



SSI 10038 - Sydney Metro response to Independent Audit 01

SM-22-00240474

Metro Body of Knowledge (MBoK)

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Item	Ref.	Type	Details of item	Independent Audit Recommendation	By whom and by when	Status	Proponent's Proposed Action
Findings from the first Independent Audit							
SSI 10038 Conditions of Approval							
11038_IA1_01	A36	Observation	The auditor observed that there is limited detailed reporting on the AA's activities on the Project, particularly around activities such as site visits / monitoring and monitoring the implementation of noise and vibration documents. The auditor recommends consideration be given to the preparation of stand-alone reports following the AA's inspections or data monitoring reviews, or alternatively inclusion of greater detail on these activities in the monthly AA reports prepared for the Project, to better demonstrate compliance with clauses f) and h).	The auditor recommends consideration be given to the preparation of stand-alone reports following the AA's site visits / monitoring and monitoring the implementation of noise and vibration documents, or alternatively inclusion of greater detail on these activities in the monthly AA reports prepared for the Project.	Acoustic Advisor 30 June 2022	OPEN	<p>The Acoustic Advisors have considered the auditors recommendation and propose the following reporting approach:</p> <ul style="list-style-type: none"> If the site visit is part of an ER inspection, AA input will be included into the ER inspection report. For other site visits, such as for OOH works, an AA report will be produced to formalise any email correspondence related to the visit. It is anticipated that a site visit for OOH works will occur by 30 June 2022, subsequently a AA report will be produced to demonstrate implementation of the approach. <p>The above addresses the observation and is preferred over adding greater detail on site visit/ monitoring activities in the monthly AA reports.</p>
11038_IA1_02	A38	Observation	Sydney Metro notified the Department on 06/12/2021 that construction would commence on Phase B1 works on 10/12/2021; however, the auditees advised that the actual construction commencement date for Phase B1 works was 10/01/2022. Notification should be submitted to the Department advising of the actual construction commencement date for Phase B1 works, to avoid any issues around non-compliance with timing of submission of documents required under this approval.	Notification has been submitted to the Department correcting the construction commencement date for Phase B1 works on 5 April 2022.	Sydney Metro 05 April 2022	CLOSED	<p>Notification has been submitted to the Department correcting the construction commencement date for Phase B1 works on 5 April 2022.</p> <p>Sydney Metro agree with the Independent Audit that this item has been Closed.</p>
11038_IA1_03	A43	Non-compliance	Evidence provided regarding an incident on the Phase C (Delta) works, involving a structural collapse during demolition on 03/02/2022, indicates that the notification of the incident via the Major Projects website did not occur within 24 hours of the initial notification. Further, no evidence has been provided to demonstrate that the unexpected contamination find incident that occurred at the Phase C (Delta) Clyde worksite on 25 February 2022 had been notified in writing via the Major Projects website within 24 hours of the initial notification.	Sydney Metro advised that this event was not considered to be an incident under A43 at the time and was notified under D37 as potential OOHW for emergency situations. Sydney Metro advised that a meeting was held on 9 March 2022 between Sydney Metro and DPE where it was agreed that any incident that was notified to SafeWork NSW would also be reported as an incident in line with A43. The auditor supports this approach.	Sydney Metro 09 March	CLOSED	<p>There is ongoing collaboration between the Sydney Metro safety and environment teams on cross-functional incidents. The Sydney Metro Health & Safety Incident Notification form has also been updated with reference to SSI_10038.</p> <p>Sydney Metro agree with the Independent Audit that this item has been Closed.</p>
11038_IA1_04	A46	Non-compliance	The notification letter for the non-compliance against D35 reported for the Phase A (Quickway) works did not include what actions have been or would be undertaken to address the non-compliance. The auditor notes that the notification was submitted within the required timeframe.	<p>Sydney Metro advised that an Environmental Incident and Non-Compliance Report Form (version 8.0) (SM-17-00000105) was completed for this event, including detail on actions undertaken/to be undertaken to address the non-compliance; however, this was not provided to DPE.</p> <p>Sydney Metro noted that the Environmental Incident and Non-Compliance Report Form will be completed and issued to DPE as part of the notification of any future non-compliances.</p>	Sydney Metro 27 April 2022	CLOSED	<p>The Sydney Metro Environmental Incident and Non-Compliance Report Form will be completed and issued to DPE for future non-compliance notifications.</p> <p>Sydney Metro agree with the Independent Audit that this item has been Closed.</p>

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11038_IA1_05	B11	Observation	The auditor found that the Project website is not easy to navigate and that the process of finding the Instrument of Approval is not particularly straightforward.	The auditor recommends that consideration be given to providing a clear link on the Sydney Metro Project website's landing page to the Project's page on the DPE Major Projects website, to ensure easier access by the community to the Instrument of Approval.	Sydney Metro 29 July 2022	OPEN	Sydney Metro are investigating options to modify the Sydney Metro website to make access to the Instrument or Approval easier. Sydney Metro are targeting the end of July to complete these investigations.
11038_IA1_06	D10	Non-compliance	Details provided for flood modelling at The Bays (Phase B (AFJV) works) indicates that the design currently does not comply with D10(b) at seven locations outside the boundary of the construction site due to increased duration of inundation of more than one hour in the 1% AEP event. The auditor is not aware of this being formally reported as a non-compliance.	In response to this finding, Sydney Metro advised that a draft memo summarising post-construction flood levels at The Bays was provided to the auditor. However, the auditor notes that this document is what indicates that there is a non-compliance with D10. The auditor recommends that further investigation be undertaken to determine compliance with D10. If a non-compliance is confirmed, this is to be reported in line with A45 and A4	AFJV 30 June 2022	OPEN	Condition D11 provides a consultative means to address situations where flooding characteristics are exceeded in D10. Consultation is ongoing. On that basis it is AFJV opinion that the intent behind conditions D10 and D11 are being met. Sydney Metro propose that this item is CLOSED.
11038_IA1_07	D25	Non-compliance	A non-compliance was raised against D25 for Phase B (AFJV) works in relation to archaeological investigation work that was conducted outside of the area described in AMS-01. This was reported to the Department on 20/01/2022 in accordance with A45.	This non-compliance was reported to the Department on 20/01/2022 in accordance with condition A45.	Sydney Metro	CLOSED	Sydney Metro reported this non-compliance to the Department on 20/01/2022 in accordance with condition A45. Sydney Metro agree with the Independent Audit that this item has been Closed.
11038_IA1_08	D35	Non-compliance	A non-compliance was raised against D35 for the Phase A (Quickway) works, associated with a concrete pour that extended past 6pm. This was reported to the Department on 09/09/2021 in accordance with A45.	This non-compliance was reported to the Department on 09/09/2021 in accordance with condition A45.	Sydney Metro	CLOSED	Sydney Metro reported this non-compliance to the Department on 09/09/2021 in accordance with condition A45. Sydney Metro agree with the Independent Audit that this item has been Closed.
11038_IA1_09	D38	Non-compliance	A non-compliance was raised against D38 for Phase B (AFJV) works in relation to out of hours works that were undertaken on date that was not approved under the associated out of hours works approval. This was reported to the Department on 22/12/2021 in accordance with A45.	This non-compliance was reported to the Department on 22/12/2021 in accordance with condition A45.	Sydney Metro	CLOSED	Sydney Metro reported this non-compliance to the Department on 22/12/2021 in accordance with condition A45. Sydney Metro agree with the Independent Audit that this item has been Closed.
11038_IA1_10	D43	Non-compliance	A non-compliance was raised against D43 for the Phase C (Delta) works relating to an out of hours oversized plant delivery at Westmead that took place prior to endorsement of the Detailed Noise and Vibration Impact Assessment (DNVIS) by the Acoustic Advisor. This was reported to the Department on 20/01/2022 in accordance with A45.	This non-compliance was reported to the Department on 20/01/2022 in accordance with condition A45.	Sydney Metro	CLOSED	Sydney Metro reported this non-compliance to the Department on 20/01/2022 in accordance with condition A45. Sydney Metro agree with the Independent Audit that this item has been Closed.
11038_IA1_11	D47	Non-compliance	No evidence has been provided regarding the involvement of a heritage specialist in the installation of monitoring equipment for the RTA façade at the Clyde worksite (Phase C (Delta) works).	Sydney Metro advised that heritage specialist advice was sought for the installation of vibration loggers within the heritage buildings at Parramatta (62-64 Macquarie St, (Kia Ora Building) and 43-47 George St, Parramatta), and that this advice confirmed that the use of existing holes to attach the vibration logger would be unlikely to impact the heritage item. Sydney Metro advised that there are no	Delta 31 May 2022	OPEN	Delta have engaged a heritage advisor to provide confirmation the monitoring equipment did not cause any damage or impact to the RTA façade. This site has been handed over to the Western Tunnelling Package contractor so

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				<p>additional loggers to be installed for heritage items for the Phase C1 works.</p> <p>The auditor notes that the correspondence provided was specifically for heritage items at Parramatta and not for the RTA Façade at Clyde. This advice was also received in April 2022, after the works at Clyde were completed. The auditor recommends that the Project seeks confirmation from a heritage specialist that no damage/impact has occurred to the RTA façade as a result of installation of monitoring equipment.</p>			<p>access by the heritage advisor is being coordinated for any required inspection.</p> <p>Delta are targeting the end of May 2022 to obtain the advice.</p>
11038_IA1_12	D85	Non-compliance	<p>AFJV has not provided site specific CTMPs and advised that they do not intend to submit these site-specific CTMPs to the Planning Secretary for information. This is contrary to a commitment made in section 2 of the approved OCTMP.</p>	<p>The site-specific CTMPs for the Phase B (AFJV) works should be submitted to the Planning Secretary for information, in line with the approved CTP OCTMP and procedure adopted on the other Phases of the Project</p>	<p>Sydney Metro / AFJV 13 May 2022</p>	OPEN	<p>The OCTMP fully addresses the requirements of condition D85, and provides all specific mandatory detail as required by the Construction Traffic Management Framework.</p> <p>There is no requirement in SSI 10038 that requires subordinate plans to be provided, and as such the provision of the OCTMP is taken as having met this condition.</p> <p>Sydney Metro propose this item is an Observation (not a non-compliance). It is proposed to close out the observation through an update to the OCTMP.</p>
11038_IA1_13	D114	Non-compliance	<p>Requirement: <i>All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal docket retained for audit purposes</i></p> <p>Non-compliance: A non-compliance was raised against D114 for the Phase C (Delta) works in relation to the transportation of excavated material from site without obtaining prior waste classification. This was reported to the Department on 25/11/2021 in accordance with A45.</p>	<p>This non-compliance was reported to the Department on 25/11/2021 in accordance with condition A45.</p>	<p>Sydney Metro</p>	CLOSED	<p>Sydney Metro reported this non-compliance to the Department on 25/11/2021 in accordance with condition A45.</p> <p>Sydney Metro agree with the Independent Audit that this item has been Closed.</p>