

INDEPENDENT ENVIRONMENTAL AUDIT

REPORT



Marrickville station platform hammering (noise mats in use) – HSEJV supplied image

Proponent:	Sydney Metro
Project:	City & South West, Sydenham to Bankstown
Scope:	CEMP & Planning Approval Compliance Management
Works / Process:	Package 4 works: Marrickville, Canterbury & Lakemba Station upgrades
Auditee:	Haslin Stephens Edwards Joint Venture (HSEJV)

Audit Organisation:	QEM Consulting Pty Ltd
Auditor:	Larry Weiss
Registration	Exemplar Global EMS Auditor Accreditation no. 12355
Audit References:	QEM 1803-IEA-025
Audit date:	18 th & 19 th August 2021
Report date:	15 th September 2021

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1.0 AUDIT DETAILS

1.1 Purpose

The purpose of this Independent Environmental Audit was to assess Sydenham to Bankstown Planning Approval compliance, as implemented for the Package 4 works undertaken by Haslin Stephen Edwards JV (HSEJV).

1.2 Context

Planning Approvals issued by the Department of Planning Infrastructure & Environment require Sydney Metro to develop an Environmental Audit Program for independent annual environmental auditing against terms of the Sydenham to Bankstown Critical State Significant Infrastructure (CSSI) Project Approval.

QEM Consulting Pty Ltd have been engaged by Sydney Metro to deliver a program of Independent Environmental Audits. As required by Sydenham to Bankstown Planning Approval CSSI 8256 (A34) and the associated Environmental Audit Program, an Independent Environmental Audit was undertaken to assess the maintenance of compliance records relating to noise, vibration and other environment / community / heritage impacts associated with the station upgrade works.

As context, Package 4 works comprise upgrades to Marrickville, Canterbury & Lakemba Stations and associated infrastructure to enable Metro-style trains to share the existing network and stations. As these works involve existing operational stations, disruptive components of these works were scheduled outside of busy commuter times, typically taking place out-of-hours (OOH). These night and weekend works have potential to impact community from a noise and vibration perspective, especially related to noise duration and intensity over planned rail possessions. Works also have the potential to impact on built heritage items and fabric as identified through the EIS and related studies.

1.3 Audit Objectives & Focus

The Audit Objective was to independently assess Planning Approval and Revised Environmental Mitigation Measure compliance in demonstrating achievement, and where necessary, improvement of required environment and community performance outcomes. The audit focussed on:

- Compliance records demonstrating implementation of Construction Environment (and related) Management Plans
- Works planning, evidencing environment and community impact minimisation
- Site supervision records evidencing implementation, monitoring and improvement of planned arrangements.

1.4 Audit Scope

The Audit Scope included compliance and continual improvement components of the Construction Environmental Management Plan and related Management Plans. Additionally, and processes around focus areas above were briefly assessed i.e. out-of-hours work, unexpected finds, complaints & corrective action management.

Given Covid-19 lockdowns and risks, the audit did not comprise any site inspections, being confined to an assessment of Marrickville, Canterbury & Lakemba Station and project compliance records.

1.5 Audit Criteria

Sydenham to Bankstown Planning Approval CSSI 8256 Modification 1, determined 22 October 2020, and related Revised Environmental Mitigation Measures.

1.6 Audit Process and Methodology

The audit comprised pre-audit information gathering, a Video Conference virtual audit review, and a post audit assessment of documentation and records. The audit process including scoping and planning was undertaken in accordance with the principals of ISO 19011:2018 – Guidelines for Auditing Management Systems. Refer to Appendix 5 of this report for further details on Auditor credentials and independence.

1.7 Auditees and Participation

The following indicates active participants in the audit, noting other interested parties observed through Video Conference, but are not recorded below:

Name	Organisation	Position
Vanessa Tavares	HSE	Environment Manager
Amy Taylor	HSE	Environment Advisor
Elena Ivanova	HSE	Environment Advisor
Jeremy Wallis	HSE	Health Safety & Environment System Manager
Dave Simpfendorfer	HSE	Communications Manager
Natalia Kuirintinus	Sydney Metro	Community Place Manager
Celso Paiva	HSE	Senior Project Manager, Lakemba & Canterbury
Mark Albert	HSE	Project Manager, Lakemba
Vitor Reis	HSE	Project Manager, Canterbury
Daniel Brazdil	HSE	Senior Project Manager, Marrickville
Joel Blanch	HSE	Site Supervisor, Marrickville
Larry Clark	Acoustic Studio	Sydney Metro Acoustic Advisor
Candice Somerville	Sydney Metro	Environment Manager

1.8 Audit Definitions & Abbreviations

The following abbreviations and definitions apply throughout this report:

Item	Explanation
CNVS	<i>Construction Noise & Vibration Management Strategy</i>
CSSI	<i>Critical State Significant Infrastructure</i>
CNVMP	<i>Construction Noise & Vibration Management Plan</i>
CNVIS	<i>Construction Noise & Vibration Impact Statement</i>
IEA	<i>Independent Environmental Audit</i>
MCoA	<i>Minister's Conditions of Approval</i>
OOHW	<i>Out-of-Hours Works</i>
REMM	<i>Revised Environmental Management Measure</i>

1.9 Audit Disclaimer

Notwithstanding due care, audit methodology and process, this report does not purport to be an absolute or definitive confirmation or otherwise of actual or future or technical compliance. Due to audit evidence observed, requested, provided (or withheld), non-compliances and improvement opportunities may not have been detected or identified. Consequently, intended compliance and performance outcomes cannot be assumed for the project timeframe assessed or for future works, activities, and events.

Furthermore, the audit was conducted under NSW State government COVID-19 Public Health Orders, resulting in Video Conferencing rather than face-to-face interactions or site inspection. This arrangement may have slightly compromised outcomes, observational assessments and documentation sharing.

2.0 AUDIT FINDINGS

2.1 Compliance Summary

This table provides a summary of compliance against audit criteria and area of focus, indicating the number of actions required:

Focus Area	Key Criteria	STATUS			
		Compliant			Non-Compliant
		NP	IO	OBS	NC
Heritage Management	MCoA C3, C7, E15, E17 REMM NAH15, 16, 18 & 20 and NVC3 & 4		1	5	
Noise & Vibration Management	MCoA C1, C3, C7, C8, C13, E19, E24, E25 REMM NVC3, 4, 5, 10, 11 & 12		1		1
Community Engagement & Complaints	MCoA B2, B5, B8, E25 REMM NVC9, 10		2	2	
CEMP & Key issues	MCA C1 & C7 REMM WM6 & SC5			1	1

* Note: Compliance is limited to demonstrated evidence referenced in Appendix 1 and/or Audit Checklist notations.

Audit Findings are classified as follows:

Status	Explanation
Notable Practice (NP)	Positive observation about a system, process, practice, or performance outcome noted for recognition and/or sharing purposes.
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that elements of the consent requirement have been complied with within the scope and temporal timeframe of the audit.
Improvement Opportunity (IO)	A suggestion to implement a good or better practice to improve efficiency, further reduce exposure to risk, improve information management or facilitate the demonstration of compliance and/or performance outcomes.
Observation (OBS)	Documented requirement and/or implementation issue which may not strictly affect required performance or compliance outcomes. Observations could be an early indication of potential non-compliance and/or an adverse performance outcome.
Non-compliant (NC)	The intent of one or more specific requirements of a condition or obligation have not been met, based on insufficient objective evidence to demonstrate required outcomes or deliverables being achieved and/or complied with.

Note: When 'Compliant' status has been determined or inferred within the scope of the Independent Audit, actions to specific finding classified as Observations and Improvements are still required.

2.3 Detailed Audit Findings & Agreed Actions

Ref	Audit Finding	Status	Agreed Action Plan
1.	<p>UF Procedure, implementation compliance</p> <p>The Unexpected Finds process was not effectively implemented, with Sydney Metro Unexpected Finds Recording Forms not always initiated and/or furnished to Sydney Metro in a timely manner, and in the absence of timely information (compliance records) by site, disposition actions were not always known.</p> <p><i>Noted – compliance records demonstrating surveys, protection pre disposition decision and/or remediation were not always readily available to the environment project team, appearing to be delayed between site, heritage consultant and responsible project managers.</i></p> <p>Planning Approval obligation(s): E15, NAH18, NAH16 and C3 (d) / HMP s5.1.3</p>	OBS	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Expedite outstanding actions and evidence of finalisation. 2) Update and maintain Unexpected Finds Register to reflect procedural timing obligations, status tracking and reasons for delays, if any. 3) Facilitate Surveyor-Heritage consultant co-operation. 4) Provide Unexpected Finds Register and progress update to "Fortnightly Package 4 HSEJV Environmental Meeting". <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 17 September 2021 and beyond</p>
2.	<p>Heritage controls, compliance checks by site</p> <p>Daily Site Supervisor inspections did not evidence site checking of heritage management controls as required by Heritage Management Plan, Table 13: Management Action Checklist requirements.</p> <p><i>Additional audit observations – inspections were not always recorded daily and/or for certain stations (e.g. Marrickville), often appearing to be updated photocopies of tick-box 1-pager forms, omitting the associated 2nd page Corrective Action log.</i></p> <p>Planning Approval obligation(s): C3 (d) / HMP s6.0</p>	OBS	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Update Daily Site Safety & Environmental Inspection Form (SEQ-CL-004) to include inspection of heritage controls. 2) Implement at all sites, including collection of date-stamped project photographs as supporting evidence of protection and associated work method implementation. <p>Responsible person: Environment Manager and delegates</p> <p>Due date(s): 17 September 2021 and beyond</p>

Ref	Audit Finding	Status	Agreed Action Plan
3.	<p>Built Heritage Condition assessment Station Buildings aside, the need for condition assessment and/or existence of condition survey reports for other identified heritage building and structures was somewhat unknown to project management.</p> <p><i>Note – this audit was only provided one non-station survey report for Canterbury (the Post Office), with no other heritage surveys appearing to be undertaken, including that of Marrickville and Lakemba heritage. Also, the Survey Log (tracking spreadsheet) for Canterbury indicated 3 heritage building surveys including the Hotel and Garage as "not required" without recorded justification.</i></p> <p>Planning Approval obligation(s): NVC3, NVC4, HMP s3.3, NVMP s 5.7 and s 8.2.2</p>	OBS	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Update Survey Log / Dilapidation Register to include details on reasons why certain identified properties were not assessed. 2) Implement surveys and update Survey Log / Dilapidation Register as required for upcoming works. <p>Responsible persons: Celso Paiva & Daniel Brazdil.</p> <p>Due date(s): 8 October 2021 and beyond</p>
4.	<p>Skilled heritage tradespeople, nominated and used Whilst Sub-Contractors have been identified as experienced with heritage and/or Sydney Metro works generally, HSE did not have on record nominated personnel who had or might work on significant heritage fabric, nor were these individuals nominated to Sydney Metro as required by the Heritage Management Plan.</p> <p>Planning Approval obligation(s): NAH20 and HMP s5.2.10</p>	IO	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Compile and maintain a list of qualified / heritage experienced tradespeople, including names and specific expertise. 2) Provide qualified heritage tradespeople list to Sydney Metro. 3) Gather project compliance records of use and implementation. <p>Responsible persons: Celso Paiva & Daniel Brazdil.</p> <p>Due date(s): 30 September 2021 and beyond</p>
5.	<p>Heritage Works, methodology compliance Whilst Heritage Consultant methodologies and advice were provided for heritage item / significant fabric restoration, repair and damage rectification, site records were not readily available to demonstrate adherence to work methods and/or acceptability of completed outcomes.</p> <p>Planning Approval obligation(s): C7 and C3 (d) / HMP s 5.2.8</p>	OBS	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Set-up project site files to collect evidence of adherence to heritage work methods. 2) Gather compliance records of implementation and heritage consultant acceptance, including that of: <ul style="list-style-type: none"> ➤ Damage / incidents ➤ Heritage Management Plan identified heritage item restoration, reinstatement and repair. <p>Responsible person: Elena Ivanova</p> <p>Due date(s): 17 September 2021 and beyond</p>

Ref	Audit Finding	Status	Agreed Action Plan
6.	<p>Heritage Management, project compliance records</p> <p>A thorough internal audit had not been conducted of Heritage Management Plan implementation, particularly Table 13 actions including but not limited to service installation works, bridge deconstruction and Marrickville Station former men's bathroom restoration.</p> <p><i>The audit observed that there was low to varied awareness of specifics and/or timing of specific HMP Table 13 Management Actions, particularly those relating to specifically identified heritage group items relating to the construction plan. There is a risk that required management actions would not be undertaken, an objective of the internal audit might be to proactively highlight these requirements.</i></p> <p>Planning Approval obligation(s): C7 and C3 (d) / HMP s6.0</p>	OBS	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Procure competent Auditor and schedule audit accordingly. 2) Conduct a Heritage Management Plan audit including detailed review of understanding and implementation of Table 13, ensuring specific compliance records (proof) are cited and collected for project compliance records. <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 22 October 2021</p>
7.	<p>Noisy works, respite period compliance records</p> <p>There were no formal records to demonstrate respite period compliance with Planning Approvals regarding high noise / vibration generating activities i.e.</p> <ul style="list-style-type: none"> ➤ continuous blocks to not exceed 3 hours each, with a minimum respite period of one hour between each block and these works. <p><i>Audit notes:</i></p> <ol style="list-style-type: none"> 1) Site did not maintain a log of actual equipment usage and works activity timing. 2) Environment attended noise monitoring did not target respite period compliance or change-over periods. 3) Ongoing noise monitoring did always target critical periods per NVC11 (i.e. times when noise emissions are expected to be at their highest) 4) A number of complaints around continuous noisy works (only) stated compliance after verbal confirmation with site, there being no formal (compliance) proof. <p>Planning Approval obligation(s): E24 (c) and NVC10 and NVC11</p>	NC	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Update Site Diary to include a section where high noise works are recorded, as well as working periods and breaks. 2) Implement accordingly for all sites / works. <p>Responsible persons: Celso Paiva & Daniel Brazdil.</p> <p>Due date(s): 30 September 2021 and beyond</p>

Ref	Audit Finding	Status	Agreed Action Plan
8.	<p>Noise Monitoring The Noise Monitoring Register (summary performance spreadsheet) was still a work-in-progress, needing regular update and could be improved by highlighting complaint investigation and/or respite period related monitoring.</p> <p>Planning Approval obligation(s): C13</p>	IO	<p>HSEJV action commitment: Update the Noise Monitoring Register to include:</p> <ul style="list-style-type: none"> ➤ Complaints column to cross reference when a noise measurement was taken as a result of a complaint investigation. ➤ Evidence of site respite-period compliance. <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 17 September 2021 and beyond</p>
9.	<p>Alternative accommodation, compliance records Whilst AA noise mitigation offers were identified in OOHW approvals plus Community Engagement tracking spreadsheets, project AA offer and acceptance compliance records were not provided / sighted during this audit.</p> <p><i>The audit review observed that a large quantum of AAs had been identified through noise assessments. Also, a number of complainant's had mentioned not receiving such offers.</i></p> <p>Planning Approval obligation(s): CNVIS, E25 and NVC9</p>	OBS	<p>Summary HSEJV response: <i>"The audit had insufficient time to fully investigate AA offer compliance. The process is fully auditable per OOH period".</i></p> <p>Independent Auditor Recommendation: Availability of compliance records (offer and acceptance evidence) will be comprehensively re-assessed during the scheduled Action Verification Audit associated with this Audit Finding (alongside), in the meanwhile it is recommended to:</p> <ol style="list-style-type: none"> 1) Maintain Consultation Manager with Alternative Accommodation offer and acceptance details, 2) Generate AA status reports from CM to demonstrate compliance with the OOHW approval i.e. of specified properties receiving this "Additional Mitigation Measure". <p>Responsible person: Dave Simpfendorfer</p> <p>Due date(s): 17 September 2021 and beyond</p>

Ref	Audit Finding	Status	Agreed Action Plan
10.	<p>Alternative accommodation, planning & tracking It was noted that Community functions were combining Respite Offer and Alternative Accommodation "counts" in the Receiver spreadsheets used to track and plan ROs and AAs – there is a risk that the lesser "Additional Mitigation Measure" of RO would be offered instead of AA specified in the OOHW impact assessment.</p> <p>Planning Approval obligation(s): CNVIS, E25 and NVC9</p>	IO	<p>Summary HSEJV response: <i>"Any exceptions where RO has been substituted instead of AA are documented with justification".</i></p> <p>Independent Auditor Recommendation: Availability of compliance records (justification proof) will be re-assessed during the scheduled Action Verification Audit associated with <u>this</u> Audit Finding (alongside), in the meanwhile it is recommended to:</p> <ol style="list-style-type: none"> 1) Revise Respite Offer and Alternative Accommodation Spreadsheet to differentiate between RO's and AA's. 2) Generate AA status reports from CM to demonstrate compliance with the OOHW approval i.e. Respite Offer or Alternative Accommodation offer and acceptance, or definitive justification thereof to the contrary. <p>Responsible person: Dave Simpfendorfer Due date(s): 17 September 2021 and beyond</p>
11.	<p>Complaint closure, unresolved It was noted that some Complaints were being prematurely closed in Consultation Manager upon "resolution" with the complainant, but in the absence of completed action i.e.</p> <ul style="list-style-type: none"> ➤ means by which the complaint was addressed, as required by Consent Condition B8 (c) <p><i>Example cited but not limited to that documented in Appendix 3.</i></p> <p>Planning Approval obligation(s): B8 (c)</p>	IO	<p>Summary HSEJV response: <i>"The Community Team will henceforth ensure that the means by which the complaint was addressed is more fully documented."</i></p> <p>Independent Auditor Recommendation: Comprehensiveness of compliance records (investigation and action / resolution) will be re-assessed during the scheduled Action Verification Audit associated with <u>this</u> Audit Finding (alongside), in the meanwhile it is recommended that:</p> <ul style="list-style-type: none"> ➤ Consultation Manager complaints are not closed before complaint information reflects investigation, completion of agreed actions or acknowledged by the complainant as satisfactorily resolved. <p>Responsible person: Dave Simpfendorfer Due date(s): 17 September 2021 and beyond</p>

Ref	Audit Finding	Status	Agreed Action Plan
12.	<p>Complaints Register, verifiable action information</p> <p>Noise complaint investigation and resolution records were sometimes conversational and/or generic in substance, with no referenced evidence cited, or verifiable evidence, or actions to substantiate compliance claimed in Consultation Manager (and verbalised to the complainant).</p> <p><i>Audit note, several Consultation Manager responses were:</i></p> <ol style="list-style-type: none"> 1) <i>Generic e.g. "noise levels were compliant with those predicted in the OOHW permit or approved CNVIS"</i> 2) <i>Unsubstantiated e.g. "works were being conducted in line with agreed respite periods (3 hours, 1 hour off)".</i> 3) <i>Somewhat non-empathetic when claiming to be "unavoidable" without investigation of noise prediction achievement E.g. "site stated that rock breaking and hammering would continue throughout the night" ID: 210629PARA and 210629GONZ</i> 4) <i>Not recording the means by which the complaint was addressed and resolution reached per Consent Condition B8 (c)</i> <p>Planning Approval obligation(s): B8 (c), E24 (c) and NVC10</p>	OBS	<p>Summary HSEJV response: <i>"Noise monitoring data is available and searchable and can be cross-referenced to the Complaint if and as required."</i></p> <p>Independent Auditor Response: There was no formal complaint investigation process to readily demonstrate verifiable evidence, or actions to improve performance or prove claimed compliance.</p> <p>Independent Auditor Recommendation: To be comprehensively re-assessed in detail during the scheduled Action Verification Audit associated with <u>this</u> Audit Finding (alongside), in the meanwhile it is recommended that:</p> <p><i>"The Community Team will henceforth ensure that the means by which the complaint was addressed is more fully documented." as documented in the Audit Finding #11 response above.</i></p> <p>Responsible person: Environment Manager and Dave Simpfendorfer</p> <p>Due date(s): post 17 September 2021 and beyond</p>

Ref	Audit Finding	Status	Agreed Action Plan
13.	<p>Waste Management, project compliance records HSE were unable to provide sufficient compliance records to demonstrate waste classification, transportation and appropriate disposal in a systematic and consistent manner for each site.</p> <p><i>Also, from a systems perspective the audit noted:</i></p> <ol style="list-style-type: none"> 1) Differing Spoil Registers (also used for hazardous waste) between Marrickville and Canterbury, with no tracking register available for Lakemba 2) Liquid waste docket were not readily available for all sites 3) Not all transporter and receiver licensing details were available 4) No internal audit had not been conducted of the Waste Heritage Management Plan implementation, particularly cradle to grave tracking of hazardous waste from each site including assessment, classification and disposal at appropriately licensed facilities. <p>Planning Approval obligation(s): E75, E76 and WM6</p>	NC	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Provide Waste Tracking Register to all 3 sites to implement. The register will include cross references with waste docket numbers as well as waste classification reports. This will cover all the items noted in 1-4 alongside. 2) The Waste Tracking Register will be updated with all waste removed from site to date. 3) Obtain and maintain a copy of licences for the waste facilities and transporters used. 4) Provide Register and progress update to "Fortnightly Package 4 HSEJV Environmental Meeting" <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 22 October 2021</p>
14.	<p>Corrective Action, investigation & ineffectiveness The Sydney Metro Environment Incident and Non-compliance Reporting Procedure was not effectively implemented, with Report Forms SM17 0000105 not always furnished to Sydney Metro and/or actioned in a timely manner.</p> <p>Additionally the audit noted:</p> <ol style="list-style-type: none"> 1) Some form completion / notification took over a month, not 48 hours 2) Actions resulting from investigations were often administrative in nature, not addressing the root cause or systems/supervision inadequacies 3) Accountability for systemic / long-term actions were not often owned and recorded as such by site. 4) The effectiveness of actions undertaken was not being assessed and reported upon. <p>Planning Approval obligation(s): CEMP s 3.10</p>	OBS	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Update and maintain the Environmental Incidents and Non-Conformance Register 2) Appoint a dedicated Environmental Officer to oversee Incident and NCR completion, maintain the register and provide updates to site. 3) Provide Register and progress update to "Fortnightly Package 4 HSEJV Environmental Meeting" and promote site ownership in outcomes, lessons learnt, progress and trends <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 17 September 2021 and beyond</p>

Appendix 1: Audit information - Heritage

The following documents, reports, information and records were briefly reviewed, accessed or sighted during the audit process:

Consent Condition	Summarised Requirement	Evidence collected	ID
	Heritage Management Planning		
C3 (d)	CEMP Sub-plan, heritage - documented	Heritage Management Plan HMP - Marrickville, Canterbury & Lakemba Station upgrades, rev03 dated 25 January 2021.	
C7	CEMP and Sub-plan implementation - Heritage Management Plan, Management Action Checklist.	HMP Table 13 Management Actions incl. <ul style="list-style-type: none"> Weekly Environment Inspections e.g. nights 7/07 & 9/07, day 9/05, 16/05, 30/05, 14/07, 5/08 Site Supervisor inspections e.g. Canterbury 25/06, 1/07, 15/7, 6/08, 13/08, Lakemba 23/06, 21/07 and unknown Marrickville Induction material i.e. Induction rev5 and Site Rules rev3 Training / Awareness (Toolbox talks) e.g. CEMP general 9/06 and heritage specific 28/04 Specialist Conservation work methodology advice e.g. EMM advice letters e.g. 21/05, 5/07, 23/06, 12/08 Original fabric renovation and repair instruction e.g. Canterbury platform wall 17/08 and floor joist 5/07 repairs, plus Lakemba awning repair 10/07 	2-OBS 5-OBS
As above	Heritage Management Plan, Table 14 Hold Points - vibration	Cardno Technical Memo dated 7/7/21 re Canterbury Platform 2 Building Condition Assessment inspection regarding vibration exceedances.	
E15	Unexpected Heritage Finds Procedure - documented	Sydney Metro Unexpected Heritage Finds Procedure rev 2.0 dated 19 March 2019, Appendix D to above mentioned.	
NAH20	Tradespeople - skilled and experienced with significant heritage fabric	Key contractor heritage experience letters: <ul style="list-style-type: none"> ABI Civil, dated 18/8/21 Brefni Construction, dated 19/8/21 Indigeco, dated 17/8/21 	4 - IO
	HMP (implementation)	Demonstrated compliance:	
C7	Heritage Management Plan implementation - internal audit	<ul style="list-style-type: none"> No audits undertaken, or compliance implementation review of Table 13 High level audit of 25/5/2021 limited to 3 tick-box checks 	6-OBS

Consent Condition	Summarised Requirement	Evidence collected	ID
E17 & NAH18	Unexpected finds - procedure implementation	EMM (Heritage consultant) Unexpected Finds Register.	
As above		Unexpected heritage item recording forms: <ul style="list-style-type: none"> ○ CD5 210704 19th century staircase footings, reflects awaiting HSE comment ○ C07 310701 floor joist, awaiting repairs ○ C06 210727 Water Tank, removal? ○ C03 210607 Arched building footings, still open ○ C01 210320 Stairs ○ M02 210609 Brick Culvert ○ M08 210628 Brick-sandstone wall ○ M15 210812 UF brick alignment 	1-OBS
NAH 15	Impact minimisation, methodologies for heritage fabric removal	<ul style="list-style-type: none"> ○ EMM Canterbury Awning Removal letter dated 5/7/21. ○ Heritage brick coping salvage information, including photographs and WE48 Brick Salvage Methodology. ○ 	
NAH16	Heritage protection, avoid damage during works by using hoardings or screens	<ul style="list-style-type: none"> ○ HSE site photographs of Marrickville and Canterbury protection (fencing, window hoardings & screens) plus signage ○ Environmental Representative Site Inspection Report #11 	

Appendix 2: Audit information - Noise & Vibration

The following documents, reports, information and records were briefly reviewed, accessed or sighted during the audit process:

Consent Condition	Summarised Requirement	Evidence collected	ID
	Noise Management Planning		
C3 (a)	CEMP Sub-plan, N&V - documented	Noise & Vibration Management Plan - Marrickville, Canterbury & Lakemba Station upgrades - rev03 dated 25 January 2021	
C8 (a)	Construction N&V Monitoring Program - documented	Program documented in N&VMP above, s8.0	
		Construction Noise & Vibration Impact Statement - Marrickville, Canterbury & Lakemba Station upgrades - rev01 dated 17 February 2020	
	Vibration Management Planning		
NVC3	Where vibration levels are predicted to exceed the vibration screening level, a more detailed assessment of the structure would be carried out to determine the appropriate vibration limits for that structure.	Canterbury Station Platform 2 Detailed Vibration Trial Report, by VMS Australia, dated 6 August 2021 (conducted June 2021, WE49)	
NVC4	For heritage items where vibration screening levels are predicted to be exceeded, the more detailed assessment would include condition assessment and specifically consider the heritage values of the structure in consultation with a heritage specialist to ensure sensitive heritage fabric is adequately monitored and managed.	<ul style="list-style-type: none"> Email trail VMS>EEM around 21 June 2021 seeking advice on fixing a sensor onto a heritage fabric. 	
	Noise mitigation (implementation)	Demonstrated compliance:	
C7, E19	Works hours, standard	<ul style="list-style-type: none"> HSEJV & SMOT Induction Register, daily sign-ins and sign-outs 	
C7, E24 NVC10	High noise intensity works – work hours and, <ul style="list-style-type: none"> Respite periods (E24 c) 	<ul style="list-style-type: none"> Register, as above No evidence of respite 	7-NC
E25	OOHW assessed, and approved - procedure implementation	Sydney Metro City \$ Southwest OOHW protocol, completed Application forms e.g. <ul style="list-style-type: none"> OOHW-014, WE07 Marrickville OOHW-010 Shutdown 1 – Lakemba OOHW-009 Shutdown 1 - Canterbury OOHW-008 Shutdown 1 – Marrickville 	

Consent Condition	Summarised Requirement	Evidence collected	ID
NVC9	Alternative accommodation, offered to nearby residents when high noise impacts are predicted over a prolonged period.	<ul style="list-style-type: none"> o RO & AA Spreadsheet of Appendix 3 below o Identified in OOHW approvals, above o No evidence of offer acceptance provided to this audit – refer Appendix 3 further 	9-OBS
NVC5	Site Noise Mitigation measures, aiming to achieve NMLs	<ul style="list-style-type: none"> o Non-tonal reversing alarms, assessed through Plant Authorisation Inspection Checklists e.g. Brefni Dumpy DT413 and 35T Excavator EX186, Porter Hire Excavator EX187 21/06 	
As above		Noise barriers, HSE site photographs: <ul style="list-style-type: none"> o Lakemba - Noise mats around lighting tower o Marrickville - Noise Mats around Platform 0 works 	
As above		Daily Pre-start consultations e.g. <ul style="list-style-type: none"> o Marrickville shutdowns from 28/06 to 11/07 and 2 shifts of 14/08 o Canterbury Shutdown 1 - 28/6, 29/06, 3/07, 5/07 o Lakemba Shutdown 1 – 27/6, 28/6 	
	Noise & Vibration monitoring	Demonstrated compliance:	
C1 & C7	CEMP required monitoring – s3.9.1 environmental inspections	<ul style="list-style-type: none"> o Weekly Environment Inspections (checkpoint question 30a to 30e) e.g. nights 7/07 & 9/07, day 9/05, 16/05, 30/05, 14/07, 5/08 	
C8 (a) & C13	Construction N&V Monitoring Program - implemented	<ul style="list-style-type: none"> o Noise Monitoring Register (summary performance spreadsheet) – 82 entries, stated as work-in-progress o Implementation details - see below: 	8 - IO
As above		<ul style="list-style-type: none"> o Noise Monitoring Records Sheets (3 recorded observations) for 20210709, Shutdown 1, Marrickville o Noise Monitoring Records Sheets (5 records) for 20210710, Shutdown 1, Lakemba and Marrickville o Canterbury Noise Meter sound video (in response to complaint) o Renzo Tonin WE52-WK07 Possession Noise Monitoring Report M0150-1-01F03 dated 18 August 2021 o HSE internal email of Noise Monitoring results from WE07 of 14-15 August 2021 o Renzo Tonin WE52-WK02 Possession Noise Monitoring Report M0150-1-01F02 dated 19 July 2021 	

Consent Condition	Summarised Requirement	Evidence collected	ID
NVC11	Ongoing noise monitoring during critical periods (i.e. when noise emissions are expected to be at their highest to identify and assist in managing high risk noise events.	<ul style="list-style-type: none"> Refer Noise Monitoring Register (summary performance spreadsheet) above. Ongoing somewhat unclear. 	
NVC3 & 4 NVMP s 5.7 and 8.2.2	Dilapidation or Condition Surveys – determining safe work distances and/or existing condition	<ul style="list-style-type: none"> Survey Log Sheet (spreadsheet) - tracking buildings and property condition surveys undertaken and planned 	3-OBS
As above	As above	Survey Report folders: <ul style="list-style-type: none"> Marrickville e.g. Station 23/02 and 15/03, and several private properties Canterbury e.g. Station 23/02 and 15/03, Post Office 30/03 (heritage) and several private properties Lakemba e.g. Station 23/02 and 19/04, and several private properties 	
NVC12	Where vibration levels are predicted to exceed the vibration screening level, attended vibration monitoring would be carried out to ensure vibration levels remain below appropriate limits for that structure	VMS Australia, Canterbury Station Vibration Monitoring, dated 9 August 2021 (2wk shutdown conducted from 28 June to 11 July 2021)	

Appendix 3: Audit info – Community engagement & complaints

The following documents, reports, information and records were briefly reviewed, accessed or sighted during the audit process:

Consent Condition	Summarised Requirement	Evidence collected	ID
	Community impact management		
B2	Community Communication Strategy implementation	Information below, including relevant Consultation Manager database entries	
C7	Community Strategy / N&V Management Plan implementation – community engagement re high noise intensity works	Three Stations Respite Planning spreadsheet- WE06-07 respite tracking	
E25, CNVIS	Community Strategy / N&V mitigation measure implementation – high noise intensity works	Targeted Respite Offers letters to 19 Marrickville residents about scheduled weekend rail shutdown of 14 - 16 August	
As above, and NVC10		Consultation Manager database report (extract) for Respite offers of 9/8/21 for WE07	
E25, NVC9	Alternative accommodation records	<ul style="list-style-type: none"> o RO & AA Spreadsheet v5 - OOHW 014 Marrickville WE07, Noise Receiver tables o No records provided of AA (accommodation) provided to this audit. Refer Appendix 2 above as well. 	10 - IO 9-OBS
	Complaints management		
B5	Complaints Management System, prepared and implemented	NSW Consultation Manager database, recently upgraded	
B8	Complaints Register maintained, recording information on all complaints	<ol style="list-style-type: none"> 1) Consultation Manager Complaint Reporting Register (spreadsheet output) as of 5 August 2021, and related management of complaints 2) SM Complaint Register (electronic register output) in Consultation Manager (the “upgraded” CM capability) in addition to above - 10 complaints between 7 and 16 August 2021 	
B8 (c)	Complaints Register , must record means by which the complaint was addressed and resolution reached	<ul style="list-style-type: none"> o Complaint ID 210706CARR closed prematurely with no action. A 3rd Party Property Damage Claim Log was created and sighted post audit 	11 - IO
As above		<ul style="list-style-type: none"> o Complaints generally stated “noise levels were compliant with those predicted in the OOHW permit or approved CNVIS” with no evidentiary proof e.g. 210606YANG, 210707SHAN, 210707ASHF 	

Consent Condition	Summarised Requirement	Evidence collected	ID
As above		<ul style="list-style-type: none"> Complaints about continuous noisy night works were often unsubstantiated stating "works were being conducted in line with agreed respite periods (3 hours, 1 hour off)" e.g. 210806SAVA 	12-OBS
As above		<ul style="list-style-type: none"> Some complaint records did not record means by which the complaint was addressed and resolution reached being <i>somewhat dismissive, claiming to be "unavoidable" without investigation stating that "rock breaking and hammering would continue throughout the night"</i> ID: 210629PARA and 210629GONZ 	

Appendix 4: Audit information – CEMP & Key Issues

The following documents, reports, information and records were briefly reviewed, accessed or sighted during the audit process:

Consent Condition	Summarised Requirement	Evidence collected	ID
	CEMP		
C1	CEMP - documented	Construction Environmental Management Plan (CEMP) - Marrickville, Canterbury & Lakemba Station upgrades, rev02 dated 4 December 2020	
C7	CEMP s3.10 implementation - Corrective Action	Environmental Incidents and Non-Conformance Register	
As above		Environment Incident & Non-compliance Reports: <ul style="list-style-type: none"> o NCR-002, Marrickville Tree removal o INC-004, Lakemba Heritage Canopy damage o INC-009, Canterbury Heritage Coping damage o INC-011, Lakemba Heritage Canopy damage o NCR-015 Canterbury, unapproved equipment use (OOHW) 	14-OBS
	Key issues	Demonstrated compliance:	
As above	CEMP Table 11 Hold Point compliance	For items not already covered in prior Appendices - refer below:	
	➤ Discharge Water	No discharge forms / records (reliant on sucker truck) – see liquid waste records further	
	➤ Vegetation removal	<ul style="list-style-type: none"> ➤ Tree Impact Register dated 17/08/21 (64 assessments, 58 removals) ➤ Arboricultural Impact Assessment Reports, May-July 2021 for all 3 stations (by Urban Arbor and Tree Survey Arboricultural) ➤ Haslin (HSE) Pre-Clearance Checklists e.g. Canterbury Charles Street, Marrickville MSB, Lakemba Railway Parade etc. 	
	➤ Site Specific Environment Controls Maps	<ul style="list-style-type: none"> o Marrickville ECM WE06-WE07 dated 5.08.2021 o Marrickville ECM Shutdown 1, rev 1 dated 10.06.2021 o Lakemba Shutdown 1 dated 18.02.2021 o Canterbury Shutdown #1 dated 11.06.2021 	
	➤ Hazardous Waste control	o Marrickville Spoil Register dated 24/5/21 (3 entries only)	

Consent Condition	Summarised Requirement	Evidence collected	ID
		<ul style="list-style-type: none"> ○ Canterbury Spoil Register, from 24/5/21 to 2/6/21 (>160 entries incl. restricted and liquid waste) ○ Lakemba register - not available 	13-NC
WM6	Waste assessment & classification	<ul style="list-style-type: none"> ○ Cardno Waste Classification Technical Memo, Canterbury stockpile, March 2021 ○ Cardno In-situ Waste Classification Memo's, Lakemba, April & May 2021 ○ ADE Waste Classification & Analysis Reports, Canterbury dated 6, 9, 22 April 2021 ○ Marrickville - unknown 	
As above	Lawful waste transportation and disposal	<ul style="list-style-type: none"> ○ Liquid waste service sheets, from Galea and AUM ○ Liquid weighbridge docketts, from Demast ○ Demast EPA Licence 20875 (liquid waste treatment) ○ Lakemba asbestos soils weighbridge docketts, from Bingo (July 2021) ○ Canterbury restricted soil / asbestos weighbridge docketts, from Suez and Breen (May & June 2021) ○ Marrickville GSW and asbestos soils weighbridge docketts, from Bingo (April & May 2021) 	
SC5	Contamination - Prior to ground disturbance, a detailed contamination assessment would be undertaken in areas with a medium to high risk of contamination, to confirm the nature and extent of contamination, specific requirements for further investigation and remediation, and/or management requirements of any contamination	<ul style="list-style-type: none"> ○ Marrickville Site Contamination Management Timeline, MSB ○ HIBBS-MSB-Detailed Site Investigation Report dated 22.06.2021 ○ HIBBS-MSB-Remedial Action Plan dated 26.06.2021 	

Appendix 5: Audit Credentials

Audit process

This Independent Environment Audit comprised an off-site desktop review, an onsite and office audit and a post audit assessment of documentation and records. The audit assignment was undertaken by the identified QEM Consulting Pty Ltd Auditor below, with the second Auditor not directly involved in the audit conducting a peer review of the report prior to finalising.

The audit process including scoping and planning was undertaken in accordance with the principals of AS / NZS / ISO 19011:2018 – Guidelines for Auditing Management Systems.

Auditor information

Audit Organisation:	QEM Consulting Pty Ltd
Auditor & Report Author:	Larry Weiss
Auditor Qualification:	Exemplar Global EMS Auditor Accreditation no. 12355
Affiliations:	Member, Engineers Australia 938517
Report Reviewer:	Julie Dickson
Auditor Qualification:	Exemplar Global EMS Auditor Accreditation no. 13573
Affiliations:	EIANZ Certified Environmental Practitioner, no. 221

Auditor certification

The abovementioned Auditor certifies as having personally undertaken this Independent Audit and preparing the contents of this Independent Audit Report; and that the findings of the audit are reported truthfully, accurately, and completely; and that he 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.

Report Author (& Auditor):

LJ Weiss

Larry Weiss

----- END REPORT -----

Post Audit Progress Verification Report of Agreed Action Plan

Audit Report reference:	QEM-1803-IEA-025V City and South West Sydenham to Bankstown Station Package 4 (Marrickville, Canterbury and Lakemba Stations)
Audit Scope:	Follow-up / close out of audit findings
Auditee / Operator:	Haslin, Stephen Edwards Joint Venture (HSEJV)
Auditor Organisation:	QEM Consulting Pty Ltd
Auditor:	Original Audit: Larry Weiss, Follow-up: Julie Dickson
Original Audit date:	18 & 19 August 2021
Date of desktop verification:	15th November 2021
Verification Report date (this report):	19 November 2021

CLASSIFICATION of AUDIT FINDINGS VERIFIED (in Tables overleaf) are as follows:

Status	Explanation
Notable Practice (NP)	Outstanding positive observation about a system, process or practice, for recognition and/or sharing purposes.
Improvement Opportunity (IO)	A suggestion or opportunity to implement a good or better practice to improve efficiency, further reduce exposure to risk or improve information management. When specifically stated as a Recommendation, this requires a formal response as to a considered action, alternative action or management decision in the negative.
Observation (OBS)	Documented requirement and/or implementation issue which may not strictly affect required performance or compliance outcomes. Also termed a non-conformance (as opposed to non-compliance) in the industry, observations could be an early indication of potential non-compliance and/or an adverse performance outcome.
Non-compliant (NC)	The intent of one or more specific requirements of a condition or obligation have not been met, based on insufficient objective evidence to demonstrate required outcomes or deliverables being achieved and/or complied with.

OVERVIEW SUMMARY

The purpose of this report is to follow up on the progress on actions taken to address the findings raised at the audit of August 2021. The following tables provide evidence sighted and commentary on the progress (or lack thereof) on each element of the findings. Some further recommendations have also been made where the findings have been substantially addressed, however require further action.

In summary, of the 14 findings reviewed, only 3 could be fully closed out. Each of the findings comprised several recommendations / agreed actions. The following is a summary of the number of recommendations / agreed actions completed/closed/and open:

Total:	32
Total closed:	16
Total remaining open:	16

In conclusion, HSEJV Environmental Team initiated many of the corrective actions as per the agreed action plan, however the implementation of the actions, particularly as a site level was generally poor. Greater communication, cooperation and sharing of information needs to be developed between the Environmental Team, and the Haslin / Stephen Edwards construction personnel.

The last column in the table below reflects evidence verified against Audit Findings and Agreed Action Plan commitments, both extracted from the original Audit Report.

Ref	Audit Finding	Agreed Action Plan	Class	Action Verification
1.	<p>UF Procedure, implementation compliance The Unexpected Finds process was not effectively implemented, with Sydney Metro Unexpected Finds Recording Forms not always initiated and/or furnished to Sydney Metro in a timely manner, and in the absence of timely information (compliance records) by site, disposition actions were not always known.</p> <p><i>Noted – compliance records demonstrating surveys, protection pre disposition decision and/or remediation were not always readily available to the environment project team, appearing to be delayed between site, heritage consultant and responsible project managers.</i></p> <p>Planning Approval obligation(s): E15, NAH18, NAH16 and C3 (d) / HMP s5.1.3</p>	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Expedite outstanding actions and evidence of finalisation. 2) Update and maintain Unexpected Finds Register to reflect procedural timing obligations, status tracking and reasons for delays, if any. 3) Facilitate Surveyor-Heritage consultant co-operation. 4) Provide Unexpected Finds Register and progress update to "Fortnightly Package 4 HSEJV Environmental Meeting". <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 17 September 2021 and beyond</p>	OBS	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) – Unexpected Finds Register entries indicate that receipt of final forms and geosurveys and comments from Sydney Metro are still outstanding (Open). 2) Unexpected finds register was updated 21 October 2021. New columns have been inserted "Geosurvey received" and "notes", and the "Draft form sent"- Column (G) has been fully populated (Closed). 3) There appears to still be ongoing issues relating to the communications between the Geo Surveyor, the Heritage Specialist and the Enviro Team, particularly for Canterbury. The "Geosurvey received" column indicates only 5 out of 38 surveys have been received (Open). 4) The Unexpected Finds Register was provided to Sydney Metro on 4/11/2021 and they are regularly updated on progress (Closed). <p>Action Status: PROGRESSED / OPEN</p>

Ref	Audit Finding	Agreed Action Plan	Class	Action Verification
2.	<p>Heritage controls, compliance checks by site Daily Site Supervisor inspections did not evidence site checking of heritage management controls as required by Heritage Management Plan, Table 13: Management Action Checklist requirements.</p> <p><i>Additional audit observations – inspections were not always recorded daily and/or for certain stations (e.g. Marrickville), often appearing to be updated photocopies of tick-box 1-pager forms, omitting the associated 2nd page Corrective Action log.</i></p> <p>Planning Approval obligation(s): C3 (d) / HMP s6.0</p>	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Update Daily Site Safety & Environmental Inspection Form (SEQ-CL-004) to include inspection of heritage controls. 2) Implement at all sites, including collection of date-stamped project photographs as supporting evidence of protection and associated work method implementation. <p>Responsible person: Environment Manager and delegates</p> <p>Due date(s): 17 September 2021 and beyond</p>	OBS	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) The Daily Site Safety & Environmental Inspection Form was updated on 15 Sept 2021 with the addition of one new item – No 23 – heritage controls. (Closed) 2) Minimal evidence of implementation at the three stations could be provided (Open). The following were noted: <ul style="list-style-type: none"> – At Marrickville, four completed inspection forms (new format with Heritage controls) dated 9 - 12/11/21) were sighted, however did not appear to be implemented prior to these dates (week prior to follow-up); – For possession 6 & 7 Nov – no inspection forms were available; – At Lakemba, only 3 records from 18, 24 and 28 Sept 2021 were available in the files (old form – no heritage checks) – No records for Canterbury Station were available / accessible to the Enviro team; – Records are primarily retained on Haslin and Stephen Edwards servers and do not appear to be made available to the Enviro team; – Insufficient evidence could be provided to demonstrate that date stamped photos are taken to provide ongoing evidence of heritage protection measures and work method implementation. <p>Action Status: PROGRESSED / OPEN</p>

Ref	Audit Finding	Agreed Action Plan	Class	Action Verification
3.	<p>Built Heritage Condition assessment Station Buildings aside, the need for condition assessment and/or existence of condition survey reports for other identified heritage building and structures was somewhat unknown to project management.</p> <p><i>Note – this audit was only provided one non-station survey report for Canterbury (the Post Office), with no other heritage surveys appearing to be undertaken, including that of Marrickville and Lakemba heritage. Also, the Survey Log (tracking spreadsheet) for Canterbury indicated 3 heritage building surveys including the Hotel and Garage as "not required" without recorded justification.</i></p> <p>Planning Approval obligation(s): NVC3, NVC4, HMP s3.3, NVMP s 5.7 and s 8.2.2</p>	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Update Survey Log / Dilapidation Register to include details on reasons why certain identified properties were not assessed. 2) Implement surveys and update Survey Log / Dilapidation Register as required for upcoming works. <p>Responsible persons: Celso Paiva & Daniel Brazdil.</p> <p>Due date(s): 8 October 2021 and beyond</p>	OBS	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) The survey log / dilapidation Register had been updated, however one property (LEP ID 167 – Federation railway station buildings) was marked "not required", with no recorded justification (Open). 2) Six (6) Dilapidation surveys have been prepared by Land Surveys since the last audit (Closed): <ul style="list-style-type: none"> • Canterbury Hotel Café LS-004-106 • Canterbury Hotel Footpaths LS-004-107 • Canterbury Hotel LS-004-083 • Canterbury Heritage Signal Building LS-004-138 • Canterbury Road Holly's Garage LS-004-114 (1) <p>Action Status: PROGRESSED / OPEN</p>
4.	<p>Skilled heritage tradespeople, nominated and used</p> <p>Whilst Sub-Contractors have been identified as experienced with heritage and/or Sydney Metro works generally, HSE did not have on record nominated personnel who had or might work on significant heritage fabric, nor were these individuals nominated to Sydney Metro as required by the Heritage Management Plan.</p> <p>Planning Approval obligation(s): NAH20 and HMP s5.2.10</p>	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Compile and maintain a list of qualified / heritage experienced tradespeople, including names and specific expertise. 2) Provide qualified heritage tradespeople list to Sydney Metro. 3) Gather project compliance records of use and implementation. <p>Responsible persons: Celso Paiva & Daniel Brazdil.</p> <p>Due date(s): 30 September 2021 and beyond</p>	IO	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) No lists of qualified / heritage experienced tradespeople with names and specific expertise could be provided – <i>Letters were provided from Brefni, Abi Civil and Indigeco in August and September 2021, however no individuals or specific qualifications /experience were identified.</i> (Open). 2) As item 1 was not provided, Item 2 could not be achieved (Open). 3) As items 1 was not provided, item 3 could not be achieved (Open). <p>It was noted that in the next 4 weeks, work will be occurring within the station</p>

Ref	Audit Finding	Agreed Action Plan	Class	Action Verification
				<p>buildings. This finding should be implemented prior to this occurring.</p> <p>Action Status: REMAINS OPEN</p>
5.	<p>Heritage Works, methodology compliance Whilst Heritage Consultant methodologies and advice were provided for heritage item / significant fabric restoration, repair and damage rectification, site records were not readily available to demonstrate adherence to work methods and/or acceptability of completed outcomes.</p> <p>Planning Approval obligation(s): C7 and C3 (d) / HMP s 5.2.8</p>	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Set-up project site files to collect evidence of adherence to heritage work methods. 2) Gather compliance records of implementation and heritage consultant acceptance, including that of: <ul style="list-style-type: none"> ➢ Damage / incidents ➢ Heritage Management Plan identified heritage item restoration, reinstatement and repair. <p>Responsible person: Elena Ivanova</p> <p>Due date(s): 17 September 2021 and beyond</p>	OBS	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) There was evidence that project files have been set up to collect evidence of adherence (Enviro team) (Closed) 2) Compliance records were being retained, however the INCs (below) had not yet been verified. <ul style="list-style-type: none"> – INC-015 damage to brick wall – Marrickville Station 22/06/21 – Platform 0. Appendix 1 – “Evidence of Completed Actions” – Latest correspondence 10 Aug 2021 – Pamela Kottaras – method acceptable, provided new paint matched existing. (no verification completed as per methodology) Same as at previous audit. – Report from Cardno – review of wall repair works – Canterbury Station – closed out 9/8/21 based on photographic evidence – photos provided. (however, will still need some repairs at next possession). – INC 11 Lakemba awning damage – prior to July, notified on 10/7/21. Still not closed, as painting is not yet finished – no verification to date. <p>It was advised that no new Heritage incidents have occurred since last audit (In progress).</p> <p>Action Status: PROGRESSED / OPEN</p>

Ref	Audit Finding	Agreed Action Plan	Class	Action Verification
6.	<p>Heritage Management, project compliance records A thorough internal audit had not been conducted of Heritage Management Plan implementation, particularly Table 13 actions including but not limited to service installation works, bridge deconstruction and Marrickville Station former men's bathroom restoration.</p> <p><i>The audit observed that there was low to varied awareness of specifics and/or timing of specific HMP Table 13 Management Actions, particularly those relating to specifically identified heritage group items relating to the construction plan. There is a risk that required management actions would not be undertaken, an objective of the internal audit might be to proactively highlight these requirements.</i></p> <p>Planning Approval obligation(s): C7 and C3 (d) / HMP s6.0</p>	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Procure competent Auditor and schedule audit accordingly. 2) Conduct a Heritage Management Plan audit including detailed review of understanding and implementation of Table 13, ensuring specific compliance records (proof) are cited and collected for project compliance records. <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 22 October 2021</p>	OBS	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) An audit was scheduled with the audit team including the HSEJV Enviro team, Heritage consultant and Sydney Metro (Amy Pamela K, Ryan, Candice) (Closed). 2) The Heritage audit was conducted on 1 Nov 2021 using Table 13 of the HMP as the audit criteria. At the time of this follow-up, the Audit Report was still in draft. <p>Action is substantially complete; however, the following still need to be completed (In progress):</p> <ul style="list-style-type: none"> - Finalise, issue and implement recommendations; - Recommend include rating / severity of findings (e.g. - NC/OBS. Opportunity etc); - Include an executive summary with summary - List the persons that attended the audit <p>Action Status: IN PROGRESS</p>

Ref	Audit Finding	Agreed Action Plan	Class	Action Verification
7.	<p>Noisy works, respite period compliance records</p> <p>There were no formal records to demonstrate respite period compliance with Planning Approvals regarding high noise / vibration generating activities i.e.</p> <ul style="list-style-type: none"> ➤ continuous blocks to not exceed 3 hours each, with a minimum respite period of one hour between each block and these works. <p><i>Audit notes:</i></p> <ol style="list-style-type: none"> 1) Site did not maintain a log of actual equipment usage and works activity timing. 2) Environment attended noise monitoring did not target respite period compliance or change-over periods. 3) Ongoing noise monitoring did always target critical periods per NVC11 (i.e. times when noise emissions are expected to be at their highest) 4) A number of complaints around continuous noisy works (only) stated compliance after verbal confirmation with site, there being no formal (compliance) proof. <p>Planning Approval obligation(s): E24 (c) and NVC10 and NVC11</p>	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Update Site Diary to include a section where high noise works are recorded, as well as working periods and breaks. 2) Implement accordingly for all sites / works. <p>Responsible persons: Celso Paiva & Daniel Brazdil.</p> <p>Due date(s): 30 September 2021 and beyond</p>	NC	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) The Daily Site Diary form was updated 15/09/2021 to include a section "High Impact Noise Works", with space to record start and finish times for 3 time periods. (Substantially complete). 2) Full implementation could not be demonstrated across the three stations. See below: <ul style="list-style-type: none"> – Canterbury: Records sighted for 6 & 7 Nov (night and day) – old form used with no detail provided on respite; – Lakemba: Records sighted for 18/09/21 (showing respite – 3 hrs on, one hour off) & 11/11/21 (no respite recorded – apparently no high impact works). Limited records - only 2 records available. – Marrickville: Various including W/E 16 (17/10/21) and W/E 17 (23/10/21, 24/10/21) – exactly 3 hours on, 1 hour off (implemented); <p>Action Status: PROGRESSED / OPEN</p> <p>Further recommendations:</p> <ul style="list-style-type: none"> – Add a field to the site diary form to indicate whether high impact noise was triggered on that day / night. – Further communication to Canterbury site to implement recording of respite; – HSEJV to ensure relevant site records are made accessible to the environmental team

Ref	Audit Finding	Agreed Action Plan	Class	Action Verification
8.	<p>Noise Monitoring The Noise Monitoring Register (summary performance spreadsheet) was still a work-in-progress, needing regular update and could be improved by highlighting complaint investigation and/or respite period related monitoring.</p> <p>Planning Approval obligation(s): C13</p>	<p>HSEJV action commitment: Update the Noise Monitoring Register to include:</p> <ul style="list-style-type: none"> ➤ Complaints column to cross reference when a noise measurement was taken as a result of a complaint investigation. ➤ Evidence of site respite-period compliance. <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 17 September 2021 and beyond</p>	IO	<p>Evidenced:</p> <p>1) HSEJV Environment Register (noise and vibration monitoring) has been updated to include column: "Was monitoring in response to a complaint?" A Yes response has been entered into 4 monitoring events. (Closed)</p> <p>2) As noted in previous finding, the recording of respite periods in Daily Site Diaries is variable at different sites and was insufficient to effectively link to complaints. (Open)</p> <p>Action Status: PROGRESSED / OPEN</p> <p>Further recommendation: Where monitoring has been conducted as the result of a complaint, the site diaries should be reviewed for respite compliance and recorded in the Register.</p>

Ref	Audit Finding	Agreed Action Plan	Class	Action Verification
9.	<p>Alternative accommodation, compliance records</p> <p>Whilst AA noise mitigation offers were identified in OOHW approvals plus Community Engagement tracking spreadsheets, project AA offer and acceptance compliance records were not provided / sighted during this audit.</p> <p><i>The audit review observed that a large quantum of AAs had been identified through noise assessments. Also, a number of complainant's had mentioned not receiving such offers.</i></p> <p>Planning Approval obligation(s): CNVIS, E25 and NVC9</p>	<p>Summary HSEJV response: <i>"The audit had insufficient time to fully investigate AA offer compliance. The process is fully auditable per OOH period".</i></p> <p>Independent Auditor Recommendation: Availability of compliance records (offer and acceptance evidence) will be comprehensively re-assessed during the scheduled Action Verification Audit associated with this Audit Finding (alongside), in the meanwhile it is recommended to:</p> <ol style="list-style-type: none"> 1) Maintain Consultation Manager with Alternative Accommodation offer and acceptance details, 2) Generate AA status reports from CM to demonstrate compliance with the OOHW approval i.e. of specified properties receiving this "Additional Mitigation Measure". <p>Responsible person: Dave Simpfendorfer</p> <p>Due date(s): 17 September 2021 and beyond</p>	OBS	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) An assessment of the AA and RO offer and acceptance process was undertaken. Exported records from Consultation Manager and spreadsheets were sighted and reviewed including: <ul style="list-style-type: none"> – Respite Offer Planning Register – Spreadsheet – noise model spreadsheet – AA and RO for each address. Spreadsheet links to word document to allow correct offers to be sent out based on the noise modelling. – Spreadsheet – individual household tracker – colour coded (accepted on not). Tabs for each station. – Spreadsheets for each possession. Correspondence is recorded / attached in Consultation Manager. – Letters of Offer (both AA and RO) for AA offer 521/2D Charles Street Canterbury (accepted 29/10/21) and RO Offer 526 / 2D <p>Letter box drops are conducted via hard copy delivery– dropped in by the HSE community teams and Sydney Metro – Natalia. Date of letter is date of delivery. (Closed)</p> <ol style="list-style-type: none"> 2) Compliance reports could be generated from the spreadsheets where required. Reports were sighted as above. (Closed) <p>Action Status: CLOSED</p>

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10.	<p>Alternative accommodation, planning & tracking</p> <p>It was noted that Community functions were combining Respite Offer and Alternative Accommodation "counts" in the Receiver spreadsheets used to track and plan ROs and AAs – there is a risk that the lesser "Additional Mitigation Measure" of RO would be offered instead of AA specified in the OOHW impact assessment.</p> <p>Planning Approval obligation(s): CNVIS, E25 and NVC9</p>	<p>Summary HSEJV response: <i>"Any exceptions where RO has been substituted instead of AA are documented with justification".</i></p> <p>Independent Auditor Recommendation: Availability of compliance records (justification proof) will be re-assessed during the scheduled Action Verification Audit associated with <u>this</u> Audit Finding (alongside), in the meanwhile it is recommended to:</p> <ol style="list-style-type: none"> 1) Revise Respite Offer and Alternative Accommodation Spreadsheet to differentiate between RO's and AA's. 2) Generate AA status reports from CM to demonstrate compliance with the OOHW approval i.e. Respite Offer or Alternative Accommodation offer and acceptance, or definitive justification thereof to the contrary. <p>Responsible person: Dave Simpfendorfer</p> <p>Due date(s): 17 September 2021 and beyond</p>	IO	<p>Evidenced: It was discussed that there is no financial risk to HSEJV in offering AA over RO, and therefore no incentive to offer less than required.</p> <p>The evidence sighted for finding 9 satisfied the requirements for this finding. RO's and AA's are differentiated in the spreadsheets now.</p> <p>Action Status: CLOSED</p>

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11.	<p>Complaint closure, unresolved It was noted that some Complaints were being prematurely closed in Consultation Manager upon "resolution" with the complainant, but in the absence of completed action i.e.</p> <ul style="list-style-type: none"> ➤ means by which the complaint was addressed, as required by Consent Condition B8 (c) <p><i>Example cited but not limited to that documented in Appendix 3.</i></p> <p>Planning Approval obligation(s): B8 (c)</p>	<p>Summary HSEJV response: <i>"The Community Team will henceforth ensure that the means by which the complaint was addressed is more fully documented."</i></p> <p>Independent Auditor Recommendation: Comprehensiveness of compliance records (investigation and action / resolution) will be re-assessed during the scheduled Action Verification Audit associated with <u>this</u> Audit Finding (alongside), in the meanwhile it is recommended that:</p> <ul style="list-style-type: none"> ➤ Consultation Manager complaints are not closed before complaint information reflects investigation, completion of agreed actions or acknowledged by the complainant as satisfactorily resolved. <p>Responsible person: Dave Simpfendorfer</p> <p>Due date(s): 17 September 2021 and beyond</p>	IO	<p>Evidenced: Since the last audit, a new field has been included in Consultation Manager – "if unavoidable, please justify". A complaints register printout in order of date received from 6 June to the audit day was provided and reviewed. The new system with new field commenced on 9 September with new field completed for each complaint.</p> <p>Sample correspondence held in Consultation Manager was sighted and reviewed – providing details of the complaints / correspondence / actions / justifications Overall, it appears that the requirement to justify "unavoidable" impacts has improved the transparency of closure of complaints.</p> <p>Action Status: CLOSED</p> <p>Further finding: A legacy complaint from prior to the Consultation Manager system update was sighted and reviewed (3 July 2021) in which the noise levels exceeded the predicted levels by 10 dBa at 21 Riverdale St. It did not come up as a complaint, only an event (not a complaint) and was determined as unavoidable. This should have been determined as "avoidable".</p> <p>New Action: This event / complaint should be updated to "avoidable" in Consultation Manager and in the spreadsheet as a record.</p>

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12.	<p>Complaints Register, verifiable action information Noise complaint investigation and resolution records were sometimes conversational and/or generic in substance, with no referenced evidence cited, or verifiable evidence, or actions to substantiate compliance claimed in Consultation Manager (and verbalised to the complainant).</p> <p><i>Audit note, several Consultation Manager responses were:</i></p> <ol style="list-style-type: none"> 1) <i>Generic e.g. "noise levels were compliant with those predicted in the OOHW permit or approved CNVIS"</i> 2) <i>Unsubstantiated e.g. "works were being conducted in line with agreed respite periods (3 hours, 1 hour off)".</i> 3) <i>Somewhat non-empathetic when claiming to be "unavoidable" without investigation of noise prediction achievement E.g. "site stated that rock breaking and hammering would continue throughout the night" ID: 210629PARA and 210629GONZ</i> 4) <i>Not recording the means by which the complaint was addressed and resolution reached per Consent Condition B8 (c)</i> <p>Planning Approval obligation(s): B8 (c), E24 (c) and NVC10</p>	<p>Summary HSEJV response: <i>"Noise monitoring data is available and searchable and can be cross-referenced to the Complaint if and as required."</i></p> <p>Independent Auditor Response: There was no formal complaint investigation process to readily demonstrate verifiable evidence, or actions to improve performance or prove claimed compliance.</p> <p>Independent Auditor Recommendation: To be comprehensively re-assessed in detail during the scheduled Action Verification Audit associated with <u>this</u> Audit Finding (alongside), in the meanwhile it is recommended that:</p> <p><i>"The Community Team will henceforth ensure that the means by which the complaint was addressed is more fully documented." as documented in the Audit Finding #11 response above.</i></p> <p>Responsible person: Environment Manager and Dave Simpfendorfer</p> <p>Due date(s): post 17 September 2021 and beyond</p>	OBS	<p>Evidenced:</p> <ul style="list-style-type: none"> - There is no formal documented complaint investigation process; - There is no process implemented to date to link the complaints with the site diaries and the verification that the respite periods were complied with; - As noted previously, site diaries are not generally made available to the Enviro team. The need to accurately complete the daily site diary needs to be reinforced with the workforce. <p>As a positive, it was noted however, that improvements have been made in the justification for "unavoidable" in the newly created field in Consultation Manager.</p> <p>Action Status: OPEN</p> <p>The following actions are still required to be undertaken:</p> <ul style="list-style-type: none"> - Develop a documented complaint investigation process; - Ensure site diary respite recording compliance, and link these to specific complaints where relevant; - Enviro team to ensure they obtain access to Daily Diary (and other relevant) records to determine when respite periods were implemented. This may require action from HSEJV senior management to provide sufficient access; - Reinforce need to record respite periods accurately with the workforce

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				<ul style="list-style-type: none"> – Ensure good working relationship between Comms team and Enviro team to resolve complaints
13.	<p>Waste Management, project compliance records</p> <p>HSE were unable to provide sufficient compliance records to demonstrate waste classification, transportation and appropriate disposal in a systematic and consistent manner for each site.</p> <p><i>Also, from a systems perspective the audit noted:</i></p> <ol style="list-style-type: none"> 1) Differing Spoil Registers (also used for hazardous waste) between Marrickville and Canterbury, with no tracking register available for Lakemba 2) Liquid waste docket were not readily available for all sites 3) Not all transporter and receiver licensing details were available 4) No internal audit had not been conducted of the Waste Heritage Management Plan implementation, particularly cradle to grave tracking of hazardous waste from each site including assessment, classification and disposal at appropriately licensed facilities. <p>Planning Approval obligation(s): E75, E76 and WM6</p>	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Provide Waste Tracking Register to all 3 sites to implement. The register will include cross references with waste docket numbers as well as waste classification reports. This will cover all the items noted in 1-4 alongside. 2) The Waste Tracking Register will be updated with all waste removed from site to date. 3) Obtain and maintain a copy of licences for the waste facilities and transporters used. 4) Provide Register and progress update to "Fortnightly Package 4 HSEJV Environmental Meeting" <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 22 October 2021</p>	NC	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) Waste Registers have been developed and provided to the 3 sites for implementation. However, a review of the Registers indicates a lack of understanding by the persons entering the information. <p>Some of the key issues with completion of the registers included:</p> <ul style="list-style-type: none"> – "Waste Classification Report" – provides only the name of the Waste Company. There is no linkage to information in any actual report? – Full information on classification not always specified (not classified in accordance with the NSW Waste Guidelines; – PASS is generated and sent to a site that accepts as restricted solid waste and then gets treated – no visibility of the end disposal of the PASS. – The Marrickville Register waste classification report column does not include links to the reports – The Canterbury Register doesn't include any waste classification report entries. Spoil is classified as "construction waste", with waste stream "GSW", with no indication if it has been tested for contamination; – Lakemba Register in place – waste classification generally not correct. <ol style="list-style-type: none"> 2) Waste tracking registers are in place and updated at site, however not appropriately completed; 3) Licences for facilities and transports were not on the registers.

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				<p>4) Waste Register and progress updates had not been provided to Sydney Metro.</p> <p>Further recommendations:</p> <ul style="list-style-type: none"> - Competent, knowledgeable persons need to complete the registers. Training, or trained personnel need to be provided; - Provide links to classification reports in the register; - Use drop down menus for waste stream / waste classification columns and provide definitions to guide users - Include provision for licence information for facilities and transporters in the spreadsheet <p>Action Status: OPEN</p>

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14.	<p>Corrective Action, investigation & ineffectiveness The Sydney Metro Environment Incident and Non-compliance Reporting Procedure was not effectively implemented, with Report Forms SM17 0000105 not always furnished to Sydney Metro and/or actioned in a timely manner.</p> <p>Additionally the audit noted:</p> <ol style="list-style-type: none"> 1) Some form completion / notification took over a month, not 48 hours 2) Actions resulting from investigations were often administrative in nature, not addressing the root cause or systems/supervision inadequacies 3) Accountability for systemic / long-term actions were not often owned and recorded as such by site. 4) The effectiveness of actions undertaken was not being assessed and reported upon. <p>Planning Approval obligation(s): CEMP s 3.10</p>	<p>HSEJV action commitment:</p> <ol style="list-style-type: none"> 1) Update and maintain the Environmental Incidents and Non-Conformance Register 2) Appoint a dedicated Environmental Officer to oversee Incident and NCR completion, maintain the register and provide updates to site. 3) Provide Register and progress update to "Fortnightly Package 4 HSEJV Environmental Meeting" and promote site ownership in outcomes, lessons learnt, progress and trends. <p>Responsible person: Environment Manager or delegate</p> <p>Due date(s): 17 September 2021 and beyond</p>	OBS	<p>Evidenced:</p> <ol style="list-style-type: none"> 1) The Incident and Non-conformance Register has been updated and maintained since the last audit (closed). 2) the Register is being maintained by Elena from the Enviro team (closed); 3) Progress reports are provided to Sydney Metro (closed) <p>The Register links to a Sharepoint folder with information on the incident. Incidents are not closed until closed by Sydney Metro after checks have been made that actions and close out are reasonable.</p> <p>From a Sydney Metro perspective, there has been a significant improvement in the corrective action, investigation and assessment of effectiveness</p> <p>Action Status: CLOSED</p> <p>Other Action required: Note: INC 09 – relating to a heritage incident with coping damage has been closed in the system. This incident should be re-opened as it has not yet been closed out by Pamela K and still needs work at next possession</p>