requires immediate management attention, with actions plans to be developed and enforced within an agreed time frame. The matter will be escalated immediately to senior management from all parties
<b>High</b>	A control weakness / issue or non-compliance that may expose the project or area under review to a high level of risk	Action plans to be developed and implemented within an agreed time frame. The matter will be escalated to relevant senior executives where it is deemed necessary
<b>Medium</b>	A control weakness / issue or non-compliance that may expose the project or area under review to a moderate level of risk	Action plans to be developed and implemented within an agreed time frame
<b>Low</b>	A control weakness / issue or non-compliance that may expose the project or area under review to a low level of risk	Action plans to be developed and implemented within an agreed time frame
<b>OFI</b>	Opportunity For Improvement (OFI) – opportunity to implement a good or better practice to improve efficiency or further reduce exposure to risk	Suggestion to be considered for implementation
<b>Observation</b>	Good Practice – process / system in place and implemented effectively across business.	Maintain to current standard. Share with other areas of business.

### Appendix 3: Personnel Consulted and Timeline

We would like to extend our appreciation to the following individuals involved this audit:

Name	Title
Jo Robertson	HBI Project Director, Alternate ER
Mike Woolley	Environmental Representative
Annabelle Reyes	Environmental Representative

The timeline is shown in the table below.

Milestone	Date
Issuance of Audit Notification Plan	16 November 2018
Issuance of Audit Checklist	26 November 2018
Briefing Meeting	26 November 2018
Desktop Audit	30 November 2018
Audit including Opening Meeting	3 December 2018
Issue of draft Audit Findings	5 December 2018
Response to audit findings (agreed action plan)	5 December 2018
Issuance of Draft Report	13 December 2018
Issuance of Final Report	17 December 2018

### Appendix 4: Audit attendance register

#### AUDIT ATTENDANCE REGISTER

<b>AUDITEE:</b> HBI <b>AUDIT:</b> SM18.19-073-CSW-HBI-ENV <b>SITE:</b> HBI Office – 29-31 Solent Circuit, Baulkham Hills			3/12/2018	
NAME (print)	POSITION & ORGANIZATION		ENTRY (Initials)	EXIT (initials)
Julie Dickson	Lead Auditor	QEM	<i>JD</i>	<i>JD</i>
Jo Robertson	HBI Project Director, Alternate ER	HBI	<i>JR</i>	<i>JR</i>
Michael Woolley	Environmental Representative (ER)	HBI	<i>MW</i>	<i>mcw UH3</i>
Annabelle Reyes	Environmental Representative (ER)	HBI	<i>AR</i>	<i>AR</i>

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## Appendix 5: Audit Credentials

### Audit process

The Independent Environmental Audit comprised a desktop review, and a one day desktop review at the HBI office, which was conducted by Julie Dickson, of QEM Consulting Pty Ltd. The audit comprised an assessment of documentation and records conducted at the HBI office at 29-31 Solent Circuit, Baulkham Hills. The audit utilised an assignment specific Audit Checklist based on the Planning Approvals, the Sydney Metro Brief and the HBI Services Management Plan. Requirements were then verified as being implemented and/or compliant, based on records and objective evidence, the entire process undertaken in accordance with AS / NZS / ISO 19011:2014 – Guidelines for Auditing Management Systems.

### Auditor information

<b>Audit Organisation:</b>	QEM Consulting Pty Ltd
<b>Auditor &amp; Report Author</b>	Julie Dickson
<b>Auditor Qualification</b>	Lead EMS and Environmental Compliance Auditor, Exemplar Global Certification 13573
<b>Affiliations</b>	Certified Environmental Practitioner (EIANZ) Reg No: #221 MEIANZ

### Auditor certification

The abovementioned Auditor certifies as having personally undertaken this Independent Audit and preparing the contents of this Independent Environmental Audit Report; and that the findings of the audit are reported truthfully, accurately and completely; and that she has exercised due diligence and professional judgement in conducting the audit. The signed Statement of Interests and Association in our services agreement with Sydney Metro confirm our Auditor’s independence and absence of pecuniary interest in the audited project.

### Audit disclaimer

It should be noted that this report is a snapshot in time, based on selected and supplied evidence, and does not purport to be a definitive confirmation of overall compliance or vice-versa.