

INDEPENDENT AUDIT NO. 2 – AUDIT REPORT

SYDNEY METRO CITY & SOUTHWEST – CROWS NEST
INTEGRATED STATION DEVELOPMENT (ISD)
SSI 7400

JUNE 2023

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Project No.: 851

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EXECUTIVE SUMMARY

Sydney Metro (SM) is responsible for delivery of the Sydney Metro City & Southwest (C&SW) Project, which involves construction and operation of a new 30-kilometre stand-alone metro railway line that would run from the end of the Metro Northwest Line at Chatswood, through to Sydney CBD, and to Bankstown via Sydenham.

Crows Nest will be one of the new stations to service this line with construction, together with a combined mixed-use development, termed Integrated Station Development (ISD), being delivered by AW Edwards (AWE). The Project site is situated on the eastern side of the Pacific Highway between Oxley Street and south of Hume Street and between Pacific Highway and Clark Lane.

Construction of the new Crows Nest Station ISD by AWE will include:

- two station entrances with one located on Pacific Highway between Oxley Street and Hume Street and one located on Clarke Street near the corner of Hume Street
- retail space next to the station entry at site C, and retail opportunities in the Pacific Highway side of sites A and B
- public domain works including footpaths, street tree planting, lighting and street furniture
- new pedestrian lights to cross the Pacific Highway on the northern side of Oxley Street intersection
- new pedestrian crossings on Clarke and Hume Streets
- new bike parking on Hume Street, Pacific Highway, Clarke Street and Oxley Street
- new kiss and ride and taxi bays in close proximity to the station
- installation of wayfinding signage and Sydney Metro information
- Hume Street bi-directional separated cycle link from Clarke Street to Nicholson Street
- upgraded Hume Street intersection with cycle crossing and increased pedestrian capacity
- improved pedestrian crossings at intersections of Oxley Street, Pacific Highway, Hume Street and Clarke Street.

This audit was carried out in accordance with the independent audit requirements outlined in the conditions of approval A37 and A38 of CSSI 7400 and in Section 4.4.3 of the Sydney Metro C&SW Compliance Monitoring & Tracking Program initially submitted to the Department of Planning and Environment (Department, or DPE) prior to the commencement of construction. The scope of this audit is defined in the C&SW Audit Program prepared by Sydney Metro in February 2023 (under A37) detailing the three planned audits to be carried out in 2023. This audit program was presented by Sydney Metro to the Department at their monthly consultation meetings.

This Independent Audit relates to the Project works covering the period from the completion of the previous Independent Audit (1 November 2022) to the date of this second Independent Audit conducted on 16 May 2023.

The audit seeks to verify compliance with, and assess the effectiveness of, environmental management associated with the following aspects / requirements as per the Audit Program:

- Compliance with Community and Stakeholder Engagement conditions (CoA B1-B15)
- Compliance with the Incident and Non-compliance Process conditions, including identification and corrective actions (CoA A20, A34, A41-A44)
- Compliance with Training of Workforce requirements (as per Section 6 'Training & Awareness' of the CEMP)
- Compliance with Noise and Vibration (day-time and OOHW) conditions (A27, E28-E56) and implementation of OOHW Protocol and management of OOHW
- Include consultation with ER and AA and conduct inspection during evening / night time OOHW.

To note, requirements under SSD 13852803 and SSD 9579 did not form part of the agreed audit scope.

The overall outcome of the Independent Audit was positive. Records were well organised and available at the time of the site inspection and interviews with Project personnel from Sydney Metro and AWE.

In summary the findings are as follows:

In relation to the status of findings from the previous Independent Audit on the Project:

- All findings that were open at the time of completion of the previous Independent Audit on the Crows Nest ISD are considered by the auditor to be closed.

In relation to the second Independent Audit on the Project, there were:

- Fifty-five (55) conditions and seven (7) CEMP requirements assessed.
- Two (2) non-compliances were identified.
- Four (4) observations were identified.

The non-compliances were related to:

- Noise exceedances at sensitive receivers and the need to revisit OOHW applications and work schedules/programs/methodologies that involve structural work during out-of-hours. It is understood that this was self-reported by Sydney Metro.
- Insufficiency of environmental training and awareness, especially with respect to sub-contractors and labour hire, as required to address all the requirements set out in the auditee's CEMP.

The observations were related to:

- The need to put a mechanism in place for a complainant (member of the public) to apply / request the support of a Community Complaints Mediator to help resolve complaints.
- The need to revise or update the Sydney Metro website to allow easier and more ready access / links to the approvals and required documentation.
- Security of boundary fencing on the night of the inspection.
- Storage of chemicals.

The Auditor would like to thank the auditees representing Sydney Metro, AWE, the Environmental Representative and the Acoustic Advisor for their high level of organisation, cooperation, openness and assistance during the Independent Audit.

1. INTRODUCTION

1.1 Project overview

Sydney Metro (SM) is responsible for delivery of the Sydney Metro City & Southwest (C&SW) Project, which involves construction and operation of a new 30-kilometre stand-alone metro railway line that would run from the end of the Metro Northwest Line at Chatswood, through to Sydney CBD, and to Bankstown via Sydenham.

Sydney Metro C&SW is classified as Critical State Significant Infrastructure (CSSI) under Division 5.2 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) and State Environmental Planning Policy (State and Regional Development) 2011. Approval for this Project (CSSI_7400) was granted on 9 January 2017.

Crows Nest will be one of the new stations constructed to service this line. The Crows Nest ISD was designed by the Crows Nest Design Consortium (CNDC) with SMEC as the lead consultant. Construction is being delivered by AWE.

The Project site is situated on the eastern side of the Pacific Highway between Oxley Street and south of Hume Street and between Pacific Highway and Clark Lane as shown in Figure 1 below. Its location within the wider Sydney Metro network is shown in Figure 2 below.

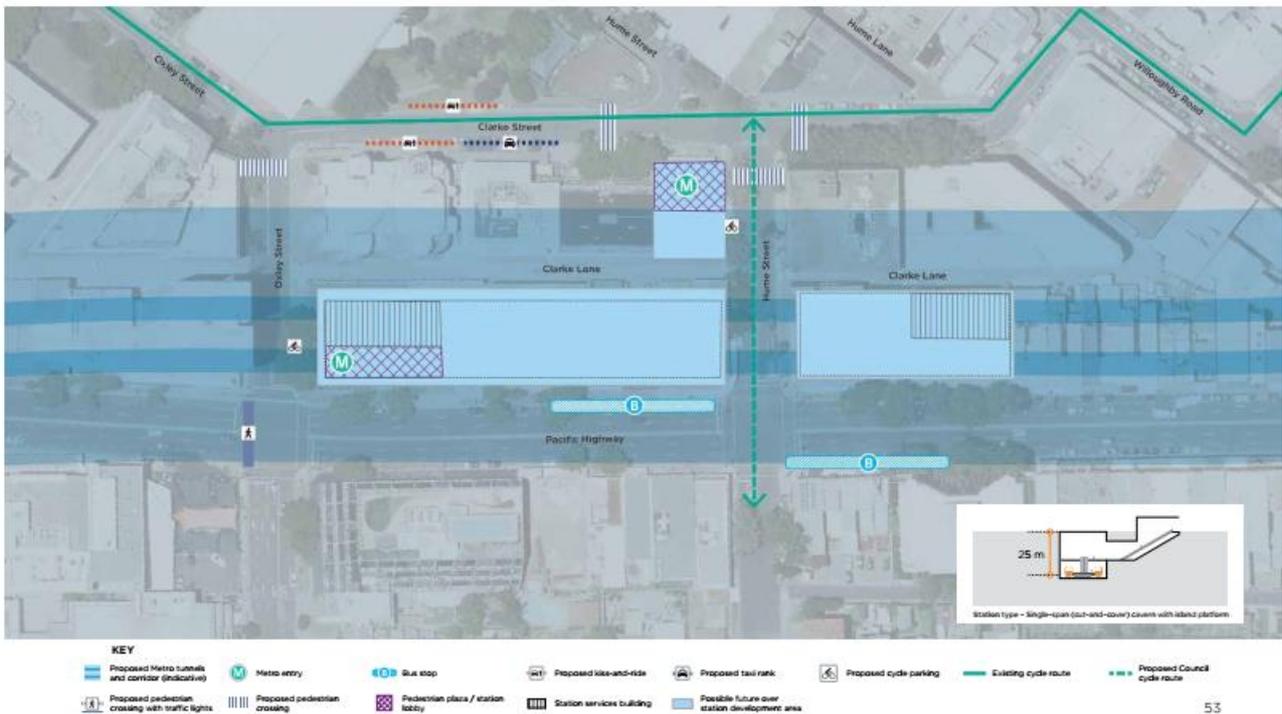


Figure 1: Crows Nest ISD Local Context (source: Chatswood to Sydenham EIS Summary, SM)



Figure 2: City & Southwest Project – Crows Nest ISD Regional Context (source: Chatswood to Sydenham EIS Summary, SM)

The construction of the Project consists of the following:

- two station entrances with one located on Pacific Highway between Oxley Street and Hume Street and one located on Clarke Street near the corner of Hume Street
- retail space next to the station entry at site C, and retail opportunities in the Pacific Highway side of sites A and B

- public domain works including footpaths, street tree planting, lighting and street furniture
- new pedestrian lights to cross the Pacific Highway on the northern side of Oxley Street intersection
- new pedestrian crossings on Clarke and Hume Streets
- new bike parking on Hume Street, Pacific Highway, Clarke Street and Oxley Street
- new kiss and ride and taxi bays in close proximity to the station
- installation of wayfinding signage and Sydney Metro information
- Hume Street bi-directional separated cycle link from Clarke Street to Nicholson Street
- upgraded Hume Street intersection with cycle crossing and increased pedestrian capacity
- improved pedestrian crossings at intersections of Oxley Street, Pacific Highway, Hume Street and Clarke Street.

Early works at the station by AWE began in January and main construction was ongoing at the time of the audit. Crows Nest Metro Station (Site A and B) is scheduled to be completed by the end of 2023 and will open in 2024, with the remainder of the ISD development (specifically Site C) scheduled to be completed in 2024/25.

The main construction activities during the month of May 2023 in which the audit took are summarised in Table 1.

Table 1: Main construction activities at time of audit (May 2023).

Construction Activities	Hours of Work
Removal of tower crane from Site A Detachment and placing of Site A tower crane arm on Clarke Lane for disassembly and removal.	Day and night work
Removal of Site A tower crane components and cabin via Pacific Highway.	Night work
<u>Within Crows Nest Station site work area</u> <ul style="list-style-type: none"> • Installation of footings and façade panels, and exterior brickwork. • Removal of steel and concrete capping beam around the site perimeter involving saw cutting and jackhammering. Please see map overleaf of planned locations in May. 	Day work

Construction Activities	Hours of Work
<p><u>Public domain work activities</u></p> <ul style="list-style-type: none"> Investigation work to locate underground services. Some of these works will be noisy as it will involve the use of a vacuum truck. Trenching along sections of Clarke Street, Clarke Lane, Oxley Street and Pacific Highway, to install new street lighting cables and underground power supply connections and upgrade existing stormwater drainage and Sydney Water assets. Some of this work will be noisy as it will involve saw cutting and jackhammering out sections of the road and footpath. Removal and rebuilding of existing kerbs, gutters, and footpaths, on Hume Street, Clarke Street between Oxley Street and Willoughby Road, and Oxley Street between Pacific Highway and Clarke Street. Covered pedestrian walkway extension on Clarke Street adjacent to Site C. 	Day work
<p><u>Street level:</u></p> <ul style="list-style-type: none"> Establishing temporary work areas with barriers, noise blankets, and fencing. Delivery and removal of equipment, machinery, and materials. Concrete deliveries and pours and mobile crane use via Clarke Lane, Hume Street and Pacific Highway <p><u>On site:</u></p> <ul style="list-style-type: none"> Formwork, reinforcement, steel fixing and structural steel installation, rigging, building of internal walls, cladding, welding, waterproofing, and concrete pouring. Installation and removal of scaffolding within and around the site perimeter. Installation of precast beams and planks, services, internal brick work and station fit out 	Day and OOHW
<p><u>Within Crows Nest Station site work area (Sites A, B and C)</u></p> <ul style="list-style-type: none"> Low impact site set up activities. Formwork, steel fixing and structural steel installation, and rigging. Crane lifts of equipment and materials. Only Site B crane use 6pm to 10pm, Monday to Sunday. Other lifts facilitated by mobile cranes. Site A tower crane removal works including, dismantling, and lifting components onto transportation vehicles to be driven off-site via Pacific Highway. <p>From 10pm to 12am Monday to Friday, 6pm to 8pm Saturday, and 8am to 8pm Sunday</p> <ul style="list-style-type: none"> Concrete finishing work. Site A tower crane removal works including, dismantling, and lifting components onto transportation vehicles to be driven off-site via Pacific Highway. <p>Activities approved 24/7 Monday to Sunday</p> <ul style="list-style-type: none"> Mobile crane lifts of equipment and materials. Station box and tunnel fit out works. 	OOHW

Construction Activities	Hours of Work
<p><u>Surrounding streets: (Clarke Lane, Clarke Street, Hume Street, Oxley Street, Pacific Highway)</u></p> <p><i>Activities approved 24/7 Monday to Sunday</i></p> <ul style="list-style-type: none"> • Deliveries via delivery lane on Pacific Highway. <p><i>From 6pm to 10pm Monday to Friday</i></p> <ul style="list-style-type: none"> • Concrete pours via Clarke Lane and Pacific Highway. • Site A tower crane removal works including, dismantling, and lifting components onto transportation vehicles via Pacific Highway. • Escalator installation. • Service investigation works on Pacific Highway • Footpath and concreting works on Clarke Street between Hume Street and Hume Lane <p><i>From 10pm to 5am the following morning:</i></p> <ul style="list-style-type: none"> • Delivery of oversize components to the site via Pacific Highway. • Escalator installation. • Lifting components from transport vehicles into our work area via cranes. • Site A tower crane removal works including, dismantling, and lifting components onto transportation vehicles to be driven off-site via Pacific Highway. • Service investigation works on Pacific Highway • Footpath concreting works on Clarke Street between Hume Street and Hume Lane 	OOHW

1.2 Approval requirements

Conditions A37 – A40 of Schedule 2 of CSSI 7400 set out the requirements for undertaking Independent Audits.

This audit was carried out in accordance with the independent audit requirements outlined in the conditions of approval A37 and A38 of CSSI 7400 and in Section 4.4.3 of the Sydney Metro C&SW Compliance Monitoring & Tracking Program submitted to DPE prior to the commencement of construction. The scope of this audit is defined in the C&SW Audit Program prepared by Sydney Metro in February 2023 (under A37) detailing the three planned audits to be carried out in 2023. This audit program was presented by Sydney Metro to DPE at their monthly consultation meetings.

This audit is being undertaken in accordance with the Sydney Metro Audit Program City South-West Audit Program prepared under Condition A37 dated February 2023. It is the second audit on the Crows Nest project completed by WolfPeak

1.3 The audit team

In accordance with Condition A39, the environmental audits of the Project must be conducted by a suitably qualified, experienced and independent team of experts in auditing which is to be documented in the Audit Report.

The independent auditor who performed the auditing works is presented in Table 1.

Table 1: Audit Team

Name	Company	Participation	Certification
Ibrahim Awad	Seventh Sense (on behalf of WolfPeak)	Lead Auditor	Bachelor of Science (Environmental) Master of Engineering Science (Civil & Environmental) Master of Environmental Law Chartered Professional Civil & Environmental Engineer (CPEng MIE) Exemplar Global Certified Environmental Lead Auditor - Certificate No. 110720

Details to demonstrate Ibrahim’s suitability was provided to and approved by Sydney Metro prior to the commencement of the audit. Ibrahim has also provided a Declaration of Independence in accordance with the Department’s *Independent Audit Post Approval Requirements (IAPAR, 2020)*¹ (Appendix D).

1.4 The audit objective

In accordance with the Sydney Metro Audit Program prepared under Condition A37 (refer Compliance Monitoring/Tracking and Reporting Program Report), this Independent Audit sought to verify compliance with the relevant conditions and assess the effectiveness of environmental management associated with the following aspects at the Crows Nest ISD site:

- Compliance with Community and Stakeholder Engagement conditions (CoA B1-B15)
- Compliance with the Incident and Non-compliance Process conditions, including identification and corrective actions (CoA A20, A34, A41-A44)
- Compliance with Training of Workforce requirements (as per Section 6 ‘Training & Awareness’ of the CEMP)
- Compliance with Noise and Vibration (day-time and OOHV) conditions (A27, E28-E56) and implementation of OOHV Protocol and management of OOHV
- Include consultation with ER and AA and conduct inspection during evening / night time OOHV.

1.5 Audit scope

The scope of the Independent Audit was determined in consultation with Sydney Metro and is set out in the 2023 Audit Program (WolfPeak, 17 February 2023).

¹ The IAPAR requirements are not applicable to this project, however we have used the declaration of independence form contained in these guidelines as the basis for declaring our independence from the Project.

This Independent Audit relates to the Project works covering the period from the completion of the previous Independent Audit (1 November 2022) to the date of this second Independent Audit conducted on 16 May 2023.

The auditees comprise Sydney Metro, and the Principal Contractor (AWE) and its subcontractors.

The scope comprises:

- an assessment of the environmental performance of the CSSI 7400, and its effects on the surrounding environment (refer Sections 3.2 and 3.8, and Appendix B)
- an assessment of whether the project is complying with the terms of this approval (refer Section 3.2 and Appendix A and B);
- a review of the adequacy of any document required under this approval (refer Sections 3.2 and 3.3); and
- the recommendation of measures or actions to improve the environmental performance of the CSSI, and improvements to any document required under this approval (refer Sections 3.2 and 3.8).

To note, requirements under SSD 13852803 and SSD 9579 did not form part of the agreed audit scope.

2. AUDIT METHODOLOGY

2.1 Audit process

The Independent Audit was conducted in a manner consistent with AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems. An overview of the audit activities, as specified in AS/NZS ISO 19011.

2.2 Audit process detail

2.2.1 Audit initiation and scope development

Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditee
- Confirm the audit team
- Confirm the audit purpose, scope and criteria.

2.2.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan, and prepared work documents (audit checklists) and distributed to the Project team in preparation for the Independent Audit.

The primary documents reviewed prior to and after the site visit are as follows:

- *Sydney Metro's Community Communications Strategy (Revision 7.2) and AWE's Community Communications Strategy Rev 1 (September 2021)*
- *City & Southwest Out of Hours Work Strategy/Protocol Ver 5.2 (09/10/2021)*
- *Sydney Metro's Construction Complaints Management System (City and Southwest) (Rev 7.2) and Complaints Register (1 November 2022 to 16 May 2023)*
- *Sydney Metro's Consultation Manager System Records (online)*
- *AWE Crows Nest ISD - Construction Noise & Vibration Management Plan, Rev. 5, 8/2/23.*
- *Sydney Metro – Incident and Non-compliance Procedures and Register 1 November 22 to 16 May 23.*

Additional documents sighted are identified in Appendix A.

2.2.3 Meetings

Opening and closing meetings were held with the Auditor and Project personnel.

During the opening meeting, held on site on 16 May 2022, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed.

At the closing meetings, held on both 17 and 19 May 2023, preliminary audit findings were presented, preliminary recommendations (as appropriate) were made, timing for finalisation of the audit report and any post-audit actions were confirmed.

2.2.4 Site Inspection

The site inspection was carried out at the Crows Nest ISD during out-of-hours between 7 to 9 pm on 16 May 2023.

The names of personnel who attended the on-site audit inspection are provided in Table 2.

Table 2: Personnel Attending Site Inspections

Name	Role	Organisation
Sam Fard	Environmental Manager	Sydney Metro
Clint Wilson	Construction Manager	AW Edwards
Darren Green	Planning & Environment Manager	AW Edwards / Element Environmental
Travis McCarthy	Environment & Sustainability Coordinator	AW Edwards

2.2.5 Interviews

The Auditor conducted audit interviews and document review with key personnel on site the day following the on-site to run through the audit evidence. The attendees included those personnel with responsibility for environmental management and were able to assist with verifying the compliance status and performance of the development. All other communication was conducted remotely, which included detailed requests for information and auditee responses to the request.

The names of personnel interviewed during the audit interviews are provided in Table 3.

Table 3: Personnel Interviewed

Name	Role	Organisation
Sam Fard	Environmental Manager	Sydney Metro
Pilar Arevalo	A/Senior Communications Manager	Sydney Metro
Sarah Yasi	Environment Officer	Sydney Metro
Darren Green	Planning & Environment Manager	AW Edwards / Element Environmental
Travis McCarthy	Environment & Sustainability Coordinator	AW Edwards
Elle Mursell	Stakeholder Engagement & Public Affairs Manager	AW Edwards

2.2.6 Consultations

The scope of this audit, as defined in the CSW Audit Program of February 2023, included consultation with the Acoustic Advisor (AA) and Environmental Representative (ER) for the Crows Nest ISD.

Both the AA and ER were consulted via a consultation meeting (19 May 2023) on the scope of the audit, as well as any issues, concerns, comments they had with respect to compliance or performance against the audit scope. The key areas of concern and comments provided to the auditor were considered in the assessment of the audit findings and recommendations, and relate to the following environmental aspects of the Project:

- Complaints associated with OOHW and the possible need to review the OOHW applications / protocols, for current and future works so as to reduce impacts to the community.
- Complaints overwhelmingly related to noise and then traffic and access.
- Likely noise level exceedances during April 2023
- Poor workplace practices and behaviours which have led to some avoidable complaints
- Level of awareness of workers in relation to environmental management requirements.

The names of the persons consulted during the audit are provided in Table 4.

Table 4: Independent Persons Consulted

Name	Role	Organisation
Brett McLennan	Environmental Representative	Healthy Buildings International
Daniel Weston	Acoustic Advisor	EMM

2.2.7 Document review

The Independent Audit included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are detailed within Appendix A.

2.2.8 Generating audit findings

Independent Audit findings were based on verifiable evidence. The evidence included:

- Relevant records, documents and reports
- Interviews of relevant site personnel
- Photographs
- Figures and plans; and
- Site inspections of relevant locations, activities and processes.

2.2.9 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the Department's *Independent Audit Post Approval Requirements 2020 (IAPAR)*, as listed in Table 3, below:

Table 3: Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Where findings were made against the requirements of a management plan, system or strategy we have used the term non-compliant where the requirement was not found to be fully implemented.

Observations and Opportunities for Improvement are also identified to provide context, identify opportunities for improvement or highlight positive initiatives.

2.2.10 Evaluation of post audit approval documentation

The Auditor assessed whether post approval documents have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

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

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

2.2.11 Completing the audit

The Independent Audit Report was distributed to the Proponent to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

The post approval documents audited comprised:

- Conditions from CSSI 7400 applicable to the agreed audit scope (in Appendix A of this Report)
- Sydney Metro's Community Communications Strategy (Revision 7.2) and AWE's Community Communications Strategy Rev 1 (September 2021)
- City & Southwest Out of Hours Work Strategy/Protocol Ver 5.2 (09/10/2021)
- Sydney Metro's Construction Complaints Management System (City and Southwest) (Rev 7.2) and Complaints Register for Crows Nest ISD for 1 November 2022 to 16 May 2023
- Sydney Metro's Consultation Manager System Records (online)
- AWE Crows Nest ISD - Construction Noise & Vibration Management Plan, Rev. 5, 8/2/23.
- Sydney Metro – Incident and Non-compliance Procedures and Register 1 November 22 to 16 May 23.

The evidence sighted and audit findings against these documents and related conditions are detailed within Appendix A.

3.2 Non-compliance, Observations and Actions

This section, including Tables 4 and 5, presents the summary of compliance and recommended actions in response to each of the findings from this Independent Audit.

In relation to the status of findings from the previous Independent Audit on the Project:

- All findings that were open at the time of completion of the previous Independent Audit on the Crows Nest ISD are considered by the auditor to be closed.

In relation to the second Independent Audit on the Project, there were:

- Fifty-five (55) conditions and seven (7) CEMP requirements assessed.
- Two (2) non-compliances were identified.
- Four (4) observations were identified.

The non-compliances were related to:

- Noise exceedances at sensitive receivers and the need to revisit OOHW applications and work schedules/programs/methodologies that involve structural work during out-of-hours. It is understood that this was self-reported by Sydney Metro.

- Insufficiency of environmental training and awareness, especially with respect to sub-contractors and labour hire, as required to address all the requirements set out in the auditee's CEMP.

The observations were related to:

- The need to put a mechanism in place for a complainant (member of the public) to apply / request the support of a Community Complaints Mediator to help resolve complaints.
- The need to revise or update the Sydney Metro website to allow easier and more ready access / links to the approvals and required documentation.
- Security of boundary fencing on the night of the inspection.
- Storage of chemicals.

Table 4: Status of previous findings identified in the previous Independent Audit on the Project (October 2022).

Item	Ref.	Type	Details of item	Recommended or completed actions	By whom and by when	Auditee Response to Recommendation	Status
7400_IA3_01	OOHW Protocol section 4.2.2	Observation	<p>For OOH work that is not subject to an EPL, the approval process is dictated by either C2S CoA E47 or S2B CoA E25. Contractors are required to prepare an OOH application using a form consistent with SM-17-00000115 Out of Hours Work Application Form.</p> <p>Observations:</p> <ul style="list-style-type: none"> Application No 1.2 approved by DPE is nearly 3 years old. Potential changes to affected stakeholders, site layout and any revised mitigation measures in response to community complaints may not be reflected in the original application since it was first approved by DPE in November 2019. In OOHW Application No 10 the risk level was noted as High by the Communications Manager and ER but Low by AA (who ultimately approves). 	<ol style="list-style-type: none"> Recommend that OOHW Application No 1.2 (if still required for ongoing girder deliveries) be reviewed for currency and also to determine if an extension and fresh approval by DPE is required It is recommended that the risk level cell be amended to NA for ER and Comms Manager to reflect the role of the AA in assessing risk level 	SM	<p>1. Noted. AWE have advised that there will be 6-8 nights of OSOM girder deliveries to be completed in 2023. The approval for these works is yet to be determined.</p> <p>2. The 'high risk; rating in OOHW No. 10 was a typo which had been carried over from another approval. This should have read as N/A against the ER and Comms Manager sign off. This had now been corrected.</p>	<p>CLOSED</p> <p>Sydney Metro notes that all OSOM girder deliveries are completed.</p> <p>OOHW 1.2 expired in December 2022.</p>
7400_IA3_02	OOHW Protocol section 4.2.2.1	Observation	<p>Respite offers for impacted receivers will be considered in accordance with the CNVS. Respite may be offered in the form of a reduction or absence of noise emissions for a period of time, or by removing the affected receiver from the noise emission point source (e.g. dinner/movie tickets and/or alternative accommodation offers).</p> <p>Observation:</p> <p>A small number of affected residents (tenants) at 473 Pacific Hwy are not being contacted directly by AWE. As contact with these tenants is currently via the owner of the premises on behalf of AWE, it is difficult to be certain that they have actually received any respite offers</p> <p>OFI:</p> <p>Project may also wish to consider voluntary offer of alternative accommodation for future OOHW for the most highly impacted receivers who have already made complaints (even though not technically qualifying for such an offer) as an act of goodwill</p>	<p>Observation: Recommend that AWE make all efforts to directly contact tenants as well as via owner</p> <p>OFI: Consider voluntary offer of alternative accommodation for future OOHW for the most highly impacted receivers who have already made complaints as an act of goodwill</p>	AWE/SM	<p>Response to Observation: AWE engages face to face with the residential tenants through the building owner/manager, and directly with the commercial tenants (Ratio Coffee, Lash & Mi Lash and Brow Bar, and the Rock Crystal Shop). All tenants (residential and commercial) are on our email distribution list and receive project and construction updates, including our weekly e-news update.</p> <p>Response to OFI: AWE recently provided a resident and their family from adjoining property with alternative accommodation from Sunday 16 October to Saturday 22 October during OOH tower crane removal and setup works. This alternative accommodation was not triggered in the noise assessment, but as a goodwill gesture. AWE will also be offering alternative accommodation to residents of 26 Clarke St for OOH girder installation works as a goodwill gesture.</p>	<p>CLOSED.</p> <p>Discretionary alternative accommodation was offered to some residents as part of OOH girder delivery works.</p> <p>Sydney Metro notes that all OSOM girder deliveries are completed.</p> <p>OOHW 1.2 expired in December 2022.</p>
7400_IA3_04	Community Communications Strategy 7.2 – Section 8.1.1	Observation	<p>Sydney Metro has established a Small Business Owners Support Program (SBOSP) to provide support, if required, to small business owners located within 50 metres of Sydney Metro C&SW. For the purposes of this program, a 'small business' is defined as a business that employs fewer than 20 people.</p> <p>OFI:</p> <p>While it is understood that support under the SBOSP has not been triggered for Crows Nest it is recommended that consideration be given to making the existence of the program more readily known on the SM website</p>	<p>Consideration be given to making the existence of the SBOSP more readily known on the SM website.</p>	SM	<p>Response to recommendation: Noted. The document's availability on the SM website in the document library is consistent with all other communications docs related to the planning approval. Suggest it would be more appropriate for a link to this doc be added in the contractor Business Management Plan when it's reviewed next.</p>	CLOSED

Table 5: Findings from the 2nd Independent Audit

Item	Ref.	Type	Details of item	Recommended or completed actions	By whom and by when	Auditee Response to Recommendation	Status
Findings from the 2nd Independent Audit: Inside agreed Audit Scope							
7400_CN_ISD_IA2_01	B12 - Community Complaints Mediator	Observation	<p>CoA: <i>The role of the Community Complaints Mediator must address any complaint where a member of the public is not satisfied by the Proponent's response. Any member of the public that has lodged a complaint which is registered in the Complaints Management System identified in Condition B6 may ask the Community Complaints Mediator to review the Proponent's response. The application must be submitted in writing and the Community Complaints Mediator must respond within 28 days of the request being made or other specified timeframe agreed between the Community Complaints Mediator and the member of the public.</i></p> <p>Observation:</p> <p>This condition implies that there is provision of a mechanism or process for complainant to request the help/support of a CCM in the review and resolution of a complaint. However, the option and process for a complainant to make such a request is not clearly stated nor explained in the Complaint Management System on the website nor in any community communications made available to the auditor.</p> <p>The auditor believes that some of the triggers/thresholds for escalating complaints to the CCM may have been met, but notes that to date no complaints have been referred to the CCM by the Director Project Communications or a member of the public (complainant) for support/resolution.</p>	The auditor recommends that the option and process for a member of the public to seek the help/support of the CCM be clearly communicated on the Sydney Metro website and in the relevant complaint management system/procedures and community communications forums.	Sydney Metro Within 4 weeks	The Sydney Metro City & Southwest Construction Complaints Management System is a public document that contains information and processes related to complaint management and escalation, including the Community Complaints Mediator. Additional text will be added to the Sydney Metro website to support this information.	OPEN

Item	Ref.	Type	Details of item	Recommended or completed actions	By whom and by when	Auditee Response to Recommendation	Status
7400_CN_ISD_IA2_02	B15 – Provision of Electronic Information	Observation	<p>CoA: A website providing information in relation to the CSSI must be established before commencement of works and maintained for the duration of construction, and for a minimum of 12 months following the completion of construction or other timeframe as agreed with the Secretary. The following up-to-date information (excluding confidential, private and commercial information or other documents as agreed to by the Secretary) must be published prior to the relevant works commencing, or in the case of documents prepared in accordance with E66 and E67 when finalised in accordance with the requirements of this approval, and maintained on the website or dedicated pages:</p> <p>(a) information on the current implementation status of the CSSI;</p> <p>(b) a copy of the documents listed in Condition A1 and Condition A2 of this approval, and any documentation relating to any modifications made to the CSSI or the terms of this approval;</p> <p>(c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval;</p> <p>(d) a copy of any Environment Protection Licence obtained in relation to the CSSI or link to any existing Environment Protection Licence applied to the CSSI; and</p> <p>(e) a current copy of each document required under the terms of this approval must be published within one week of its endorsement / approval or before the commencement of any works to which they relate or before their implementation as the case may be.</p> <p>Note: Environment Protection Licences relevant to each stage of the project need to be clearly differentiated to identify how and where they specifically apply.</p> <p>Observation:</p> <p>The requirements documents were difficult to find on the Sydney Metro website and in some cases they could not be found and the information had to be sourced via elsewhere.</p>	Ensure relevant sections on the website clearly describe and are entitled 'approvals' and that the links provided are clearly and consistently named as 'approvals' instead of 'EIS' for Chatswood to Sydenham and 'NSW DPE' for Sydenham to Bankstown and that all relevant documents are uploaded within the timeframes stipulated under this condition.	Sydney Metro Within 4 weeks	<p>All approved documents required under these conditions are uploaded to the Sydney Metro or relevant contractor's website prior to being implemented.</p> <p>As per correspondence dated 12 September 2017 between the Department and Sydney Metro, the Department has agreed that it is sufficient to include links to documents on the Contractor websites within the Sydney Metro website.</p> <p>Sydney Metro will consider updating website with clearer links to the two planning approvals, a request has been submitted to the Sydney Metro Public Communications team.</p>	OPEN
7400_CN_ISD_IA2_03	Not used.						

Item	Ref.	Type	Details of item	Recommended or completed actions	By whom and by when	Auditee Response to Recommendation	Status
7400_CN_ISD_IA2_04	E44 - Variation to Standard Construction Hours	Non-compliance	<p><i>CoA: Notwithstanding Condition E36 construction associated with the CSSI may be undertaken outside the hours specified under those conditions in the following circumstances:</i></p> <p><i>(a) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or</i></p> <p><i>(b) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or</i></p> <p><i>(c) where different construction hours are permitted or required under an EPL in force in respect of the construction;</i></p> <p><i>or</i></p> <p><i>(d) construction that causes LAeq(15 minute) noise levels:</i></p> <p><i>i. no more than 5 dB(A) above the rating background level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009), and</i></p> <p><i>ii. no more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses, and</i></p> <p><i>iii. continuous or impulsive vibration values, measured at the most affected residence are no more than those for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), and</i></p> <p><i>iv. intermittent vibration values measured at the most affected residence are no more than those for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006); or</i></p> <p><i>(e) where a negotiated agreement has been reached with a substantial majority of sensitive receivers who are within the vicinity of and may be potentially affected by the particular construction, and the noise management levels and/or limits for ground-borne noise and vibration (human comfort) cannot be achieved. All agreements must be in writing and a copy forwarded to the Secretary at least one (1) week before the works commencing; or</i></p> <p><i>(f) construction approved through an Out of Hours Work Protocol referred to in Condition E47, provided the relevant council, local residents and other affected stakeholders and sensitive receivers are informed of the timing and duration at least five (5) days and no more than 14 days before the commencement of the works.</i></p> <p><i>Note: This condition does not apply where an EPL is in force in respect of the construction.</i></p> <p>Non-compliance:</p> <p>Exceedance and non-compliance with respect to E44(d), as evidence by attended noise monitoring, unattended noise monitoring at various locations, complaints and an issued non-compliance by the ER.</p> <p>The auditor notes that OOHW Application 25 is due to expire on 30/6/23.</p>	<p>The auditor recommends that OOHW Application 25 – Extended Work be revised with a view to removing the activity of structural work, and that the work scheduling and program, and work methodologies and mitigations be revised to ensure low impact noise during OOH.</p> <p>Any further OOHW applications should be established so that the approval expires within a reasonable timeframe², so as to ensure that the application (and associated assessment and approval pathway), is representative of the works proposed.</p> <p>Additionally, the auditor recommends that regular self-monitoring and reporting be implemented to ensure compliance with this condition should such structure work be continued under a revised OOHW Application.</p> <p>Finally, the auditor recommends that the ER and AA conduct more regular site inspections (both planned and unannounced) during OOHW to ensure any potential risks/impacts are detected early and the required mitigations implemented to reduce avoidable noise and vibration impacts on the surrounding community.</p>	<p>SM / AWE</p> <p>Within 4 weeks</p>	<p>OOHW Application # 25.2 is revised, and the structural activities are excluded from the OOHW application. OOHW #34 is currently under review by AA, ER and Sydney Metro.</p> <p>Sydney Metro requires the Principal Contractor to issue the OOHW application 10 business days prior to the works. A one-week expiration of OOHW approval² is not standard nor feasible on major construction sites where it can take weeks to prepare and notify. This may result in constant renotification of ongoing work such as upcoming intersection upgrade, Clarke St reinstatement and removal of TC3.</p> <p>Ongoing monitoring is being completed (e.g., refer to April and May report) and will continue to remain consistent with modelling predictions.</p> <p>This is a self-reported Non-Conformance Report (NCR) which has been raised outside of this environmental audit and Sydney Metro is currently in the process of formally raising it to be included in June 2023 reporting.</p>	OPEN

² Note the auditor initially recommended a 1 week timeframe for OOHW approvals to expire. The auditor acknowledges the auditee's response and has updated this recommendation so that the OOHW approval expires in a reasonable timeframe.

7400_CN_ISD_IA2_05	<p>C8 – Implementation of CEMP and Sub-plans</p> <p>Section 6 - Training and Awareness, AWE CEMP</p>	Non-compliance	<p>CoA: <i>Construction must not commence until the CEMP and all CEMP sub-plans have been approved by the Secretary. The CEMP and CEMP sub-plans, as approved by the Secretary, including any minor amendments approved by the ER (or AA in regards to the Noise and Vibration sub-plan), must be implemented for the duration of construction. Where the CSSI is being staged, construction of that stage is not to commence until the relevant CEMP and sub-plans have been approved by the Secretary.</i></p> <p>Section 6 of the CEMP sets out the details on training and awareness of all Project personnel, including subcontractors.</p> <p>Non-compliance:</p> <p>AWE has not implemented training and awareness of its staff and subcontractors in accordance with Section 6 of the CEMP, noting the following:</p> <p>Section 6.2 – Strategic Environmental Training & Upskilling: The auditor requests evidence of targeted training e.g. for spill response provided to Foremen, Contractor Managers/Supervisors. This evidence was not made available.</p> <p>Section 6.3 – Toolbox Talks, Training & Awareness: The auditor could not find evidence of regular, systematic and planned toolbox talk, nor a comprehensive training & awareness program that is tailored to key environmental risks/hazards and contractors/labour hire.</p> <p>Section 6.4 – Daily Pre-start Meetings: The auditor was not able to find evidence of dedicated sections / focus on environmental risks and mitigations associated with daily works in the Daily Pre-start meetings.</p> <p>Section 6.5 – Environmental Alerts: The auditor was unable to find a systematic and planned program of environmental alerts for the audit period that addresses key environmental risk/hazards and requirements in this section.</p> <p>Separate to the above the auditor further observes that for Section 6.6 – Subcontractors: The auditee has provided some evidence to support parts of this requirement, for example sub-contract preliminary and interview forms but not the entirety of the requirements in this section. This section requires the auditee to build effective relationships with their sub-contractors and suppliers to improve environmental management and sustainability performance through various proactive initiatives, and with respect to this audit scope, particularly on noise and vibration aspects, the auditor is of the view that more work can be done to educate, train and raise awareness of risks and mitigations/controls on specific works being carried out by contractors and labour hire, and that such training and awareness be tailored to the specific needs of the workers.</p>	<p>It is recommended that the Planning & Environment Manager (or delegate) work with contractors to identify the training needs associated with the relevant works programs, and provide specific training around environmental hazards / risks; relevant legislative or approval conditions / requirements; management measures, controls and mitigations; incident reporting; communications protocols; and other measures required to manage project specific aspects of their work. This includes targeted training and environmental alerts as per the requirements of Section 6 Training & Awareness of the CEMP.</p> <p>It is further recommended that site/project specific training developed for contractors/labour hire be tailored to the trainee needs in consideration of cultural backgrounds, language and other communication barriers and needs.</p> <p>Additionally, to ensure that environmental induction are effective, the Planning & Environment Manager (or delegate should develop and implement both regular and ad hoc training awareness and competency assessments to ensure that trainees/contractors have understood the key environmental risks and issues associated with their work, their mitigations, and roles & responsibilities with regards controls and hazard, risk or incident notification and communications.</p> <p>The auditor recommends that Daily-start meetings include a dedicated section on environmental risks/mitigations associated with daily works by different work teams/contractors. These environmental daily start-up meetings can be easily integrated into the existing safety daily start-up meetings.</p> <p>The auditor recommends that the Planning & Environment Manager work with Sydney Metro to identify relevant and common risks/themes and lessons learnt/learnings from across the Sydney Metro project and develop and issue regular environmental alerts to the AWE team and contractors on a planned and regular basis.</p>	<p>AWE</p> <p>Within 4 weeks</p>	<p>6.2 Auditor states that no evidence provided. AWE consider that evidence was provided with a specific example listed on the document.</p> <p>6.3 Auditor states no evidence of regular planned toolbox talks, AWE consider this is not the commitment in the CEMP.</p> <p>AWE provided examples with a focus on approved N&V i.e., approved hours, OOHW applications, behaviour expected, however there are examples of waste water, complaints etc. Additionally, weekly toolbox talks are conducted though this had not been requested as the focus was on noise and vibration for this audit. Hammertech screenshot is available via email.</p> <p>6.4 Daily prestart examples were provided, noting that content could be improved on using non project water, banning of music and weather. AWE state that the auditor previously advised this would be supported to remove from the CEMP as it was onerous.</p> <p>6.5 No internal alerts have been required by AWE in the past 6 months.</p> <p>6.6 AWE noted that evidence was provided although further direction to document references was requested via Email on 14/6.. Examples of documentation such as AWE Invitation to Tender including workforce commitments, requirement to undergo induction, comply with CEMP, workforce requirements, environment requirements, sustainability requirements.</p> <p>Sydney Metro will continue to work collaboratively with its</p>	<p>OPEN</p> <p>The Auditor acknowledges the response and additional information provided for CEMP Section 6.6. However the Auditor disagrees with the remaining statements provided by AWE, and retains the view that the evidence provided does not adequately demonstrate the implementation of training and awareness commitments from the CEMP.</p>
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Item	Ref.	Type	Details of item	Recommended or completed actions	By whom and by when	Auditee Response to Recommendation	Status
						Principal Contractors to develop and share lessons learnt training packages to help raise awareness of common themes and issues encountered on all of Sydney Metro's project sites.	
Findings from the 2nd Independent Audit: Outside of agreed Audit Scope							
7400_CN_ISD_IA2_06	A19 - Boundary fencing A20 - Boundary screening	Observation	CoA: <i>A19 Boundary fencing that incorporates screening must be erected around all ancillary facilities that are adjacent to sensitive receivers for the duration of construction unless otherwise agreed with Relevant Council(s), and affected residents, business operators or landowners.</i> <i>A20 Boundary screening required under Condition A19 of this approval must minimise visual, noise and air quality impacts on adjacent sensitive receivers</i> Observation: Boundary fencing/screening of construction site on Pacific Hwy removed and left wide open OOH while no deliveries or works appeared to be occurring at the location.	Ensure re-instatement of work site boundary fencing when no deliveries or related works are being carried out at that location	AWE	AWE acknowledges that they were aware of this specific area, as it had traffic control implemented along with a pedestrian detour to facilitate out-of-hours deliveries and worker access.	OPEN
7400_CN_ISD_IA2_06	Spill management - CEMP	Observation	Requirement: <i>AWE CEMP, Soil & Water Management Plan</i> Observation: Chemical containers in lane not stored in designated bunded area.	Ensure all chemical containers are stored in designated and bunded areas	AWE	The IBCs / pods were viewed on the night and the auditor informed these are water pods, not chemical, that are placed there for removal.	CLOSED

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

A review was conducted of the effectiveness and implementation of the following documents relevant to the agreed audit scope:

- Sydney Metro's Community Communications Strategy (Revision 7.2) and AWE's Community Communications Strategy Rev 1 (September 2021)
- Sydney Metro's Construction Complaints Management System (City and Southwest) (Rev 7.2) and Complaints Register for 1/11/22 to 16/5/23.
- City & Southwest Out of Hours Work Strategy/Protocol Ver 5.2 (09/10/2021)
- Sydney Metro's Consultation Manager System Records (online)
- AWE Crows Nest ISD - Construction Noise & Vibration Management Plan, Rev. 5, 8/2/23.
- Sydney Metro – Incident and Non-compliance Procedures and Register 1 November 22 to 16 May 23.

The Auditor considers the documents to be adequate for the works being undertaken, noting however findings relating to:

- The Complaints Management System and related communications, where a complainant (member of the public) should be provided a clear process and guidance on how to apply/request the support of the Community Complaints Mediator in the resolution of a complaint.
- OOHW Protocol, where the application and approval process needs to be revised to ensure OOHW Applications are still appropriate given the results of recent noise monitoring, emerging non-compliances, and fairly regular complaints.
- CEMP – Section 6 'Training & Awareness', where a Training & Awareness Plan and Program should be developed and implemented to ensure these requirements are addressed, tracked, reported and complied with.

The Auditor is of the view that the recommendations from Table 5 should be implemented to address the deficiencies.

3.4 Summary of notices from agencies

To the Auditor's knowledge, there were no notices issued by the Department for the audit period.

3.5 Other matters considered relevant by the Auditor

Other than the matters identified in Section 3.2, there were no other matters considered relevant by the Auditor.

3.6 Complaints

An up-to-date complaints register is being maintained for the Project using the software, Consultation Manager, and was provided to the auditor on 15 June 2023. A total of 55 complaints related to Sydney Metro activities were recorded for the audit period. The majority of the complaints related to noise & vibration, particularly associated with out of hours works which had been approved under the OOHV protocol, with the second most common complaints being related to traffic, access and parking.

Of the 55 complaints received, 32 were assessed by Sydney Metro as being unavoidable, and 23 as avoidable. The level of 'avoidable' complaints and the four non-compliances with respect to noise and vibration demonstrates that the assessment of OOHV may be insufficient or inaccurate (see finding 7400_CN_ISD_IA2_04) and / or that communication of OOHV appears to be deficient. It is recommended that AWE and Sydney Metro assign increased effort to managing out-of-hours works and related applications and community communications in this regard.

Sydney Metro has investigated, considered and closed all of the complaints above as at the time of finalisation of this audit.

The Auditor considers the management of complaints on the Project to be adequate, notwithstanding the opportunities for improvement and observations outlined in Table 5.

3.7 Incidents

There were no notifiable incidents reported / recorded for the audit period. There were four (4) incidents at CN ISD for the audit period. All were class 3, non-notifiable and related to spills and leaks, and these have been addressed and closed out.

3.8 Environmental performance and effect on surrounding environment

As noted in Sections 3.2 and 3.6 a number of findings were identified in relation to the environmental performance of the Project. These relate to:

- Avoidable noise & vibration impacts and complaints relating to OOHV and worker behaviour
- Avoidable traffic & access impacts and complaints relating to general work practices and house keeping
- Insufficient emphasis and focus on development and implementation of detailed and tailored environmental training & awareness programs and initiatives with respect to employees, subcontractors and labour hire and related work and practices.

According to the non-compliance and complaints registers, the primary impacts on the community appear to be related to noise and vibration, OOHV, and traffic and access. The Auditor is of the view that these impacts appear consistent with those expected to occur from the approved works (given its close proximity to residences and commercial businesses) but that there are clear opportunities for improvement in work practices and performance, namely:

- more robust assessment of OOHW, along with appropriate approval for the works as assessed
- better communication of OOHW.

The auditee's environmental training and awareness program does not sufficiently address the requirements stipulated in Section 6 'Training & Awareness' of the CEMP. Whilst there is a good general induction / training provided at the outset of work on site, there does not appear to be a more comprehensive and planned training program in place that identifies and then implements the training needs required for various staff, sub-contractors and labour hire to properly carry out their work/duties with full awareness and understanding of environmental risks, mitigations, responsibilities and reporting procedures with respect to their specific work/tasks.

Additionally, it does not appear that the training is properly tailored to the various needs of the subcontractors/labour hire with consideration of cultural background and language barriers.

The deficiencies in the auditee's environmental training & awareness program may be resulting in and / or compounding community impacts and leading to avoidable complaints and therefore improvements in these areas, to comply with the stated requirements in Section 6 'Training & Awareness' of the Contractor's own CEMP, would help address some of these avoidable impacts and complaints. This is particularly the case with respect to work practices and worker behaviours.

It is the view of the auditor, ER and AA that the auditee may also be pushing the limits of the existing OOHW Application No. 25 – Extended Works, where there has been reported exceedances to noise limits, related complaints, and a subsequent non-compliance. The auditor recommended that this application be reviewed to remove high-risk structural work during out-of-hours, to allow more low impact works, and to review work scheduling and methodologies to reduce the risk of exceedances and non-compliances. Should the auditee wish to continue with such works during out-of-hours, then the auditor recommends more regular self-monitoring and self-reporting to demonstrate compliance and minimise impacts on the community and complaints. As noted by the auditee in Section 3.2, OOHW Application # 25.2 is revised, and the structural activities are excluded from the OOHW application. A new OOHW application (#34) is currently under review by AA, ER and Sydney Metro.

Further, the auditor recommends that the ER and AA conduct more regular site inspections (both planned and unannounced) during OOH to ensure any potential risks/impacts are detected early and the required mitigations implemented to reduce avoidable noise and vibration impacts on the surrounding community.

4. CONCLUSIONS

This Independent Audit sought to verify compliance with the relevant conditions and assess the effectiveness of environmental management associated with the following aspects:

- Compliance with Community and Stakeholder Engagement conditions (CoA B1-B15)
- Compliance with the Incident and Non-compliance Process conditions, including identification and corrective actions (CoA A20, A34, A41-A44)
- Compliance with Training of Workforce requirements (as per Section 6 'Training & Awareness' of the CEMP)
- Compliance with Noise and Vibration (day-time and OOHW) conditions (A27, E28-E56) and implementation of OOHW Protocol and management of OOHW
- Include consultation with ER and AA and conduct inspection during evening / night time OOHW.

The overall outcome of the Independent Audit was positive. Records were mostly well organised and available at the time of the site inspection and interviews with Project personnel from Sydney Metro and AWE. In summary:

In relation to the status of findings from the previous Independent Audit on the Project:

- All findings that were open at the time of completion of the previous Independent Audit on the Crows Nest ISD are considered by the auditor to be closed.

In relation to the second Independent Audit on the Project, there were:

- Fifty-five (55) conditions and seven (7) CEMP requirements assessed.
- Two (2) non-compliances were identified.
- Four (4) observations were identified.

The non-compliances were related to:

- Noise exceedances at sensitive receivers and the need to revisit OOHW applications and work schedules/programs/methodologies that involve structural work during out-of-hours. It is understood that this was self-reported by Sydney Metro.
- Insufficiency of environmental training and awareness, especially with respect to sub-contractors and labour hire, as required to address all the requirements set out in the auditee's CEMP.

The observations were related to:

- The need to put a mechanism in place for a complainant (member of the public) to apply / request the support of a Community Complaints Mediator to help resolve complaints.
- The need to revise or update the Sydney Metro website to allow easier and more ready access / links to the approvals and required documentation.
- Security of boundary fencing on the night of the inspection.
- Storage of chemicals.

The Auditor would like to thank the auditees representing Sydney Metro, AWE, the Environmental Representative and the Acoustic Advisor for their high level of organisation, cooperation, openness and assistance during the Independent Audit.

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APPENDIX A – SSI 7400 CONDITIONS OF APPROVAL AND ASSOCIATED REQUIREMENTS

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT				
B1	A Community Communication Strategy must be prepared to facilitate communication between the Proponent, and the community (including Relevant Councils, adjoining affected Landowners and businesses, and others directly impacted by the CSSI), during the design and construction of the CSSI and for a minimum of 12 months following the completion of construction of the CSSI	<p>Crows Nest Station specific AWE CCS (Rev 1) is available at: https://crowsnestmetrostation.com.au/</p> <p>Overarching CCS updated and approved (Rev 7.2, dated 18 May 2022) with ER endorsement.</p> <p>Sydney Metro overarching CCS (Rev 6.2) available at: https://www.sydneymetro.info/documents</p> <p>Copy of all Project Communications Procedures relating to the CCS provided to auditor.</p>	A Sydney Metro and AW Edwards CCS have been prepared and approved and are being implemented in accordance with this requirement – see below sections.	Compliant
B2	<p>The Community Communication Strategy must:</p> <p>(a) identify people or organisations to be consulted during the design and construction phases;</p> <p>(b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the CSSI;</p> <p>(c) identify opportunities to provide accessible information regarding regularly updated site construction activities, schedules and milestones at each construction site including use of construction hoardings to provide information regarding construction, specific to the location;</p> <p>(d) identify opportunities for the community to visit construction sites (taking into consideration workplace, health and safety requirements);</p> <p>(e) involve construction personnel from each construction site in engaging with the local community;</p> <p>(f) provide for the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community(ies) for the CSSI;</p> <p>(g) set out procedures and mechanisms:</p> <p>i. through which the community can discuss or provide feedback to the Proponent;</p> <p>ii. through which the Proponent will respond to enquiries or feedback from the community; and</p> <p>iii. to resolve any issues and mediate any disputes that may arise in relation to environmental management and delivery of the CSSI</p>	<p>Overarching CCS (OCCS) updated and approved (Rev 7.2, dated 18 May 2022) with ER endorsement.</p> <p>https://www.sydneymetro.info/sites/default/files/2022-05/CSW-Overarching-Community-Communications-Strategy.pdf</p> <p>Table 1 of SM CCS indicates how all of these requirements have been addressed.</p> <p>Appendix A Compliance Matrix of AWE CCS indicates how all of these requirements have been addressed.</p> <p>Summary of communication and engagement activities 01/11/2022 to 30/04/2023</p> <p>Type and Number of events</p> <p>Door knocks 35</p> <p>Stakeholder meetings 13</p> <p>Presentations 0</p> <p>Email campaigns 46</p> <p>General emails 430 incoming emails 416 outgoing emails</p> <p>Phone calls 56 incoming phone calls 150 outgoing phone calls</p> <p>Letterbox drops (only) 19</p> <p>Site visit 21</p> <p>Other face-to-face contact 19</p> <p>SMS 5 incoming 4 outgoing</p>	<p>The CCS has addressed all of the requirements (a-g) and has been approved by the Department and endorsed by the ER at the project start-up phase and subsequently in its last revision.</p> <p>The CCS is being actively implemented and evidence has been provided that shows how the requirements in B2 are being addressed.</p> <p>A compliance matrix is included in the AWE CCS identifying how each of the requirements is being met.</p>	Compliant
B3	The Community Communication Strategy must be submitted to the Secretary for approval no later than three months from the date of this approval or one (1) month before commencement of any work, whichever is the latter	<p>DPE letter of 12/3/19 approving Rev 6 of SM CCS (noting previous versions were approved earlier by DPE on 16/3/17).</p> <p>Subsequent DPE approval letter on 9/6/17 and ER endorsed letter of Overarching CCS on 16/3/17.</p> <p>Overarching CCS (OCCS) updated and approved (Rev 7.2, dated 18 May 2022) with ER endorsement.</p>	The CCS was submitted to the Secretary and approved by DPE on 16/3/17 which is within 3 months of the date of this approval on 9/1/17.	Compliant

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B4	Work for the purposes of the CSSI must not commence until the Community Communication Strategy has been approved by the Secretary, or within another timeframe agreed with the Secretary	<p>Interview with auditees 16/5/23.</p> <p>DPE letter of 12/3/19 approving Rev 6 of SM CCS (noting previous versions were approved earlier by DPE on 16/3/17).</p> <p>Subsequent DPE approval letter for Sydney Metro CCS on 9/6/17.</p> <p>AWE CCS approved by Sydney Metro on 5/2/21.</p> <p>Crows Nest Station newsletter May 2021.</p>	The Sydney Metro CCS was first approved by DPE on 16/3/17 which is before the commencement of construction of the C&SW Project in June 2017, and well in advance of the commencement of construction and early works at Crows Nest Station in January 2021.	Compliant
B5	The Community Communication Strategy, as approved by the Secretary, must be implemented for the duration of the works and for 12 months following the completion of construction.	<p>Interview with auditees 16/5/23.</p> <p>Overarching CCS updated and approved (Rev 7.2, dated 18 May 2022) with ER endorsement.</p> <p>https://www.sydneymetro.info/sites/default/files/2022-05/CSW-Overarching-Community-Communications-Strategy.pdf</p> <p>Sydney Metro Newsletter Crows Nest ISD - Upcoming work - Crows Nest Station and surrounding precinct, January 2023.</p> <p>Monthly Sydney Metro Construction Update Notice.</p> <p>Sydney Metro, Crows Nest Out of Hours Notice, March, 2023.</p>	<p>The Sydney Metro OCCS (as approved by the Secretary) is still being implemented as construction is ongoing.</p> <p>The OCCS is being implemented through the development of the contractor AWE CCS and evidence of its implementation and related communications activities are provided on the Sydney Metro website.</p> <p>These activities include: community/stakeholder notifications, communication of OOHW, monthly project updates for the Crows Nest ISD location including planned OOHW, engagement and consultation with local businesses, updating of stakeholder database, implementation of signage and hoarding information, and a community complaints management system and register.</p> <p>Sighted emails provide evidence of information distributed to the community on how to discuss or provide feedback to the Proponent: Systems Connect, questions about upcoming work at the ISD and recent community consultation in February 2022, where AWE consulted with businesses and residents within 50 metres of the works to request feedback on preferences for respite hours for high impact noise and vibration works. AWE consulted on two options for respite and 411 businesses and residents were doorknocked, and approximately 191 people were consulted. This included 108 businesses and 83 residents.</p>	Compliant
COMPLAINTS MANAGEMENT SYSTEM				
B6	A Complaints Management System must be prepared before the commencement of any works in respect of the CSSI and be implemented and maintained for the duration of works and for a minimum for 12 months following completion of construction of the CSSI.	<p>Interview with auditees on 16/5/23.</p> <p>Sydney Metro Construction Complaints Management System – Sydney Metro City & Southwest – Sydney Metro website, Rev 7.2 (18/5/22).</p> <p>https://www.sydneymetro.info/sites/default/files/2022-05/CSW-Construction-Complaints-Management-System.pdf</p>	<p>The Sydney Metro CMS was prepared and submitted to Secretary on 28/3/17, and construction works commenced on Crows Nest ISD in January 2021.</p> <p>The CMS has since been reviewed and updated/finalized on 18/5/22.</p>	Compliant

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>CS1.1 – Complaint Management Procedure (Sydney Metro) – ‘Project Communications Procedure – Complaint Reporting, Consultation Manager (Place Manager and Contractor Teams)’.</p> <p>Sydney Metro Complaints Register details provided to the auditor for the audit period 1/11/22 to 11/5/23.</p> <p>https://www.sydneymetro.info/sites/default/files/2022-05/CSW-Construction-Complaints-Management-System.pdf</p>	<p>The Sydney Metro and AWE Communications and Consultation Managers maintain adherence to the requirements in this CMS.</p> <p>Consultation Manager is an integral component of this system used to manage complaints</p>	
B7	<p>The Complaints Management System must include a Complaints Register to be maintained recording information on all complaints received about the CSSI during the carrying out of any works associated with the CSSI and for a minimum of 12 months following the completion of construction. The Complaints Register must record the:</p> <p>(a) number of complaints received;</p> <p>(b) number of people affected in relation to a complaint; and</p> <p>(c) nature of the complaint and means by which the complaint was addressed and whether resolution was reached, with or without mediation</p>	<p>Complaints Reporting Register (1/11/22 to 16/5/23) prepared by SM/AWE (55 complaints recorded).</p> <p>Complaints Register is included as Appendix A in the Sydney Metro Construction Compliance Certificate, the most recent draft edition dated May 2023.</p> <p>Complaints Register is embedded within Consultation Manager database which was sighted during the audit interview on 17/5/23 and which contains the information required to be recorded by this condition</p> <p>Daily, weekly and monthly complaints report is provided to DPE</p> <p>Daily Complaint Reports sighted includes the required information</p> <p>Weekly Complaints Reports sighted, which contain more details than the daily reports</p> <p>May 2023 Monthly Complaints Report sighted</p>	<p>A Complaints Register (1/11/22 to 16/5/23) has been developed and is being maintained by AWE Consultation Manager with shared visibility by the Sydney Metro.</p> <p>The Complaints Register details the number of complaints received, number of people affected, the nature of the complaint and means by which it has been addressed.</p> <p>The Complaints Register is also included as Appendix A in the Sydney Metro Construction Compliance Report, the most recent draft edition dated May 2023.</p> <p>There were 55 complaints recorded for the audit period 1/11/22 to 16/5/23. 32 were described as unavoidable and 23 as avoidable.</p> <p>The nature of the complaints relate mostly to noise and vibration (including OOH), and then traffic, access and parking.</p> <p>All complaints had been closed at the time of the audit.</p>	Compliant
B8	<p>The Complaints Register must be provided to the Secretary upon request, within the timeframe stated in the request</p>	<p>Request by Secretary on 10 August 2017 for Complaints Register and fortnightly submission.</p> <p>Daily Complaint Report email - 11 May 2023</p> <p>CSW Daily Complaints Report - 11 May 2023</p> <p>Daily complaints submission to Secretary since January 2018.</p> <p>Monthly spreadsheet of Complaints to DPE Compliance Team since June 2019.</p> <p>Weekly and monthly complaints register issued to DPE via portal from Q4 2021.</p> <p>Sydney Metro – Chatswood to Sydenham – Weekly Complaint Report No. 13, dated 19/3/22.</p>	<p>The Complaints Register is being provided to the Secretary / DPE as requested and in the timeframe requested.</p> <p>DPE has not requested a copy of the complaints register per se but are receiving the reports referred to in B7 above via Compliance email address (SM Enviro Team does this)</p>	Compliant
B9	<p>The following facilities must be available within one (1) month from the date of this approval and for 12 months following the completion of construction and appropriately broadcast to collect community enquiries and complaints:</p>	<p>SM CCS and at following SM web page: https://www.sydneymetro.info/get-touch</p> <p>‘Get in Touch’ page/link details:</p>	<p>Details of requirements a-c for SM CSW are available on the Sydney Metro website and have been available on the website since March 2017 (at the commencement of the broader CSW Project), and well in advance of</p>	Compliant

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>(a) a 24 hour telephone number for the registration of complaints and enquiries about the CSSI;</p> <p>(b) a postal address to which written complaints and enquires may be sent;</p> <p>(c) an email address to which electronic complaints and enquiries may be transmitted; and</p> <p>(d) place-based community manager for each of the station locations available to meet with community members on request</p>	<p>(a-c) 24 hour community information line, phone. 1800 171 386. Postal address: Sydney Metro City & Southwest, PO Box K659, Haymarket, NSW 1240. Email: sydneymetro@transport.nsw.gov.au (link sends e-mail with a response during business hours only).</p> <p>(d) is AWE responsibility as per Table 2 of AWE CCS, currently Susan Von Kolpakow</p>	<p>the commencement of construction works at Crows Nest ISD in June 2021.</p> <p>A place based Community Manager (Susan Von Kolpakow) has been appointed by Sydney Metro and is available to meet community members upon request.</p> <p>Targeted emails and newsletters are provided information which the community can see.</p> <p>Records of communication / interaction with the community are maintained by the Consultation Manager.</p>	
B10	The telephone number, postal address and email address required under Condition B9 of this approval must be published in a newspaper circulating in the local area and on site hoarding at each construction site before commencement of construction and published in the same way again before commencement of operation. This information must also be provided on the website required under Condition B15 of this approval	<p>Newspaper advertisements with B9 details in week commencing 6 March 2017.</p> <p>Booking request with North Shore Times for Thursday, 9 March, 2017 and Start of Construction B9 information advert sighted.</p> <p>Details in B9 on site hoardings.</p>	<p>The details required in B9 have been provided in newspaper advertisements, community notices and on-site hoarding since the commencement of works.</p> <p>Newspaper advertisements included the following: 1800 171 386 24 hour community information line. sydneymetro@transport.nsw.gov.au (link sends e-mail with a response during business hours only) Sydney Metro City & Southwest, PO Box K659, Haymarket, NSW 1240.</p>	Compliant
B11	A Community Complaints Mediator that is independent of the design and construction personnel must be nominated by the Proponent, approved by the Secretary and engaged during all works associated with the CSSI. The nominated Community Complaints Mediator must be submitted to the Secretary for approval within one month of the date of this approval or within another timeframe agreed with the Secretary	<p>Sydney Metro engagement letter for Christine Marsden of Quatro Group as Community Complaints Mediator (CCM), dated November 2020.</p> <p>Sydney Metro request for approval of Chistine Marsden as CCM submitted to DPE on 28 March 2017.</p> <p>DPE approval letter for Community Complaints Mediator dated 13 April 2017.</p> <p>CCM, Dr Rosemary Howell, replaced Christine Marsden in November 2020.</p> <p>Dr Rosemary Howell (newly appointed CCM) approval by DPE on 10/11/20.</p> <p>Letter 03/11/2020 SM-DPE re: Sydney Metro City & Southwest SSI 7400 – Change of Community Complaints Mediator - Dr. Rosemary Howell of Strategic Action Pty Ltd</p>	<p>A Community Complaints Mediator (CCM) has been engaged and is approved by DPE.</p> <p>The CCM has not been used for the Crows Nest ISD site since the commencement of construction works.</p>	Compliant
B12	<p>The role of the Community Complaints Mediator must address any complaint where a member of the public is not satisfied by the Proponent's response. Any member of the public that has lodged a complaint which is registered in the Complaints Management System identified in Condition B6 may ask the Community Complaints Mediator to review the Proponent's response.</p> <p>The application must be submitted in writing and the Community Complaints Mediator must respond within 28 days of the request being made or other specified timeframe agreed between the Community Complaints Mediator and the member of the public</p>	<p>Interview with auditees on 16/5/23.</p> <p>Section 5.2 – 'Role of Community Complaints Mediator', Construction Complaints Management System – Sydney Metro City & Southwest – Sydney Metro website, Rev 7.2 (18/5/22).</p> <p>Auditor requested details of any complaints referred to CCM in audit interview.</p>	<p>There have been no complaints that have been referred by Sydney Metro / AWE to the CCM for the Crows Nest ISD site.</p> <p>Nor, to the auditor's knowledge based on evidence provided has there been an escalation of complaints to the Director of Communications.</p> <p>Observation</p> <p>This condition implies that there is provision of a mechanism or process for complainant to request the help/support of a CCM in the review and resolution of a complaint. However, the option and process for a complainant to make such a request is not clearly stated nor explained</p>	<p>Not triggered</p> <p>Observation</p>

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			<p>in the Complaint Management System on the website nor in any community communications made available to the auditor.</p> <p>The auditor believes that some of the triggers/thresholds for escalating complaints to the CCM may have been met, but notes that to date no complaints have been referred to the CCM by the Director Project Communications or a member of the public (complainant) for support/resolution.</p> <p>The auditor recommends that the option and process for a member of the public to seek the help/support of the CCM be clearly communicated on the Sydney Metro website and in the relevant complaint management system/procedures and community communications forums.</p>	
B13	<p>The Community Complaints Mediator will:</p> <p>(a) review the Proponent's unresolved disputes between the project and members of the public if the procedures and mechanisms under Condition B2(g)(iii) do not satisfactorily address complaints; and</p> <p>(b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes</p>	<p>Section 5.2 – 'Role of Community Complaints Mediator', Construction Complaints Management System – Sydney Metro City & Southwest – Sydney Metro website, Rev 7.2 (18/5/22).</p> <p>Auditor requested details of any complaints referred to CCM in audit interview.</p>	<p>There were no complaints referred to the Community Complaints Mediator.</p> <p>Observation: As per B12.</p> <p>Auditor recommendations as per B12.</p>	<p>Not triggered</p> <p>Observation</p>
B14	<p>The Community Complaints Mediator will not act before the Proponent has provided an initial response to a complaint and will not consider issues such as property acquisition where other dispute processes are provided for in this approval, or clear government policy and resolution processes are available, or matters which are not within the scope of the CSSI.</p>	<p>Section 5.2 – 'Role of Community Complaints Mediator', Construction Complaints Management System – Sydney Metro City & Southwest – Sydney Metro website, Rev 7.2 (18/5/22).</p> <p>Auditor requested details of any complaints referred to CCM in audit interview.</p>	<p>There were no complaints referred to the Community Complaints Mediator.</p> <p>Observation: As per B12.</p> <p>Auditor recommendations as per B12.</p>	<p>Not triggered</p> <p>Observation</p>
Provision of Electronic Information				
B15	<p>A website providing information in relation to the CSSI must be established before commencement of works and maintained for the duration of construction, and for a minimum of 12 months following the completion of construction or other timeframe as agreed with the Secretary. The following up-to-date information (excluding confidential, private and commercial information or other documents as agreed to by the Secretary) must be published prior to the relevant works commencing, or in the case of documents prepared in accordance with E66 and E67 when finalised in accordance with the requirements of this approval, and maintained on the website or dedicated pages:</p> <p>(a) information on the current implementation status of the CSSI;</p> <p>(b) a copy of the documents listed in Condition A1 and Condition A2 of this approval, and any documentation relating to any modifications made to the CSSI or the terms of this approval;</p> <p>(c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to</p>	<p>https://www.sydneymetro.info/citysouthwest/environment-planning</p> <p>https://www.sydneymetro.info/sites/default/files/2022-05/CSW-Overarching-Community-Communications-Strategy.pdf</p> <p>(a) Section entitled 'Compliance Documentation' under heading 'Planning & Compliance' and section entitled 'Planning Modifications' provided under https://www.sydneymetro.info/citysouthwest/environment-planning</p> <p>Web pages 'Project and Progress' and 'Construction Stations and Sites' provide updates on works.</p> <p>(d) Copy of EPL https://www.sydneymetro.info/sustainability/environmental-management - link to NSW EPA website.</p>	<p>Information relating to the current implementation status of the CSSI (B15 (a)) is provided in https://www.sydneymetro.info/citysouthwest/environment-planning and sections entitled 'Compliance Documentation' under heading 'Planning & Compliance' and section entitled 'Planning Modifications'.</p> <p>Details of construction works and progress are provided under webpages 'Project and Progress' and 'Construction Stations and Sites' provide updates on works.</p> <p>Details for the approvals B15 (b-c) are contained under a link entitled 'Chatswood to Sydenham Environmental Impact Statement (EIS) and 'NSW Department of Planning and</p>	<p>Compliant</p> <p>Observation</p>

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval;</p> <p>(d) a copy of any Environment Protection Licence obtained in relation to the CSSI or link to any existing Environment Protection Licence applied to the CSSI; and</p> <p>(e) a current copy of each document required under the terms of this approval must be published within one week of its endorsement / approval or before the commencement of any works to which they relate or before their implementation as the case may be.</p> <p><i>Note: Environment Protection Licences relevant to each stage of the project need to be clearly differentiated to identify how and where they specifically apply.</i></p>		<p>Environment website' link for Sydenham to Bankstown.</p> <p>Planning modifications are detailed in links under the Planning Modifications headings.</p> <p>A copy of the EPL for SSI7400 is not immediately available on the website but through a link to the EPA website where it needs to be searched/located.</p> <p>Copies of the documents required under the approval are provided under 'Compliance Documentation' under section 'Planning & Compliance' of the 'Sustainability & Planning' page and 'Document Library' link of the website.</p> <p>A copy of the CEMF is provided under the Environmental Management section under the Sustainability & Planning page of the website.</p> <p>Observation: The requirements documents were difficult to find on the Sydney Metro website and in some cases they could not be found and the information had to be sourced via elsewhere.</p> <p>Ensure relevant sections on the website clearly describe and are entitled 'approvals' and that the links provided are clearly and consistently named as 'approvals' instead of 'EIS' for Chatswood to Sydenham and 'NSW DPE' for Sydenham to Bankstown and that all relevant documents are uploaded within the timeframes stipulated under this condition.</p>	
COMPLIANCE TRACKING PROGRAM				
A30	<p>The Compliance Tracking Program in the form required under Condition A28 of this approval must be implemented for the duration of construction and for a minimum of one (1) year following commencement of operation, or for a longer period as determined by the Secretary based on the outcomes of independent environmental audits, Environmental Representative Reports and regular compliance reviews submitted through Compliance Reports. If staged operation is proposed, or operation is commenced of part of the CSSI, the Compliance Tracking Program must be implemented for the relevant period for each stage or part of the CSSI.</p>	<p>Sydney Metro – City South West Compliance Monitoring/Tracking and Reporting Program Report, Rev 4, 19/12/22.</p> <p>Environmental Incident and Noncompliance Reporting Procedure, SM-17-00000096, Version: 5.1, 18 February 2019</p> <p>Spill Management Procedure SM C&SW Line Works Rev 3, 12/08/2022 by Sydney Metro</p> <p>Environmental Incident and Non-compliance Reporting Procedure SM-1700000096 Rev 5.1 18/02/2019 by SM</p> <p>Environmental Incidents and Non-Compliance Registers (1/11/22 to 16/5/23) by SM/AWE.</p> <p>Four (4) incidents recorded and nine (9) non-compliances for the audit period 1/11/22 to 16/5/23 – details are as follows:</p>	<p>The Compliance Tracking Program required under A28 is being implemented as required.</p> <p>There were four (4) incidents at CN ISD for the audit period. All were class 3, non-notifiable and related to spills and leaks, and these have been addressed and closed out.</p> <p>There were nine (9) non-compliances issued for the audit period, most related to noise & vibration and the others to access & traffic.</p> <p>All non-compliances, except one relating to OOHW Application 25, have been closed out.</p>	Compliant

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p><u>Incidents:</u></p> <p>There were four incidents (Class 3, non-notifiable) at CN ISD on dates 15/3/23, 24/2/23, 17/2/23 and 19/1/23 relating to spills and leaks.</p> <p><u>Non-compliances:</u></p> <ol style="list-style-type: none"> 1. Material stored outside site boundary on 16/11/22. CLOSED. 2. Access impeded / blocked on 23 and 28 Nov 22, not consistent with community communications. CLOSED. 3. Excess noise – attended noise monitoring – forklift moving skip on 2/2/23. CLOSED. 4. Noise – attended noise monitoring internal for OOHW not carried out as required in OOHW Application 24. Since conducted on 2 Feb 23. CLOSED. 		
A34	Construction Compliance Reports must be prepared and submitted to the Secretary for information every six (6) months from the date of the commencement of construction or within another timeframe agreed with the Secretary, for the duration of construction. The Construction Compliance Reports must include:	<p>SM Construction Compliance Report #12 (1 October 2022 to 31 March 2023), dated December 2022, in Draft, v1.</p> <p>CCR11 (Apr 2022 to Sep 2022): https://www.sydneymetro.info/media/document/32501</p> <p>(a) Section 5 of CCR 'Environmental & Compliance Performance'</p> <p>(b) Section 5.7 of CCR 'Complaints' and Appendix 1 'Complaints during the reporting period'</p> <p>(c) Section 3.2 of CCR 'Construction Environmental Management Plan Reviews / Amendments'</p> <p>(d) Section 2.2.2 of CCR 'Consistency Assessments'</p> <p>(e) Section 5.4 of CCR 'Environmental Audit Findings'</p> <p>(f) Section 5.3 of CCR 'Incidents'</p> <p>(g) Response from Sydney Metro to DPE on request for information re: CCR dated 19/12/22.</p>	<p>Construction Compliance Reports (CCR) are being prepared and submitted to DEP.</p> <p>The most recent draft (CCR #12) was provided to the auditor and covers the period 1/10/22 to 31/3/23. The number of any complaints received, including a summary of main areas of complaint are documented in s57 of the CCR. A description of the complaint, investigation and resolution actions, as well as proposed strategies to reduce recurrence are detailed in Appendix 1 'Complaints Register.'</p> <p>Results of independent audits are provided in s5.4 but the section does not include details of the actions taken in response of the recommendations of the audit.</p>	Compliant
INCIDENT NOTIFICATION				
A41	The Secretary must be notified as soon as possible and in any event within 24 hours of any incident.	<p>Environmental Incident and Non-compliance Reporting Procedure, SM-17-00000096, Version: 5.1, 18 February 2019</p> <p>Compliance matrix in Construction Compliance Reports (CCR) with details of compliance.</p> <p>Construction Compliance Report #12 (1 October 2022 to 31 March 2023), dated December 2022, in Draft, v1.</p>	<p>This condition requires that 'any' incident must be notified but the definition of incident in the approval relates to incident that threaten to cause material harm to the environment.</p> <p>There were no notifiable incidents for CN ISD for the audit period.</p>	Not triggered
A42	Notification of an incident under Condition A41 of this approval must include the time and date of the incident, details of the incident and must identify any non-compliance with this approval.	<p>Environmental Incident and Non-compliance Reporting Procedure, SM-17-00000096, Version: 5.1, 18 February 2019</p> <p>NCR Table (extracted from ER meeting minutes#52 dated 19/05/2023)</p>	<p>There were no notifiable incidents for CN ISD for the audit period.</p>	Not triggered
A43	Any requirements of the Secretary or Relevant Public Authority (as determined by the Secretary) to address the cause or impact of an incident reported in accordance with Condition A41 of this approval, must be met within the timeframe determined by the Secretary or relevant public authority.	<p>Environmental Incident and Non-compliance Reporting Procedure, SM-17-00000096, Version: 5.1, 18 February 2019</p>	<p>There were no notifiable incidents for CN ISD for the audit period.</p>	Not triggered

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A44	If statutory notification is given to the EPA as required under the POEO Act in relation to the CSSI, such notification must also be provided to the Secretary for information within 24 hours after the notification was given to the EPA.	Environmental Incident and Non-compliance Reporting Procedure, SM-17-00000096, Version: 5.1, 18 February 2019	There were no notifiable incidents for CN ISD for the audit period.	Not triggered
NOISE AND VIBRATION				
A27	<p>The approved AA must:</p> <ul style="list-style-type: none"> (a) receive and respond to communication from the Secretary in relation to the performance of the CSSI in relation to noise and vibration; (b) consider and inform the Secretary on matters specified in the terms of this approval relating to noise and vibration; (c) consider and recommend, to the Proponent, improvements that may be made to work practices to avoid or minimise adverse noise and vibration impacts; (d) review all noise and vibration documents required to be prepared under the terms of this approval and, should they be consistent with the terms of this approval, endorse them before submission to the Secretary (if required to be submitted to the Secretary) or before implementation (if not required to be submitted to the Secretary); (e) regularly monitor the implementation of all noise and vibration documents required to be prepared under the terms of this approval to ensure implementation is in accordance with what is stated in the document and the terms of this approval; (f) review the Proponent's notification of noise and vibration incidents in accordance with Condition A41 of this approval; (g) in conjunction with the ER (where required), the AA must: <ul style="list-style-type: none"> i. consider requests for out of hours construction activities and determine whether to endorse the proposed activities in accordance with Condition E47; ii. as may be requested by the Secretary or Complaints Mediator, help plan, attend or undertake audits of noise and vibration management of the CSSI including briefings, and site visits; iii. if conflict arises between the Proponent and the community in relation to the noise and vibration performance during construction of the CSSI, follow the procedure in the Community Communication Strategy approved under Condition B3 of this approval to attempt to resolve the conflict, and if it cannot be resolved, notify the Secretary; iv. consider relevant minor amendments made to any noise and vibration document approved by the Secretary that require updating or are of an administrative or minor nature, and are consistent with the terms of this approval and the document approved by the Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval; v. assess the noise impacts of minor ancillary facilities as required by Condition A18 of this approval; and 	<p>Section 2.2 'Criteria' under Section 2 'Scope of Works' under the Services Brief, Sydney Metro City & Southwest, Acoustic Advisory Services (Chatswood to Sydenham) – RFT No. SM2021/006.</p> <p>DPE approval letter addressed to Sydney Metro for appointment of AA entitled 'Sydney Metro: Chatswood to Sydenham (SSI-7400) Condition A25: Approval of Acoustic Advisors' and dated 27/9/21.</p> <p>AA Approval letter (dated 23/12/22) for CN ISD CNVIS Rev. N, dated 19/12/22.</p> <p>AA monthly reports detailing communications with Secretary, and AA attendance at monthly meeting with Sydney Metro and DPE.</p> <p>Email 17/04/2023 transport.nsw-SC re: Requesting for reporting requirement - Construction Compliance Report 12 Inputs for Linewide including noise monitoring results and vibration monitoring results.</p> <p>Monthly Noise & Vibration Report City & Southwest Acoustic Advisor - November 2022, 06/12/2022 by EMM.</p> <p>Monthly Noise & Vibration Report City & Southwest Acoustic Advisor - December 2022, 06/01/2023 by EMM.</p> <p>Monthly Noise & Vibration Report City & Southwest Acoustic Advisor – January 2023, 07/02/2023 by EMM.</p> <p>Monthly Noise & Vibration Report City & Southwest Acoustic Advisor – February 2023, 07/03/2023 by EMM.</p> <p>Monthly Noise & Vibration Report City & Southwest Acoustic Advisor – March 2023, 06/04/2023 by EMM.</p> <p>Review and approval of Construction Noise and Vibration Impact Statement (CNVIS) Addendum Report by Acoustic Advisor (EMM), dated 19/9/22.</p>	<p>An AA has been engaged and approved by DPE and is carrying out their duties in accordance with this Condition, the requirements of which are also described in the AA's contract (as stated in the brief and s2 of the RFT).</p> <p>The AAs activities and observations and recommendations are noted in the monthly AA reports submitted to DPE.</p> <p>The AA has been attending regular meetings with Sydney Metro, DPE and ER and liaises with DPE on any emerging issues at those meetings.</p> <p>The AA has been conducting regular site inspections with the ER and Sydney Metro and the contractor and raises issues directly with the auditee.</p>	Compliant

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	vi. prepare and submit to the Secretary and other relevant regulatory agencies, for information, a monthly Noise and Vibration Report detailing the AAs actions and decisions on matters for which the AA was responsible in the preceding month (or another timeframe agreed with the Secretary). The Noise and Vibration Report must be submitted within seven (7) days following the end of each month for the duration of construction of the CSSI, or as otherwise agreed with the Secretary.			
Vibration				
E28	The Proponent must ensure that vibration from construction activities does not exceed the vibration limits set out in the British Standard BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from groundborne vibration.	<p>Interview with auditees 17/5/2023</p> <p>AWE CNVMP Rev. 5, 8/2/23.</p> <p>AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p> <p>SM Noise and Vibration Monitoring Program, for period 1 Nov to 31 March 23.</p> <p>Review and approval of Construction Noise and Vibration Impact Statement (CNVIS) Addendum Report by Acoustic Advisor (EMM), dated 19/9/22.</p>	<p>Noise and vibration monitoring programs were in place for CN ISD and Table 14 'Noise Monitoring Results Summary and Analysis' of Section 5.5.1 'Noise & Vibration' of the CCR details the results of monitoring for the audit period. There were nil management level exceedances identified for the period 1/10/22 to 31/3/23.</p> <p>For 1 April to 16 May 23, there were no vibration exceedances recorded in the CCR.</p> <p>Attended vibration monitoring was undertaken before and during detailed excavation and during capping beam demolition at CN ISD. In addition, real-time vibration monitoring is underway adjacent to the station. Neither the attended nor the real-time vibration monitoring has exceeded the project vibration criteria and there were nil management level exceedances for the CCR reporting period 1/10/22 to 31/3/23, nor the audit period 1/11/22 to 16/5/23.</p>	Compliant
E28.1	If the modifications to this approval as described in A1(e) proceed, the vibration screening criterion for 50 Martin Place must remain at 7.5 mm/s, unless a detailed investigation of the construction of the building determines that increasing the screening criterion to 25 mm/s is acceptable. The investigation must be undertaken by a suitably qualified structural engineer with experience assessing heritage structures and approved by the Secretary and must be supported by evidence to demonstrate the higher criterion is appropriate.	Interview with auditees 17/5/2023	Not applicable to this audit scope.	Not triggered
E29	Owners of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before construction that generates vibration commences in the vicinity of those properties. The management of construction works in the vicinity of properties at risk of exceeding the screening criteria for cosmetic damage must be considered in the Noise and Vibration management sub plan required by Condition C3.	<p>Interview with auditees 17/5/2023.</p> <p>AWE CNVMP Rev. 5, 8/2/23.</p> <p>AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p> <p>Section 5.5 'Construction Vibration Disturbance to buildings', Section 6.3 'Evaluation and Assessment of Construction Noise and Vibration Impacts' and Section 7.3 of 'Minimum working distances for vibration intensive activities' of CNVMP C2B, Line Wide Works, Rev. 1, dated 30/10/2020.</p> <p>CNVIS Addendum - Construction Noise and Vibration Impact Addendum Report (CNVIAR) dated June 2022.</p>	<p>The Addendums of CNVIS have not identified potential exceedances or risks to properties in the vicinity of the CN ISD and there have been no recorded non-compliances or incidents or complaints relating to this requirement during the audit period.</p> <p>The Crows Nest ISD CNVIS has assessed the construction works against the noise and vibration criteria applicable to this project.</p> <p>An updated CNVIS was submitted on 13/10/2022 for review; all comments were closed and approval issued on 23/12/2022.</p>	Not triggered

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			<p>Attended noise monitoring has been undertaken for out of hour works, with no non-compliances or exceedances being recorded.</p> <p>Real-time noise monitoring has been compliant with E38 at all times.</p>	
E30	The Proponent must conduct vibration testing before and during vibration generating activities that have the potential to impact on heritage items to identify minimum working distances to prevent cosmetic damage. In the event that the vibration testing and monitoring shows that the preferred values for vibration are likely to be exceeded, the Proponent must review the construction methodology and, if necessary, implement additional mitigation measures.	<p>Interview with auditees 17/5/2023.</p> <p>AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p> <p>Section 5.5 'Construction Vibration Disturbance to buildings', Section 6.3 'Evaluation and Assessment of Construction Noise and Vibration Impacts' and Section 7.3 of 'Minimum working distances for vibration intensive activities' of CNVMP C2B, Line Wide Works, Rev. 1, dated 30/10/2020.</p> <p>CNVIS Addendum - Construction Noise and Vibration Impact Addendum Report (CNVIAR) dated June 2022.</p>	<p>The heritage buildings identified in the vicinity of the CN ISD were not required to be monitored for vibration impacts during this audit period.</p> <p>The noise and vibration monitoring results in the CCR do not identify any vibration management exceedances for CN ISD for this audit period.</p>	Not triggered
E31	The Proponent must seek the advice of a heritage specialist on methods and locations for installing equipment used for vibration, movement and noise monitoring of heritage-listed structures.	<p>Interview with auditees 17/5/2023.</p> <p>AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p> <p>Section 5.5 'Construction Vibration Disturbance to buildings', Section 6.3 'Evaluation and Assessment of Construction Noise and Vibration Impacts' and Section 7.3 of 'Minimum working distances for vibration intensive activities' of CNVMP C2B, Line Wide Works, Rev. 1, dated 30/10/2020.</p> <p>CNVIS Addendum - Construction Noise and Vibration Impact Addendum Report (CNVIAR) dated June 2022.</p>	<p>The heritage buildings identified in the vicinity of the CN ISD were not required to be monitored for vibration impacts during this audit period.</p> <p>The noise and vibration monitoring results in the CCR do not identify any vibration management exceedances for CN ISD for this audit period.</p>	Not triggered
Construction Noise and Vibration Strategy				
E32	<p>The Proponent must review the Sydney Metro City and Southwest Construction Noise and Vibration Strategy in the PIR during detailed construction planning to consider scale and duration of impacts, the requirements of this approval and all measures to limit construction noise impacts to sensitive receivers including:</p> <ul style="list-style-type: none"> (a) at property or architectural treatment; (b) relocation; and (c) other forms of mitigation where impacts are predicted to be long term and significant. <p>The revised Sydney Metro City and Southwest Construction Noise and Vibration Strategy must be submitted to the Secretary for approval at least one (1) month before construction commences</p>	<p>Sydney Metro CSW Construction Noise and Vibration Strategy (CNVS) Version 0.4, Mark Russell Associate Consultant & SLR Consulting Australia Pty Ltd, Dated 8 August 2016. Review date: 9/8/2017</p> <p>https://www.sydneymetro.info/sites/default/files/2021-09/Sydney_Metro_City_Southwest_Construction_Noise_and_Vibration%2520Strategy.pdf</p> <p>Letter of approval from DPE to Sydney Metro dated 14/7/17, and endorsements by ER and AA.</p> <p>Construction Noise and Vibration Management Plan – C2B, Line Wide Works Contract Sydney Metro City & Southwest, Project number: C600, Document number: MCSWLWC-SYC-1NL-PM-PLN-000032, Revision date: 30/10/2020, Revision: 1</p>	<p>The CNVS was reviewed on 9/8/2017 and includes sections on Standard Noise & Vibration Mitigation Measure (s7) and Additional Noise & Vibration Mitigation Measures (s8), and was submitted to DPE more than one month before commencement of construction and approved by DPE on 14/7/17.</p>	Compliant
E33	Construction Noise and Vibration Impact Statements must be prepared for each construction site before construction noise and vibration impacts commence and include specific mitigation measures identified through consultation with affected sensitive receivers.	<p>Interview with auditees 17/5/2023.</p> <p>AWE - CN ISD - CNVIS Rev. D, dated 24/6/21.</p> <p>AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p> <p>Auditee response on draft audit findings, received by WolfPeak on 23/06/23</p>	<p>An CNVIS for the Crows Nest ISD, Rev. D was prepared dated 24/6/21 and endorsed by AA on 17/6/21 has been updated to Rev. N dated 19/12/22.</p> <p>Early works / construction on the CN ISD commenced in January 2021.</p> <p>In response to the draft findings, the auditee noted that the 'CNVIS was first prepared by AWE and submitted to Sydney Metro on 7 January 2021, several weeks in advance of</p>	Compliant

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			<p><i>the commencement of construction (refer to CNVIS Rev A, dated 7 January 2021). The CNVIS was then approved in June 2021 after several review cycles. CoA E33 states that the CNVIS must be prepared before construction, but it does not require approval prior to the construction commencement date. A pre-construction compliance report was submitted to DPE along with a notification of the commencement of construction for 26 February 2021. A requirement of the PCCR was to include a CNVIS demonstrating that this had been prepared prior to construction commencing (refer to Appendix A.14 of PCCR dated 26 Feb 2021 demonstrating compliance with E33).'</i></p>	
E34	<p>Noise generating works in the vicinity of potentially-affected, religious, educational, community institutions and noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) must not be timetabled within sensitive periods, unless other reasonable arrangements to the affected institutions are made at no cost to the affected institution or as otherwise approved by the Secretary.</p>	<p>Interview with auditees 17/5/2023. Proactive consultation with sensitive receivers as per evidence folder provided – Mach 2023. School engagement, consultation presentation/meeting – 27/4/23.</p>		Compliant
E35	<p>The Proponent must review alternative methods to rock hammering and blasting for excavation as part of the detailed construction planning with a view to adopting methods that minimise impacts on sensitive receivers. Construction Noise and Vibration Impact Statements must be updated for each location or activity to adopt the least impact alternative in any given location unless it can be demonstrated, to the satisfaction of the AA, why it should not be adopted.</p>	<p>Interview with auditees 17/5/2023.</p>	<p>There was no rock hammering and blasting for the locations covered in this audit scope/period, and therefore no impacts on sensitive receivers from such a source of activity. It should also be noted that the construction methodology for Blues point was adjusted to minimize impacts to the heritage bus shelters and other heritage structures.</p>	Not triggered
Standard Construction Hours				
E36	<p>Construction, except as allowed by Condition E48 (excluding cut and cover tunnelling), must only be undertaken during the following standard construction hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 6:00pm Saturdays; and (c) at no time on Sundays or public holidays.</p>	<p>Interview with auditees 17/5/2023. AWE OOHW Application Register Nov 22 to April 23 Out of Hours Works Applications.</p>	<p>Works carried out through the audit period have generally been undertaken during these standard construction hours unless otherwise approved under Out of Hours Applications and approved permits. The auditor did not identify any non-compliances relating to construction activities during the standard construction activities. However, there have been a number of complaints that have been properly investigated and manage/closed.</p>	Compliant
Respite for Receivers				
E37	<p>The Proponent must identify all receivers likely to experience internal noise levels greater than Leq(15 minute) 60 dB(A) inclusive of a 5 dB penalty, if rock breaking or any other annoying activity likely to result in regenerated (ground-borne) noise or a perceptible level of vibration is planned (including works associated with utility adjustments), between 7am – 8pm at:</p>	<p>Interview with auditees 17/5/2023. AWE CNVMP Rev. 5, 8/2/23. AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p>	<p>The auditee has identified and is in regular contact and communication with sensitive receivers through various means including project updates on the website, community</p>	Compliant

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	<p>(a) Crows Nest, Victoria Cross, Blues Point, Barangaroo, Martin Place, Pitt Street, and Central; and</p> <p>(b) Marrickville, Newtown, St Peters, Sydenham and Tempe for works specified in SSI 7400_MOD 4 referenced in Condition A1 (c).</p>	Community notifications and agreed respite for the audit period, evidence folder 'Proactive Consultation March 2023.	<p>notifications including on OOHW, door knocks and emails.</p> <p>There was no rock breaking during the audit period.</p> <p>The auditee has maintained compliance with agreed respite program and hours.</p>	
E38	<p>The Proponent must consult with all receivers identified in accordance with Condition E37 with the objective of determining appropriate hours of respite so that construction noise (including ground-borne noise), does not exceed internal noise levels of:</p> <p>(a) Leq(15 minute) 60 dB(A) inclusive of a 5 dB penalty if rock breaking or any other annoying activity likely to result in ground-borne noise or a perceptible level of vibration is planned between 7am – 8pm for more than 50 percent of the time; and</p> <p>(b) Leq(15 minute) 55 dB(A) inclusive of a 5 dB penalty if rock breaking or any other annoying activity likely to result in ground-borne noise or a perceptible level of vibration is planned between 7am – 8pm for more than 25 percent of the time,</p> <p>unless an agreement is reached with those receivers. This condition does not apply to noise associated with the cutting surface of a TBM as it passes under receivers.</p> <p>Note This condition requires that noise levels be less than Leq(15 minute) 60 dB(A) for at least 6.5 hours between 7am and 8pm, of which at least 3.25 hours must be below Laeq(15 minute) 55 dB(A). Noise equal to or above Leq(15 minutes) 60 dB(A) is allowed for the remaining 6.5 hours between 7am and 8pm.</p>	<p>Interview with auditees 17/5/2023.</p> <p>AWE CNVMP Rev. 5, 8/2/23.</p> <p>AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p> <p>Consultation emails from Place Manager – records in evidence folder 'Proactive Consultation March 2023.</p> <p>All notifications in evidence folders for audit period.</p> <p>AA endorsement letter for Construction Monitoring Report is attached (CNISD NVMR Oct 21 to Mar 22 Rev. C AA approval)</p>	The auditee has been consulting with sensitive receivers on a regular basis through various means including project updates on the website, community notifications including OOHW, door knocks and emails.	Compliant
E39	The Proponent must consult with proponents of other construction works in the vicinity of the CSSI and take reasonable steps to coordinate works to minimise cumulative impacts of noise and vibration and maximise respite for affected sensitive receivers.	<p>Interview with auditees 17/5/2023.</p> <p>AWE CNVMP Rev. 5, 8/2/23.</p> <p>AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p>	There were no other construction works in the vicinity of Cn ISD during the audit period.	Not triggered
E40	The Proponent must ensure all works (including utility works associated with the CSSI where undertaken by third parties) are coordinated to provide the required respite periods identified in accordance with the terms of this approval.	<p>Interview with auditees 17/5/2023.</p> <p>OOHW 29 – Sydney Water Main Shutdown</p> <p>AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p>	The auditee coordinated work with Sydney Water with respect to mains works during OOH and adhered to compliance requirements with the OOHW Application.	Compliant
Mitigation – Non Residential Zones				
E41	The Proponent must ensure that residential receivers, located in non-residential zones, likely to experience an internal noise level exceeding Leq(15 minute) 60 dB(A) between 8pm and 9pm or Leq(15 minute) 45 dB(A) between 9pm and 7am (inclusive of a 5 dB penalty if rock breaking or any other annoying activity likely to result in ground-borne noise, or a perceptible level of vibration is planned (including works associated with utility adjustments)) must be offered additional mitigation in accordance with the Sydney Metro City and South West Noise and Vibration Strategy referenced in Condition E32.	<p>Interview with auditees 17/5/2023.</p> <p>Attended noise monitoring report – Noise and Vibration Measurement Results, dated 16/1/23 for sensitive receiver on corner 20 Clarke St building on 14/12/22.</p> <p>AWE CNVMP Rev. 5, 8/2/23.</p> <p>AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.</p> <p>AA and ER monthly reports for Nov 22 to April 23.</p>	<p>Attended noise monitoring was conducted for sensitive receivers in the building on 20 Clarke St and the results show that there were no exceedances for noise or vibration.</p> <p>There were no other recorded exceedances from the noise and vibration monitoring program, also provided in the CCR, or reported non-compliances with respect this condition for the audit period.</p>	Compliant

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Mitigation – Residential receivers in residential zones				
E42	The Proponent must ensure that residential receivers in residential zones likely to experience an internal noise level of Leq(15 minute) 45 dB(A) or greater between 8pm and 7am (inclusive of a 5 dB penalty if rock breaking or any other annoying activity likely to result in ground-borne noise, or a perceptible level of vibration is planned (including works associated with utility adjustments)) must be offered additional mitigation in accordance with the Sydney Metro City and South West Noise and Vibration Strategy referenced in Condition E32.	Interview with auditees 17/5/2023. AWE CNVMP Rev. 5, 8/2/23. AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.	The CNVIS does not identify receivers that are likely to experience noise levels in excess of the limits set in this condition for this audit period. None-the-less, the auditee has provided respite and additional mitigations as per the CCS and CNVIS where expected noise levels are expected to be a risk.	Not triggered
Workplace health and safety for nearby workers				
E43	3 At no time can noise generated by construction exceed the National Standard for exposure to noise in the occupational environment of an eight-hour equivalent continuous A-weighted sound pressure level of LAeq,8h, of 85dB(A) for any employee working at a location near the CSSI.	Interview with auditees 17/5/2023. AWE CNVMP Rev. 5, 8/2/23. AWE - CN ISD - CNVIS Rev. N, dated 19/12/22.	There were no other construction projects or such exceedances for employees in nearby sites for the audit period.	Not triggered
Variation to Standard Construction Hours				
E44	Notwithstanding Condition E36 construction associated with the CSSI may be undertaken outside the hours specified under those conditions in the following circumstances: (a) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (b) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or (c) where different construction hours are permitted or required under an EPL in force in respect of the construction; or (d) construction that causes LAeq(15 minute) noise levels: i. no more than 5 dB(A) above the rating background level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009), and ii. no more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses, and iii. continuous or impulsive vibration values, measured at the most affected residence are no more than those for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), and iv. intermittent vibration values measured at the most affected residence are no more than those for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006); or (e) where a negotiated agreement has been reached with a substantial majority of sensitive receivers who are within the vicinity of and may be potentially affected by the particular construction, and the noise management levels and/or limits for ground-borne noise and vibration (human comfort) cannot be achieved. All agreements must	Interview with auditees 17/5/2023. Report - Sydney Metro Crows Nest Station - Tower Crane 3 Attended Noise Measurements, by Resonate, dated 18/5/23. AWE CNVMP Rev. 5, 8/2/23. AWE - CN ISD - CNVIS Rev. N, dated 19/12/22. 20230503 Crows Nest OOH Register Nov to May 2023 OOHW 24 – Concrete Pour Oxley St OOHW 25 – Extended work OOHW 26 – OSOM Precast girder deliveries OOHW 27 – Service Investigations Clarke St OOHW 29 – Sydney Water Main Shutdown OOHW 30 – OSOM Girder Delivery March OOHW 31 – TC2 Removal OOHW – Strategy Protocol v5.3. And no vibration – low impact	Attended noise monitoring at sensitive receivers around the site on 12/4/23 and a subsequent report by Resonate have shown there was an exceedance of (d) in this condition with respect to OOHW 25 – Extended work application. This relates to structural work conducted OOH where noise levels were more than 5dB (A) above background levels. The above measurements are supported by several real time measurements from the unattended noise monitoring equipment as well as several complaints. Non-compliance: Exceedance and non-compliance with respect to E44(d). The auditor notes that OOHW Application 25 is due to expire on 20/6/23. The auditor recommends that OOHW Application 25 – Extended Work be revised with a view to removing the activity of structural work, and that the work scheduling and program, and work methodologies and mitigations be revised to ensure low impact noise during OOH. Additionally, the auditor recommends that regular self-monitoring and reporting be implemented to ensure compliance with	Not compliant

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	<p>be in writing and a copy forwarded to the Secretary at least one (1) week before the works commencing; or</p> <p>(f) construction approved through an Out of Hours Work Protocol referred to in Condition E47, provided the relevant council, local residents and other affected stakeholders and sensitive receivers are informed of the timing and duration at least five (5) days and no more than 14 days before the commencement of the works.</p> <p>Note: This condition does not apply where an EPL is in force in respect of the construction.</p>		this condition should such structure work be continued under a revised OOH Application.	
E45	On becoming aware of the need for emergency construction in accordance with Condition E44(b), the Proponent must notify the AA, the ER and the EPA (if an EPL applies) of the need for those activities or work. The Proponent must also use best endeavours to notify all affected sensitive receivers of the likely impact and duration of those works.	Interview with auditees 16/5/2023.	There were no emergency construction works recorded for the audit period.	Not triggered
E46	<p>Notwithstanding Conditions E44 and E48, rock breaking and other particularly annoying activities for station shaft or cut and cover stations is not permitted outside of standard construction hours, except at Central (excluding Central Walk works at 20-28 Chalmers Street, Surry Hills); or</p> <p>(a) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or</p> <p>(b) where different construction hours are permitted or required under an EPL in force in respect of the construction; or</p> <p>(c) where an EPL is not required or in force, approved through an Out of Hours Work Protocol developed in accordance with Condition E47; or</p> <p>(d) construction that causes LAeq(15 min) noise levels:</p> <p>i. no more than 5 dB(A) above the rating background level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009); and</p> <p>ii. no more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses; and</p> <p>iii. continuous or impulsive vibration values, measures at the most affected residence are no more than those for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006); and</p> <p>iv. intermittent vibration values measured at the most affected residence are no more than those for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006).</p>	Interview with auditees 16/5/2023.	This requirement is not applicable to this CN ISD scope.	Not triggered
Out of Hours Work Protocol for works not subject to an EPL				
E47	<p>An Out of Hours Work Protocol for the assessment, management and approval of work outside of standard construction hours, as defined in Condition E36 of this approval, must be prepared in consultation with the EPA and submitted to the Secretary for approval before construction commences for works not subject to an EPL. The protocol must include:</p> <p>(a) the identification of low and high risk construction activities;</p>	<p>Interview with auditees 16/5/2023.</p> <p>OOHW Protocol in process of being updated to version 5.3 in response to Mod 9</p> <p>Previous version 'City & Southwest Out of Hours Work Strategy / Protocol', March 2019 approved by the Acoustic Advisor on 1/4/19.</p>	<p>The initial version of the OOH Work Protocol was prepared in consultation with the EPA and submitted to the Secretary for approval on 30 March 2017, prior to the commencement of works on 17 June 2017.</p> <p>The OOHW Protocol / Strategy has since been updated twice and is now entitled</p>	<p>Compliant</p> <p>Observation</p>

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>(b) a risk assessment process in which the AA reviews all proposed out of hours activities and identifies their risk levels;</p> <p>(c) a process for the endorsement of out of hours activities by the AA and approval by the ER for construction activities deemed to be of:</p> <ul style="list-style-type: none"> i. low environmental risk; or ii. high risk where all construction works cease by 9pm. <p>All other high risk out of hours construction must be submitted to the Secretary for approval unless otherwise approved through an EPL.</p> <p>The protocol must detail standard assessment, mitigation and notification requirements for high and low risk out of hours works, and detail a standard protocol for referring applications to the Secretary.</p>	<p>Sydney Metro City & Southwest Out of Hours Work Strategy / Protocol, SM ES-PW-317 Sydney Metro Integrated Management System (IMS), Version: 5.3, dated October 2022</p> <p>https://www.sydneymetro.info/sites/default/files/2022-10/CSW-OOHW-Strategy-Protocol-v5.3.pdf</p> <p>Reviewed and endorsed by AA on 11 October 2022.</p> <p>Application No 1.2 OSOM Pre Cast Girder Delivery from July 21 to Dec 22 OOHW Application assessed as High Risk by AA and approved by DPE on 19/11/19</p> <p>Application No 17 Service investigations: Pacific Highway West approved by AA on 7/10/22 as Low Risk Works (post audit site inspection)</p> <p>Application No 10 Version 22 dated 19/9/22 reviewed in during audit. This covers low impact works such as waterproofing, steel fixing, formwork, concrete pours and finishing, rigging work, installation of services below slab, deliveries. Each new version applies for a month and is then reapproved to respond to new activities, changes, complaints etc.</p> <p>Respite offers have been triggered but no alternative accommodation triggered</p> <p>Noise verification monitoring of finishing works undertaken</p> <p>November, December, January, February, March, April monthly newsletters sighted</p> <p><u>Summary of communication and engagement activities 01/11/2022 to 30/04/2023</u></p> <p>Type and Number of events</p> <p>Door knocks 35</p> <p>Stakeholder meetings 13</p> <p>Presentations 0</p> <p>Email campaigns 46</p> <p>General emails 430 incoming emails 416 outgoing emails</p> <p>Phone calls 56 incoming phone calls 150 outgoing phone calls</p> <p>Letterbox drops (only) 19</p> <p>Site visit 21</p> <p>Other face-to-face contact 19</p> <p>SMS 5 incoming 4</p> <p>OOH mobile crane consultation register sighted which includes details of residents at home, slip being left if not, SM contact details left. Records kept in Consultation Manager.</p> <p><u>20230503 Crows Nest OOH Register Nov to May 2023</u></p> <p>OOHW 24 – Concrete Pour Oxley St</p> <p>OOHW 25 – Extended work</p> <p>OOHW 26 – OSOM Precast girder deliveries</p>	<p>Sydney Metro City & Southwest Out of Hours Work Strategy / Protocol, SM ES-PW-317, Rev 5.3, Oct 2022.</p> <p>No EPL applies to the Crows Nest Station site.</p> <p>Observation</p> <p>As per audit No. 1 CN ISD. Refer to 7400_IA3_01 and 7400_IA_3 in Table 4.</p>	

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>OOHW 27 – Service Investigations Clarke St</p> <p>OOHW 29 – Sydney Water Main Shutdown</p> <p>OOHW 30 – OSOM Girder Delivery March</p> <p>OOHW 31 – TC2 Removal</p> <p>OOHW – Strategy Protocol v5.3.</p>		
24 Hour Construction				
E48	<p>Notwithstanding Condition E36 of this approval and subject to Condition E47, the following activities may be undertaken 24 hours per day, seven (7) days per week:</p> <p>(a) tunnelling and associated support activities (excluding cut and cover tunnelling, and excluding the installation and decommissioning of the Blues Point acoustic shed except where compliance with Condition E44 is achieved);</p> <p>(b) excavation within an acoustic enclosure (excluding the Blues Point temporary site except where compliance with Condition E44 is achieved);</p> <p>(c) excavation at Central (excluding Central Walk works at 20-28 Chalmers Street, Surry Hills) without an acoustic enclosure;</p> <p>(d) station and tunnel fit out; and</p> <p>(e) haulage and delivery of spoil and materials</p>	<p>AWE- OOHW applications register, Nov 22 to May 23</p> <p>SM received approval for OSOM OOHW No 1.2 on 19/11/19 from DPE.</p> <p>Sydney Metro City & Southwest Out of Hours Work Strategy / Protocol, SM ES-PW-317 Sydney Metro Integrated Management System (IMS), Version: 5.3, dated October 2022</p> <p>https://www.sydneymetro.info/sites/default/files/2022-10/CSW-OOHW-Strategy-Protocol-v5.3.pdf</p> <p>Reviewed and endorsed by AA on 11 October 2022</p> <p>Project Update and Community Notifications of OOH for the audit period detailed on SM Website.</p> <p>20230503 Crows Nest OOH Register Nov to May 2023</p> <p>OOHW 24 – Concrete Pour Oxley St</p> <p>OOHW 25 – Extended work</p> <p>OOHW 26 – OSOM Precast girder deliveries</p> <p>OOHW 27 – Service Investigations Clarke St</p> <p>OOHW 29 – Sydney Water Main Shutdown</p> <p>OOHW 30 – OSOM Girder Delivery March</p> <p>OOHW 31 – TC2 Removal</p> <p>OOHW – Strategy Protocol v5.3.</p>	<p>All works carried out 24 hours per day have been subject to OOHW Applications and Protocol.</p> <p>Additionally, notification emails and newsletters were issued for OOHW to communicate likely impacts and options for respite. Examples have been documented and sighted in the audit evidence.</p> <p>The auditor was unable to identify any 24 hour works that were not subject to an OOHW Application or consistent with the Protocol.</p> <p>Additionally, the only activity in this condition that was still being carried out at the time of the audit was (d) station and tunnel fit out, and these activities were subject to OOHW Applications.</p>	Compliant
E48.1	Notwithstanding E48(a), the Proponent must use best endeavours to schedule annoying activities, including steel hammering and movement of the self-propelled modular trailer, at the Blues Point temporary site between 7am and 8pm.	Interview with auditees 16/5/2023	This work is not applicable to this CN ISD site.	Not triggered
E48.2	Heavy vehicles deliveries to the Blues Point temporary site are only permitted between 7 am and 10 pm except where permitted otherwise through an EPL or where oversized vehicle movement is directed by NSW Police and/or Transport for NSW at other times.	Interview with auditees 16/5/2023	Heavy vehicle activities at the Blues Point site was not in this audit scope.	Not triggered
E49	All acoustic sheds must be erected as soon as site establishment works at the facilities are completed and before undertaking any works or activities which are required to be conducted within the sheds.	Interview with auditees 16/5/2023	There were no acoustic shed work / activities for this CN ISD site and audit scope/period.	Not triggered

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
E48	<p>Notwithstanding Condition E36 of this approval and subject to Condition E47, the following activities may be undertaken 24 hours per day, seven (7) days per week:</p> <ul style="list-style-type: none"> (a) tunnelling and associated support activities (excluding cut and cover tunnelling, and excluding the installation and decommissioning of the Blues Point acoustic shed except where compliance with Condition E44 is achieved); (b) excavation within an acoustic enclosure (excluding the Blues Point temporary site except where compliance with Condition E44 is achieved); (c) excavation at Central (excluding Central Walk works at 20-28 Chalmers Street, Surry Hills) without an acoustic enclosure; (d) station and tunnel fit out; and (e) haulage and delivery of spoil and materials 	Interview with auditees 16/5/2023	<p>There were no construction works/ activities covered in a-c of this condition for this CN ISD site and audit scope/period.</p> <p>For haulage and delivery of spoil and material, there was no haulage of spoil material during the audit period and all deliveries of large/heavy materials to the site were completed within day time / normal construction hours od during approved OOHW Applications and via the Pacific Hwy.</p>	Compliant
Blasting Management				
E50	<p>A Blast Management Strategy must be prepared and include:</p> <ul style="list-style-type: none"> (a) sequencing and review of trial blasting to inform blasting; (b) regularity of blasting; (c) intensity of blasting; (d) periods of relief; and (e) blasting program. 	Interview with auditees 16/5/2023	There was no blasting activity to be considered for this CN ISD audit scope/period.	Not triggered
E51	The Blast Management Strategy must be endorsed by a suitably qualified and experienced person and reviewed by an independent specialist.	Interview with auditees 16/5/2023	There was no blasting activity to be considered for this CN ISD audit scope/period.	Not triggered
E52	<p>The Blast Management Strategy must be prepared so that all blasting and associated activities are carried out so as not to generate unacceptable noise and vibration impacts or pose a significant risk to sensitive receivers. The Blast Management Strategy must be prepared in accordance with relevant guidelines including the principles outlined in Hazardous Industry Planning Advisory Paper No 6: Hazard Analysis (Department of Planning, January 2011) and Assessment Guideline: Multi-Level Risk Assessment (Department of Planning and Infrastructure, May 2011) for the handling and storage of hazardous materials and include:</p> <ul style="list-style-type: none"> (a) details of blasting to be performed, including location, timing, method and justification of the need to blast; (b) identification of all potentially affected noise and vibration sensitive sites including heritage buildings and utilities; (c) establishment of appropriate criteria for blast overpressure and ground vibration levels at each category of noise sensitive site; (d) details of the storage and handling arrangements for explosive materials and the proposed transport of those materials to the construction site; (e) identification of hazardous situations that may arise from the storage and handling of explosives, the blasting process and recovery of the blast site after detonation of the explosives; 	Interview with auditees 16/5/2023	There was no blasting activity to be considered for this CN ISD audit scope/period.	Not triggered

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	(f) determination of potential noise and vibration and risk impacts from blasting and appropriate best management practices; and (g) community consultation procedures.			
E53	The Blast Management Strategy must be submitted to the Secretary one (1) month before blasting commences, or as agreed by the Secretary. The Blast Management Strategy as submitted to the Secretary, must be implemented for all blasting activities	Interview with auditees 16/5/2023	There was no blasting activity to be considered for this CN ISD audit scope/period.	Not triggered
E54	Blasting associated with the CSSI must not exceed the following criteria, measured at the most affected residence or other sensitive receiver as specified below: (a) airblast overpressure (dB(Lin Peak)) 125 dBL; and (b) vibration (PPV): i. 25 mm/s generally; or ii. 7.5mm/s for heritage structures except where detailed investigation of the construction of the building determines that increasing the screening criterion to 25 mm/s is acceptable. The investigation must be undertaken by a suitably qualified structural engineer with experience assessing heritage structures that is approved by the Secretary. Any decision to adopt the higher vibration criterion must be supported by evidence to demonstrate the higher criterion is appropriate.	Interview with auditees 16/5/2023	There was no blasting activity to be considered for this CN ISD audit scope/period.	Not triggered
E55	Blasting must be limited to a single detonation in any one day, and a maximum of six per week, at each station location, or any other frequency agreed by the Secretary. Note: for the purpose of this Condition, a single detonation may involve a number of individual blasts fired in quick succession in a discrete area.	Interview with auditees 16/5/2023	There was no blasting activity to be considered for this CN ISD audit scope/period.	Not triggered
E56	Blasting associated with the project must be undertaken at a time to have the least impact on the nearby sensitive receivers determined in consultation with those receivers. All sensitive receivers affected by any blast must be advised fortnightly of the proposed blasting schedule. The Secretary must also be advised of the advance blasting schedule for any location.	Interview with auditees 16/5/2023	There was no blasting activity to be considered for this CN ISD audit scope/period.	Not triggered
Integrated Station Development – Crows Nest – Construction Environmental Management Plan				
Section 6 - Training and Awareness				
Sec 6	All employees will receive suitable environmental induction and training to ensure that they are aware of their responsibilities and are competent to carry out the work. Environmental requirements will be outlined during the project induction and on-going training via toolbox talks, briefings, notifications and targeted aspect specific training.	Interview with auditees 17/5/2023 AWE Induction Presentation D_Section_8 – Environment & Community, Rev. 5 Induction Register April 23 230221 – Noise Mitigation Measures Toolbox 20230516 – CN Sustainability Meeting	A presentation has been developed and is being delivered to employees and contractors. Section 8 of the presentation covers project risks and environmental requirements and control measures The auditor sighted evidence of a few ad hoc briefings and toolbox talks covering environmental issues. The auditor was unable to find evidence for a systematic, regular, formal and planned / ongoing training program that included toolbox talks, briefings, notifications and target specific training.	Compliant Observation

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Environmental Induction				
Sec 6.1	<p>All personnel, including sub-contractors, are required to attend a compulsory program induction that includes an environmental component prior to commencement on the project. The Planning & Environment Manager (or delegate) will present the environmental component of the program induction. The environmental component will include an overview of:</p> <ul style="list-style-type: none"> • Relevant details of the CEMP including purpose and objectives • General environmental management requirements and responsibilities. <p>Incident response and reporting requirements.</p> <p>All construction personnel will also be subject to a project specific environmental induction prior to the commencement of works, including as a minimum:</p> <ul style="list-style-type: none"> • Training purpose, objectives and key issues. • Contractor's environmental policy and key performance indicators. • Due diligence, duty of care and responsibilities. • Relevant conditions of any environmental licence and/or the relevant conditions of approval. • Site specific issues and controls including those described in the environmental procedures. • Reporting procedure for environmental hazards and incidents. • Communication protocols. • Specific environmental management requirements and responsibilities. • Site environmental rules and mitigation measures for the control of environmental issues. • Information relating to the location of environmental constraints. <p>The Planning & Environment Manager may authorise amendments to the inductions where required to address project modifications, legislative changes in response to incidents or amendments to this CEMP or related documentation.</p> <p>The Planning & Environment Manager will establish and maintain an induction register that includes the following:</p> <ul style="list-style-type: none"> • Induction date. • Name of the training course/topic. • Names of persons trained, their position and signature. <p>Trainer details providing to all employees.</p>	<p>Interview with auditees 17/5/2023.</p> <p>AWE Induction Presentation D_Section_8 – Environment & Community</p> <p>Induction Register April 23</p> <p>230221 – Noise Mitigation Measures Toolbox</p> <p>20230516 – CN Sustainability Meeting</p>	<p>An online general induction is provided to all employees and includes general environmental induction.</p> <p>The presentation covers relevant details of CEMP and broader project risks and environmental requirements and control measures.</p> <p>The auditor was unable to find evidence for project specific environmental induction prior to works, including training purpose, contractor's environmental policy and key performance indicators, and other requirements detailed in this section.</p> <p>A training induction register for April 23 was provided.</p> <p>Non-compliance:</p> <p>The environmental induction training is not comprehensive and does not cover all the requirements set out in this section.</p> <p>It is recommended that the Planning & Environment Manager (or delegate) work with contractors to identify the training needs associated with the relevant works programs, and provide specific training around environmental hazards / risks; relevant legislative or approval conditions / requirements; management measures, controls and mitigations; incident reporting; communications protocols; and other measures required to manage project specific aspects of their work.</p> <p>It is further recommended that site/project specific training developed for contractors/labour hire be tailored to the trainee needs in consideration of cultural backgrounds, language and other communication barriers and needs.</p> <p>Additionally, to ensure that environmental induction are effective, the Planning & Environment Manager (or delegate) should develop and implement both regular and ad hoc training awareness and competency assessments to ensure that trainees/contractors have understood the key environmental risks and issues associated with their work, their mitigations, and roles & responsibilities</p>	<p>Not compliant</p>

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			with regards controls and hazard, risk or incident notification and communications.	
Strategic Environmental Training and Upskilling				
Sec 6.2	Targeted environmental training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management, or those undertaking an activity with a high risk of environmental impact (e.g. spill response training will be provided to all Foremen).	Interview with auditees 17/5/2023 AWE Induction Presentation D_Section_8 – Environment & Community Induction Register April 23 230221 – Noise Mitigation Measures Toolbox 20230516 – CN Sustainability Meeting Lunch and Learn Session – Acoustics (internal Sydney Metro Employees) by AA, 17/2/23.	The auditor was unable to find evidence of strategy and targeted training provided to individuals or groups of workers with specific authority or responsibility for environmental management, particularly those undertaking high risk activities. Non-compliance: The auditor requests evidence of targeted training e.g. for spill response provided to Foremen, Contractor Managers/Supervisors. This evidence was not made available.	Not compliant
Toolbox Talks, Training and Awareness				
Sec 6.3	Toolbox talks will be used to raise awareness and educate personnel on construction related environmental issues. The toolbox talks will be used to ensure environmental awareness continues during construction. Toolbox talks will be tailored to specific environmental issues including (but not limited to): <ul style="list-style-type: none"> • Erosion and sedimentation control. • Hours of work. • Emergency and spill response. • Aboriginal and non-Aboriginal heritage. • Noise. • Housekeeping and waste. • Concrete washout. • Excavation dewatering. • Dust control. • General procedures for site preparation prior to absence or significant rain events. • Out of hour work approval processes. • Working outside of standard construction hours (including monitoring of noise and light spill). • Dealing with members of the public and/or stakeholders. • Use of non-tonal reverse alarms. Toolbox talk attendance is mandatory, and attendees of Toolbox talks are required to sign an attendance form. Records of toolbox talk attendance will be maintained. Awareness notes, in the form of posters, booklets or similar may be developed and distributed to Site Managers, foremen and others with a responsibility for managing specific work locations or activities. Awareness notes may also be	Interview with auditees 17/5/2023 Toolbox Meeting Minutes – 24/4/23. AWE Induction Presentation D_Section_8 – Environment & Community Induction Register April 23 230221 – Noise Mitigation Measures Toolbox 20230516 – CN Sustainability Meeting Lunch and Learn Session – Acoustics (internal Sydney Metro Employees) by AA – 17/2/23.	The auditor notes that some Toolbox talks have been held, for example, one for Noise Mitigation Measures on 21/2/23. Non-compliance: The auditor could not find evidence of regular, systematic and planned toolbox talk, nor a comprehensive training & awareness program that is tailored to key environmental risks/hazards and contractors/labour hire. The auditor recommends the development and implementation of tailored toolbox talks that focus on the key environmental issues of concern and their mitigations, such as noise and vibration, traffic & access, and spill management which have come up as high-risk activities during this audit. These toolbox talks and awareness training should be delivered to all contractors / labour hire whose work poses and/ or is relevant to the risks identified.	Not compliant

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>distributed to the broader workforce at daily pre-start meetings or made available in worker crib sheds/break facilities.</p> <p>The Planning & Environment Manager will review the training program and monitor its implementation.</p>			
Daily Pre-Start Meetings				
Sec 6.4	<p>The pre-start meeting is a tool for informing the workforce of the day's/shift's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, co-ordination issues with other trades, hazards and other information that may be relevant to the day's work.</p> <p>The Foreman, or other appropriate site staff member, will conduct a daily pre-start meeting for the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Pre-start meetings may be project-wide and/or held for specific work areas. The environmental component of pre-starts will include any environmental issues that could potentially be impacted by, or impact on, the day's activities. All attendees will be required to sign on to the pre-start and acknowledge their understanding of the issues explained.</p> <p>Pre-start topics, dates delivered and a register of attendees will be maintained and the records captured.</p>	<p>Interview with auditees 17/5/2023</p> <p>Daily Pre-starts – AWE Procedures Manual – Safety and Environment</p> <p>Pre-start meeting notes for:</p> <p>27/4/23</p> <p>28/4/23</p>	<p>Daily pre-start meeting are held but are focused on occupational health & safety and operational matters.</p> <p>The daily pre-start meetings are organised and delivered by the Safety Manager and Foremen.</p> <p>Non-compliance:</p> <p>The auditor was not able to find evidence of dedicated sections / focus on environmental risks and mitigations associated with daily works in the Daily Pre-start meetings.</p> <p>The auditor recommends that Daily-start meetings include a dedicated section on environmental risks/mitigations associated with daily works by different work teams/contractors.</p> <p>Additionally, the audit recommends that the Planning & Environment Manager (or delegate) attend Daily pre-start meetings where there are high-risk activities identified in the planned daily works which pose a significant risk to the environment or community, and provide detailed advice around the nature of the risks, mitigations and controls.</p> <p>The auditor recommends that the language barriers for trainees/contractors be considered in the development and delivery of the Pre-starts to ensure proper and effective communication and understanding of the pre-starts.</p>	Not compliant
Environmental Alerts				
Sec 6.5	<p>The Planning & Environment Manager will promote regular environmental alerts to be distributed to the wider project team and sub-contractors. Such environmental alerts may include:</p> <ul style="list-style-type: none"> • Highlight environmental legislation changes. • Industry news. • New technology or innovations regarding environmental management. 	<p>Interview with auditees 17/5/2023</p> <p>20230516 – CN Sustainability Meeting</p> <p>Sydney Metro – Environmental Alert - Out of Hours Works – Noise Compliance – 26/3/22.</p>	<p>The auditor only found two examples of what could be considered an environmental alert as per the requirements of this section, and these pre-date this audit period.</p>	Non-compliance

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> Lessons learned from site inspections and audits. Promotion of a culture of continuous improvement in response to identified poor performance trends. <p>Highlighting environmental case studies or excellent performance on the project.</p> <p>To promote excellent environmental performance across the Sydney Metro project, at the discretion of the Project Director, the Planning & Environment Manager may distribute environmental alerts for wider internal distribution within Sydney Metro and other contracts.</p>	<p>Sydney Metro – Environmental Alert – Implementing Noise & Vibration Impact Statements – 11/2/22.</p>	<p>The auditor could not find any evidence of environmental alerts provided by auditee during the audit period.</p> <p>Non-compliance:</p> <p>The auditor was unable to find a systematic and planned program of environmental alerts that addresses the each of the detailed requirements in this section.</p> <p>The auditor recommends that the Planning & Environment Manager work with Sydney Metro to identify relevant and common risks/themes and lessons learnt/learnings from across the Sydney Metro project and develop and issue environmental alerts to the AWE team and contractors on a planned and regular basis.</p>	
Subcontractors				
<p>Sec 6.6</p>	<p>A W Edwards will build effective relationships with subcontractors and suppliers to ensure they positively contribute to the environmental management and sustainability performance of the project by considering environment and sustainability proactively when procuring all supplier agreements and subcontracts including:</p> <ul style="list-style-type: none"> Preparing environment and sustainability subcontractor requirements to be included in requests for tenders to set out sustainability and workforce targets. Using the pre-award tender interview questionnaire to request detailed information on environmental performance, sustainability compliance and workforce details. Using environment, sustainability and workforce criteria in selecting subcontractors and suppliers. Writing key sustainability and workforce requirements into contracts where relevant. <p>Assessing compliance with local regulations and human rights standards for proposed supply contracts with a value over \$5M where the proposed supplier undertakes some manufacturing in a developing country.</p> <p>As part of their subcontract all sub-contractors will be required to comply with the project planning approval and all licences and permits and the relevant environment management documentation. All subcontractors working at the project will be required to comply with this CEMP. Subcontractors will not be permitted to operate under their own environmental management documentation.</p> <p>All subcontractors will be required to participate in or complete a risk assessment including the potential environmental risks associated with their work package and comply with all relevant environment and planning documents. All subcontractors will be required to attend the induction as well as a specific site induction/prestart/toolbox talks relevant to the area they are</p>	<p>Interview with auditees 17/5/2023</p> <p>CN_Subcontract Preliminaries</p> <p>Item 2 – Interview Form</p>	<p>Observation: The auditee has provided some evidence to support parts of this requirement, for example sub-contract preliminary and interview forms but not the entirety of the requirements in this section. This section requires the auditee to build effective relationships with their sub-contractors and suppliers to improve environmental management and sustainability performance through various proactive initiatives, and with respect to this audit scope, particularly on noise and vibration aspects, the auditor is of the view that more work can be done to educate, train and raise awareness of risks and mitigations/controls on specific works being carried out by contractors and labour hire, and that such training and awareness be tailored to the specific needs of the workers.</p>	<p>Compliant Observation</p>

CoA / ITEM	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>working in. Subcontractors will be required to attend formal training courses and/or site toolbox talks at the direction of A W Edwards.</p> <p>In addition, subcontractors will be required to be inducted into ECM relevant to their work. Each subcontractor is responsible for conducting toolbox talks with their own employees. The subcontractor will maintain a record of toolbox talks it holds which includes the date and time the meeting was conducted, the individuals who attended and the specific topics addressed.</p>			

APPENDIX B – SITE PHOTOS

Crows Nest ISD



Plate 1 – Construction works from XX Lane



Plate 2 – Construction works from Pacific Hwy



Plate 3 – Local businesses across Pacific Hwy



Plate 4 – Waste bin and construction site

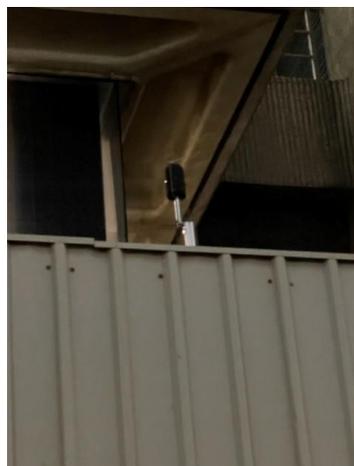
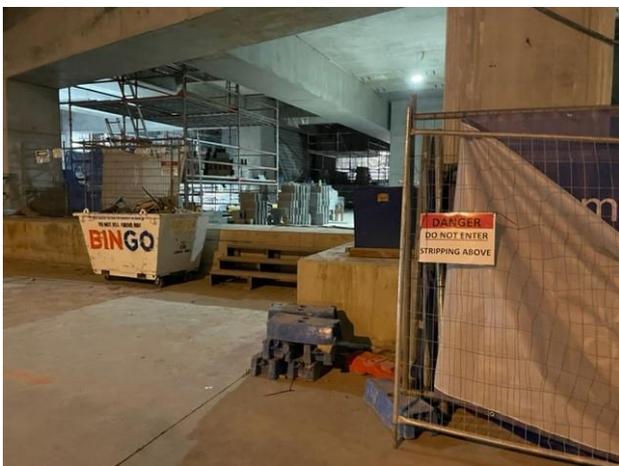


Plate 5 – Fencing on Pacific Hwy removed and work site access open



Plate 6 – Unattended noise monitor microphone



Plate 7 – Community information hotline



Plate 8 – Steel fixing works on upper levels of Site B



Plate 9 – Waste bins

Plate 10 – Mobile crane



Plate 11 – Chemical containers on not properly stored / banded.

APPENDIX C – DECLARATIONS

Project Name:	Sydney Metro City & Southwest – Line Wide
Consent Number:	SSI 7400 & SSI 8256
Description of Project:	Construction and operation of a new 30-kilometre stand-alone metro railway line that would run from the end of the Metro Northwest Line at Chatswood, through to Sydney CBD, and to Bankstown via Sydenham
Project Address:	Multiple properties and land comprised in the Inner West and Canterbury Bankstown Council areas
Proponent:	Sydney Metro Authority
Title of Audit	Independent Audit No. 1 – Audit Report
Date:	29 May 2023

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor:	Ibrahim Awad
Signature:	
Qualification:	Bachelor of Science (Env) - Macquarie University Master of Engineering Science (Civil & Env) – Scholarship, Uni of Melb. Master of Environmental Law – University of Sydney Certified Lead Auditor & OHS Auditor, Exemplar Global Certificate 110720
Company:	Seventh Sense Sustainability Consultants Pty Ltd