

# Sydney Metro - Western Sydney Airport

EPBC Act (2020/8687) Annual  
Compliance Report 20 July 2022  
- 20 July 2023

October 2023




# Document Control

Document Number	Document Name	Revision
SM-23-00875184	SM-WSA EPBC Act (2020/8687) Annual Compliance Report 20 July 2022 – 20 July 2023	1

## Revision History

Revision	Date	Description	Author	Reviewer
0.1	21 August 2023	First Draft	L. Brevia	C. Lestrangle
0.2	28 August 2023	Second Draft	C. Lestrangle	K. Mackenzie, C. Berg,
0.3	28 September 2023	Final Draft	S. Anderson, C. Lestrangle	C. Riley, H. Chapman
1	17 October 2023	Approved	S. Anderson, C. Lestrangle	H. Chapman and C. Riley

## Plan Authorization

Position	Name	Signature	Date
Director Project Environment, Sustainability & Planning (SM-WSA)	H. Chapman		17 October 2023

# Table of Contents

<b>Declaration of accuracy</b> .....	<b>4</b>
<b>1. Introduction</b> .....	<b>5</b>
1.1 Purpose .....	5
1.2 Project overview .....	5
1.3 Description of the approved action .....	7
1.4 Location of the approved action.....	8
1.5 Activities undertaken during the reporting period.....	12
<b>2. Compliance with Conditions of Approval</b> .....	<b>15</b>
<b>3. Summary of Compliance</b> .....	<b>41</b>
<b>4. New environmental risks</b> .....	<b>42</b>
<b>Appendices</b> .....	<b>43</b>
Appendix A -Flora and fauna surveys.....	44
<b>Figures</b>	
Figure 1: Planning approval context from the Sydney Metro –Western Sydney Airport Project.....	6
Figure 2: Location of the Project –St Marys to Claremont Meadows. Land to which this approval applies is shown in orange. ....	9
Figure 3: Location of the Project –Orchard Hills to Warragamba to Prospect Water Supply Pipeline. Land to which this approval applies is shown in orange.....	10
Figure 4: Location of the Project –Luddenham to Western Sydney International. Land to which this approval applies is shown in orange.....	11
<b>Tables</b>	
Table 1: Key approval dates.....	5
Table 2: Construction works undertaken by each package during the 2022-2023 reporting period..	12
Table 3: EPBC (2020/8687) Conditions of Approval compliance table.....	16

# Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents.

The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed



Full name

Hugh Chapman

Position

Director Project Environment, Sustainability and Planning,  
Sydney Metro – Western Sydney Airport (SM-WSA)

Organisation

Sydney Metro

Organisation ABN

12 354 063 515

Date

17/10/2023

# 1. Introduction

## 1.1 Purpose

This compliance report covers the reporting period between 20 July 2022 and 20 July 2023 in respect of the *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act) Approval (2020/8687). The purpose of this report is to document compliance with the conditions for the EPBC (2020/8687) approval. Details of compliance are provided, and where appropriate, the timing of individual actions as identified.

According to the EPBC (2020/8687) conditions of approval “Commencement of the action” is defined as the first instance of any specified activity associated with the action including clearing and construction. Commencement of the action does not include minor physical disturbances or investigation works.

The key dates that relate to the approval are detailed in Table 1.

Table 1: Key approval dates

Action	Key Date
Commonwealth approval	3 June 2021
Commencement of the action	20 July 2022
Expiry of Commonwealth approval	31 December 2100

## 1.2 Project overview

The Sydney Metro –Western Sydney Airport (SM-WSA) Project involves the construction and operation of a new metro railway line around 23 kilometres in length that extends from the existing Sydney Trains suburban T1 Western Line (at St Marys) in the north and the Aerotropolis (at Bringelly) in the South. The alignment includes a combination of tunnel, surface, bridges, and viaduct sections, and comprises six new metro stations between St Marys and the Aerotropolis Core precinct, as well as a stabling and maintenance facility and operational control centre to support the operation of the new metro railway line. The approved action only relates to part of the project and is summarised in section 1.3 below.

There are three principal statutory schemes that govern the planning and assessment process for the project:

- *NSW Environmental Planning and Assessment Act 1979* (EP&A Act) applies to works located outside the boundary of Western Sydney International (Nancy-Bird Walton) Airport (referred to as Western Sydney International) (off-airport)
- *Commonwealth Airports Act 1996* (Airports Act) applies to works located within the boundary of Western Sydney International (on-airport)
- *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act):
  - For works located north of Western Sydney International (off-airport), assessment and approval was required under Part 8 and 9 of the EPBC Act to address impacts on listed threatened species and communities and Commonwealth land
  - For the lands located south of Western Sydney International (off-airport), impacts on matters of national environmental significance (MNES) and Commonwealth land have already been assessed and approved under a strategic assessment in accordance with Part 10 of the EPBC Act.

Figure 1 shows the statutory approval regime applicable to different areas of the project areas.

The EPBC (2020/8687) approval relates to works located on State land to the north of Western Sydney International (Nancy-Bird Walton) Airport (Western Sydney International) to address impacts on listed threatened species and ecological communities, and Commonwealth land. Other parts of the SM-WSA Project have been approved under other mechanisms and are not included in the scope of this compliance report.

The Sydney Metro –Western Sydney Airport (SM-WSA) EPBC Act Final Environmental Impact Assessment of the off-airport proposed action (EPBC 2020/8687) was prepared in October 2020 to assess the impacts of construction and operation of a rail link from St Marys to Elizabeth Drive, Badgerys Creek, as a controlled action under the EPBC Act, (the approved action). This document was exhibited between 21 October 2020 and 18 November 2020 in accordance with section 95A of the EPBC Act.

The SM-WSA EPBC 2020/8687 referral was approved, subject to conditions, by the Commonwealth Minister for the Environment on 3 June 2021 under Part 9 of the EPBC Act.

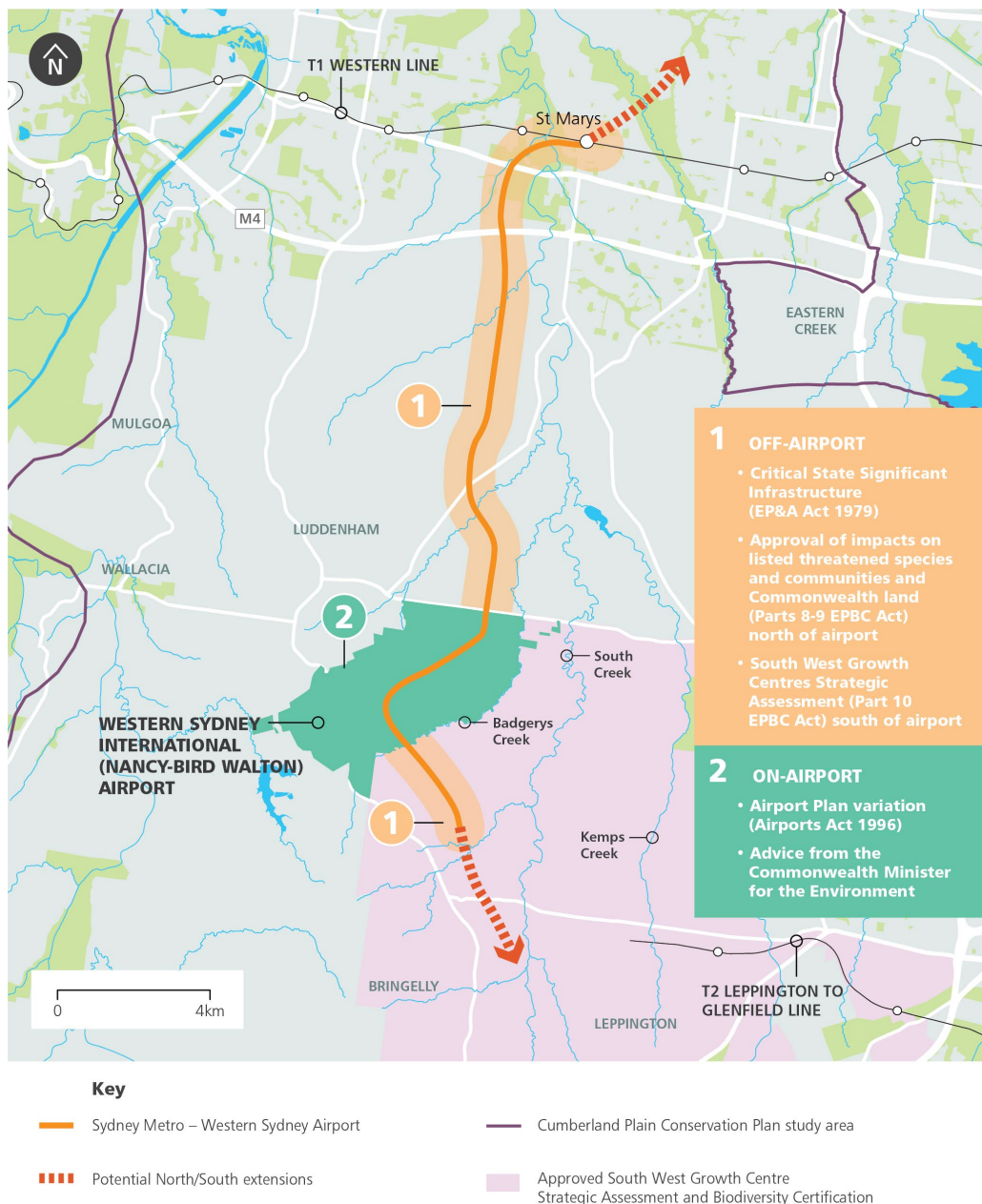


Figure 1: Planning approval context from the Sydney Metro –Western Sydney Airport Project

### 1.3 Description of the approved action

The Sydney Metro – Western Sydney Airport (SM-WSA) EPBC Act Final Environmental Impact Assessment of the off-airport proposed action (EPBC 2020/8687) provides a detailed description of the approved action and should be referred to where further information is required.

Key operational components of the approved action include:

- Around 4.3 kilometres of twin rail tunnels (generally located side by side) between St Marys (the northern extent of the approved action) and Orchard Hills
- A cut-and-cover tunnel around 350 metres long (including tunnel portal), transitioning to an in-cutting rail alignment south of the M4 Western Motorway at Orchard Hills
- Around 10 kilometres of rail alignment between Orchard Hills and Western Sydney International (the southern extent of the approved action), consisting of a combination of viaduct and surface rail alignment
- Three new metro stations:
  - St Marys (providing interchange with the T1 Western Line)
  - Orchard Hills
  - Luddenham Road
- Grade separation of the track alignment at key locations including:
  - Where the alignment interfaces with existing infrastructure such as the Great Western Highway, M4 Western Motorway, Lansdowne Road, Patons Lane, the Warragamba to Prospect Water Supply Pipelines (the pipelines), Luddenham Road, the future M12 Motorway and Elizabeth Drive
  - Crossings of Blaxland Creek and Cosgroves Creek and other small waterways to provide flood immunity for the project
- Modifications to the existing Sydney Trains station and rail infrastructure at St Marys to support interchange and customer transfer between the new metro station and the T1 Western Line
- A stabling and maintenance facility and operational control centre located to the south of Blaxland Creek and east of the proposed metro track
- An integrated tunnel ventilation system including a potential service facility at Claremont Meadows, as required
- All operational systems and infrastructure such as crossovers, rail sidings, signalling, communications, overhead wiring, power supply, lighting, fencing, security and access tracks/paths
- Retaining walls at required locations along the alignment
- Environmental protection measures such as noise barriers (if required), on-site water detention, water quality treatment basins and other drainage works.

Construction activities that would be undertaken for the approved action include:

- Enabling works
- Main construction works including:
  - Tunnelling and associated works
  - Corridor and associated works
  - Stations and associated works
  - Ancillary facilities and associated works
- Rail systems fitout
- Finishing works and testing and commissioning

## 1.4 Location of the approved action

Land to which the EPBC (2020/8687) approval applies is shown in Figure 2, Figure 3 and Figure 4. The construction boundaries and final surface levels shown are indicative only and are subject to construction planning and detailed design.



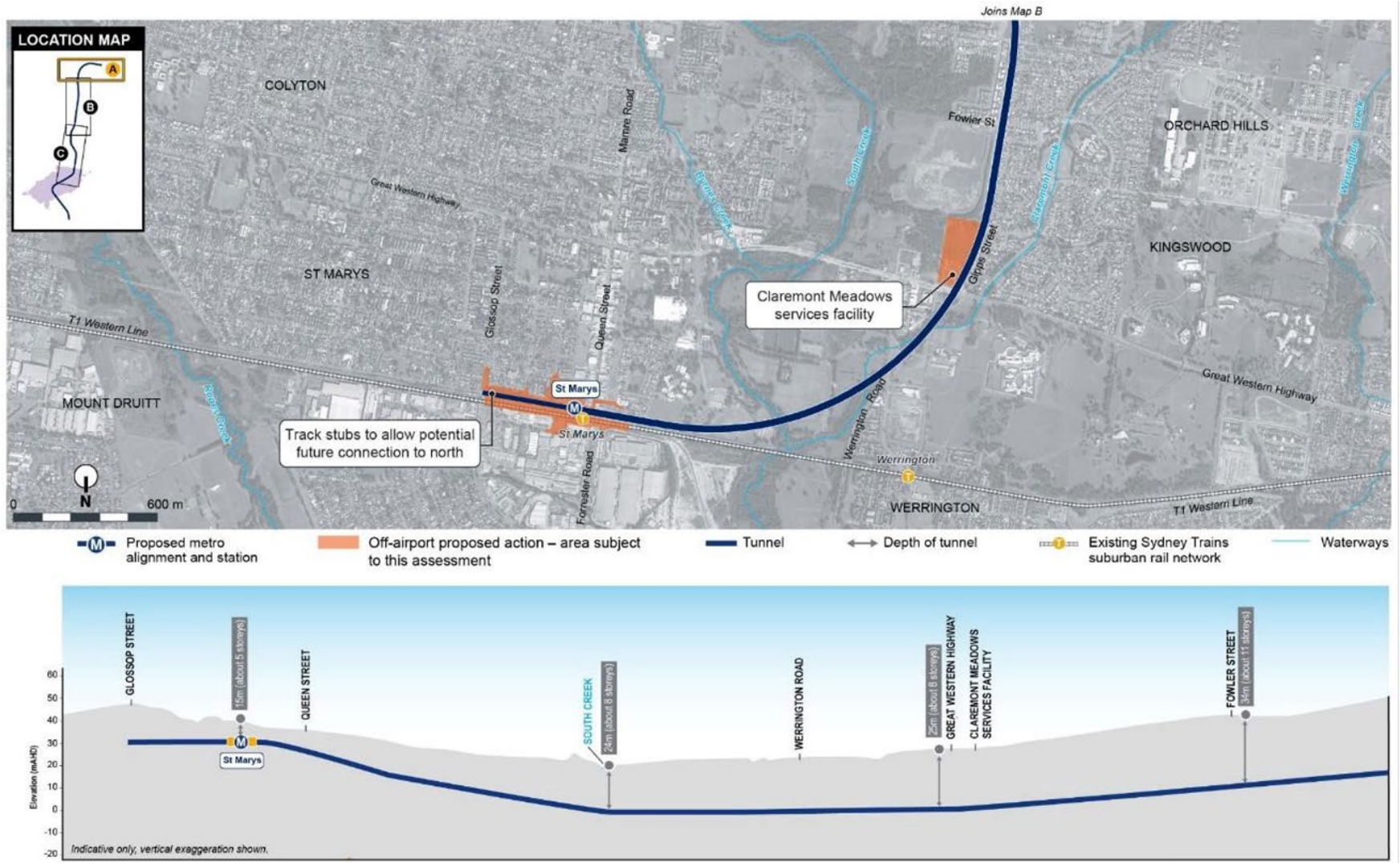


Figure 2: Location of the Project – St Marys to Claremont Meadows. Land to which this approval applies is shown in orange.

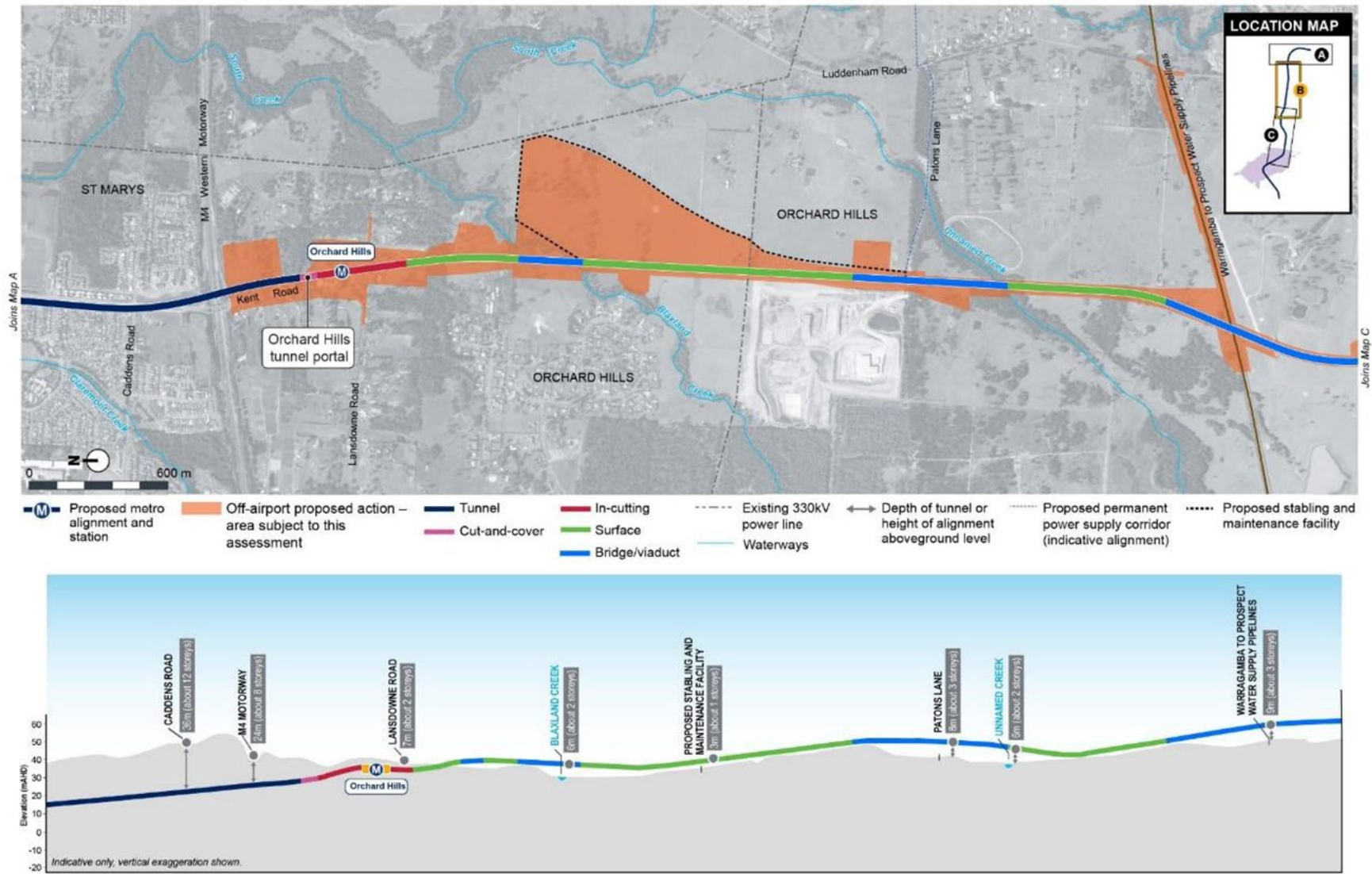


Figure 3: Location of the Project – Orchard Hills to Warragamba to Prospect Water Supply Pipeline. Land to which this approval applies is shown in orange.

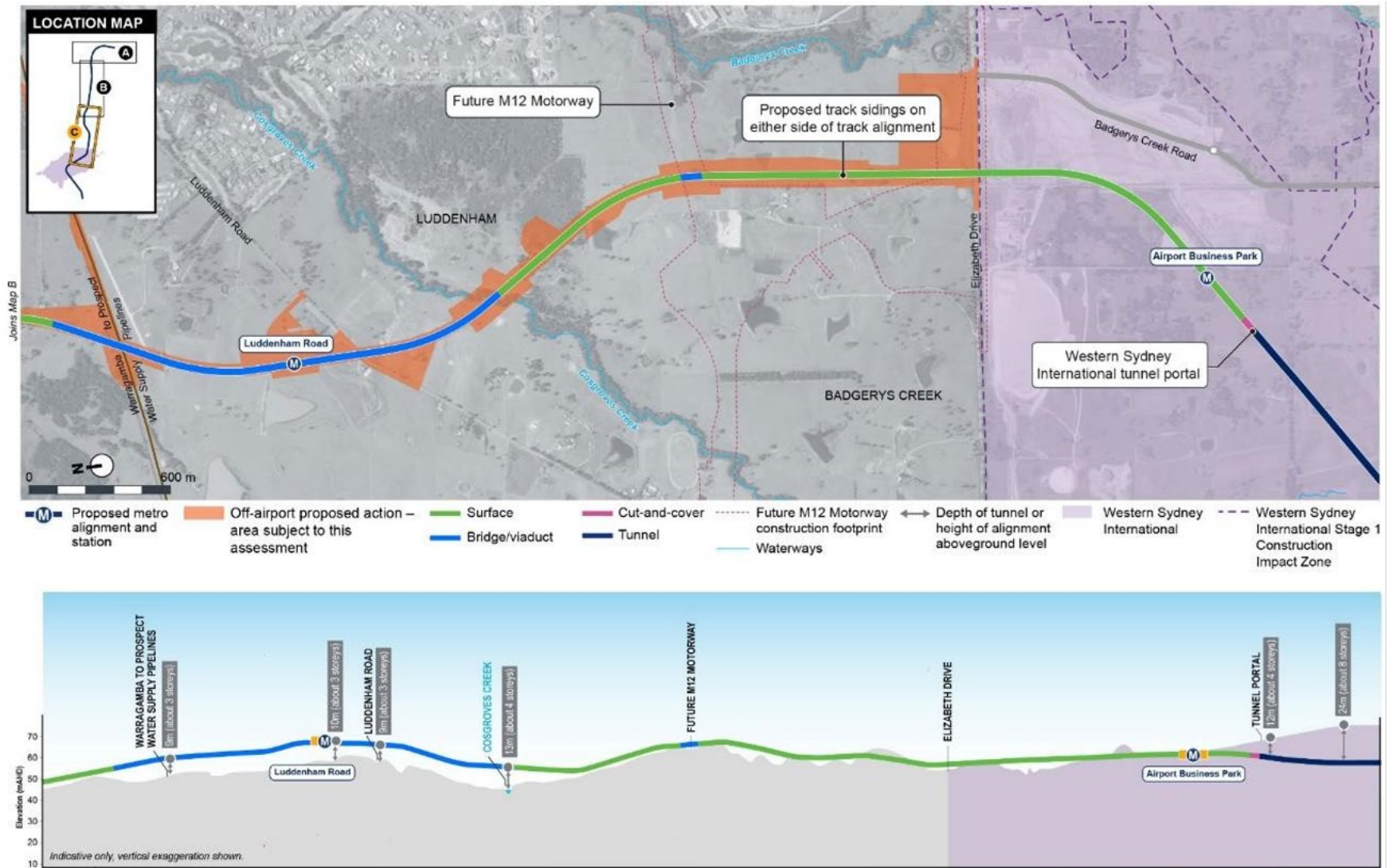


Figure 4: Location of the Project –Luddenham to Western Sydney International. Land to which this approval applies is shown in orange.

## 1.5 Activities undertaken during the reporting period

Construction works undertaken in the approval area during the 2022-2023 reporting period are summarised in Table 2. During the reporting period Sydney Metro has commenced work on three contract packages:

1. **Advanced and Enabling Works (AEW):** The AEW package includes works that would establish key construction sites and facilitate construction activities. This may include items such: preparatory works; site investigations; some demolition; provision of utilities to construction sites; road network adjustments including provision of access roads; and utility adjustments/relocations.
2. **Station Box and Tunnelling (SBT):** The SBT package includes the construction of two sections of twin tunnels between St Marys and Orchard Hills stations, and between the Western Sydney Airport Terminal and Aerotropolis stations. This package also includes all associated works including station box excavation, tunnel support activities, and clearing works at St Marys, Claremont Meadows and Orchard Hills.
3. **Surface and Civil Alignment Works (SCAW):** The SCAW package includes the construction of surface infrastructure including approximately 3.7 kilometres of viaduct structures in three sections, surface railway track, civil works for the stabling and maintenance facility and major earthworks for cuttings and embankments. The SCAW package also includes clearing works between Orchard Hills and Badgerys Creek.

Table 2: Construction works undertaken by each package during the 2022-2023 reporting period.

Package	Activity	Description
<b>St Marys</b>		
AEW	Enabling works	<ul style="list-style-type: none"> <li>Investigation works</li> <li>Transport network adjustments including relocation of the existing bus interchange</li> <li>Utility relocations and connections</li> </ul>
SBT	Site establishment	<ul style="list-style-type: none"> <li>Topsoil stripping, site clearing, grubbing and tree clearing</li> <li>Installation of hoarding, fencing, environmental controls, concrete barriers and access gates</li> <li>Establishment of ancillary facilities and haul roads</li> <li>Demolition of buildings and plaza</li> </ul>
	Tunnelling and associated works (Station box)	<ul style="list-style-type: none"> <li>Excavation works</li> <li>Installation of rock anchors</li> <li>Spoil laydown bay operational</li> <li>Water treatment plan operational</li> </ul>
	Tunnelling and associated works (Tunnelling)	<ul style="list-style-type: none"> <li>Stub tunnels commenced</li> </ul>
<b>Claremont Meadows</b>		
AEW	Enabling works	<ul style="list-style-type: none"> <li>Investigation works</li> <li>Transport network adjustments</li> <li>Utility relocations and connections</li> </ul>
SBT	Site Establishment	<ul style="list-style-type: none"> <li>Topsoil stripping, site clearing, grubbing and tree clearing</li> <li>Installation of hoarding, fencing, environmental controls, concrete barriers and access gates</li> <li>Establishment of ancillary facilities and haul roads</li> </ul>

Package	Activity	Description
	Intermediate service facility shaft excavation	<ul style="list-style-type: none"> <li>Piling &amp; capping beam complete</li> <li>Excavation works</li> <li>Rock bolts and shotcreting progressing with excavation</li> </ul>
<b>Orchard Hills</b>		
AEW	Enabling works	<ul style="list-style-type: none"> <li>Investigation works</li> <li>Utility relocations and connections</li> </ul>
SBT	Site establishment	<ul style="list-style-type: none"> <li>Topsoil stripping, site clearing, grubbing and tree clearing</li> <li>Installation of hoarding, fencing, environmental controls, concrete barriers and access gates</li> <li>Establishment of ancillary facilities and haul roads</li> <li>Demolition of buildings</li> </ul>
	Tunnelling and associated works (Station box)	<ul style="list-style-type: none"> <li>Excavation, piling, anchors &amp; capping beam complete</li> <li>Shotcreting progressing with excavations</li> <li>Water treatment plan operational</li> <li>Stockpile management, testing and removal</li> <li>Lansdowne Road Bridge open and operational</li> </ul>
	Tunnelling and associated works (Tunnelling)	<ul style="list-style-type: none"> <li>Two tunnel boring machines (TBMs) launched (heading towards Claremont Meadows then St Marys).</li> <li>TBM support equipment installed (including acoustic covering, conveyor)</li> <li>Tunnel segment delivery</li> </ul>
<b>Stabling and Maintenance Facility and Main Alignment</b>		
AEW	Enabling works	<ul style="list-style-type: none"> <li>Investigation works</li> <li>Utility relocations and connections</li> </ul>
SCAW	Enabling works	<ul style="list-style-type: none"> <li>Geotechnical and contamination investigations.</li> <li>Ecological survey and pre-clearing inspections.</li> <li>Installation of nest boxes.</li> </ul>
	Site establishment	<ul style="list-style-type: none"> <li>Topsoil stripping, site clearing, grubbing and tree clearing.</li> <li>Installation of fencing, environmental controls and access gates.</li> <li>Dewatering and clearing of farm dams, prior to filling.</li> <li>Temporary drainage and sediment basin establishment.</li> <li>Construction of all-weather access track from Patons Lane to compound.</li> <li>Establishment of main haul roads with imported sandstone.</li> <li>Filling of compound area with sandstone and chip seal.</li> <li>Topsoil and seeding of drains and batters.</li> </ul>
	Earthworks	<ul style="list-style-type: none"> <li>Cut/fill within the Stabling and Maintenance Facility footprint.</li> <li>Importation of sandstone and filling to final formation height.</li> <li>Cross drainage installation.</li> <li>Excavation of permanent 12ML basin and associated drainage.</li> <li>Establishment of piling pads.</li> <li>Construction of Blaxlands Creek and Unnamed Tributary of Blaxlands Creek temporary crossings.</li> <li>Establishment of Permanent Stockpile (PS105).</li> </ul>

Package	Activity	Description
	Structures	<ul style="list-style-type: none"> <li>Piling and form, reinforcement and concrete pour of viaduct piers.</li> </ul>
<b>Patons Lane to Luddenham Station</b>		
SCAW	Enabling works	<ul style="list-style-type: none"> <li>Geotechnical and contamination investigations</li> <li>Ecological survey and pre-clearing inspections.</li> </ul>
	Site establishment	<ul style="list-style-type: none"> <li>Topsoil stripping, site clearing, grubbing and tree clearing.</li> <li>Installation of fencing, environmental controls and access gates.</li> <li>Establishment of main haul roads with imported sandstone.</li> </ul>
	Earthworks	<ul style="list-style-type: none"> <li>Cut/fill within main alignment and temporary areas.</li> <li>Importation of sandstone and filling to final formation height.</li> <li>Drainage works.</li> <li>Construction of Unnamed Creek temporary crossing.</li> <li>Establishment of piling pads.</li> </ul>
	Structures	<ul style="list-style-type: none"> <li>Piling and form, reinforcement and concrete pour of viaduct piers.</li> <li>Installation of Luddenham Station spans via falsework.</li> </ul>
<b>Alignment between Luddenham Station and Elizabeth Drive</b>		
AEW	Enabling works	<ul style="list-style-type: none"> <li>Investigation works</li> </ul>
SCAW	Enabling works	<ul style="list-style-type: none"> <li>Geotechnical and contamination investigations.</li> <li>Ecological survey and pre-clearing inspections</li> <li>Installation of nest boxes.</li> <li>Demolition of existing buildings.</li> </ul>
	Site establishment	<ul style="list-style-type: none"> <li>Topsoil stripping, site clearing, grubbing and tree clearing.</li> <li>Installation of fencing, environmental controls and access gates.</li> <li>Dewatering and clearing of farm dams, prior to filling.</li> <li>Construction of drainage lines.</li> <li>Establishment of main haul roads with imported sandstone.</li> <li>Site compound establishment, filling and chip seal.</li> <li>Topsoil and seeding of drains and batters.</li> </ul>
	Earthworks	<ul style="list-style-type: none"> <li>Cut/fill within main alignment and temporary areas.</li> <li>Importation of sandstone and filling to final formation height.</li> <li>Excavation of M12 crossing area.</li> <li>Construction of Cosgrove creek temporary crossing.</li> <li>Drainage works.</li> <li>Establishment of piling pads.</li> <li>Excavation of permanent basins south of Cosgroves Creek.</li> </ul>
	Structures	<ul style="list-style-type: none"> <li>Construction of bridge crossing M12 alignment.</li> <li>Piling and form, reinforcement and concrete pour of viaduct piers.</li> </ul>

# 2. Compliance with Conditions of Approval

The EPBC (2020/8687) Approval contains 40 conditions of approval. Table 3 replicates the conditions, comments on compliance with the condition requirements during the reporting period and provides supporting documents to confirm findings. Three non-compliances were identified during the reporting period and reported to the Department of Climate Change, Energy, the Environment and Water (hereafter referred to as Department). A summary of compliance is provided in section 3.

Table 3: EPBC (2020/8687) Conditions of Approval compliance table

No.	Condition	Status	Comments	Supporting evidence
1	The approval holder must not clear protected matters outside the study area.	Compliant	The current clearing footprints for the AEW, SBT and SCAW packages show that Sydney Metro has not cleared any protected matters outside the study area.	<p>Clearing boundaries from the AEW, SBT and SCAW contracts:</p> <ul style="list-style-type: none"> <li>• AEW – Harris St SPO SEMP</li> <li>• AEW Post clearing report Elizabeth Drive Roundabout</li> <li>• AEW – CEMP Temporary Bus Interchange</li> <li>• SBT – Permit to Clear_Claremont Meadows</li> <li>• SBT – Permit to Clear_Orchard Hills 2023</li> <li>• Pre-clearing inspection of St Marys (Figure 6-1)</li> <li>• SCAW -Clearing Footprint Maps_May 2023</li> </ul>
2	To minimise the impacts of the action on protected matters, the approval holder must not clear more than the following specified amounts within the study area:	Overall condition 2 is compliant. The sections of this condition have been separated out below.	Refer below	Refer below
	a. 5.87 hectares of Cumberland Plain Woodlands and Shale-Gravel Transition Forest threatened ecological community (TEC).	Compliant	<p>Sydney Metro has not cleared more than the amounts specified in Condition 2(a) within the study area.</p> <p>As of 20 July 2023 the contractors have requested to clear 3.92 hectares of the allowed 5.87 hectares of EPBC listed Cumberland Plain Woodlands and Shale-Gravel Transition Forest TEC.</p>	<ul style="list-style-type: none"> <li>• Western Sydney Airport Metro SBT Project – Revised Biodiversity Offset Credit Calculations, May 2023</li> <li>• Sydney Metro Western Sydney Airport SCAW Project – Updated Biodiversity Offset Credit Requirements, May 2023</li> </ul>



No.	Condition	Status	Comments	Supporting evidence
				<ul style="list-style-type: none"> <li>As multiple contract packages contribute to this condition Sydney Metro has combined the cleared amounts through a memo (Memo on condition 2)</li> </ul>
	b. 4.94 hectares of Coastal Swamp Oak ( <i>Casuarina glauca</i> ) Forest of New South Wales and South East Queensland TEC.	Compliant	<p>Sydney Metro has not cleared more than the amounts specified in Condition 2(b) within the study area.</p> <p>As of 20 July 2023 the contractors have requested to clear 3.56 hectares of the allowed 4.94 hectares of EPBC listed Coastal Swamp Oak (<i>Casuarina glauca</i>) Forest of New South Wales and South East Queensland TEC.</p>	<ul style="list-style-type: none"> <li>Western Sydney Airport Metro SBT Project – Revised Biodiversity Offset Credit Calculations, May 2023</li> <li>Sydney Metro Western Sydney Airport SCAW Project – Updated Biodiversity Offset Credit Requirements, May 2023</li> <li>Memo on condition 2</li> </ul>
	c. 24.79 hectares of Grey-headed Flying-fox foraging habitat.	Compliant	<p>Sydney Metro has not cleared more than the amounts specified in Condition 2(c) within the study area.</p> <p>As of 20 July 2023 the contractors have requested to clear 17.2 hectares of the allowed 24.79 hectares of Grey-headed Flying-fox foraging habitat.</p>	<ul style="list-style-type: none"> <li>Western Sydney Airport Metro SBT Project – Revised Biodiversity Offset Credit Calculations, May 2023</li> <li>Sydney Metro Western Sydney Airport SCAW Project – Updated Biodiversity Offset Credit Requirements, May 2023</li> <li>Memo on condition 2</li> </ul>
	d. 7.3 hectares of native vegetation on the Defence Establishment Orchard Hills site (which may include threatened ecological communities in conditions 2a and 2b).	Compliant	<p>Sydney Metro has not cleared more than the amount specified in Condition 2(d) within the study area on the Defence Establishment Orchard Hills (DEOH).</p> <p>The total native vegetation cleared in the grubbing footprint within DEOH is 4.21</p>	<ul style="list-style-type: none"> <li>Western Sydney Airport Metro SCAW Project – Pre-clearing Inspections of the Clearing and Grubbing Footprint – January 2023</li> <li>Post-clearing Summary for the SCAW Project on the Orchard Hills</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
			hectares which is less than the 7.3 hectares permitted.	Defence Base -26 September 2023
	e. 335 identified individuals of <i>Grevillea juniperina</i> subsp. <i>juniperina</i> on the Defence Establishment Orchard Hills site (Lot 1 DP 629326 and Lot 2 DP 242968).	Compliant	<p>Sydney Metro has not cleared more than the amount specified in Condition 2(e) within the study area Lot 1 DP 629326 and Lot 2 DP 242968 on the Defence Establishment Orchard Hills (DEOH).</p> <p>Pre-clearing inspections were undertaken by the SCAW contractor on 13 December 2022. Field observations confirmed <i>Grevillea juniperina</i> locations were consistent with the species polygons developed during the Biodiversity Development Assessment Report (BDAR) with no additional populations.</p> <p>The total <i>Grevillea juniperina</i> cleared in the grubbing footprint within Lot 1 DP 629326 and Lot 2 DP 242968 on the DEOH is calculated to be 301 individuals which is less than the 335 individuals permitted.</p>	<ul style="list-style-type: none"> <li>Western Sydney Airport Metro SCAW Project – Pre-clearing Inspections of the Clearing and Grubbing Footprint – January 2023</li> <li>Post-clearing Summary for the SCAW Project on the Orchard Hills Defence Base -26 September 2023</li> </ul>
	f. The number of individuals identified by pre-clearance surveys, undertaken in accordance with conditions 3-5.	Compliant	<p>The pre-clearance surveys undertaken in November 2021 identified 14 individuals of <i>Pultenaea parviflora</i>. Refer to condition 3 for further details of these surveys.</p> <p>As part of the SBT pre-clearance inspection (in accordance with the BMP) of Orchard Hills undertaken on 22 and 23 June 2022, further individuals of <i>Dilwynia tenuifolia</i> and <i>Pultenaea parviflora</i> were identified outside the area which they were previously recorded in November 2021. <i>Pultenaea parviflora</i> is listed under the EPBC Act.</p>	<ul style="list-style-type: none"> <li>SBT -Pre-clearing Inspections of Orchard Hills South, October 2022</li> <li>SBT – Post clearing summary, September 2023</li> <li>Memo on condition 2</li> <li>Refer to condition 16 and 17 for evidence of biodiversity offsets secured</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
			<p>As such, targeted threatened flora surveys were completed in accordance with the Biodiversity Assessment Method (BAM). These targeted surveys identified an additional two individuals of <i>Pultenaea parviflora</i> within the construction footprint. These additional two individuals were rooted within exotic grassland cover which did not meet the threshold for assessment as threatened species habitat in accordance with the BAM requirements. The two individuals were therefore not required to be offset and as such were not reported as an unexpected find.</p>	
3	<p>To inform the preparation of the Biodiversity Management Plan required under conditions 8 and the Biodiversity Offset Strategy required under conditions 18, the approval holder must undertake pre-clearance surveys in areas not yet surveyed for the following species:</p> <ol style="list-style-type: none"> <li>Bynoe's Wattle.</li> <li>Downy Wattle.</li> <li><i>Allocasuarina glareicola</i>.</li> <li>White-flowered Wax Plant.</li> <li>Small-flower Grevillea.</li> <li><i>Micromyrtus minutiflora</i>.</li> <li><i>Pimelea curviflora</i> var. <i>curviflora</i>.</li> <li>Spiked Rice-flower.</li> <li><i>Pultenaea parviflora</i>.</li> </ol>	Compliant	<p>Sydney Metro completed pre-clearance surveys in areas not yet surveyed on 3, 5 and 8 November 2021 in accordance with the NSW threatened plant survey guidelines for the Biodiversity Assessment Method (BAM). The survey targeted the species listed under condition 3 and the following additional threatened flora species:</p> <ul style="list-style-type: none"> <li><i>Dillwynia tenuifolia</i></li> <li>Juniper-leaved Grevillea</li> <li><i>Marsdenia viridiflora</i> R. Br. subsp. <i>viridiflora</i>.</li> </ul> <p>Pre-clearance field surveys in the November 2021 study area recorded three threatened flora species:</p> <ul style="list-style-type: none"> <li><i>Pultenaea parviflora</i></li> <li><i>Dillwynia tenuifolia</i>,</li> <li>Juniper-leaved Grevillea</li> </ul>	<ul style="list-style-type: none"> <li>SM-WSA, EPBC Approval 2020/8687 – Off-Airport Biodiversity Management Plan, Rev 6, June 2022</li> <li>SM-WSA_EPBC Pre-clearance survey memo, Version 4, 18 November 2021.</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
			Only <i>Pultenaea parviflora</i> is listed under the EPBC Act. This information was used to inform the preparation of the Biodiversity Management Plan.	
4	Pre-clearance surveys in areas not yet surveyed must be undertaken in accordance with the NSW Biodiversity Assessment Method, or another methodology agreed to by the Department in writing.	Compliant	Sydney Metro completed pre-clearance surveys in areas not yet surveyed on 3, 5 and 8 November 2021 in accordance with the NSW threatened plant survey guidelines for the Biodiversity Assessment Method (BAM). The SM-WSA EPBC Pre-clearance survey Memo details the methodology used for the preclearance surveys in areas not yet surveyed.	<ul style="list-style-type: none"> <li>SM-WSA_EPBC Pre-clearance survey memo, Version 4, 18 November 2021.</li> <li>Letter to Department regarding CoA 4 and seeking the Department's agreement to the use of the results of the assessments of assumed presence for properties where access has not yet been obtained, as documented in the Revised BDAR, to inform the preparation of the Biodiversity Management Plan and Biodiversity Offset Strategy until the pre-clearance surveys can be completed, 25 August 2021. This was ultimately not required.</li> </ul>
5	The results of the pre-clearance surveys in areas not yet surveyed must be submitted to the Department in writing prior to, or with, the submission of: <ul style="list-style-type: none"> <li>a. The Biodiversity Management Plan required under condition 8; and</li> <li>b. The Biodiversity Offset Strategy required under condition 18.</li> </ul>	Compliant	The results of the pre-clearance surveys in areas not yet surveyed were submitted to Department in writing on 13 December 2021. The Biodiversity Management Plan and Biodiversity Offset Strategy were submitted in writing to Department and were approved on 29 March 2022.	<ul style="list-style-type: none"> <li>Email (Submission of documents required under Condition 5 of EPBC 2020/8687) sent on 13 December 2021.</li> <li>Letter from Department regarding approval of SMWSA – Biodiversity Management Plan, Biodiversity Staging Plan, Biodiversity Offset Strategy and Western Sydney</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
				Airport Plan Biodiversity Offset Strategy, 29 March 2022
6	<p>To minimise the impacts of the action on heritage values of the Defence Establishment Orchard Hills, the approval holder must prepare an Aboriginal Cultural Heritage Management Plan in consultation with the Registered Aboriginal Parties and Heritage NSW, prior to the commencement of the action.</p> <p>To demonstrate compliance with this condition, the approval holder must keep appropriate records to demonstrate that consultation has taken place, and how comments received during consultation have been taken into account in the Aboriginal Cultural Heritage Management Plan.</p>	Compliant	<p>Sydney Metro has prepared an EPBC Off-Airport Aboriginal Cultural Heritage Management Plan (EPBC ACHMP) which relates to management of Aboriginal Heritage on the Defence Establishment Orchard Hills site. Heritage NSW provided comments on the EPBC ACHMP on 13 April 2022. These comments were responded to; however some related to the State approval and were not adopted. The EPBC ACHMP was updated as appropriate in response to the comments from Heritage NSW.</p> <p>The updated ACHMP was sent to Registered Aboriginal Parties (RAPs) via email on 31 May 2022. No formal feedback was received however the ACHMP was updated to document the consultation process including general enquiries about providing feedback. The EPBC ACHMP was finalised on 18 July 2022 ahead of the commencement of the action commenced on 20 July 2022.</p> <p>Minor administrative changes to the EPBC ACHMP to update regulator names occurred on 12 September 2022.</p>	<ul style="list-style-type: none"> <li>SM-WSA EPBC Off-airport Aboriginal Cultural Heritage Management Plan, Rev 4, September 2022</li> <li>PDF document (HNSW ACH – Sydney Metro – Western Sydney Airport – EPBC off-airport – ACHMP – April 2022) details the formal feedback provided by Heritage NSW.</li> <li>Excel document (EPBC ACHMP Heritage NSW comments _M2A) provides the comments from Heritage NSW and the response from the Sydney Metro heritage specialist (M2A).</li> <li>Email to RAPs (FW_EPBC ACHMP) from Dr Darran Jordan on 31 May 2022. Hard copies also distributed to two RAPs on the same day.</li> <li>Email from Dr Darran Jordan (SM-WSA FW: EPBC ACHMP – contact with RAPs – Updated Plan to address Heritage NSW comments) on 30 June 2022 provides a summary of RAP consultation and notes that no formal feedback was received.</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
				<ul style="list-style-type: none"> <li>Email from Dr Darran Jordan (FW: Consultation with Gandangara on the ACHMP) details a conversation with Gandangara Local Aboriginal Land Council in relation to the final EPBC ACHMP and notes that no formal feedback was provided.</li> </ul>
7	The approval holder must not remove or disturb any Aboriginal archaeological heritage artefacts or sites on the Defence Establishment Orchard Hills, including unexpected finds, except in accordance with an Aboriginal Cultural Heritage Management Plan prepared under condition 6.	Compliant	<p>Two Aboriginal archaeological sites were located on the Defence Establishment Orchard Hills [REDACTED].</p> <p>The EPBC ACHMP identified that one site would require salvage excavation and one site would require no further management.</p> <p>Salvage was completed for [REDACTED] and a clearance certificate was issued.</p> <p>The salvage was led by a suitably qualified archaeologist (Dr Darran Jordan) with RAP field representatives present.</p> <p>No clearance certificate was completed for [REDACTED] as no further management was required. No unexpected finds or human skeletal remains were found so no further artefact recording was required.</p> <p>The work completed for [REDACTED] included Phase 1 and Phase 2 salvage excavations at [REDACTED]. Management of site [REDACTED] was undertaken in accordance with the EPBC ACHMP.</p> <p>Phase 3 geomorphic assessments were completed by a suitably qualified geomorphologist under the supervision of the</p>	<ul style="list-style-type: none"> <li>SM-WSA EPBC Off-airport Aboriginal Cultural Heritage Management Plan, Rev 4, September 2022</li> <li>Clearance Certificate for [REDACTED]</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
			Principal Contractor's Cultural Heritage Advisor during the site works, A draft report on the Aboriginal Cultural Heritage works is pending completion due to the level of artefacts found across the entire SM-WSA project. Analysis and interpretation of the geomorphology forms part of this report. This can be provided to Department upon completion.	
8	For the protection of protected matters, the approval holder must submit to the Minister for approval a Biodiversity Management Plan that sets out requirements for Flora and Fauna Management Plans prepared under the project's Construction Environmental Management Framework.	Compliant	<p>Sydney Metro submitted a Biodiversity Management Plan (BMP) to the Minister. This plan was approved on 29<sup>th</sup> March 2022. The BMP sets out the requirements for the construction contractors' Flora and Fauna Management Plans.</p> <p>On 22 June 2022 Sydney Metro submitted a revised Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy to the Department. The updates were minor in nature and provided for information only.</p> <p>Department responded via email on 30 June 2022, confirming that the revised plans be implemented from 13 July 2022 onwards. Refer to condition 35 and 36 for evidence of the revised BMP and notification to the Department.</p>	<ul style="list-style-type: none"> <li>• SM-WSA EPBC Approval 2020/8687 – Off-airport Biodiversity Management Plan, Rev 6, June 2022</li> <li>• Letter from Department in regard to approval of the SM-WSA – Biodiversity Management Plan, Biodiversity Staging Plan, Biodiversity Offset Strategy and Western Sydney Airport Plan Biodiversity Offset Strategy, 29 March 2022</li> <li>• SBT – NSW (Off-Airport) Flora and Fauna Management Sub-Plan, Rev 01, 5 October 2022</li> <li>• SCAW – Fauna and Flora Management Sub-plan, Rev E, 13 October 2022</li> <li>• SSTOM – Flora and Fauna Management Sub-plan, Rev 00, 15 June 2023</li> <li>• Refer to condition 35 for evidence of submission of the revised BMP.</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
9	<p>The Biodiversity Management Plan must be consistent with the Department's <i>Environmental Management Plan Guidelines</i> (2014), and must include:</p> <p>a. Environmental objectives, relevant protected matters, and a reference to EPBC Act approval conditions to which the Biodiversity Management Plan refers;</p> <p>b. A table of commitments made in the Biodiversity Management Plan to achieve the objectives, and a reference to where the commitments are detailed in the Biodiversity Management Plan;</p> <p>c. Reporting and review mechanisms, and documentation standards, to demonstrate compliance with the Biodiversity Management Plan;</p> <p>d. An assessment of risks to achieving Biodiversity Management Plan environmental objectives and risk management strategies that will be applied;</p> <p>e. Impact avoidance, mitigation and repair measures, and their timing;</p> <p>f. A monitoring program, which must include:</p> <ol style="list-style-type: none"> <li>i. measurable performance indicators;</li> <li>ii. trigger values for corrective actions;</li> <li>iii. the timing and frequency of monitoring to detect trigger values and changes in the performance indicators; and</li> <li>iv. proposed corrective actions, if trigger values are reached.</li> </ol> <p>g. Provide any links to other plans or conditions of approval for the action.</p>	Compliant	<p>The BMP was developed consistent with the Department's <i>Environmental Management Plan Guidelines</i> (2014). Table 1-4 of the BMP outlines where within the BMP the EPBC conditions have been addressed including condition 9.</p> <p>Sydney Metro submitted the BMP to the Minister, this plan was approved on 29th March 2022.</p>	<ul style="list-style-type: none"> <li>• SM-WSA EPBC Approval 2020/8687 – Off-airport Biodiversity Management Plan, Rev 6, June 2022</li> <li>• Letter from DAWE in regard to approval of SMWSA – Biodiversity Management Plan, Biodiversity Staging Plan, Biodiversity Offset Strategy and Western Sydney Airport Plan Biodiversity Offset Strategy, 29 March 2022</li> </ul>
10	<p>The approval holder must not commence the action unless the Minister has approved the Biodiversity Management Plan in writing.</p>	Compliant	<p>Sydney Metro is compliant with this condition as the BMP was approved on 29 March 2022 before the action commenced on 21 July 2022.</p>	<ul style="list-style-type: none"> <li>• Letter to Department in regard to <i>Commencement of the Action – Sydney Metro Western Sydney Airport – St Mary's to Elizabeth Drive, NSW, EPBC 2020/8687</i>, August 2022</li> <li>• Letter from Department in regard to approval of SMWSA – Biodiversity Management Plan,</li> </ul>



No.	Condition	Status	Comments	Supporting evidence
				<p>Biodiversity Staging Plan, Biodiversity Offset Strategy and Western Sydney Airport Plan Biodiversity Offset Strategy, 29 March 2022</p>
11	<p>If the Minister approves the Biodiversity Management Plan then the Biodiversity Management Plan must be implemented</p>	Non-compliant	<p>In completing this Annual Compliance Report some inconsistencies with the BMP were found. The BMP was not reviewed within the necessary timeframes i.e. reviewed by a suitably qualified person at least every 12 months. An action has been identified to review the BMP.</p> <p>In addition, baseline mapping of listed Priority Weeds and pathogens within the construction area was not undertaken in accordance with section 7.3 and 9.3 of the BMP. The Principal contractor has been directed to map priority weeds.</p> <p>Sydney Metro notified Department on the 27 September 2023 after becoming aware of the non-compliance. Refer to section 3 for further information.</p>	
12	<p>The approval holder must submit to the Minister, for approval, a Staging Plan in relation to the construction of the action, prior to commencement of the action.</p>	Compliant	<p>Sydney Metro submitted the Biodiversity Staging Plan to the Minister, which was approved on 29<sup>th</sup> March 2022.</p> <p>On 22 June 2022 Sydney Metro submitted a revised Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy to the Department. The updates were minor in nature and provided for information only.</p>	<ul style="list-style-type: none"> <li>Letter from Department in regard to approval of SMWSA – Biodiversity Management Plan, Biodiversity Staging Plan, Biodiversity Offset Strategy and Western Sydney Airport Plan Biodiversity Offset Strategy, 29 March 2022</li> <li>SM-WSA Off-Airport Biodiversity Staging Plan, Rev 6, May 2022</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
			Department responded via email on 30 June 2022, confirming that the revised plans be implemented from 13 July 2022 onwards. Refer to condition 35 and 36 for evidence of the revised Biodiversity Staging Plan and notification to the Department.	<ul style="list-style-type: none"> <li>Refer to condition 35 for evidence of submission of the revised Biodiversity Staging Plan.</li> </ul>
13	The approval holder must implement the Staging Plan approved by the Minister.	Compliant	<p>No non-compliances have been raised against the implementation of the Biodiversity Staging Plan.</p> <p>Section 3.2 of the Biodiversity Staging Plan details the off-airport scope of works for each construction package, as relevant to the EPBC (2020/8687) Approval and section 3.4 shows the location of each stage. This is shown by the AEW, SBT and SCAW site access documents, noting that there are some overlaps with the AEW package which came prior to the other two stages.</p> <p>In accordance with Section 4.2 of the Biodiversity Staging Plan Sydney Metro have either purchased available Biobanking biodiversity credits or made a payment into the Biodiversity Conservation Fund, refer to condition 16.</p> <p>Sydney Metro did not commence the action until the Biodiversity Staging Plan, the Biodiversity Offset Strategy and the Biodiversity Management Plan were approved by the Minister.</p>	<ul style="list-style-type: none"> <li>SM-WSA Off-Airport Biodiversity Staging Plan, Rev 6, May 2022</li> <li>SBT – construction access plan</li> <li>SCAW – site access schedule</li> <li>AEW site access documents – <ul style="list-style-type: none"> <li>Harris St SPO SEMP</li> <li>AEW CEMP temporary bus interchange</li> <li>AEW post clearance report Elizabeth Drive roundabout</li> </ul> </li> </ul>
14	The Staging Plan must set out: a. how the construction of the action will be staged, including details of clearing and other activities to be carried out in each stage;	Compliant	Section 1.3, Table 1 of the SM-WSA off-airport Biodiversity Staging Plan outlines where	<ul style="list-style-type: none"> <li>SM-WSA Off-Airport Biodiversity Staging Plan, Rev 6, May 2022</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
	b. mapping and delineation of the spatial location of each stage; and c. the planned timing of when construction of each stage will commence and finish.		within the staging plan the EPBC conditions have been addressed. Sydney Metro submitted the Biodiversity Staging Plan (Rev 5) to the Minister, this plan was approved on 29th March 2022. The Staging Plan was revised (Rev 6) on 30 June 2022 under Condition 35 and implemented from 13 July 2022 onwards. Refer to condition 35 and 36 for evidence of the revised Biodiversity Staging Plan and notification to the Department.	
15	Prior to the commencement of clearing of protected matters identified in condition 2 in each stage, as defined in the Staging Plan required under condition 12, the approval holder must: a. determine the offset requirement for protected matters identified in condition 2 to be cleared in that stage in accordance with the NSW Biodiversity Assessment Method and the process set out in the Biodiversity Offset Strategy required under condition 18. b. secure the required offsets for that stage.	Compliant	The Sydney Metro – Western Sydney Airport EPBC Biodiversity Offset Strategy for off-airport lands (BOS) provides a summary of offset requirements for protected matters per construction stage, Table 5-1 gives ecosystem credits and Table 5-2 gives species credits. Offset requirement were calculated in accordance with the NSW Biodiversity Assessment Method (BAM). The BOS (Rev 6) was approved on 29 March 2022 prior to the commencement of the action on 21 July 2022. The BOS was revised (Rev 7) on 30 June 2022 under Condition 35 and implemented from 13 July 2022 onwards. Refer to condition 35 and 36 for evidence of the revised BOS and notification to the Department. The offsets have been secured and allocated to construction stages on a progressive basis. Letters have been provided to Department under condition 17 which append evidence of payments and retirements.	<ul style="list-style-type: none"> <li>• EPBC Biodiversity Offset Strategy for off-airport lands, Rev 7, May 2022</li> <li>• Letter to Department in regard to Commencement of the Action – Sydney Metro Western Sydney Airport – St Mary’s to Elizabeth Drive, NSW, EPBC 2020/8687, August 2022</li> <li>• Letter to Department regarding Sydney Metro Western Sydney Airport (SM-WSA) (EPBC 2020/8687) – Conditions of Approval 17, Evidence of the retirement of credits or payment to secure offsets to the Department, 23 March 2022</li> <li>• Letter to Department regarding SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
			<p>The first letter was provided to Department in March 2022 in order to align with the State approval requirements however clearing of protected matters did not occur until after the commencement of the action.</p> <p>The latest letter within the reporting period detailing all the credits purchased and retired for the Project was sent to Department on 14 August 2023 and relates to credits purchased during the reporting period (June 2023).</p>	<p><i>offsets to the Department, 19 October 2022</i></p> <ul style="list-style-type: none"> <li>Letter to Department regarding SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, 22 November 2022</li> <li>Letter to Department regarding SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, 14 August 2023 (note SBT component was retired during the reporting period).</li> </ul>
16	The offsets must be secured in accordance with the NSW Biodiversity Offset Scheme	Compliant	<p>Under the Biodiversity Offset Scheme, applications for development or clearing approvals must set out how impacts on biodiversity will be avoided and minimised. The remaining residual impacts can be offset by the purchase and/or retirement of biodiversity credits or payment to the Biodiversity Conservation Fund.</p> <p>The project has been refined to avoid and minimise potential impacts on biodiversity including:</p> <ul style="list-style-type: none"> <li>Refining the construction footprint to minimise impacts on Threatened Ecological Communities (TECs) and to</li> </ul>	<ul style="list-style-type: none"> <li>Letter to Department regarding Sydney Metro Western Sydney Airport (SM-WSA) (EPBC 2020/8687) – Conditions of Approval 17, Evidence of the retirement of credits or payment to secure offsets to the Department, 23 March 2022</li> <li>Letter to Department regarding SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, 19 October 2022</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
			<p>avoid vegetation that provides fauna habitat and movement corridors</p> <ul style="list-style-type: none"> <li>• Providing fauna connectivity structures (for example viaducts, bridges and culverts) to assist fauna habitat connectivity</li> <li>• Straightening the project alignment to avoid vegetation impacts</li> <li>• Designing tunnel options to avoid direct impacts on ecologically sensitive environments (e.g. riparian vegetation, and Cumberland Plain Woodland).</li> </ul> <p>Evidence of purchase and/or retirement of credits or payment into the Biodiversity Conservation Fund has been provided to Department on a progressive basis. The latest letter within the reporting period detailing all of the credits purchased and retired for the Project was sent on 14 August 2023 and relates to credits purchased in the reporting period (June 2023).</p>	<ul style="list-style-type: none"> <li>• Letter to Department regarding SMWSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, 22 November 2022</li> <li>• Letter to Department regarding SMWSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, 14 August 2022 (note the SBT component was retired during the reporting period).</li> </ul>
17	Within 3 months of retiring credits or making a payment to secure offsets, the approval holder must submit evidence of the retirement or payment the Department.	Compliant	<p>Evidence of purchase and/or retirement of credits has been provided to Department on a progressive basis. The latest letter within the reporting period detailing all of the credits purchased and retired for the Project was sent on 14 August 2023 and relates to credits purchased in the reporting period (June 2023). All letters have been sent within three months of making a new retirement or payment.</p> <p>For example: A letter was sent to Department on 22 November 2022 which covered retirement</p>	<ul style="list-style-type: none"> <li>• Letter to Department in regard to Sydney Metro Western Sydney Airport (SM-WSA) (EPBC 2020/8687) – Conditions of Approval 17, Evidence of the retirement of credits or payment to secure offsets to the Department, 23 March 2022</li> <li>• Letter to Department regarding SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
			<p>applications approved on 26 October 2022 and 9 November 2022.</p>	<p><i>credits or payment to secure offsets to the Department, 19 October 2022</i></p> <ul style="list-style-type: none"> <li>Letter to Department in regard to SMWSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, 22 November 2022</li> <li>Letter to Department in regard to SMWSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, 14 August 2022.</li> </ul>
18	<p>The approval holder must submit a Biodiversity Offset Strategy for the Minister's approval, prior to clearing of protected matters identified in condition 2.</p>	Compliant	<p>Sydney Metro submitted the Biodiversity Offset Strategy to Minister. The strategy was approved on the 29 March 2022.</p>	<ul style="list-style-type: none"> <li>Letter from Department regarding the approval of SMWSA – Biodiversity Management Plan, Biodiversity Staging Plan, Biodiversity Offset Strategy and Western Sydney Airport Plan Biodiversity Offset Strategy, 29 March 2022</li> <li>SM-WSA EPBC Biodiversity Offset Strategy for Off-Airport Lands, Rev 7, May 2022</li> </ul>
19	<p>The Biodiversity Offset Strategy must:</p> <p>a. Be prepared by a suitably qualified ecologist;</p>	Compliant	<p>Sydney Metro developed a Biodiversity Offset Strategy for the Project.</p>	<ul style="list-style-type: none"> <li>SM-WSA EPBC Biodiversity Offset Strategy for Off-Airport Lands, Rev 7, May 2022</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
	<p>b. Be prepared in accordance with the NSW Biodiversity Assessment Method;</p> <p>c. Be based on and consistent with the Biodiversity Development Assessment Report at Appendix A of the EIA;</p> <p>d. Be consistent with the principles of the Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy (October 2012); and</p> <p>e. Provide for the number of individuals identified in accordance with condition 3; and</p> <p>f. Set out:</p> <p>i. The process used for quantifying the impacts to protected matters based on the final design of the action, with quantification of the final number and class of biodiversity credits required to offset the residual impacts of action on protected matters;</p> <p>ii. Details of how the credit requirement to offset the impacts from each stage of construction (defined in the Staging Plan) will be determined and reported; and</p> <p>iii. How offset requirements will be satisfied, including the timeframes by which offsets must be secured in relation to each stage of construction as defined within the Staging Plan.</p>		<p>Section 2.4, Table 2-1 of the SM-WSA EPBC Biodiversity Offset Strategy for off-airport lands outlines where within the strategy the EPBC conditions have been addressed.</p> <p>Sydney Metro submitted the Biodiversity Offset Strategy to the Minister, this plan was approved on 29th March 2022.</p>	
20	<p>The approval holder must not commence the action unless the Minister has approved the Biodiversity Offset Strategy in writing.</p>	Compliant	<p>The Minister approved the Biodiversity Offset Strategy (Rev 6) on 29 March 2022.</p> <p>The Biodiversity Offset Strategy was revised (Rev 7) on 30 June 2022 under Condition 35 and implemented from 13 July 2022 onwards. Refer to condition 35 and 36 for evidence of the revised Biodiversity Offset Strategy and notification to the Department.</p>	<ul style="list-style-type: none"> <li>Letter from Department regarding approval of SMWSA – Biodiversity Management Plan, Biodiversity Staging Plan, Biodiversity Offset Strategy and Western Sydney Airport Plan Biodiversity Offset Strategy, 29 March 2022</li> <li>SM-WSA EPBC Biodiversity Offset Strategy for Off-Airport Lands, Rev 7, May 2022</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
21	If the Minister approves the Biodiversity Offset Strategy then the Biodiversity Offset Strategy must be implemented.	Compliant	<p>No non-compliances have been raised against the implementation of the Biodiversity Offset Strategy.</p> <p>In accordance with the Biodiversity Offset Strategy Sydney Metro have either:</p> <ul style="list-style-type: none"> <li>• Purchased and retired existing biodiversity credits through biodiversity stewardship agreements</li> <li>• Made a payment into the Biodiversity Conservation Fund.</li> </ul> <p>Evidence of retirements or payment is provided in condition 16.</p> <p>Offsets have been purchased or retired on a progressive basis in accordance with the construction stages presented in the document.</p> <p>Reporting of purchase or retirement has been undertaken in accordance with condition 17, which satisfies the reporting requirements of the Biodiversity Offset Strategy.</p>	<ul style="list-style-type: none"> <li>• SM-WSA EPBC Biodiversity Offset Strategy for Off-Airport Lands, Rev 7, May 2022</li> <li>• Refer condition 16 and 17.</li> </ul>
22	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Compliant	<p>Sydney Metro wrote to notify the Department that the action would commence on 21 July 2022. This notification letter was sent on 14 July 2022. The Department noted that the condition specified that notification must occur after the date of the commencement of the action and a subsequent email was sent by Sydney Metro on 1 August 2022.</p>	<ul style="list-style-type: none"> <li>• Letter to Department in regard to <i>Commencement of the Action – Sydney Metro Western Sydney Airport – St Mary’s to Elizabeth Drive, NSW, EPBC 2020/8687, August 2022</i></li> <li>• Email correspondence between Sydney Metro and Department (<i>RE Commencement of Works SECOFFICIAL 2</i>).</li> </ul>



No.	Condition	Status	Comments	Supporting evidence
23	The approval holder must notify the Department in writing of the date of commencement of each stage of the action, as specified in the Staging Plan required under condition 12, within 10 business days after the date of commencement of the relevant stage of the action.	Non-compliant	Sydney Metro did not notify Department when the Station Box and Tunnelling (SBT) and Surface Civil Alignment Works (SCAW) stages commenced.  Sydney Metro notified Department on the 13 July 2023 after becoming aware of the non-compliance.  Department responded to the Non-compliance Report (NCR) on 15 August 2023. Refer to Section 3 for further information.	<ul style="list-style-type: none"> <li>Letter to Department in regard to <i>Commencement of the Action – Sydney Metro Western Sydney Airport – St Mary’s to Elizabeth Drive, NSW, EPBC 2020/8687</i>, August 2022</li> <li>Correspondence from Department, <i>Condition of Approval 23 &amp; 29: notification of commencement of stages and reporting a non-compliance</i>, 15 August 2023</li> </ul>
24	The approval holder must maintain accurate and complete compliance records.	Compliant	This Report.  Sydney Metro document management system and record keeping.  Internal compliance review that was completed in the lead-up to the preparation of the annual report.	SM-WSA EPBC 2020/8687 Annual Compliance Report, October 2023  Sydney Metros internal document control systems.
25	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Not applicable	The Department has not made a request of this nature in the reporting period.	Not applicable.
26	The approval holder must: <ul style="list-style-type: none"> <li>a. submit plans electronically to the Department</li> <li>b. publish each plan on the website within 3 month of the date the plan is approved by the Minister or the date a revised action management plan is submitted to the Minister or the Department, unless otherwise agreed in writing by the Minister</li> <li>c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public</li> </ul>	Non-compliant	<ul style="list-style-type: none"> <li>a. Plans have been provided to Department in electronic format (PDF).</li> <li>b. The revised Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy were published on the Sydney Metro website on 28 June 2022, this was within three months of Sydney Metro of both the original approval date for these plans (29 March 2022) and within three months of when the revised plans were submitted to</li> </ul>	<ul style="list-style-type: none"> <li>Email Correspondence – acceptance of the revised SMWSA Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy in accordance with conditions 35 and 36 of EPBC Act approval 2020/8687, 30 June 2022</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
	d. keep plans published on the website until 24 months after the completion of the action, or as otherwise agreed by the Department in writing.		<p>Department (22 June 2022). As the revisions were minor in nature and submitted under condition 35 approval of the plans was not required from Department.</p> <p>The EPBC ACHMP was finalised in July 2022, with minor updates in September 2022, but was published on the Sydney Metro website on 23 August 2023. This was non-compliant with Condition of Approval 26(b) since the EPBC ACHMP was not published within three months of plan finalisation.</p> <p>c. Sensitive heritage information was redacted from the EPBC ACHMP. Redactions included details of registered Aboriginal parties and locations of Aboriginal heritage sites.</p> <p>d. Part d of the condition is not applicable as the action has not been completed.</p> <p>Refer to Section 3 for further information on non-compliances.</p>	<ul style="list-style-type: none"> <li>Letter from Department regarding approval of SMWSA –Biodiversity Management Plan, Biodiversity Staging Plan, Biodiversity Offset Strategy and Western Sydney Airport Plan Biodiversity Offset Strategy, 29 March 2022</li> <li>Screenshots of plans available on the Sydney Metro website.</li> <li>Redacted version of the final EPBC ACHMP available on the Sydney Metro project website</li> <li>Refer to condition 35 for evidence of submission of revised BMP, revised BOS and revised Staging Plan.</li> </ul>
27	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the Biodiversity Management Plan, is prepared in accordance with the Department’s Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan.	Compliant	<p>The BMP requires the following monitoring data where related to management of Commonwealth biodiversity protected matters or Commonwealth land:</p> <ul style="list-style-type: none"> <li>Vegetation clearing and retention</li> <li>Next box monitoring</li> <li>Pre-dewatering assessment</li> <li>Fauna relocation and euthanasia of pest species</li> <li>Water quality and dissolved oxygen during draining of the dams</li> <li>Weed mapping of certain species, weed treatment, monitoring of effectiveness of</li> </ul>	

No.	Condition	Status	Comments	Supporting evidence
			<p>weed treatment and monitoring of weed and pathogen management during rehabilitation, if rehabilitation is required.</p> <p>Works within the reporting period have only triggered monitoring requirements for vegetation clearing, nest boxes and weed and pathogen monitoring. Dam dewatering and fauna relocation did not occur on Commonwealth land or impact Commonwealth listed species.</p> <p>The BMP required monitoring data undertaken within the reporting period (including associated surveys, maps, and other spatial data and metadata) and applicable to EPBC-listed species and non-listed species on Commonwealth land within the Project footprint, will be provided to the Department in the required format via email to <a href="mailto:speciesmetadata@environment.gov.au">speciesmetadata@environment.gov.au</a> in accordance with the <i>Department's Guidelines for biological survey and mapped data</i> (2018).</p>	
28	<p>The approval holder must prepare a compliance report addressing each condition of this approval for each 12-month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p> <ol style="list-style-type: none"> <li>publish each compliance report on the website within 3 months following the relevant 12-month period;</li> <li>notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication;</li> </ol>	Not applicable	<p>This report, the Sydney Metro – Western Sydney Airport EPBC 2020/8687 Annual Compliance Report, October 2023.</p> <p>This report is the first compliance report completed by Sydney Metro for the Sydney Metro – Western Sydney Airport project.</p> <p>Compliance with the notification, publishing, and redaction requirements will be audited during the following reporting period.</p>	Sydney Metro – Western Sydney Airport EPBC 2020/8687 Annual Compliance Report, October 2023.

No.	Condition	Status	Comments	Supporting evidence
	<p>c. keep all compliance reports publicly available on the website until 24 months after the completion of the action, or as otherwise agreed by the department in writing;</p> <p>d. exclude or redact sensitive ecological data from compliance reports published on the website; and</p> <p>e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.</p>			
29	<p>The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify:</p> <p>a. any condition which is or may be in breach</p> <p>b. a short description of the incident and/or non-compliance</p> <p>c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.</p>	Compliant	<p>Sydney Metro had three non-compliances that occurred during the reporting period. Refer to Condition 11, 23, 26 and section 3 for further details of these non-compliances.</p> <p><b>Condition 11 - BMP implementation.</b></p> <p>Sydney Metro became aware of the non-compliance on 25 September 2023 and notified Department on 27 September 2023. Department was notified in writing within the required two business day timeframe.</p> <p><b>Condition 23 - staged commencement works notification.</b></p> <p>Sydney Metro became aware of the non-compliance on 12 July 2023 and notified Department on 13 July 2023. Department was notified in writing within the required two business day timeframe.</p> <p><b>Condition 26 - ACHMP publication.</b></p> <p>Sydney Metro became aware of the non-compliance on 23 August 2023 and notified Department on 25 August 2023. Department was notified in writing within the required two business day timeframe.</p> <p>All non-compliance reports (NCRs) specified which condition was in breach, a short</p>	<ul style="list-style-type: none"> <li>• Non-Compliance Report condition 11, 26 September 2023</li> <li>• Non-Compliance Report condition 23, 12 July 2023</li> <li>• Non-Compliance Report condition 26, 23 August 2023</li> <li>• Notification letter to Department, SMWSA –notification of commencement of stages (commencement of the Action) - reporting non-compliance, dated 13 July 2023</li> <li>• Notification letter to Department, SMWSA –document on website - reporting non-compliance, letter dated 24 August 2023 but sent 25 August 2023</li> <li>• Notification letter to Department, SMWSA -BMP implementation - reporting non-compliance, letter dated 27 September 2023</li> <li>• Department Responding Correspondence, notification of commencement of stages and reporting of a non-compliance, 15</li> </ul>

No.	Condition	Status	Comments	Supporting evidence
			description of the non-compliance, any stages that were impacted, dates of the non-compliance, and action taken to resolve the non-compliance.	<p>August 2023 (email and PDF version)</p> <ul style="list-style-type: none"> <li>• Department Responding Correspondence, reporting of non-compliance with condition of approval 11, 28 September 2023 (email and PDF version)</li> <li>• Department Correspondence, reporting of non-compliance with condition of approval 26, 25 August 2023 (email and PDF version)</li> </ul>
30	<p>The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <p>a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future</p> <p>b. the potential impacts of the incident or non-compliance</p> <p>c. the method and timing of any remedial action that will be undertaken by the approval holder.</p>	Compliant	<p>Sydney Metro had three non-compliances that occurred during the reporting period. Refer to Condition 11, 23, 26 and section 3 for further details of these non-compliances.</p> <p>All three non-compliances were administrative in nature with minor to negligible impacts.</p> <p><b>Condition 11 - BMP implementation.</b></p> <p>The NCR was provided within two business days to Department. The NCR provided details of the proposed corrective actions and commented on the minor impacts from the non-compliance.</p> <p><b>Condition 23 - staged commencement works notification.</b></p> <p>The NCR was provided within two business days to Department. The NCR provided details of the corrective action taken, when corrective actions were undertaken, and commented on the minor to negligible impacts from the non-compliance.</p>	Refer to supporting evidence in Condition 29.

No.	Condition	Status	Comments	Supporting evidence
			<p><b>Condition 26 - ACHMP publication.</b></p> <p>The NCR was provided within two business days to Department. The NCR provided details of the corrective action taken, when corrective actions were undertaken, and commented on the minor to negligible impacts from the non-compliance.</p>	
31	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.	Not applicable	An independent audit has not been undertaken during the reporting period. No requests for an independent audit have been received from the Minister during the reporting period.	Not applicable.
32	For each independent audit, the approval holder must: <ul style="list-style-type: none"> <li>a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department</li> <li>b. only commence the independent audit once the independent auditor and audit criteria have been approved in writing by the Department</li> <li>c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.</li> </ul>	Not applicable	An independent audit has not been undertaken during the reporting period. No requests for an independent audit have been received from the Minister during the reporting period.	Not applicable.
33	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until 24 months after the completion of the action, or as otherwise agreed by the department in writing.	Not applicable	An independent audit has not been undertaken during the reporting period. No requests for an independent audit have been received from the Minister during the reporting period.	Not applicable.
34	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister under conditions 8 and 15, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action	Not applicable	Sydney Metro has not submitted a revised action management plan for approval by the Minister. Minor updates to the Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy were	Not applicable.

No.	Condition	Status	Comments	Supporting evidence
	management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.		provided for information under Condition 35 (see below).	
35	The approval holder may choose to revise an action management plan approved by the Minister under conditions 18 and 15, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	Compliant	On 22 June 2022 Sydney Metro submitted a revised Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy to the Department. The updates were minor in nature and provided for information only.  Department responded via email on 30 June 2022, confirming that the revised plans be implemented from 13 July 2022.	<ul style="list-style-type: none"> <li>Email Correspondence – acceptance of the revised SM-WSA <i>Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy in accordance with conditions 35 and 36 of EPBC Act approval 2020/8687, 30 June 2022</i></li> </ul>
36	If the approval holder makes the choice under condition 35 to revise an action management plan without submitting it for approval, the approval holder must: <ol style="list-style-type: none"> <li>notify the Department in writing that the approved action management plan has been revised and provide the Department with:               <ol style="list-style-type: none"> <li>an electronic copy of the RAMP</li> <li>an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP</li> <li>an explanation of the differences between the approved action management plan and the RAMP</li> <li>the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact</li> <li>written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department.</li> </ol> </li> </ol>	Compliant	On 22 June 2022 Sydney Metro submitted a revised Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy to the Department. The updates were minor in nature and provided for information only.  The documents were submitted as electronic copies, in two versions (track changes to show the updates and a clean version). The covering letter provided a brief explanation of the differences between the approved action management plans and the RAMPs and why Sydney Metro considers that the RAMPs are considered not likely to have a new or increased impact. Sydney Metro proposed to implement the revised plans from 13 July 2022 onwards.  Department responded via email on 30 June 2022, confirming that the revised plans be implemented from 13 July 2022.	<ul style="list-style-type: none"> <li>Email Correspondence – acceptance of the revised SMWSA <i>Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy in accordance with conditions 35 and 36 of EPBC Act approval 2020/8687, 30 June 2022</i></li> </ul>

No.	Condition	Status	Comments	Supporting evidence
	b. subject to condition 38, implement the RAMP from the RAMP implementation date.		Implementation of the Biodiversity Management Plan, Biodiversity Staging Plan and Biodiversity Offset Strategy are covered by conditions 11, 13 and 21. Refer to these conditions for further details.	
37	The approval holder may revoke their choice to implement a RAMP under condition 35 at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 35, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 35.	Not applicable	Sydney Metro did not revoke their choice to implement any of the RAMPs requested.	Not applicable
38	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then: a. condition 35 does not apply, or ceases to apply, in relation to the RAMP b. the approval holder must implement the action management plan specified by the Minister in the notice.	Not applicable	The Minister has not given this notice during the reporting period.	Not applicable
39	At the time of giving the notice under condition 38, the Minister may also notify that for a specified period, condition 35 does not apply for one or more specified action management plans.	Not applicable	This direction was not received by the Minister during the reporting period.	Not applicable.
40	Within 20 business days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Not applicable	The approved action is not yet complete.	Not applicable



## 3. Summary of Compliance

This section summarises the findings of the annual compliance report. There are 40 conditions of approval, during the reporting period 27 conditions were considered to be compliant, three non-compliances were identified, and 10 conditions were considered not applicable. The three non-compliances are summarised below and conditions 23 and 26 are considered closed.

### Condition 11

Condition 11 requires the approved BMP to be implemented. In preparation for the EPBC (2020/8687) Annual Compliance report, Sydney Metro identified some elements that were inconsistent with the BMP.

- The BMP has not been reviewed within the timeframes specified in the plan i.e., reviewed by a suitably qualified person at least every 12 months. It should be noted that since implementation of the BMP Sydney Metro have not identified any instances which would necessitate the review of the BMP, however the review timeframes nominated in EPBC CoA 11, have lapsed.
- Baseline mapping of listed Priority Weeds and pathogens within the construction area was not undertaken in accordance with section 7.3 and 9.3 of the BMP.

The non-compliance was detected on 25 September 2023 and a non-compliance report was provided to Department on 27 September 2023.

Sydney Metro has since directed the Principal Contractor to map priority weeds and is intending to utilise six monthly revised weed mapping undertaken to monitor the effectiveness of treated areas, to close this non-compliance. An action has also been identified to conduct a review of the BMP within three months from the date of the non-compliance report. Sydney Metro determined that no further action was required to address the non-compliance. Safeguards have been implemented to avoid reoccurrence and the non-compliance was communicated to the wider SM-WSA environment team and contractors.

### Condition 23

Condition 23 requires Sydney Metro to notify the Department in writing of the date of commencement of each stage of the action, within 10 business days after the date of commencement of the relevant stage of the action. Notification of commencement of the Station Box and Tunnelling (SBT) and Surface Civil Alignment Works (SCAW) stages occurred on 13 July 2023. This was non-compliant with Condition of Approval 23 since the notification to the Department did not occur within 10 business days after the date of commencement of the relevant stages of the action.

In preparation for the EPBC (2020/8687) Annual Compliance report, Sydney Metro identified a non-compliance with CoA 23. The non-compliance was detected on 12 July 2023 and was corrected by providing the notification of commencement of stages on 13 July 2023. In addition to this notification a non-compliance report was also provided to Department on 13 July 2023 to address the non-compliance.

Sydney Metro determined that no further action was required to address the non-compliance. Safeguards have been implemented to avoid reoccurrence and the non-compliance was communicated to the wider SM-WSA environment team and contractors.

### Condition 26(b)

Condition 26(b) requires Sydney Metro to publish each plan on the website within three months of the date the plan is approved by the Minister or the date a revised action management plan is submitted to the Minister or the Department, unless otherwise agreed in writing by the Minister.

The EPBC Aboriginal Cultural Heritage Management Plan (ACHMP) was finalised on 18 July 2022, noting some minor administrative updates in September 2022, but was not published on the Sydney Metro

website until 23 August 2023. This was non-compliant with Condition of Approval 26(b) since the EPBC ACHMP was not published within three months of being finalised.

In preparation for the EPBC (2020/8687) Annual Compliance report, Sydney Metro identified a non-compliance with CoA 26. The non-compliance was detected on 23 August 2023 and was corrected by uploading the document onto the Sydney Metro website that same day. A non-compliance report was provided to Department on 25 August 2023 to address the non-compliance.

While investigating this non-compliance Sydney Metro confirmed that our website contained the SSI-10051 ACHMP, which was mistaken for the EPBC ACHMP. Consequently, Sydney Metro has re-named the documents as the SM-WSA ACHMP and the SM-WSA EPBC off-airport ACHMP to improve clarity and ensure compliance against CoA 26 in the future. Sydney Metro determined that no further action was required to address the non-compliance. Safeguards have been implemented to avoid reoccurrence and the non-compliance was communicated to the wider SM-WSA environment team and contractors.

## 4. New environmental risks

No new environmental risks have been identified during the reporting period.

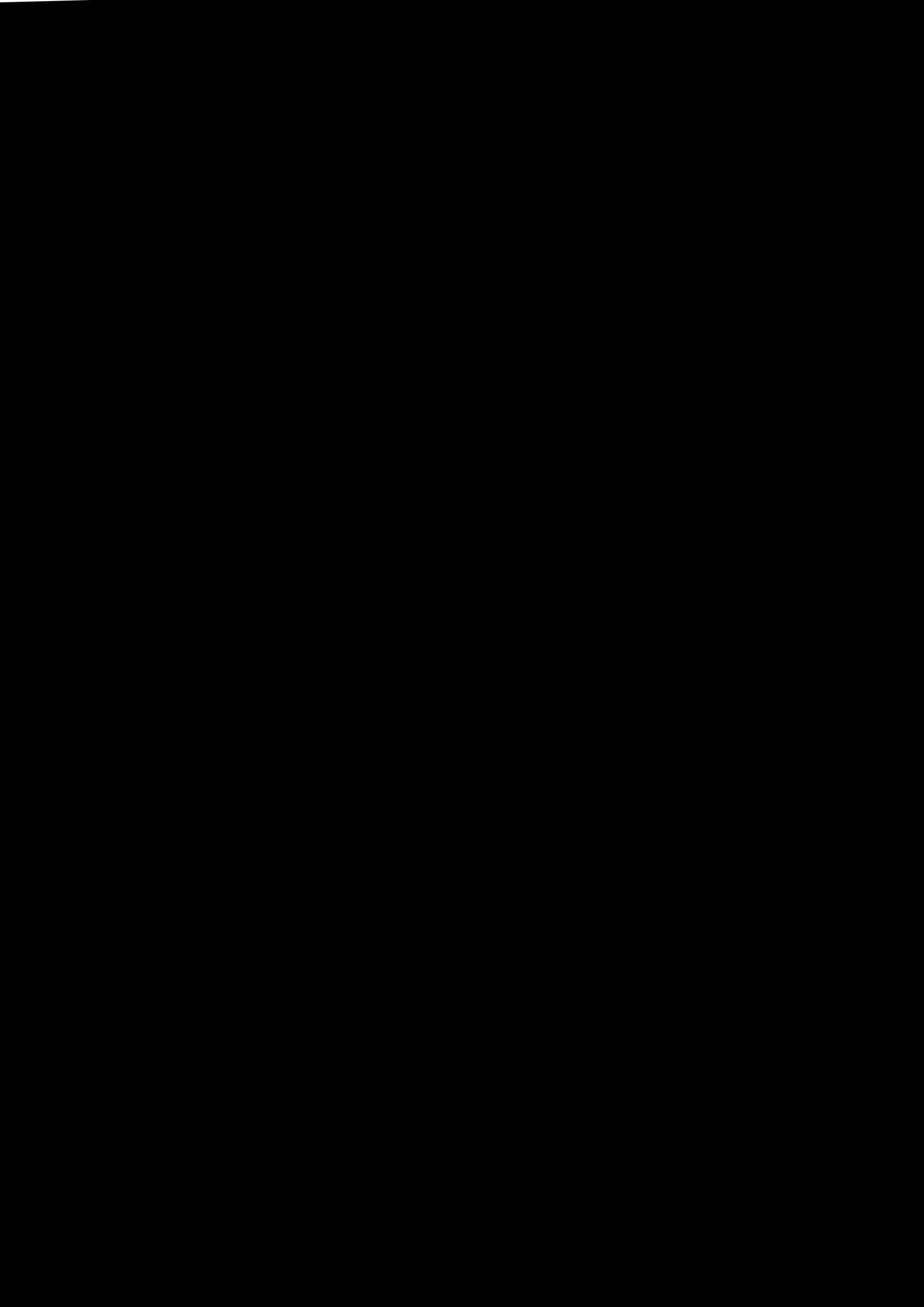
As the project advances, Sydney Metro and its contractors will continue to monitor and manage environmental risks through the Sydney Metro and our contractor's ISO 14001-compliant environmental management systems.

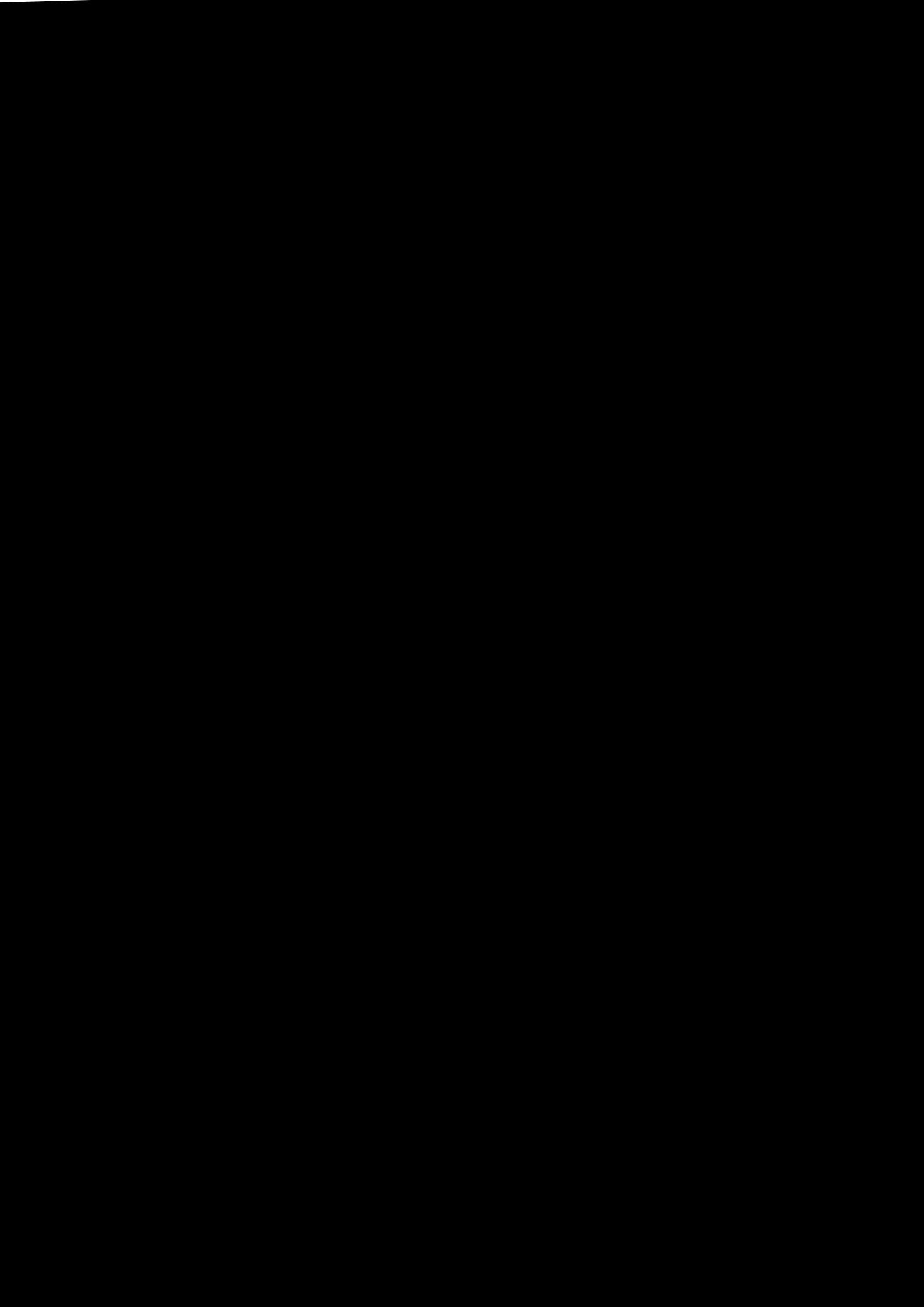
# Appendices

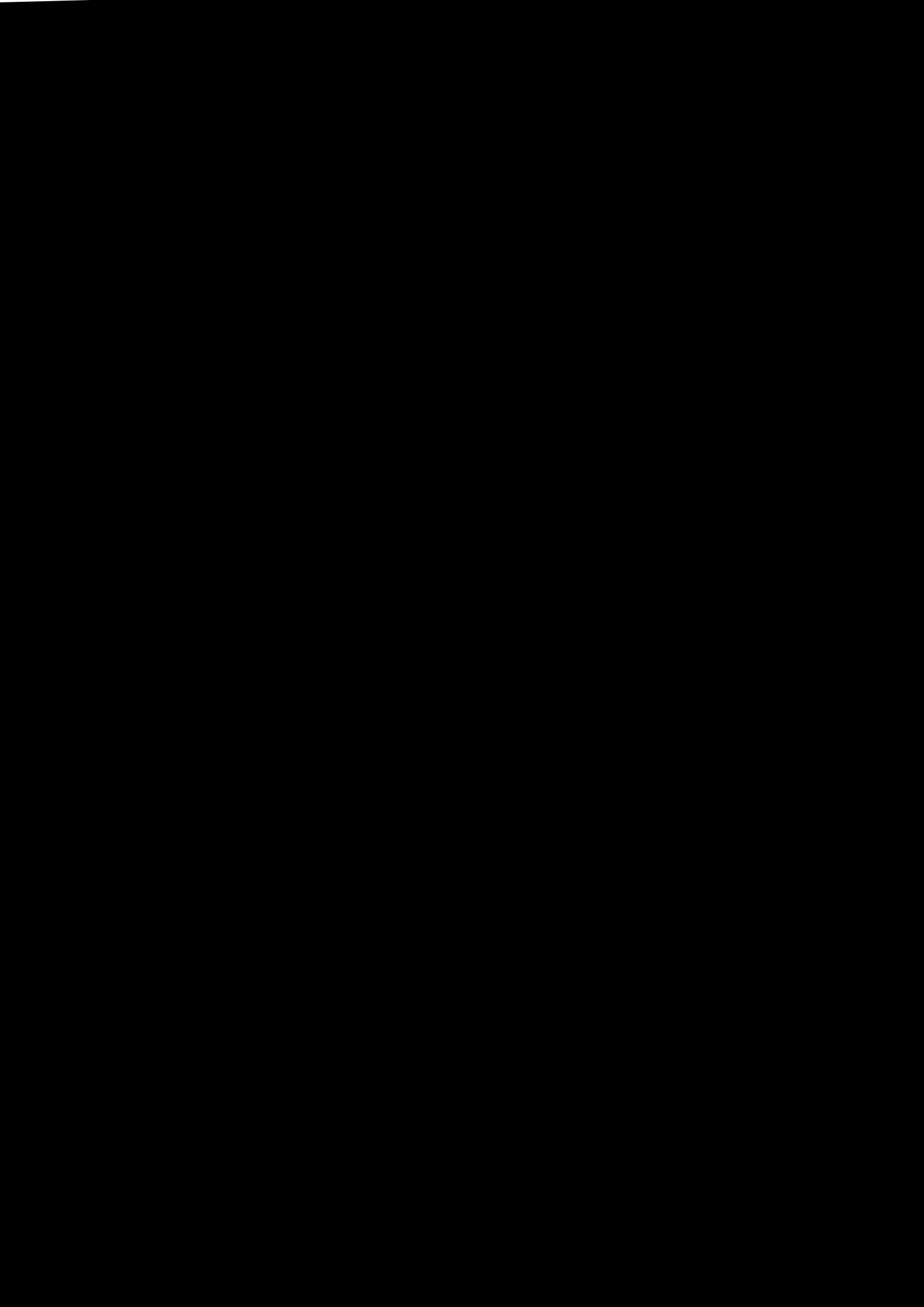
Appendix A – Flora and Fauna Surveys

## Appendix A - Flora and fauna surveys

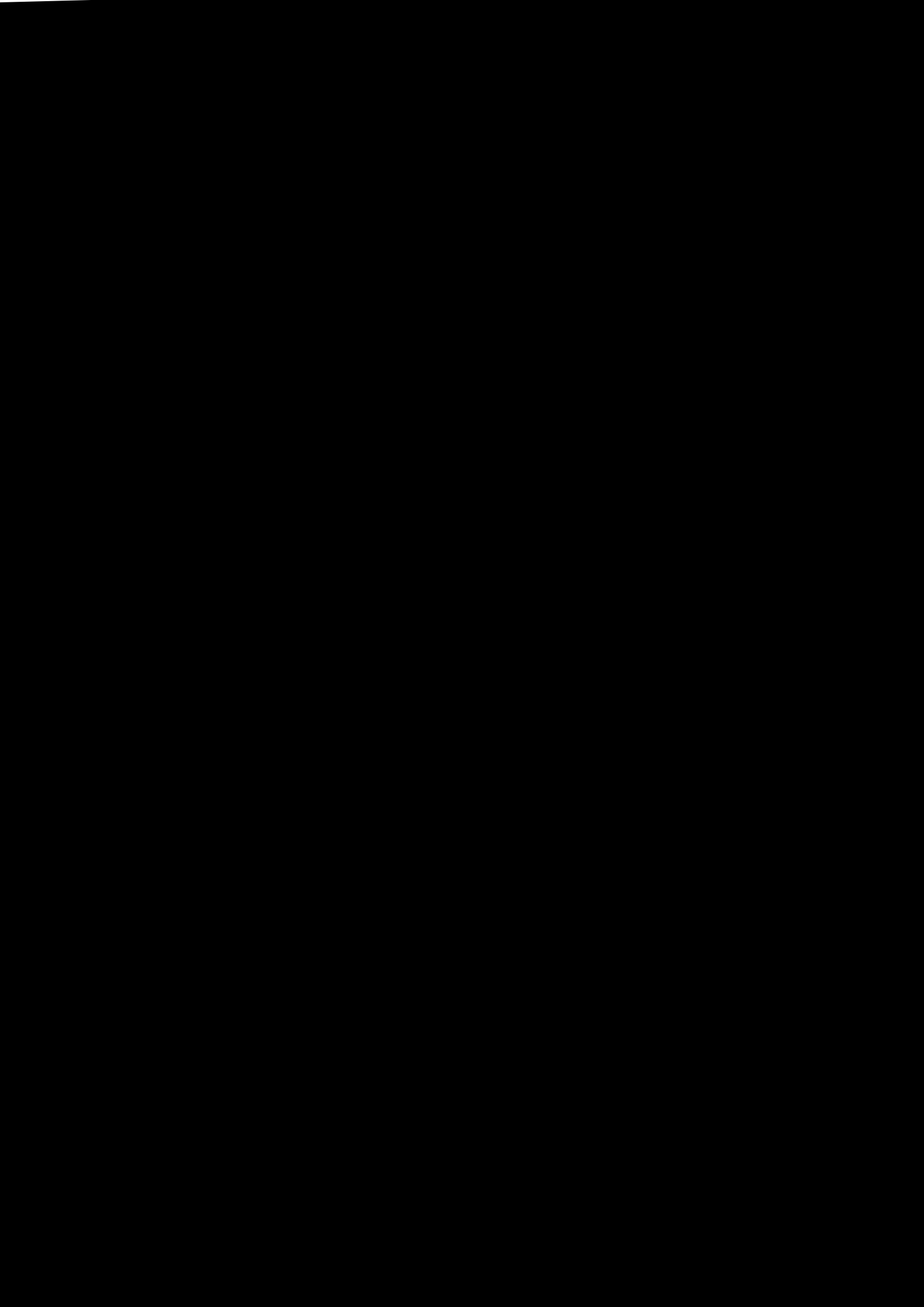
This section has been redacted for the public version due to sensitivities.

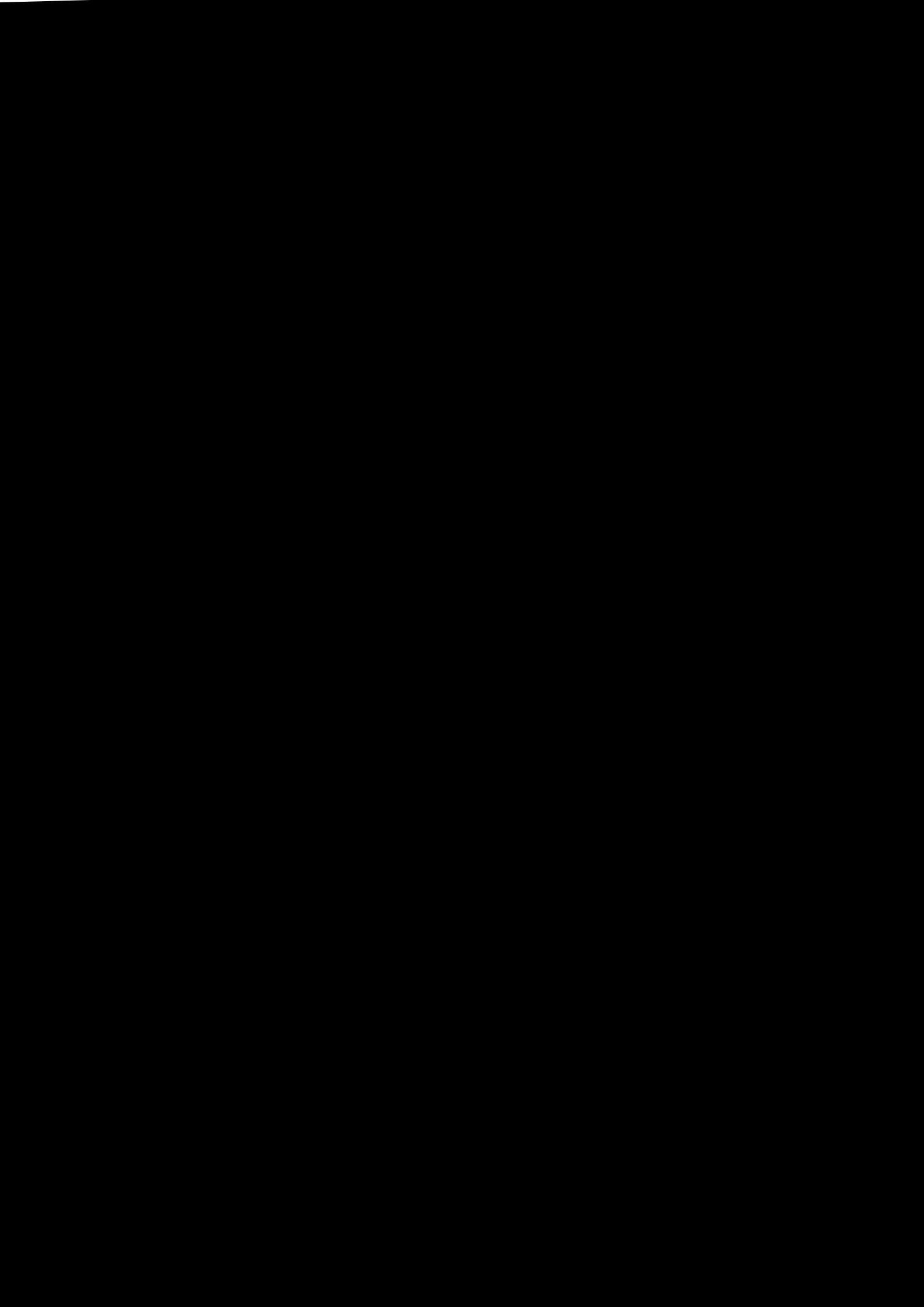


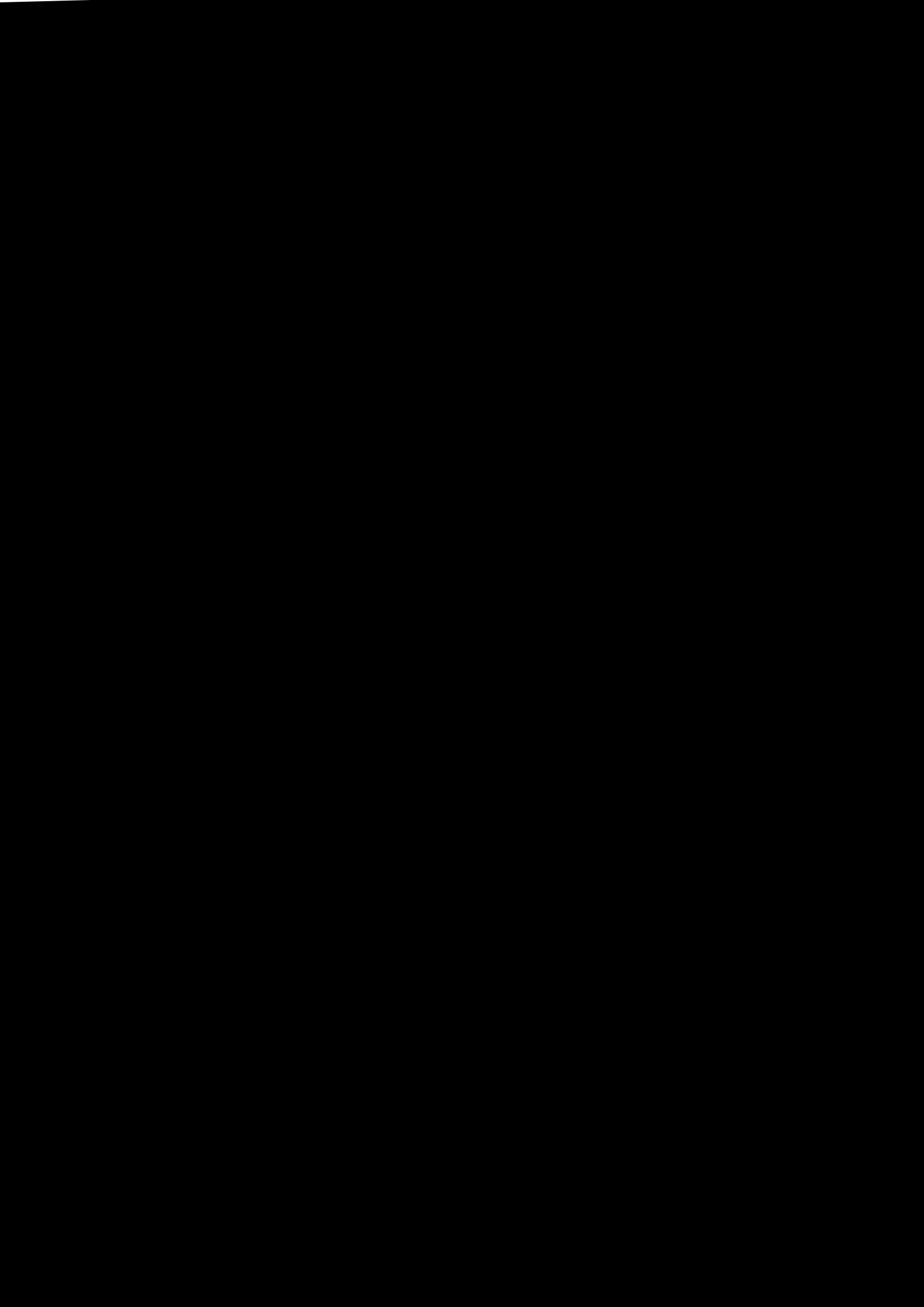


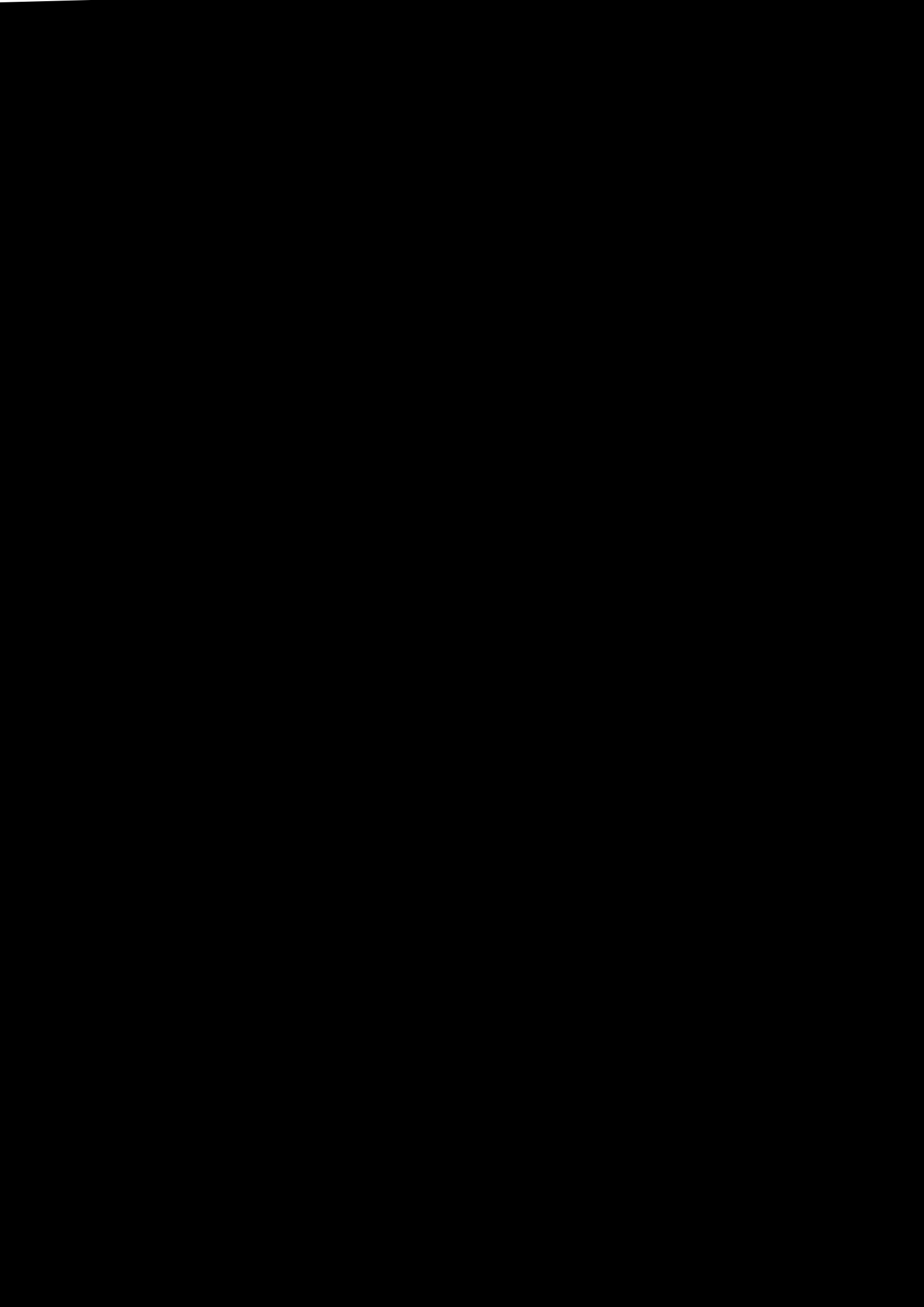


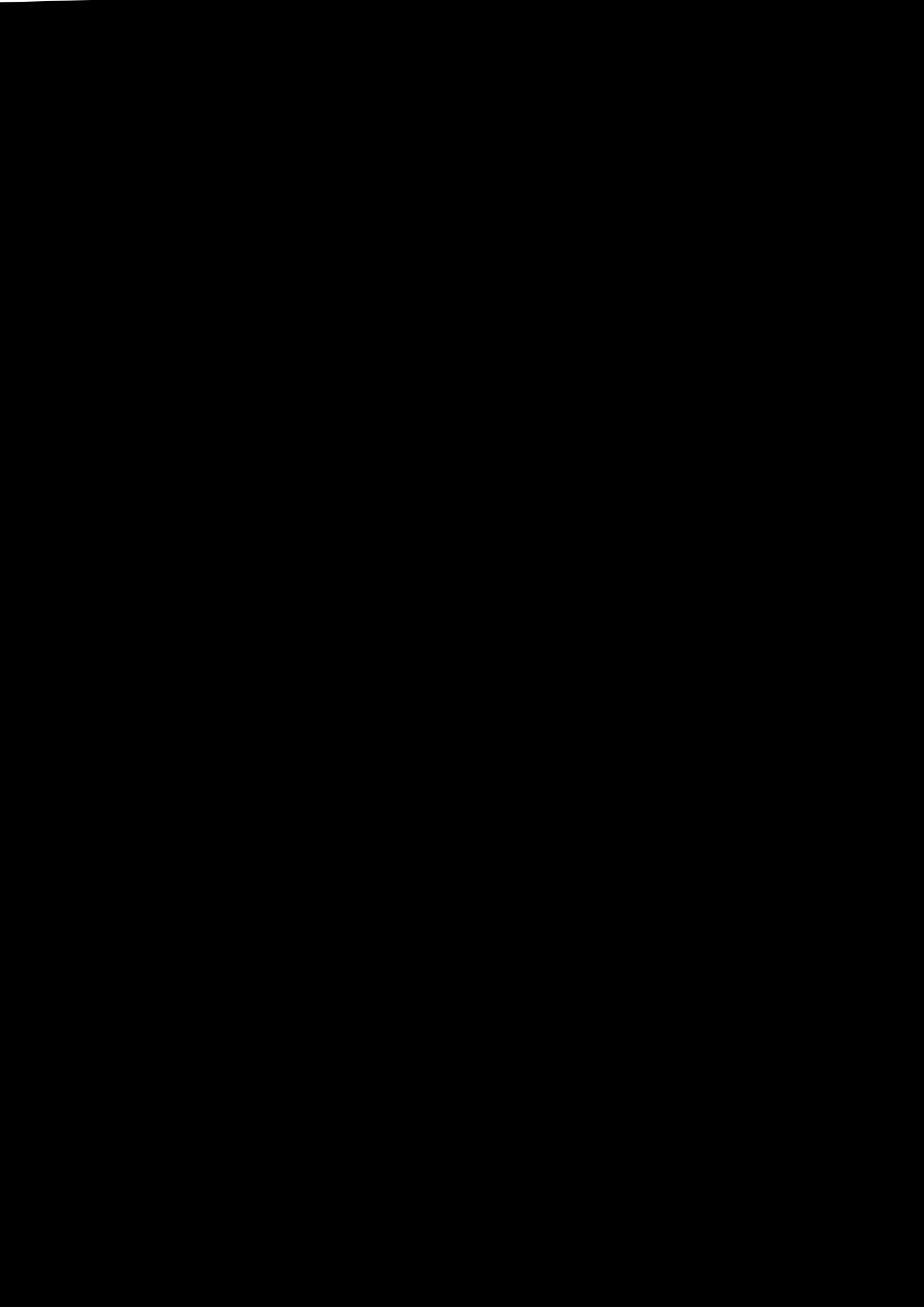


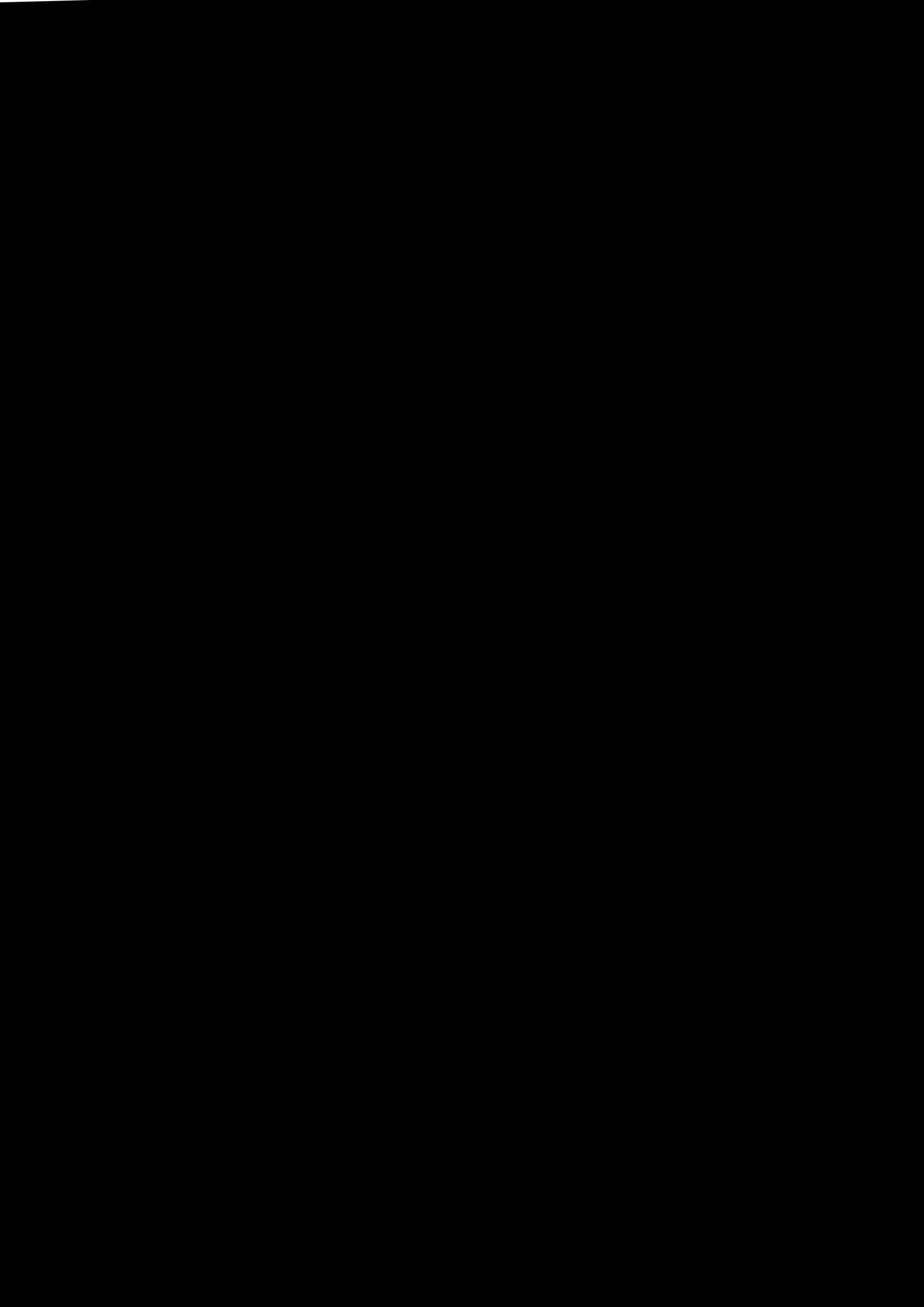


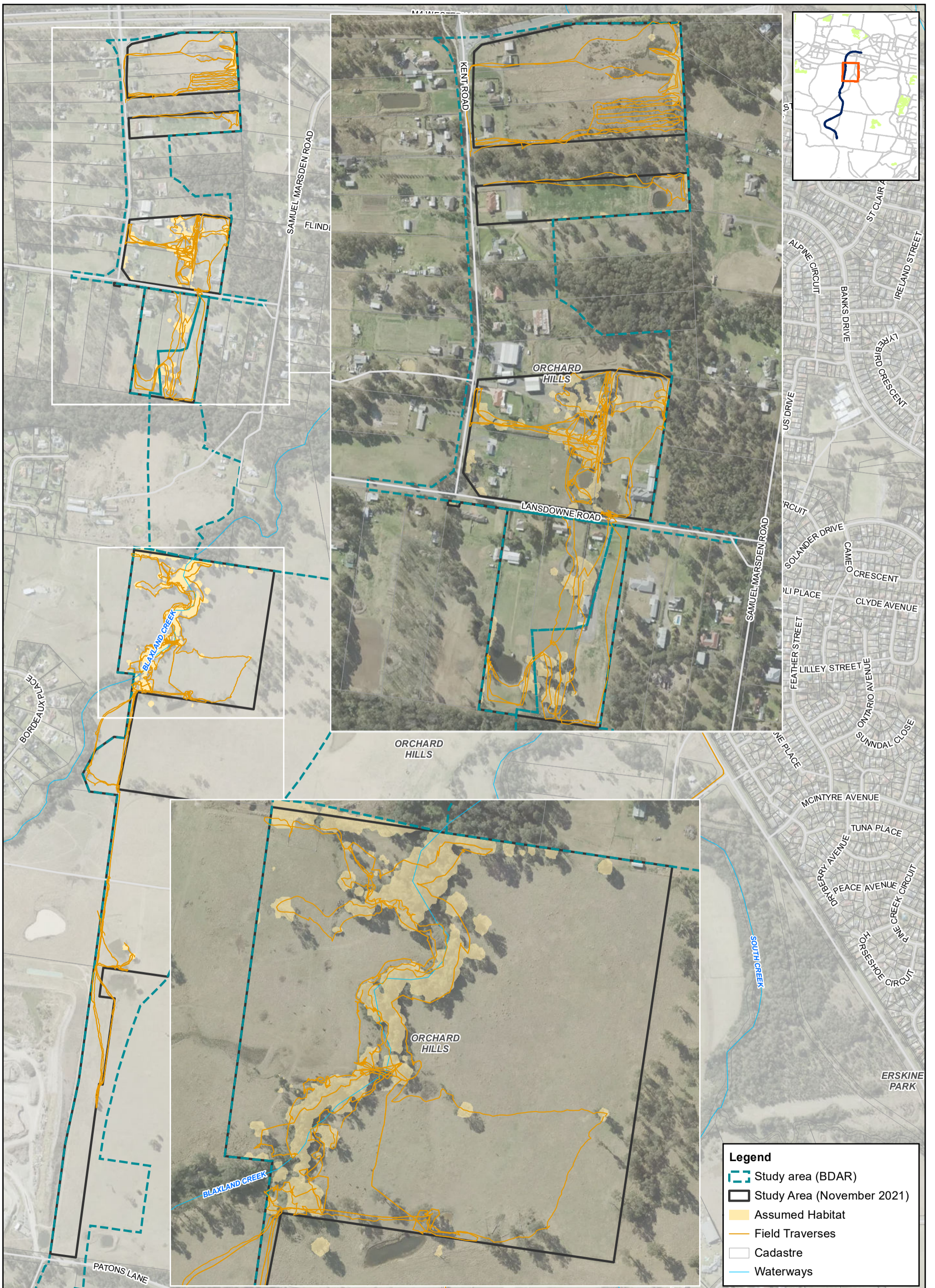












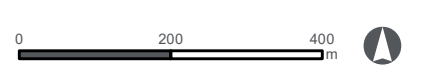
**Legend**

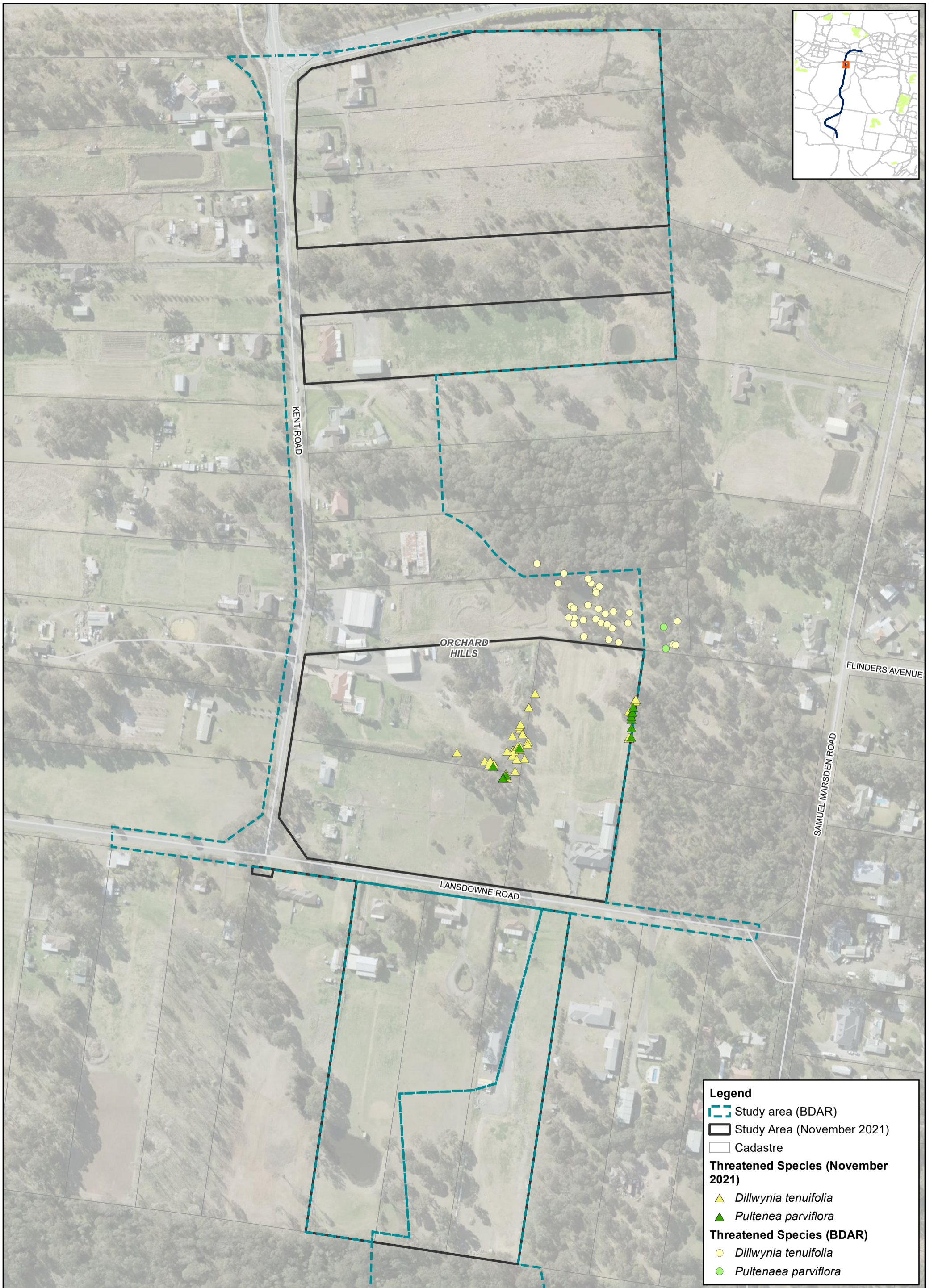
- Study area (BDAR)
- Study Area (November 2021)
- Assumed Habitat
- Field Traverses
- Cadastral
- Waterways

Flora Survey Effort - November 2021

Indicative only, subject to design development

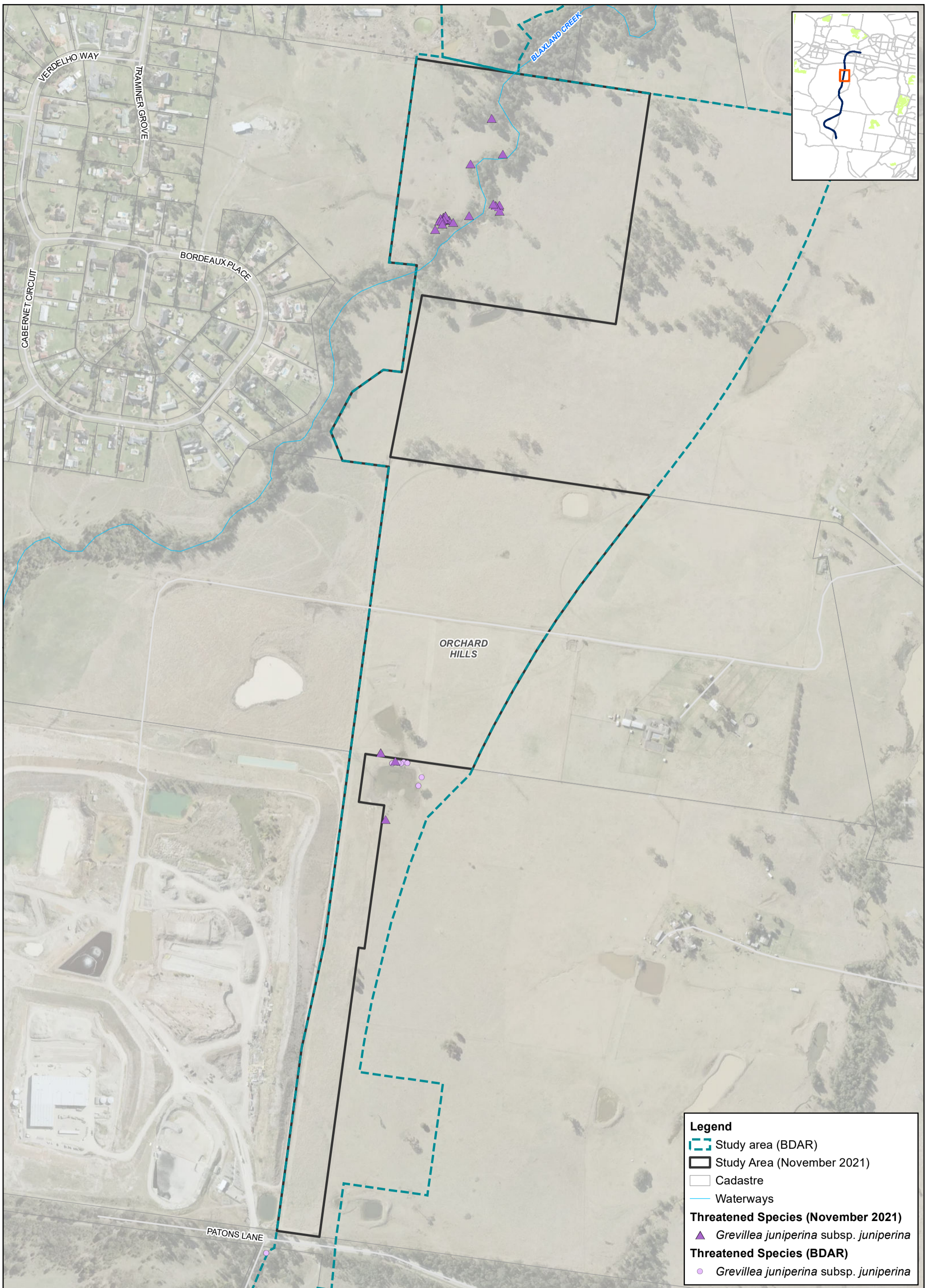
Figure 1-1





Flora Survey Results - November 2021





**Legend**

- Study area (BDAR)
- Study Area (November 2021)
- Cadastre
- Waterways

**Threatened Species (November 2021)**

- ▲ *Grevillea juniperina* subsp. *juniperina*

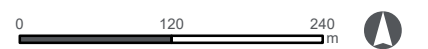
**Threatened Species (BDAR)**

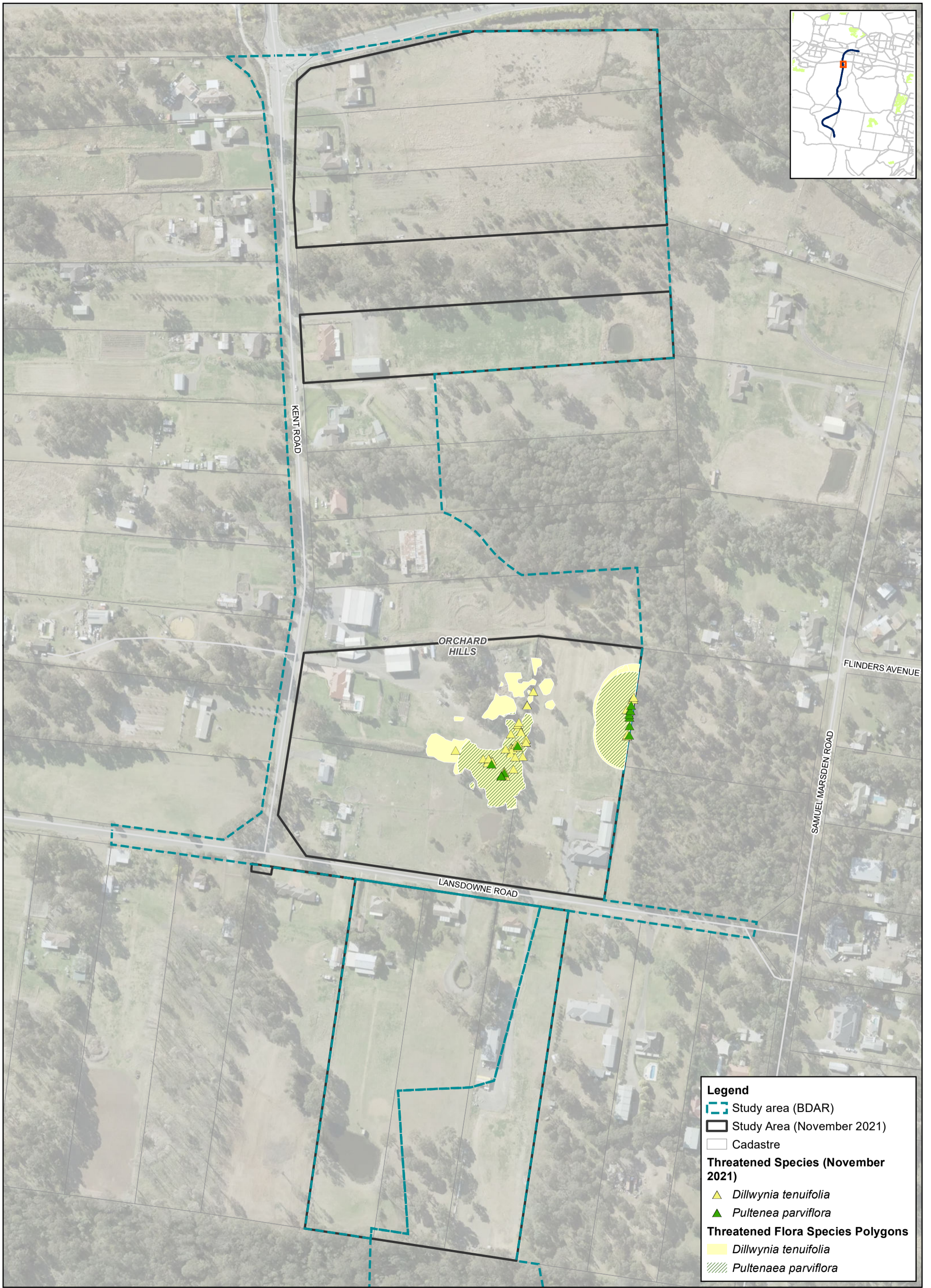
- *Grevillea juniperina* subsp. *juniperina*

Flora Survey Results - November 2021

Indicative only, subject to design development

Figure 2-2





**Legend**

- Study area (BDAR)
- Study Area (November 2021)
- Cadastre

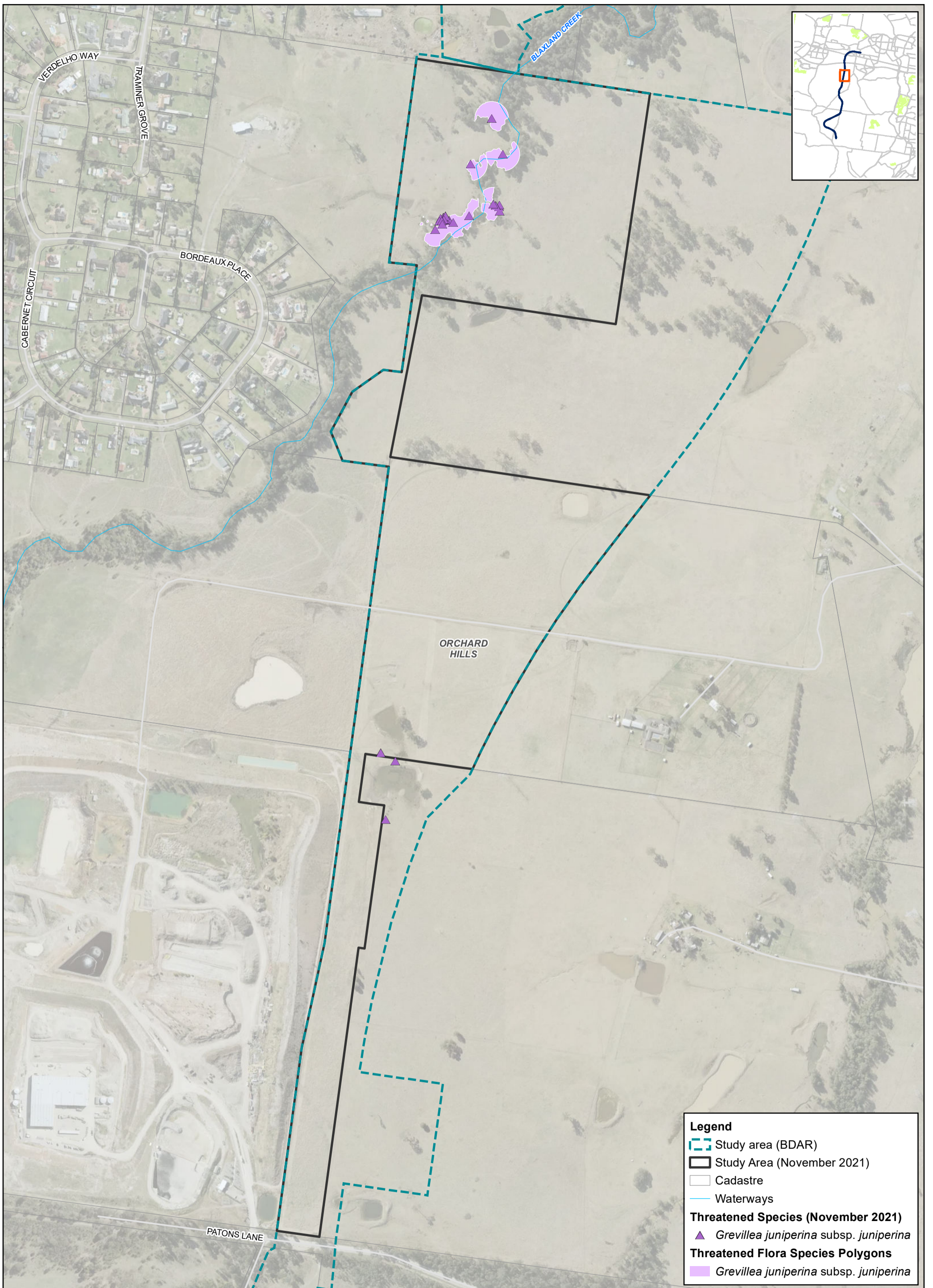
**Threatened Species (November 2021)**

- ▲ *Dillwynia tenuifolia*
- ▲ *Pultenea parviflora*

**Threatened Flora Species Polygons**

- Dillwynia tenuifolia*
- Pultenea parviflora*

Threatened Species Polygons - November 2021



Threatened Species Polygons - November 2021

**© Sydney Metro**

Users are welcome to copy, reproduce and distribute the information contained in this report for non-commercial purposes only, provided acknowledgement is given to Sydney Metro as the source.