Sydney Metro – Western Sydney Airport

Annual Report

Airport Plan – Condition 47
2023 - 2024

Artists Impression – Subject to Change

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Position	Name	Signature	Date
A/Director Project Environment, Sustainability & Planning (SM-WSA)	[redacted]	[redacted]	January 2025

Glossary, abbreviations and definitions

Terms	Definitions
AEPR	Airports (Environment Protection) Regulations 1997
AEO	Airport Environment Officer - Means a person appointed under AEPR 2.01
AEW	Advanced and Enabling Works
Airport	"The airport located at the Airport Site. Note: The Airport is referred to in the Act as Sydney West Airport and commonly known as Western Sydney Airport"
Airport Lease	An airport lease for the Airport granted under section 13 of the Act
Airport Plan	Means the airport plan for the airport site as determined by the Infrastructure Minister under section 96B of the Airports Act in December 2016 as varied from time to time in accordance with the Airports Act.
Airport Site	The site for Sydney West Airport as defined by the Airports Act.
Airports Act	*Airports Act 1996* (Cth)
ALC	Airport lessee company (WSA Co. Limited)
AS/NZS	Australian Standard/ New Zealand Standard
Approved Plan	Means a plan approved in accordance with the Conditions of Approval
CEMF	Construction Environmental Management Framework
CEMP	Means a Construction Environmental Management Plan (CEMP) required under a condition in Section 3.10.2 of the Airport Plan.
CICG	Cumulative Impacts Control Group
CIP	Cumulative Impacts Plan
CIZ	"Construction impact zone – the part or parts of the Airport Site or an Associated Site on which Main Construction Works are planned to occur, as detailed in the Construction Plan approved in accordance with Condition 1 of the Airport Plan. Note: In accordance with the definitions and terminology of the Airport Plan, this differentiates between the CIZ as the area for WSA-related main construction works and a Rail Construction Impact Zone (RCIZ) as the area for SM-WSA related rail construction works. The RCIZ includes areas within and outside of the CIZ.
Condition	A condition set out in Part 3 of the Airport Plan in accordance with section 96C of the Airports Act.
Cth	Commonwealth
DAWE	Former Department of Agriculture, Water and Environment (Commonwealth)
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Commonwealth)
EIA	Environmental impact assessment – refers to the EIA prepared in relation to the Sydney Metro – Western Sydney Airport under the EPBC Act.
EIS	Environmental impact statement – refers to the EIS prepared in relation to the Western Sydney International Airport under the EPBC Act.

Terms	Definitions
Environment Minister	The Minister responsible for the EPBC Act.
EPA	NSW Environment Protection Authority
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
EMS	Environment management system
FIW	Foundation Infrastructure Works
Infrastructure Department	The department responsible for administering the Airports Act, currently the Australian Government Department of Infrastructure, Transport, Regional Development and Communications and the Arts (DITRDCA)
IS	Infrastructure Sustainability Rating Scheme
ISO 14001	AS/NZS ISO 14001:2015 Environmental Management System
Main Construction Works	Substantial physical works on a particular part of the Airport Site (including large scale vegetation clearance, bulk earthworks, civil works and the carrying out of other physical works, and the erection of buildings and structures) described in Part 3 of the Airport Plan, other than TransGrid Relocation Works or Preparatory Activities.
Main Works Contractors	Contractors engaged to undertake SM-WSA Main Construction Works on SBT, SCAW and SSTOM within the Rail Development
Non-compliance	Failure to comply to the requirements of the Airport Plan including approved plans.
OOHW	Out-of-Hours Works
PM	Particulate matter refers to the suspension of microscopic solid or liquid matter in the air and includes in organic and inorganic matter including dust, smoke, liquid and pollen.
Preparatory Activities	Preparatory Activities mean the following: a. day to day site and property management activities. b. site investigations, surveys (including dilapidation surveys), monitoring, and related works (e.g. geotechnical, or other investigative drilling, excavation, or salvage). c. establishing construction work sites, site offices, plant and equipment, and related site mobilisation activities (including access points, access tracks and other minor access works, and safety and security measures such as fencing but excluding bulk earthworks). d. enabling preparatory activities such as: i. demolition or relocation of existing structures (including buildings, services, utilities, and roads). ii. the disinterment of human remains located in grave sites identified in the European and other heritage technical report in volume 4 of the EIS; and iii. application of environmental impact mitigation measures; and e. any other activities which an Approver determines are Preparatory Activities for this definition
Project, the	The Sydney Metro – Western Sydney Airport Construction and operation as approved by the EPBC and Airport Plan as the Action or Rail Development within the Rail Construction Impact Zone on-airport, being the WSI airport, in agreeance with the Deed between SM -WSA and WSA Co.
QSR	Quarterly Sustainability Report

Terms	Definitions
Rail Construction Impact Zone	The part or parts of the Airport Site or an Associated Site outside of the Construction Impact Zone on which Rail Construction Works are planned to occur, as detailed in the Construction (Rail) Plan approved in accordance with Condition 38 of the Airport Plan.
Rail Development	The Sydney metro – Western Sydney Airport development described in Part 3 of the Airport Plan.
SBT	Station Boxes and Tunnelling
SCAW	Surface Civil and Alignment Works
Site Occupier	Site Occupier means: (a) before an Airport Lease is granted – the Commonwealth; and Note: Where a condition specifies an activity to be carried out by the Commonwealth, the Infrastructure Department will be responsible for carrying out the activity on behalf of the Commonwealth (unless stated otherwise). (b) after an Airport Lease is granted – the ALC.
SMP	Sustainability Management Plan
SM-WSA	Sydney Metro – Western Sydney Airport, the entity responsible for constructing and operating the Sydney Metro – Western Sydney Airport rail development in accordance with the Airport Plan.
SSTOM	Stations Systems, Trains, Operations and Maintenance
Stage 1 Development	The Western Sydney International Airport development described in Part 3 of the Airport Plan.
TBM	Tunnel Boring Machine
TfNSW	Transport for New South Wales
WSI	Western Sydney International (Nancy Bird Walton) Airport. Note: Under the Airports Act the Airport is referred to as Sydney West Airport
WSA	WSA Co Limited (ACN 618 989 272), the entity responsible for constructing and operating the Airport in accordance with the Airport Plan. For the purposes of the Airports Act 1996 (Cth), WSA is the “airport-lessee company” for WSI.

Table of Contents

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	[redacted]
Position	A/Director Project Environment, Sustainability and Planning, Sydney Metro – Western Sydney Airport (SM-WSA)
Organisation	Sydney Metro
Organisation ABN	12 354 063 515
Date	15/01/2025

1. Introduction

1.1 Overview

Sydney Metro is Australia's biggest public transport project. Sydney Metro – Western Sydney Airport is the new metro railway line which will service Greater Western Sydney and the new Western Sydney International (Nancy-Bird Walton) Airport. A city-shaping project, the new 23-kilometre metro railway will connect Bradfield city centre with St Marys in the north – where customers can connect to the existing Sydney Trains suburban T1 Western Line.

The NSW and Australian governments have a shared objective of having Sydney Metro – Western Sydney Airport operational when the airport opens for passenger services.

The Sydney Metro – Western Sydney Airport project (the project) is shown in Figure 1 and will become the transport spine for Greater Western Sydney, connecting communities and travellers with the new Western Sydney International (Nancy-Bird Walton) Airport (referred to as Western Sydney International), Bradfield City, and the growing region.

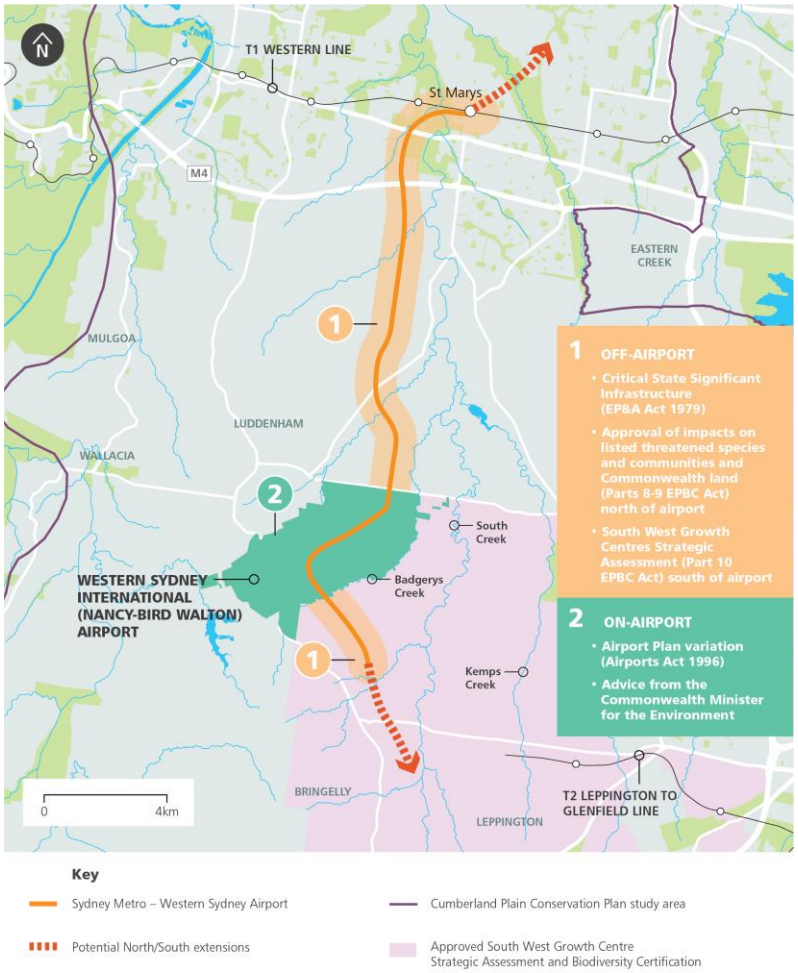


Figure 1: Planning approval context from the Sydney Metro – Western Sydney Airport Project

The city-shaping project, from St Marys through to the new airport and the Western Sydney Aerotropolis, will provide a major economic stimulus for Western Sydney, supporting more than 14,000 jobs during construction for the NSW and national economies, including more than 250 new apprenticeships. The project comprises

components that are located outside Western Sydney International (off-airport) and components that are located within Western Sydney International (on-airport). The Sydney Metro – Western Sydney Airport (SM-WSA) Construction (Rail) Plan, Construction Environmental Management Framework (CEMF) and the Construction Environmental Management Plans (CEMPs) address the on-airport components of the Project.

1.2 Purpose

This compliance report covers the reporting period between 12 September 2023 and 12 September 2024. The purpose of this report is to document compliance with Condition 47 of the Airport Plan (as varied Sep 2021). Details of compliance are provided, and where appropriate, the timing of individual actions are identified.

The report addresses the conditions of approval relevant to Sydney Metro as defined within the Airport Plan as the Rail Authority, specifically Condition 47:

> *Unless otherwise agreed in writing by an Approver, the Rail Authority must prepare a report addressing its compliance with each condition set out in section 3.11.6, including implementation of any Approved Plan, in respect of: (a) the 12-month period commencing with the commencement of Rail Construction Works; (b) each subsequent 12-month period until the end of the Rail Construction Period; and (c) any period between the commencement of Rail Construction Works and the end of the Rail Construction Period that is not covered by paragraph (a) or (b).*

Appendix 1 details the conditions and how compliance has been met for each of the condition requirements during the reporting period.

The key dates that relate to the SM-WSA Project approval are detailed in Table 1.

Table 1: Key Approval dates

Action	Key Date
Commonwealth Approval	September 2021
Commencement Date of Main Works	12 September 2022
Report Period	12 September 2023 - 12 September 2024

1.3 Description of the approved action

The SM-WSA will service Greater Western Sydney by providing a link between St Marys through to the new airport and the Western Sydney Aerotropolis (Bradfield City). The SM-WSA comprises components that are located outside Western Sydney International (Nancy Bird Walton) Airport (WSI) (off-airport) and components that are located within WSI airport (on airport). In September 2019, the Commonwealth Infrastructure Minister referred the on-airport components on the SM-WSA to the Commonwealth Environment Minister. The SM-WSA EPBC Act Final Environmental Impact Assessment of on-airport proposed action (EPBC 2019/8541) was prepared to identify the potential impacts associated with the on-airport construction activities and operation. The EIA was endorsed by the former Commonwealth Department of Agriculture, Water, and the Environment (DAWE) and formed part of the conditions of the Airport Plan. The Airport Plan was varied and approved in September 2021 to provide authorisation for the sections of the SM-WSA rail line to be built on the WSI site.

The on-airport Rail Development of SM-WSA, that is, the works occurring on-airport land, comprised the following key features:

- Around two kilometres of surface rail alignment within WSI
- Around 3.3 kilometres of twin rail tunnels (including tunnel portal) within WSI
- Two new metro stations
- A concrete batch plant; and a spoil stockpile area

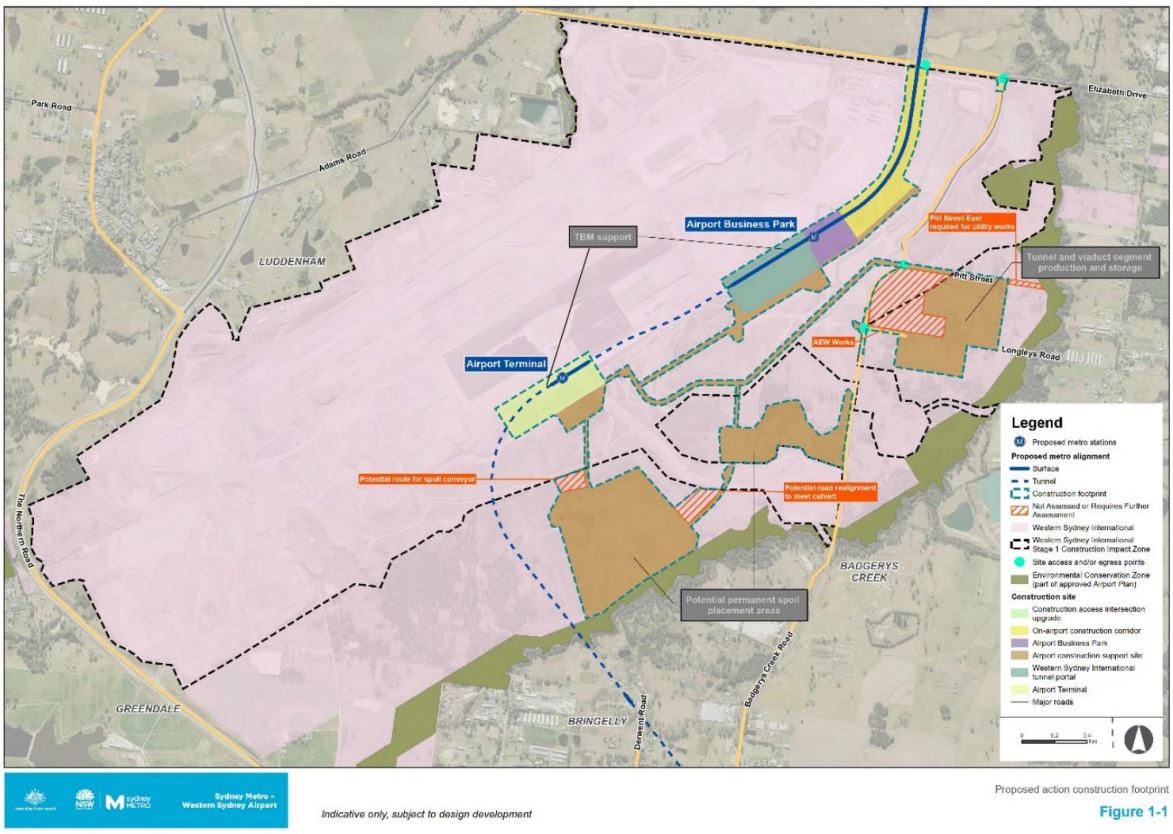


Figure 2: Sydney Metro – WSA Rail Construction Impact Zone (RCIZ)

The rail construction works will be undertaken both within and outside of the Construction Impact Zone (CIZ) in an area referred to as the Rail Construction Impact Zone (RCIZ). The RCIZ can be found in Figure 2 and the SM-WSA Construction (Rail) Plan.

2. Construction Update

All major contracts for SM-WSA project with continuing construction activities within the 2023-2024 reporting period include:

- Station Box and Tunnelling (SBT)
- Surface and Civil Alignment Works (SCAW)
- Stations, Systems, Trains, Operations and Maintenance (SSTOM)

Construction works for these major contracts undertaken in the approval area during the reporting period are detailed below:

2.1 Station Box and Tunnelling (SBT)

SBT completed works in the station box and portal dive including tunnelling from airport land at Airport Terminal (ATL) to Bradfield during the reporting period. The Airport Business Park (ABP) has now been handed over to SSTOM and the Airport Terminal (ATL) scope of works of civil works are progressively being completed.

Bulk fill activities are continuing, with SBT on track towards construction completion.

2.2 Surface and Civil Works

The SCAW package of works includes the construction of surface rail alignment, bridges, and viaducts to cross floodplains, watercourses and existing and proposed permanent infrastructure.

During the reporting period, SCAW have completed construction on all on- Airport surface rail corridor works including remaining Main alignment civil works (approx. 750lm) and a single span Super T Bridge. Completion of works marks the connection of Sydney Metro Western Sydney Airport linewide rail from St Marys to the on-Airport section.

2.3 Stations, Systems, Trains, Operations and Maintenance (SSTOM)

SSTOM commenced construction on-airport within the reporting period and are currently progressing through the package scope of works.

Construction works at Airport Business Park Station and Airport Terminal Station have progressed well over the past year.

At Airport Business Park Station, piling and base slab works have now been completed. Construction has commenced on the columns and perimeter wall with internal wall to follow.

At Airport Terminal Station, piling works have now been completed and 10 out of 11 base slabs have also been completed. Water proofing is progressing well and is near completion. The perimeter wall construction started and internal walls are expected to commence shortly.

Design and Approvals continue to progress for linewide, station structures, systems and Architectural elements of the project.

3. Environmental Management Framework

The Environmental Management Framework (EMF) for the SM-WSA during Stage 1 Development construction activities is undergoing continual improvement. Compliance reporting for the purposes of this Annual Report are against the Revision six (6) CEMPs.

The SM-WSA linewide CEMF provides the overarching framework for managing environmental impacts at the airport rail construction during construction, environmental procedures, risk assessment criteria, incident and hazard reporting, training, and responsibilities of workers. This framework is a requirement of the Airport Plan, which sets out compliance conditions relevant to the development of the airport. Appendix 1 provides details on the Airport Plan conditions and how SM-WSA and its Contractors have met these requirements.

The SM-WSA CEMPs detail all the management objectives and targets and are consistent with the Western Sydney Airport CEMPs, including all appendices to the CEMPs. Progress towards these objectives and targets are outlined in the tables against each environmental aspect in section 4 below. System reviews and scope reviews by the SSTOM package of works prior to construction resulted in reviews being undertaken against Approved Plans and as required minor administrative updates were undertaken to all CEMP's for the project which were published on 17 August 2023.

The project has remained compliant to the objectives and targets set under the CEMPs. There are Lessons Learnt from project environmental incidents, and non-compliances including audit findings that have been identified as an opportunity for improvement to ensure that these findings are incorporated into subsequent packages of works and continuous improvement occurs as the project progresses.

3.1 Regulatory Approvals, Permits and Preparatory Activities

3.1.1 Preparatory Activities

Preparatory activities are defined within Appendix A of the Airport Plan as:

- Day-to-day site and property management activities
- Site investigations, surveys (including dilapidation surveys), monitoring, and related works (e.g., geotechnical, or other investigative drilling, excavation, or salvage)
- Establishing construction work sites, site offices, plant and equipment, and related site mobilisation activities (including access points, access tracks and other minor works, and safety and security measures such as fencing, but excluding bulk earthworks)
- Enabling preparatory activities such as:
    - Demolition or relocation of existing structures (including buildings, services, utilities, and roads)
    - The disinterment of human remains in grave sites identified in the European and Other Heritage technical report in volume 4 of the EIS
    - Application of environmental mitigation measures
    - Any other activities which an Approver determines are Preparatory Activities for this definition

Preparatory activities have been utilised on SM-WSA for all works required to be undertaken outside SM-WSA Licenced Areas and within WSA Stage 2 areas or Main Works Contractors Shared Access locations. The following preparatory activities were this reporting period, including but not limited to:

- Geotechnical investigations
- Groundwater monitoring
- Monthly ECZ monitoring

All applicable activities were conducted under a WSA approved Preparatory Activity Approval Form (PAAF).

3.1.2 Forums and Meetings

SM-WSA continues to meet monthly with the Airport Environmental Officer (AEO) as part of the joint Environmental Reference Group (ERG) with WSA. The monthly ERG includes all the main works packages who have commenced construction presenting a status update of their works, key environmental risks, incidents, and achievements. Where in-person site assessments were unable to take place, Sydney Metro and the Airport Environmental Officer have met online to discuss the project progress and respective packages of works including providing the site inspection reports for all packages of works to support the ERG.

Fortnightly Environment and Planning Working Group (EWG) meetings are held between SM-WSA and WSA to discuss and manage interface components of the two projects, track management items and may also include any potential cumulative impacts.

The Cumulative Impacts Plan is also an Approved Plan provided by WSA and required to be implemented by SM-WSA throughout construction. Active engagement is occurring between WSA and SM-WSA to assure all potential cumulative impacts from both projects are identified and where required, mitigated. The reporting requirements of the Cumulative Impacts Plan has been addressed in Section 6.

3.1.3 Interfaces

The project has commenced and maintains interface with the following key stakeholders and adjacent projects:

- Western Sydney Airport - As the Airport Licensee
- Transport for NSW - M12 Motorway (off airport)

- Bradfield City Authority (BDA) (off airport)

4. Environmental Aspects

4.1 Soil and Water

Surface and groundwater quality is monitored in accordance with the Soil and Water CEMP. Surface water quality is monitored by the project contactors on a monthly basis, with groundwater quality monitored assessed against baseline data and undertaken as required by the tunnelling contractor.

Surface water generated as a result from the SM-WSA packages of works is discharged via WSA sitewide drainage infrastructure into the Badgerys Creek tributary, located on the eastern boundary of the WSA project.

The project is continually working towards improving surface water quality and controlling stormwater runoff from construction areas through the:

- Construction and operation of retention basins situated on the perimeter of Licensed Areas to capture and treat surface water runoff from construction activities;
- Use of flocculants to treat basin water;
- Retention of vegetation, where possible, to reduce sediment runoff
- Progressive landscaping, where possible, of disturbed earth areas to stabilise the soil
- Erosion and sedimentation controls installed to reduce water velocity and capture sediment;
- Stabilisation of temporary and permanent stockpiles; and
- Application of soil polymers and binders across site to reduce sediment runoff.

SM-WSA compliance against the objectives and targets are shown below in Table 2. Opportunities for improvement have been identified with improvements made to the surface water discharge approvals process and interface with contractor teams to ensure compliance with site wide WSA dewatering requirements.

Table 2: Compliances Objective and Targets

Objective	Target	Measurement
Environmental management compliance	Compliance with the requirements and mitigation measures set out in this Soil and Water CEMP.	**Opportunity for Improvement**
Environmental management compliance Airports (Environment Protection) Regulations 1997	Compliance with the performance criteria in this CEMP which have been developed taking into account the general duty not to pollute under the AEPRs (Reg 4.01) and the related limits.	**Objective met**
Erosion and sedimentation	Establishment and maintenance of erosion and sedimentation controls in accordance with the NSW Blue Book (NSW Government, 2018) and the current soil and water conditions.	**Opportunity for Improvement**
Water quality	All plant and equipment maintained in accordance with manufacturers' requirements.	**Objective Met**
Contamination disposal	Disposal of any material from site in accordance with the NSW EPA Waste Classification Guidelines (2014).	**Objective Met**

4.1.1 Authorisation

An Authorisation application made under Section 5.07 of the AEPR 1997 to discharge treated tunnel construction water resulting from Station Box and Tunnelling construction activities at the Airport Business Park and Airport Terminal Station sites via a pipeline outlet located on Badgerys Creek adjacent to the Basin 3 discharge point on the WSA project, was approved by the AEO in July 2023 effectively permitting treated tunnel construction water with exceedances in salinity to be discharged offsite.

No treated tunnel construction water has been discharged during the reporting period due to exceedances in metals identified in monitoring prior to any discharge into Badgerys Creek commencing. A variation to the Authorisation application was made in Q4 2023 to the AEO and was withdrawn by the contractor. Rather a trade waste agreement has been utilised to dispose of groundwater appropriately offsite.

4.1.2 Surface Water Management

All Main Works Contractors are required to submit Erosion and Sediment Control Plans (ESCPs) as part of their initial design for temporary works on all airport packages of works and install erosion and sedimentation controls during preparatory activities on site. ESCPs are progressively updated throughout the construction phase of works to respond to changing site conditions. Incorporated into ESCPs are Environmental Control Maps (ECMs) which identifies the location of physical protection measures, environmental controls including monitoring requirements to minimise the impact of the project activities on the environment. The combined ESCPs/ECMs are reviewed and endorsed by the Contractors' Environmental manager, a Certified Professional in Erosion and Sediment Control (CPESC) and the SM-WSA Environmental team.

Erosion and sediment controls have been managed through progressive updates to ESCPs as construction progresses across the project and are reviewed and endorsed by each contractors CPESC.

Under the ESCP design requirements, temporary basins have been installed as part of site establishment for SBT, SCAW and SSTOM works on the project. A total of seven (7) temporary sediment basins have been operational including two (2) sumps across the SM-WSA airport project sites. All basins have been designed and constructed in line with the requirements of the SM-WSA Soil and Water CEMP and the *NSW Department of Planning and Environment - Managing Urban Stormwater: Soils and Construction*.

For the reporting period, erosion and sediment controls have been maintained along the project boundaries to reduce the sediment load travelling off-site due to surface water runoff. This has been a combination of sediment fencing, mulch bunds and internal sumps. With on-airport sites, temporary drainage lines have been separated into clean water diversions and construction water drains lead to the temporary sediment basins where in line controls such as rock checks and coir logs have been used to slow water velocity and allow sediment to drop out into the drainage lines which are maintained. Where possible across SM-WSA contractor works packages, existing groundcover has been retained and re-instated along batters reducing exposed areas at risk of erosion. Temporary stockpiles and other work areas not in immediate use have utilised soil binder or polymer application as a stabilisation mechanism during construction works and also shutdown periods.

Treatment and discharge of construction water runoff to sediment basins has occurred throughout the reporting period. A combination of flocculants and coagulants have been utilised across the contractor works packages consistent with the SM-WSA Soil & Water CEMP.

Surface water monitoring is being undertaken monthly in the locations identified in Table 3 below. Ad-hoc monitoring events have also occurred where surface water discharges have occurred as dewatering over an extended period of time and decommissioning activities and results provided to WSA as required.

Table 3: Surface Water Monitoring Locations

Site	Location	Receiving Waterway
1	U/S FS01	Badgerys Creek
2	U/S Basin 3 (D/S FS01)	Badgerys Creek
3	Basin 3 (Outlet -tie in) (D/S Basin 3 bridge)	Badgerys Creek
4	D/S Basin 3	Badgerys Creek

5	D/S Basin 1	Badgerys Creek

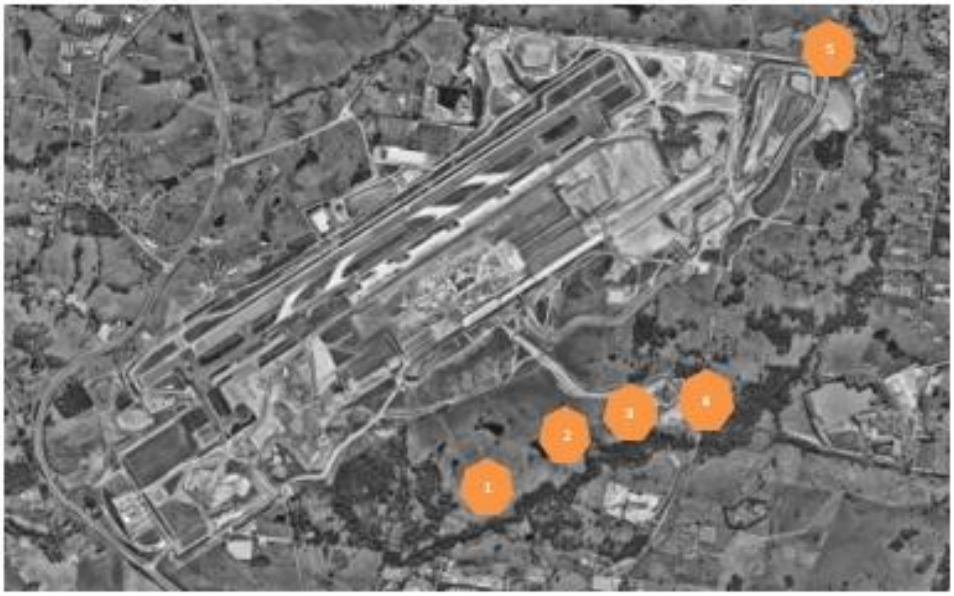


Figure 3: Approximate Surface Water Monitoring Stations

SM-WSA have received twenty (20) WSA-approved dewatering permits for the reporting period across SBT and SSTOM packages of works. All dewatering permits are submitted for approval by the contractor once surface water quality meets the criteria consistent with the SM-WSA Soil & Water CEMP and WSA Soil & Water CEMP for discharge. An Interface Control Document (ICD) is also attached to the permit where movement of the water will cross contractor site boundaries or a WSA project area to demonstrate that interface agreement has been sought with the downstream receptor to ensure no impact to works or sensitive areas will occur.

Groundwater monitoring commenced on a monthly basis upon the commencement of tunnel boring machine (TBM) activities. SM-WSA's highest risk for impact to water quality from its activity on the on-Airport construction sites is from the treated groundwater as a result of TBM activity. The SM-WSA Environment Impact Statement has identified that the condition of Badgerys Creek is degraded. Ongoing monitoring is being undertaken to ensure any further degradation is minimised noting that no tunnel process water has been discharged into Badgerys Creek during the reporting period. Lessons Learned are developed as works continue across the project, and will ensure targets are achieved during the next reporting period.

As noted in Section 3.1 due to the Authorisations being unable to be utilised for discharge of groundwater in Badgerys Creek. Ground water has been discharged from site by a combination of trucking offsite under trade waste agreement and utilisation for dust suppression across limited locations under conditions including an approved risk assessment.

4.2 Air Quality

Air Quality is managed across SM-WSA packages of works in line with the SM-WSA Air Quality CEMP. Contractors have implemented air quality mitigation measures to reasonably control dust generation across the project and include the use of water carts, a dust suppression system maintained on the TBM radial stacker conveyor, application of polymers and the progressive stabilisation of work areas as Foundation Infrastructure Works (FIW) Contractors have moved towards construction completion. SM-WSA performance against the performance criteria are outlined below in Table 4.

Stationary air quality monitors are located in proximity to the nearest sensitive receptors to the project and capture data related to PM2.5, PM10 and Depositional dust.

Activities onsite that may have contributed toward air quality impacts have included but are not limited to:

- Stockpiling of material from radial stacker depositing TBM excavated material;
- Importation and internal movement of excavated excess material for backfill and tunnelled material; and
- Fill activities on the primary fill site.

Table 4: Air Quality Targets

Objective	Target	Measurement	Evidence
Ensure ambient air quality is maintained at acceptable levels at sensitive receptor locations surrounding the airport site	Not exceeding the criteria outlined in Table 8-1 No dust or odour related complaints.	**Objective met**	Inspections Real time monitoring
Minimising the risk of dust or odour nuisance impacts on neighbours	No dust or odour related complaints Not exceeding the criteria outlined in Table 8-1.	**Objective met** **Opportunity for improvement**	Monthly reports Relocating monitoring equipment to location representative of offsite impacts.
Ensure emissions are minimised from all plant, equipment and machinery	All plant and equipment are maintained in accordance with manufacturers requirements Not exceeding the criteria outlined in Table 8-1.	**Objective Met** **Opportunity for improvement**	Inspections Internal and Independent Audits

SM-WSA is continuing to assess the effectiveness of dust mitigation measures. Impacts from dust generation as a result of construction activities as expected have reduced as sites have been progressively completed and final design executed (including the installation of sealed hardstand areas and early stabilisation through landscaping).

SM-WSA Contractor ambient air quality static monitors are situated in two locations on the eastern and southern Sydney Metro site boundaries located in close proximity to the project's closest sensitive receptors.

Figure 4: Approximate Air Quality Monitoring Stations

Criteria for air quality has been drawn from the SM-WSA Air Quality CEMP. The Criteria is detailed below:

Table 5: Air Quality Monitoring Frequency

Pollutant	Criterion	Average Period
PM10	50 µg/m3	24 hour
	25 µg/m3	1 year
PM2.5	25 µg/m3	1 year
	8 µg/m3	1 year
Depositional Dust	2 g/m2/month	Monthly (incremental)
	4 g/m2/month	Annual (cumulative)

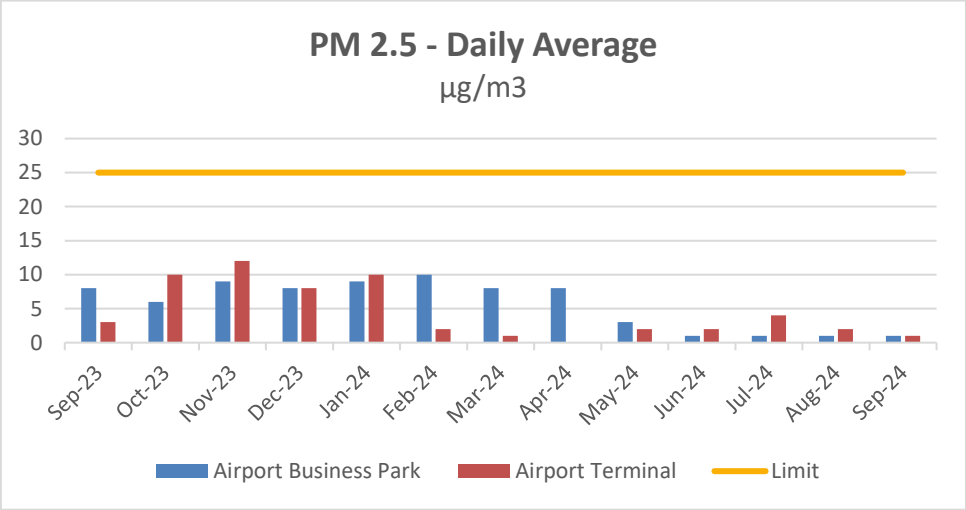


Figure 5: PM 2.5 Monitoring Results

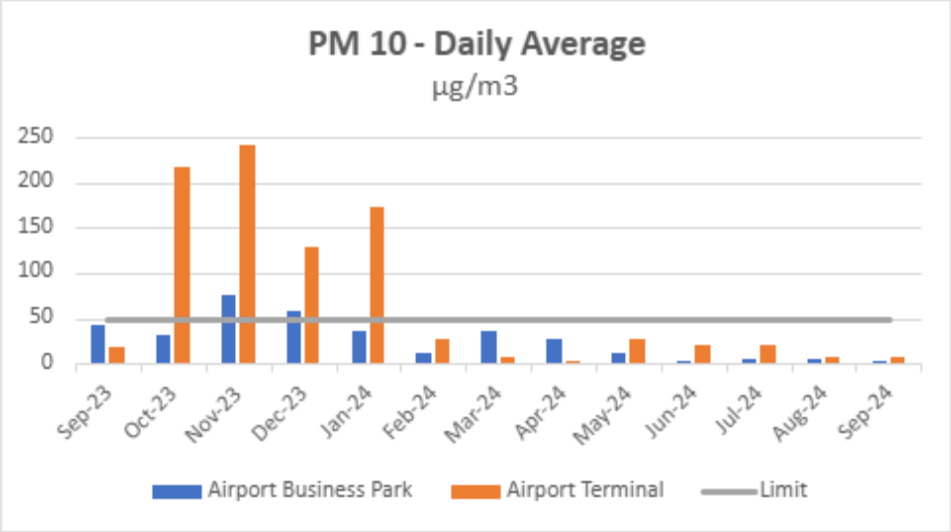


Figure 6: PM10 Monitoring Results

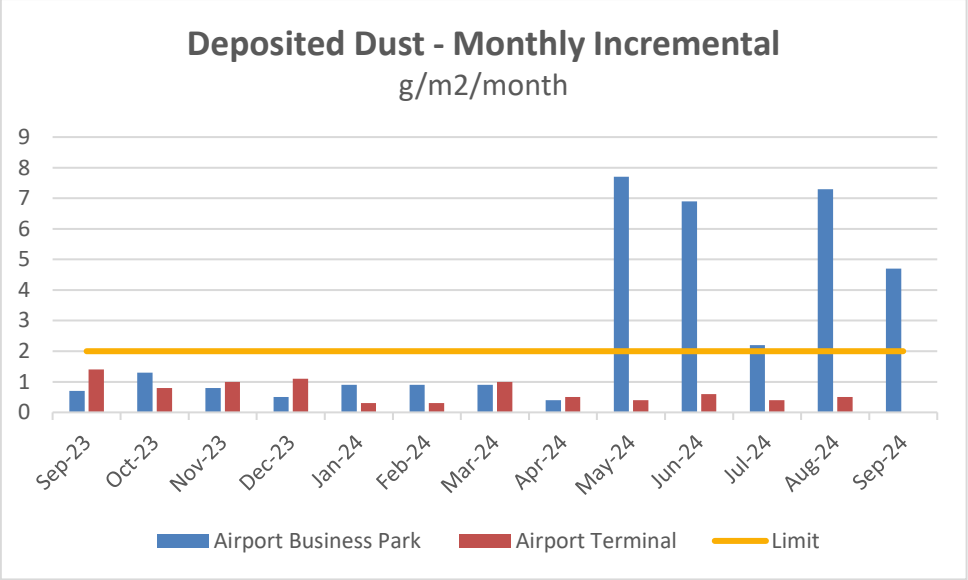


Figure 7: Dust Deposition Monitoring Results

The Project has generally complied against PM 2.5 and PM10 however there have been instances between October 2023 to January 2024 where exceedances were recorded at the ATL site. These were during the early hours of the morning, generally between 2.00am-6.00am with no out-of-hours surface construction activities at FS01 during the monitoring period which may have contributed to these exceedances.

SM-WSA contractors also monitor monthly incremental criteria as a proactive measure to inform management of the site and provide more agile response to air quality results. Depositional Dust monitoring at Airport Business Park showed exceedances across a number of months (Figure 7). Instances of exceedance involved delay in collection of the gauge as well as tampering resulting in additional signage and security identifying the monitor. Additional works in close proximity may have also impacted results. Triggering of air quality management levels have been noted for the monthly incremental criteria. Under these circumstances contractors have implemented proactive mitigation measures such as:

- utilisation of water carts across the site with a combination of water and dust suppressant chemicals from onsite water supplies.
- Where possible, revegetation and progressive stabilisation of disturbed areas with grass including hardstand areas.
- Street sweeper operational to remove sediment off shared roads.
- Monitor stockpile heights to mitigate lift off.
- Wheel wash installation at contractor site exit.

The above controls are also utilised in response to any community complaints to demonstrate all reasonable and practical mitigation measures are being implemented to achieve improved air quality across the project.

4.3 Biodiversity

The project has continued to manage biodiversity impacts in accordance with the SM-WSA Biodiversity CEMP, the SM-WSA CEMF, the On-airport Biodiversity Offset Strategy (BOS) and the On-airport Biodiversity Staging Report. Tracking against Objectives and Targets has been outlined below in Table 6.

Table 6: Objectives and Targets

Objective	Target	Measurement	Evidence

Minimising disturbance to terrestrial and aquatic flora and fauna in the construction footprint during construction	Negligible disturbance to native terrestrial and aquatic flora and fauna in the construction footprint	**Objective Met**	Monthly ECZ Inspections – nil impacts
Minimising adverse effects on terrestrial fauna by construction activities	Minimise adverse effects on terrestrial fauna by construction activities.	**Objective Met**	Monthly ECZ Inspections – nil impacts
Minimise or where possible avoid impacts on threatened flora and fauna species, and TECs).	Minimise adverse effects on terrestrial fauna by construction activities.	**Objective Met**	Terrestrial fauna successfully relocated.
Impacts on threatened ecological communities and threatened species are offset in accordance with the requirements of the NSW Biodiversity Assessment Method (OEH, 2018)	Biodiversity Offset Strategy has been developed and credits will be purchased and retired to ensure offset against TEC and TS.	**Objective Met**	All EPBC Biodiversity offsets completed for works undertaken
Protecting areas outside the construction footprint that contain a listed Threatened Ecological Community or provide an important habitat for a listed threatened species during clearing activities	Ensure all areas outside the construction footprint that contain a listed threatened ecological community or provide important habitat for a listed threatened species are protected.	**Objective Met**	No disturbance within the ECZ
Managing weed, pest species and plant pathogens spread	No introduction of weed, pest species and plant pathogens. No inadvertent spread of existing weed, pest species and pathogens	**Objective Met**	Weed surveys conducted. Identified weeds managed under Weed Management Plan

The project has not undertaken any further vegetation clearing as approved under its Part 13 Permit for the reporting period. Vegetation clearing undertaken to date is detailed in Tables 7 and 8 below. All clearing was undertaken in line with the SM-WSA Biodiversity CEMP Vegetation Management Plan and the SM-WSA CEMF. Functional tree hollows were retained within the project post clearing but outside of the clearing footprint. Residual impacts to threatened species and communities were offset in accordance with the SM-WSA On-airport Biodiversity Offset Strategy (BOS) and the On-airport Biodiversity Staging Plan.

The EPBC Act Part 13 Permit Compliance Report though not required to be completed within this reporting period is currently under development and will be available in 2025.

Table 7: Vegetation Clearing

Vegetation type	NSW listed Threatened ecological community	EPBC listed Threatened ecological community	Total Design Credits	Hectares cleared	Credit Savings
PCT 835 - Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion	River-Flat Eucalypt Forest (Endangered)	Not listed	53	4	49
PCT 849 - Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	Cumberland Plain Woodland (Critically Endangered)	Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (Critically Endangered)	201	12	189

PCT 1071 - Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin Bioregion	Not listed	Not listed	1	1	0
TOTAL Ecosystem Credits			**255**	**17**	**238**
Note: All credit numbers have been rounded to the nearest whole number, unless the nearest whole number is zero as these have been rounded to one. ***Credits required for the SSTOM contract are now no longer required and have been removed from the credit allocation.***					

Monitoring for biodiversity management measures which have been established and are ongoing include:

- Ecological Conservation Zone Monitoring (monthly)
- Dam dewatering monitoring

Where SM-WSA Licenced Areas share a downstream boundary with the project ECZ, monthly monitoring is undertaken in the ECZ to ensure environmental control measures at this boundary are sufficient and no impacts are evident within the ECZ.

Table 8: Vegetation Clearing cont.

Species	Area	Credit Requirements estimated	Credit Requirements actual	Credit savings
Meridolum corneovirens (Cumberland Plain Land Snail) – Fauna	5.57 ha	188	12	176
Myotis macropus (Southern Myotis) - Fauna	0.05 ha	2	1	1
TOTAL species credits		190	13	177
Note: All credit numbers have been rounded to the nearest whole number. ***Credits required for the SSTOM contract are now no longer required and have been removed from the credit allocation.***				

Nest boxes were previously installed as habitat replacement into the ECZ by WSA and its Main Works Contractors. Subsequent rounds of monitoring have found that the density of nest boxes within the ECZ is sufficient. As such SM-WSA maintains dispensation from WSA that no additional nest boxes are required to be installed in the ECZ and ongoing monitoring requirements are not required.

4.4 Waste and Resources

Waste and Resources are managed in accordance with the SM-WSA Waste and Resources CEMP.

Contractors are undertaking continual improvement of current management practices to improve waste management on site as well as reduce waste disposed to landfill including:

- Continued importation and reuse of sandstone from M6 and Sydney Metro West Project
- Diversion of approximately 1,951,960 tonnes of SM-WSA Tunnel excavation and site won spoil from landfill by effective containment on site
- Maximising surface water reuse onsite

SM-WSA and its Main Works Contractors are tracking waste generated in accordance with the requirements of the Waste and Resources CEMP and the Rail Sustainability Plan including for:

- General construction waste
- Contaminated waste
- Recycled construction waste
- Office waste (recyclable and non-recyclable)

All Materials that are imported to the SM-WSA packages of work have maintained review and risk assessment by SM-WSA and WSA prior to approval to import and placement onto the Airport.

Performance criteria and targets for waste management are set in the Waste and Resources CEMP and compliance against these targets are shown below.

Table 9: Waste Management Objectives

Objective	Measurement	Evidence
Compliance with this approved Waste and Resources CEMP;	**Opportunity for Improvement**	Inspections Monthly reporting Audits
Compliance with the approved Sustainability Plan;	**Objective Met**	Inspections Monthly reporting Audits
Waste management practices do not place unnecessary burden on local and regional waste services;	**Objective Met**	Waste reduction implemented Waste segregation implemented Waste Audits
Effective application of the waste management hierarchy (refer to Section 6.8) across construction activities;	**Objective Met**	Monthly reporting
Dispose of waste materials in accordance with relevant legislative requirements (NSW EPA Waste Classification Guidelines, 2014); and	**Objective Met**	Waste classifications provided. Monthly reporting
Minimise the risk of illegal dumping on the Airport Site;	**Objective Met**	Sites fenced and appropriately secured. Nil illegal dumping to report.
Achieve the waste re-use / recycling targets in Table 3-1.	**Opportunity for Improvement**	Targets not achieved

Waste is being tracked by Main Works Contractors including for:

- General construction waste (non-recyclable)
- Recycled construction waste (concrete, bricks, tiles)
- Office waste (recyclable and non-recyclable)

The graphs below represent total waste for the reporting period compared to the targets for all packages combined.

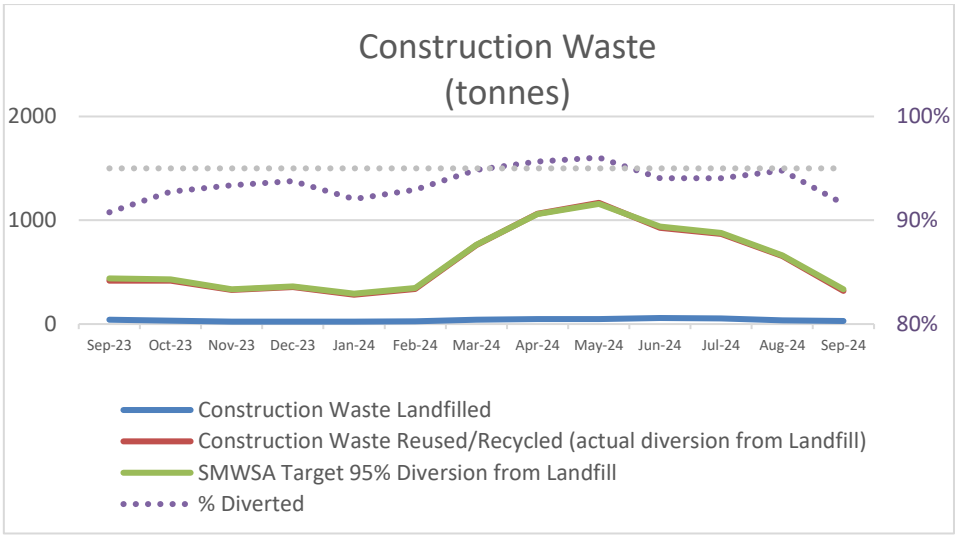


Figure 8: Construction Waste Generation

Construction waste diversion from landfill for the reporting period achieved 94%. It is noted that the reporting utilises SM-WSA project wide data.

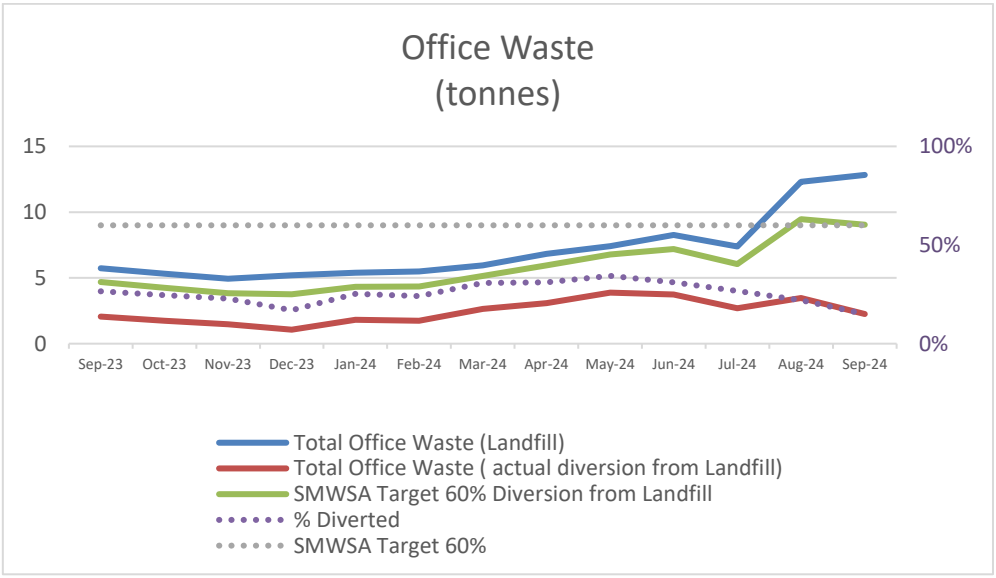


Figure 9: Office Waste Generation

The average office waste recycling for the reporting period across all packages was 41.5% compared to the targeted 60%.

Improvement strategies are being developed by each main works package in conjunction with SM-WSA Sustainability team to maximise office recycling opportunities and meet the target across all packages of work prior to the completion of construction works.

Additional waste targets are set in the SM-WSA Waste and Resources CEMP Table 3-1 including for:

- Surplus spoil (virgin excavated natural material- VENM/ excavated natural materials- ENM).
- Contaminated soil - 6,338.49 tonnes of combined ACM Contaminated and Restricted Solid Waste was disposed appropriately to Licenced Waste Facilitates.
- Vegetation – all vegetation cleared onsite has been beneficially re-used on site.
- Concrete and brick and steel.

- Surplus construction materials (steel, PVC, wood)
- Dewatering - maximized use of Non-potable water for dust suppression and soil conditioning and where required disposed appropriately offsite to in accordance with Project approvals.

4.5 Aboriginal Cultural Heritage

SM-WSA has continued to operate in compliance with the Aboriginal Cultural Heritage CEMP during the reporting period; this includes following the projects Unexpected Finds Protocol in the event Aboriginal Cultural Heritage finds were to occur across all Licenced Areas.

There have been no unexpected finds of Aboriginal Cultural Heritage items associated with SM-WSA works during the reporting period across all packages of works.

All access to WSA stage 2 areas (which may have aboriginal cultural value) for ongoing monitoring and maintenance by SM-WSA contractors has been managed in consultation and accordance with the WSA approval process and with an approved WSA permit.

Table 10: ACH Objectives and Targets

Objective	Target	Measurement	Evidence
Minimise disturbance and loss of Aboriginal cultural heritage values	Comply with the objective to manage heritage values in the ECZ as outlined in the Land Use Plan in the Airport Plan	**Objective Met**	No unexpected finds within the reporting period.
Protect and conserve in situ where appropriate those Aboriginal cultural items and sites located within the ECZ	Comply with the objective to manage heritage values in the ECZ as outlined in the Land Use Plan in the Airport Plan	**Objective Met**	There were no aboriginal heritage works/ sites within the SM-WSA construction impact zone in this reporting period.
Seek Aboriginal stakeholder participation during the development of this CEMP and incorporate Aboriginal cultural heritage management measures	Aboriginal stakeholders contribute to the development of this CEMP and related mitigation and management plans, participate in archaeological surveys and are consulted about the management, storage and curation of cultural materials salvaged at the Airport site Implementing Aboriginal cultural heritage management measures as agreed with Aboriginal stakeholders	**Objective Met**	RAPs consultation included in the On-Airport ACHMP
Contribute to a greater understanding of the archaeological record within Western Sydney	Aboriginal cultural heritage values of the Airport site are commemorated in the detailed design of the airport	**Objective Met**	Heritage Interpretation Plan Station Design
Treat Aboriginal cultural heritage items with respect having regard to their identified values and avoid any unnecessary impacts	Employees and contractors to complete Aboriginal cultural awareness training prior to working in areas of cultural significance. Compliance with the general duty to preserve heritage under the AEPR	**Objective Met**	All surveys undertaken prior to construction works commencing. All inducted site personnel aware of SM-WSA project boundaries and exclusion zones.
Comply with legislation and other requirements	No non-conformance with the requirements of the CEMP	**Objective Met**	No incidents or non-conformances.

4.6 European and Other Heritage

European heritage items were identified during the Environmental Impact Assessment undertaken by WSA. All European heritage clearance was undertaken by the Department of Infrastructure prior to construction works occurring in the WSA Stage 1 Construction Impact Zone (CIZ) and subsequently SM-WSA Licenced Areas.

SM-WSA has continued to operate in compliance with the European and Other Heritage CEMP; this includes following the projects Unexpected Finds Protocol in the event European Heritage finds were to occur.

In the WSA Stage 2 Licensed Area, an archaeological assessment of European and other Heritage was completed prior to site disturbance. No archaeological test excavations were recommended, and the site has continued to be managed in accordance with the European and Other Heritage CEMP and the Unexpected Finds Protocol.

There were no unexpected finds of European and other heritage associated with SM-WSA works during the reporting period.

Compliance against the European and Other Heritage objectives and targets are shown in Table 10 below.

Table 11: EOH Objectives and Targets

Objective	Target	Measurement	Evidence
Minimise disturbance and loss to European or Other Cultural Heritage values	Ensure full compliance with statutory requirements (including general duty to preserve heritage under the AEPR). Compliance with objectives to ensure that environment and heritage items are appropriately considered as outlined in the Land Use Plan in the Airport Plan.	**Objective met**	No unexpected finds. No disturbance during the reporting period.
Enhance public knowledge of the heritage values in the local area	Recognising the European and other heritage values of the site in the detailed design of the airport. Treating heritage items with respect to their identified values.	**Objective met**	Heritage Interpretation Plan Station Design
Implement agreed management measures for elements of European and other heritage	Compliance with the approved European and Other Heritage CEMP. Compliance with the general duty to preserve heritage under the AEPR.	**Objective met**	No unexpected finds.

4.7 Traffic and Access

Traffic and access are monitored in accordance with the SM-WSA Traffic and Access CEMP and in collaboration with WSA. Roads that surround the airport and have been continually utilised by SM-WSA construction traffic include:

- Badgerys Creek Road
- The Northern Road
- Elizabeth Drive
- Luddenham Road

Traffic is continually managed so that impact to local traffic is minimised as far as reasonably practical.

On internal access roads:

- Appropriate signage utilised within the airport boundary on shared access roads to ensure support way finding for all site personnel.

During the reporting period site access points for SM-WSA have been reviewed and strategically distributed to along the road network surrounding the Airport to assist with minimisation of congestion along the Elizabeth Drive corridor. Noting the SSTOM package of works have commenced, traffic volumes remain consistent with the SM-WSA Traffic and Access CEMP.

Continued interface and traffic coordination is being undertaken with key stakeholders on the wider WSA project including other external projects with regards to traffic and access. Traffic and Access is monitored and discussed in the following forums on a fortnightly basis:

- SM-WSA Led - Traffic Control Working Group
- SM-WSA Representative - Joint Project Integrated Meeting (bi-monthly);

And monthly:

- SM-WSA Cumulative Impacts Control Group

Compliance against the Traffic and Access objectives and targets are shown in table 11 below:

Table 12: Traffic and Access Objectives and Targets

Objective	Target	Measurement	Evidence
Maintain communication with the potentially affected local residents, visitors and businesses to minimise disruption	Effective communication of traffic management measures to the local community within specified timeframes to minimise disruption to local residents and other road users.	**Objective Met**	Community Notifications.
Minimise disturbance to the local and regional road network	Appropriate training on access and haulage routes provided to employees and contractors. Communication with the Traffic Management Centre, Emergency Services and public transport authorities prior to and during changes to the road network	**Objective Met**	Site personnel inductions
Ensure access to the Airport Site does not compromise the safety of the local road network	Safe access onto/from the local network implemented in full consultation with TfNSW	**Objective Met**	Traffic Consultation Groups.
Comply with legislation and other requirements	No non-conformance with the requirements of the CEMP	**Objective Met**	Nil non-compliances.
Minimise disruption to pedestrians, cyclists and motorists	Measures to be put in place to ensure the minimisation of disruption to pedestrians, cyclists and motorists	**Objective Met**	Traffic Consultation Groups.
Ensure Sydney metro construction traffic accesses the arterial network as soon as practicable on route to, and immediately after leaving, the construction site	Enable and ensure Sydney Metro Construction traffic to access the arterial network as soon as practicable on route to and immediately after leaving, the construction site	**Objective Met**	Construction Traffic Management Plans
Minimise impacts on route bus operations, routes and stops where possible	Ensure that works cause minimal impact to bus route operations, routes and stopes	**Objective Met**	Construction Traffic

Objective	Target	Measurement	Evidence
	where possible		Management Plans
Minimise changes to traffic operation during network peak periods (maximum peak period construction vehicle volumes should not exceed those outlined in the EIS)	Ensure that minimal changes to traffic operation during network peak periods occur (maximum peak period construction vehicle volumes should not exceed those outlined in the EIS)	**Objective Met**	Traffic Consultation Groups. OOHW Permits.
Maintain access to properties and businesses where possible, or arrange alternative	Where possible, access to properties and businesses must be maintained or an alternative must be arranged	**Objective Met**	Nil change to approved traffic routes under the Traffic and Access CEMP.
Maintain a safe environment for pedestrians and cyclists	Safe environments for pedestrians and cyclists are to be maintained	**Objective Met**	Site Inductions. Inspections.
No worker injury accidents during construction	Ensure that all workers are safe during construction and that no injury accidents occur	**Objective Met**	Mobile equipment and pedestrian interfaces separated where practicable on site. Clear and directional traffic signage installed on site.
No injury accidents to members of the public because of construction	Ensure that all members of the public are safe and that no injury accidents occur because of construction	**Objective Met**	Zero injury/accident.
Work collaboratively with other stakeholders and other major projects to mitigate traffic and transport impacts	Adopt a collaborative approach when working with other stakeholders and other major projects to mitigate traffic and transport impacts	**Objective Met**	Traffic Consultation Groups. Cumulative Impacts CICG.
Minimise noise and other environmental impacts on the residents and businesses in the vicinity of the construction sites, in line with the Construction Noise and Vibration Strategy (CNVS)	In line with the Construction Noise and Vibration Strategy (CNVS) noise and other environmental impacts on the residents and businesses in the vicinity of the construction sites must be minimised.	**Objective Met**	Traffic Consultation Groups. Cumulative Impacts CICG.

4.8 Noise and Vibration

Noise and vibration are monitored in compliance with the SM-WSA Noise and Vibration CEMP.

Activities that have had the potential to generate noise and vibration impacts from SM-WSA scope of works during the reporting period on the Airport include:

- Operation of heavy equipment
- Importation of materials
- Tunnelling

Management actions undertaken jointly by Main Works Contractors and SM-WSA to control and monitor noise and vibration include:

- Comprehensive DNVIS undertaken by Contractors to assess impacts on sensitive receptors
- Review of noise and vibration parameters
- Review and approval of Out of Hours Work (OOHW) Permits by SM-WSA
- Review and endorsement from WSA in provision of Out of Hours Work Intent form to assess cumulative impacts
- Community consultation for events that may cause noise and vibration impacts
- Attended monitoring activities carried out by contractors where required
- Static monitoring by SM-WSA Main Works Contractors

SM-WSA Main Works Contractors have identified the risk of noise and vibration to sensitive receptors as a project risk, and where applicable and appropriate, are working toward continuous improvement by adoption of alternate construction methodologies.

Objectives and Targets are monitored by the WSA Team and are outlined in Table 12.

Table 12: Noise and Vibration Objectives and Targets

Objective	Target	Measurement	Evidence
Community Management	No noise or vibration-related complaints associated with the project	**Opportunity for Improvement**	Nil noise or vibration-related complaints.
	All works are to be undertaken within the designated construction hours or with an out-of-hour work approval	**Opportunity for Improvement**	Inspections. Out of Hours Work permits. Out of Hours Work Intent Forms. Audit.
Statutory compliance	Nil instances of non-compliance with environmental statutory requirements (e.g. infringement notices, clean-up notices, etc.)	**Objective Met**	Nil regulatory infringements received.
CEMP compliance	Weekly Environmental Inspections completed	**Objective Met**	Weekly Inspections undertaken.
	All Environmental Audits completed	**Objective Met**	Internal Audit. Independent Environment Audit.
	All incidents and non-conformances closed out in a timely manner	**Objective Met**	Nil noise or vibration-related complaints.
	Implementation of feasible and reasonable noise mitigation measures with the aim of achieving the construction noise management levels detailed in the Interim Construction Noise Guideline (ICNG) (DECC, 2009)	**Opportunity for Improvement**	Inspections. Monitoring data. Out of Hours Work permits. Monthly Reports. Investigation of real time monitoring alerts.
Plant and Equipment	All plant and equipment maintained in accordance with manufacturers' requirements	**Objective Met**	Inspections Audits

SM-WSA Contractors conduct noise monitoring from two static monitors on the Eastern boundaries at the closest sensitive receptors, approximate locations are shown in below. The north-east ABP noise monitoring was moved from the ABP carpark to Portion 5 area (indicated in aqua below) during September 2024.

Figure 12: Approximate Locations of Noise Monitoring Stations

The construction Noise Management Levels (NML) have been nominated for the project in the SM-WSA Noise and Vibration CEMP.

The project has adopted two criteria to assess impacts against which are detailed in this section:

- LAeq (15 minutes)
- LA10 (15 minutes)

Where construction noise levels are predicted to be above the LAeq NML, all reasonable and practical mitigation measures must be applied. The LAeq NML are shown below and are also consistent with WSA project NMLs:

Table 13: Noise Management Levels

Criteria	LAeq (15 minute) NML
Standard Hours (0700 – 1800)	45 dB(A)
Highly Noise Affected	75 dB(A)

As per the SM-WSA Environmental Impact Assessment airport –

- *Construction work is currently being undertaken at the Western Sydney International. Noise generated by these works has been observed to have little impact on the existing noise environment at the nearest sensitive receivers. This observation is consistent with the predicted impacts from the construction noise assessment for Western Sydney International as part of the Western Sydney Airport – Environmental Impact Statement (Department of Infrastructure and Regional Development, 2016b).*

Noise monitoring on airport for LAeq (15 minute) is demonstrated below:

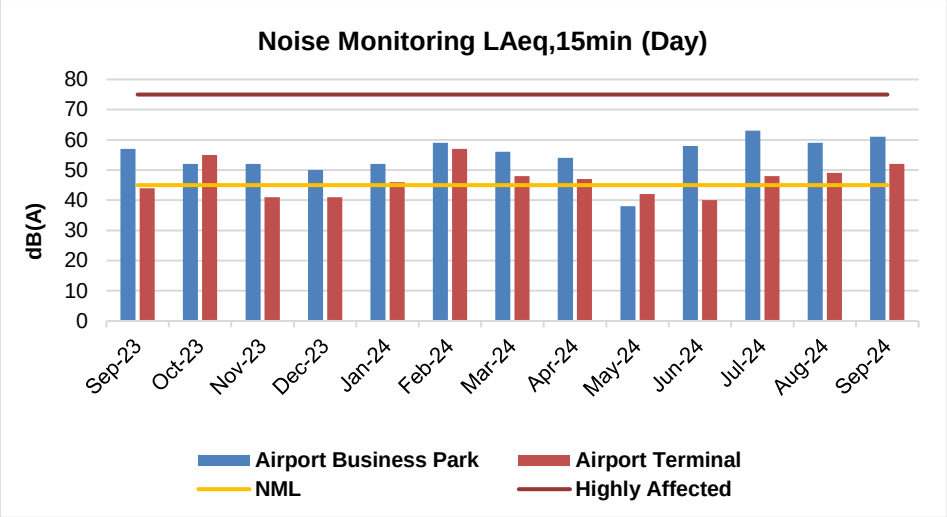


Figure 13: LAeq Noise Monitoring Results (Day)

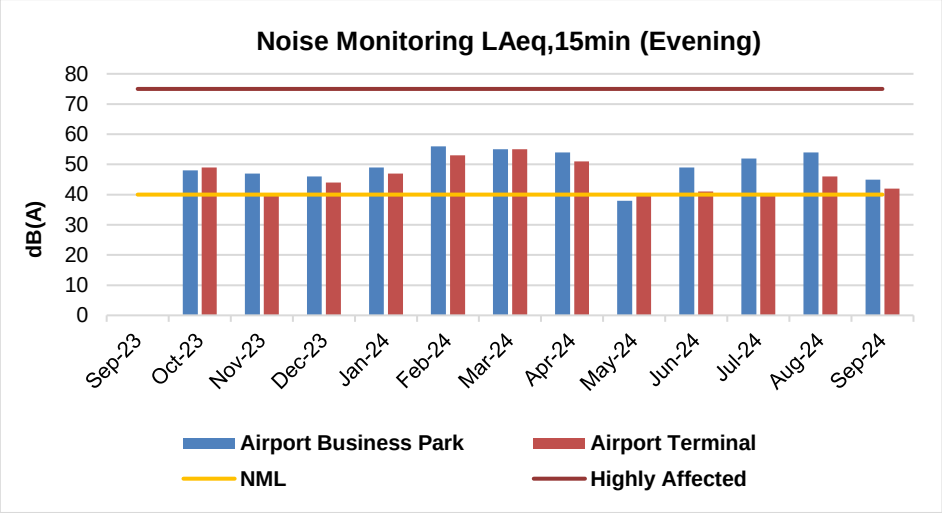


Figure 14: LAeq Noise Monitoring Results (Evening)

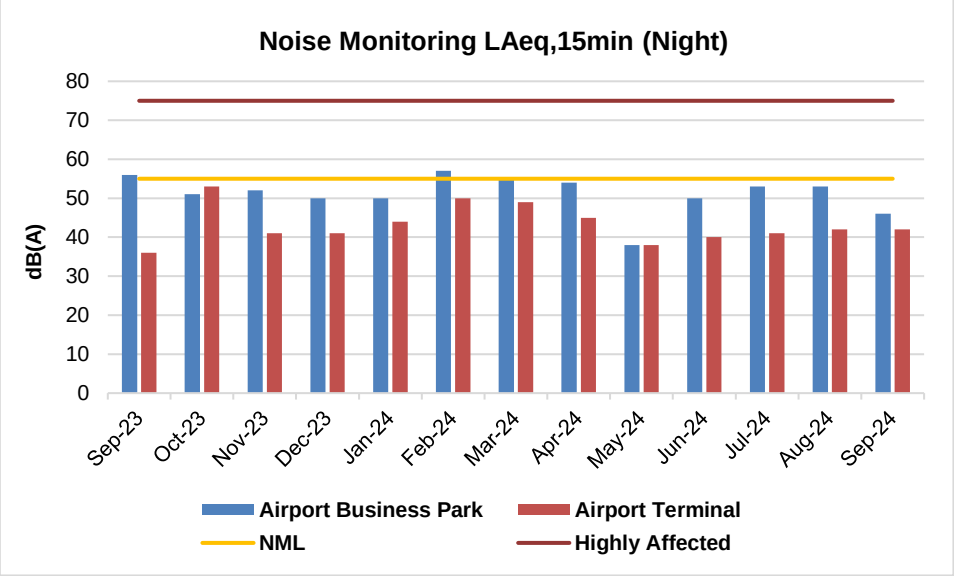


Figure 15: LAeq Noise Monitoring Results (Night)

SM- WSA noise monitoring indicates that the project area is trending with exceedances to the baseline conditions identified in the WSA EIS prior to construction commencement for all NML criteria, with all locations exceeding the LAeq for the NML.

Consistent with Section 2.02 of the AEPR (1997) which nominates the noise criteria for the construction stage of the project are prescribed as below:

- Noise generated from construction, maintenance, or demolition of a building or other structure at an airport should not exceed 75 dB(a), calculated in accordance with subclause (2), at the site of a sensitive receptor
- For sub regulation (1), the sound pressure level of a particular noise is the sound pressure level that is exceeded for 10% of a period of at least 15 minutes, adjusted to take account of tonal character and impulsiveness (if any) of the noise

Criteria for LA10 is detailed below:

Table 14: Construction Noise Limit

Criteria	LA10 (15 minute)
AEPR Construction Noise	**75 dB(A)**

Noise monitoring on airport for LA10 is demonstrated below:

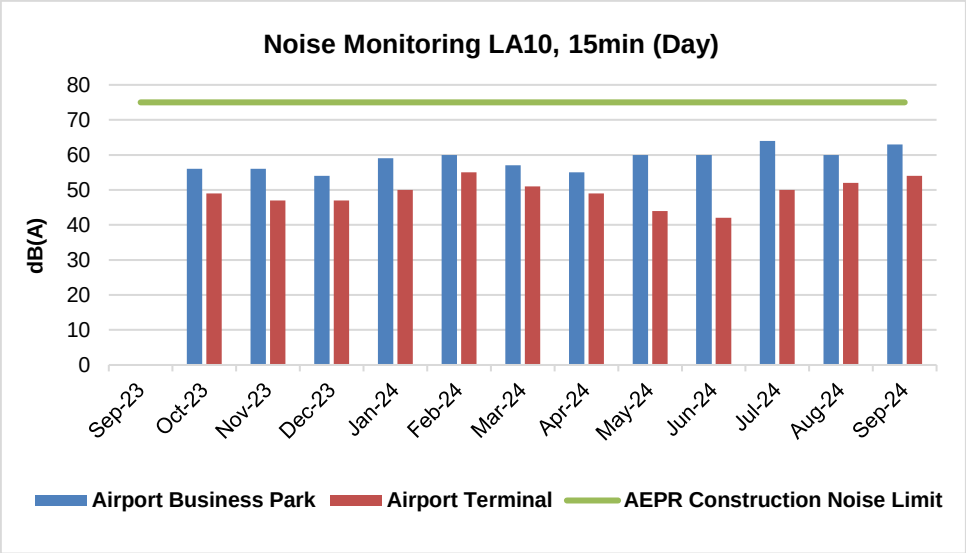


Figure 16: LA10 Noise Monitoring Results (Day)

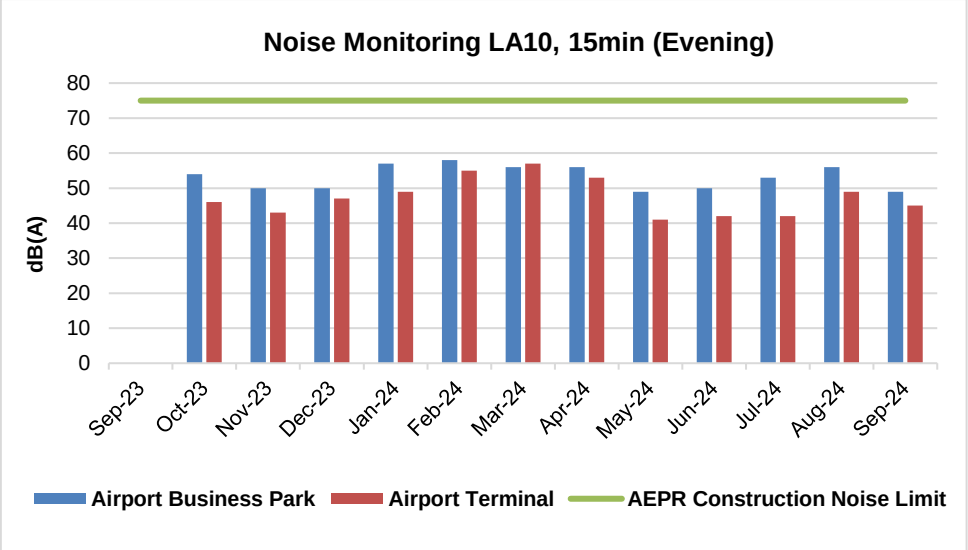


Figure 17: LA10 Noise Monitoring Results (Evening)

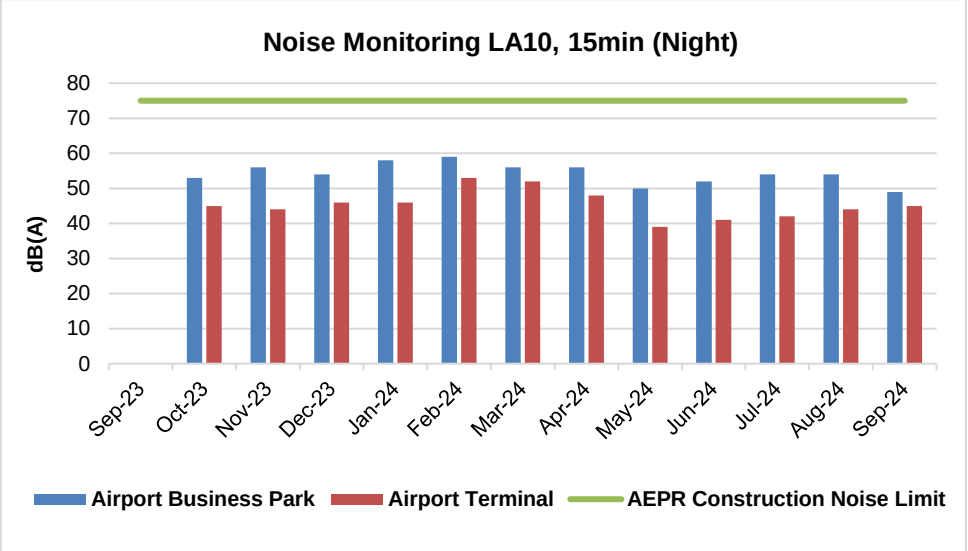


Figure 18: LA10 Noise Monitoring Results (Night)

During the reporting period, all average noise levels across the time period recorded were compliant with the AEPR criteria.

4.9 Visual and Landscape

Management of visual and landscape impacts of the airport on surrounding amenities has been implemented and continually monitored in line with the SM-WSA Visual and Landscape CEMP and include:

- Out of Hours Work Permits reviewed and approved by both SM-WSA Environmental and Community Managers to ensure directional lighting is utilized and light spill is managed to reduce impacts during construction on any sensitive receptors.
- All designs for any permanent infrastructure are reviewed by SM-WSA and WSA to ensure compliance with the visual and amenity requirements under the Airport Plan.

Compliance against the Visual and Landscape Objectives and Targets are shown in Table 15 below.

Table 15: Visual & Landscape Objectives and Targets

Objective	Target	Measurement	Evidence
Ensure the Airport makes a positive contribution to the changing identity and character of Western Sydney	The airport stations are appropriately integrated into the surrounding region and land uses, taking into account the changing nature of Western Sydney.	**Objective Met**	ABP station design. ATL station design.
Landscape and visual amenity impacts minimised during construction	Appropriate landscape treatments are identified and implemented to reduce visual amenity impacts in accordance with this CEMP and detailed design	**Objective Met**	Inspections. Audits.
Impacts associated with light spill during construction will be minimised	All lights where possible to be downward facing and directed away from receivers in accordance with AS4282:1997	**Objective Met**	Captured in Out-of-hours works permits. Temporary design reviews.
Comply with legislation and other requirements	No non-conformance with the requirements of the CEMP	**Objective Met**	Nil incidents or non-compliances reported.

5. Environmental Compliance and Assurance

Environmental compliance within SM-WSA is undertaken by reviewing the compliance requirements of the Airport Plan, CEMF and CEMPs and include the following assurance activities :

- Weekly Contractor Environmental Meetings
- Weekly site inspection Reports
- Monthly SM-WSA joint site inspection with AEO, Commonwealth, WSA and contractors.
- Internal Audits of contractor compliance
- SM-WSA led audit of contractor performance
- Independent audit of CEMP compliance
- Investigation of incidents
- Permit review, approval and close out

The above activities allow for the joint identification of corrective actions and identification of risk to assure preventative actions can be implemented across all packages of works.

5.1 Incidents

A total of eighteen (18) incidents occurred during the reporting period. SM-WSA classifies incidents under the following general categories:

- Class 3 – Minor Impact
- Class 2 – Moderate Impact
- Class 1 – Extreme Impact

Of the eighteen (18) incidents that occurred across the reporting period there were thirteen (13) minor spills of <20L to land, four (4) related to erosion and sediment controls and one (1) incident related to waste and spoil recorded.

There was no Class 1 – Extreme or Class 2 – Moderate Impact incidents across the project. All notifications were undertaken as required to the AEO and WSA as the ALC. All incidents identified during the reporting period had remedial action occurring within the required timeframes to ensure no further environmental harm was caused.

5.2 Non-Compliances

One (1) non-compliance was recorded during the reporting period as a result of an incident relating to the over-topping of a water storage basin following 39.8mm of rainfall. Notifications were undertaken as required to the AEO and WSA as the ALC. This resulted in a non-compliance against approval requirements for surface water management detailed in Section 8.2 of the approved SW-WSA Construction Environmental Management Plan (CEMP).

5.3 Audits

During the reporting period, Sydney Metro engaged GHD Pty Ltd (GHD) to undertake an Independent Environmental Audit (IEA) to assess compliance with the Airport Plan during the construction phase of the project, covering twelve (12) months from the start of construction works on 12 September 2022. This was submitted to the Commonwealth on 15 March 2024.

Two (2) administrative non-compliances relating to the submission of consultation evidence and information of cumulative impacts in site inductions were identified and ten (10) observations were noted.

Additionally, an internal environmental audit was also undertaken to assess compliance of the Stations, Systems, Trains, Operations and Maintenance (SSTOM) package of works, being undertaken by ParkLife Metro (PLM) with the approved SM-WSA On-Airport Construction Environmental Management Plans (CEMP).

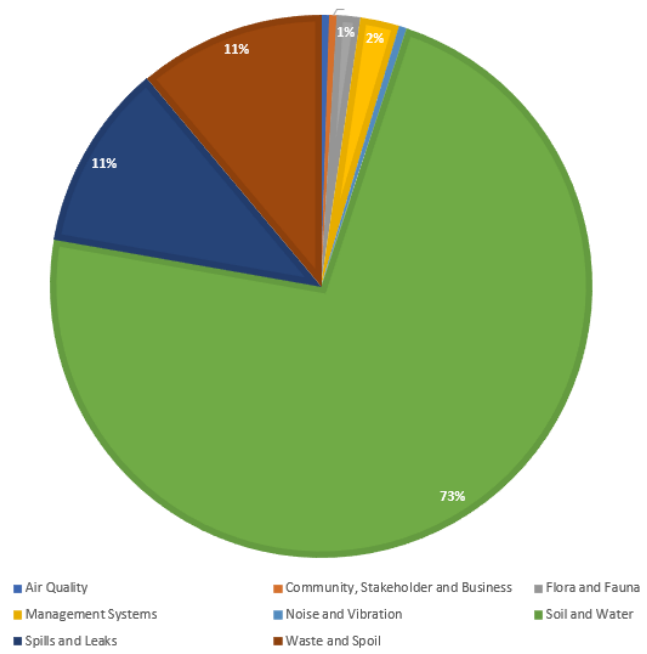
No non-compliances and four (4) opportunities for improvement were identified in provision of documentation by the subcontractor to SM-WSA.

5.4 Inspections

SM-WSA undertakes weekly joint inspections of SBT, SCAW and SSTOM in accordance with the requirements of project CEMP. This is in addition to the Environmental Reference Group (ERG) monthly inspections. The purpose of the weekly inspection is to monitor, assess and maintain compliance with the Airport Plan and relevant CEMPs and Legislative requirements.

A total of 125 inspections were undertaken over the reporting period with 216 issues and 271 actions raised by SM-WSA for review and close out by the relevant contractor. SM-WSA actively monitors and tracks all of the actions raised and tabulates this data for reporting purposes.

73% of the actions raised related to Soil and Water which is reflective of the nature of the construction works in the period and relate to improvements and maintenance for sediment and erosions controls. The nature of the actions raised during inspections during the reporting period is demonstrated in Figure 19 below.



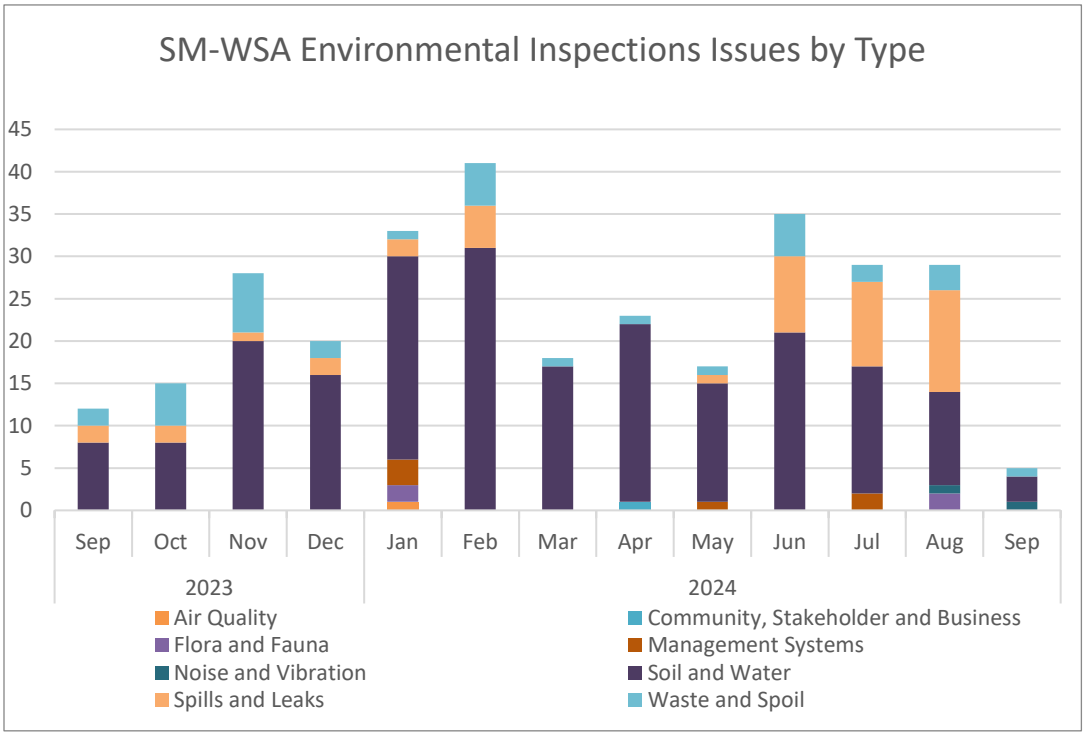


Figure 19: Nature of Issues raised during the reporting period

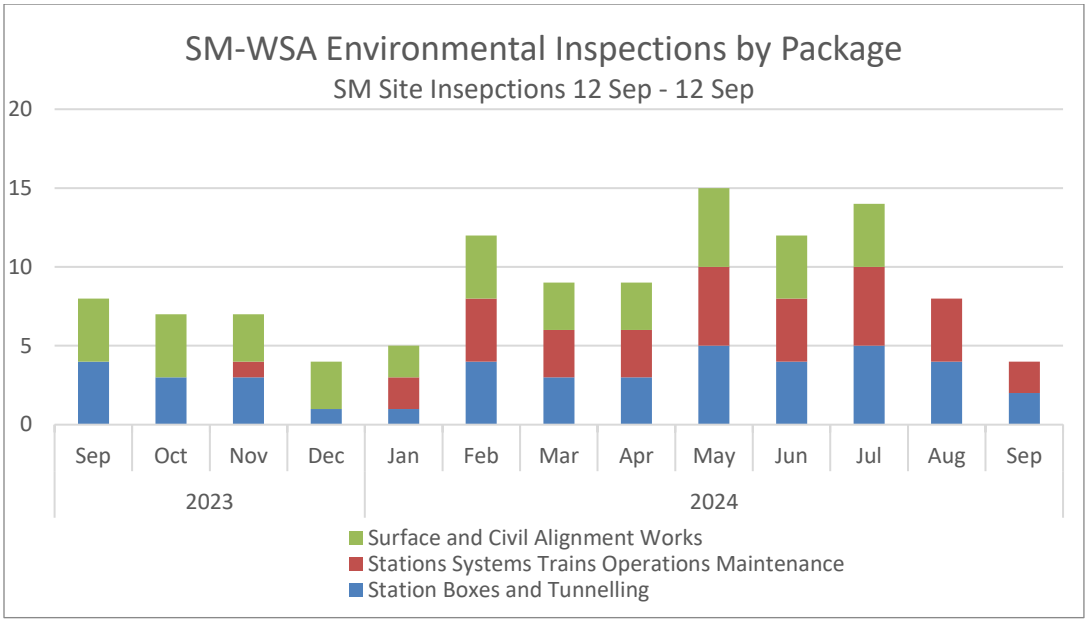


Figure 20: No. of Inspections conducted during the reporting period

During the inspections, field controls are jointly reviewed with the Main Works Contractor's issued environmental approvals to ensure any conditions contained within are being complied with and include review of:

- Land Disturbance Permits.
- Environmental Control Maps.
- Progressive Erosion and Sediment Control Plans
- Preparatory Activity Approval forms (where work was undertaken in WSA Stage 2 areas).

6. Cumulative Impacts

Cumulative Impacts have been continually managed on SM-WSA through implementation of the WSA Cumulative Impacts Management Plan (CIP). Compliance tracking and monitoring for all cumulative impacts between WSA and SM-WSA have been maintained to ensure all requirements of the CIP are implemented across the SM-WSA project and new scopes of works throughout the reporting period.

SM-WSA compliance against the objectives and targets for Cumulative Impacts are shown below in Table 16.

Table 16: Cumulative Impacts Objectives and Targets

Objective	Target	Measurement	Evidence
To meet the full range of requirements identified in this Plan and the Airport Plan relating to cumulative impacts.	Full compliance. Cumulative Impacts Plan training for all personnel relative to roles and responsibilities	**Opportunity for Improvement**	Bi-annual Audits CICG Training
To ensure that all identified cumulative impacts and issues are appropriately managed and mitigated during construction including through the identification of contingencies should	No regulatory infringements.	**Objective Met**	Quarterly Review Bi-annual Audits Inspections Nil regulatory infringements received

Objective	Target	Measurement	Evidence
unexpected adverse outcomes occur, or control measures are found to be inadequate.			
To promote continual improvement in cumulative impacts performance.	Identify and address non-conformances and corrective actions within specific timeframes. Implementation of the continuous improvement process review at every CIP Quarterly Review. Training to be delivered to communicate lessons learnt, and process review and updates for cumulative impacts	**Objective Met**	Quarterly Review CICG Complaints and incident reporting Bi-annual Audit (including Lessons Learnt)
To ensure that controls are properly implemented, regularly monitored, and audited to assess their effectiveness.	Full compliance with implementation of agreed monitoring and inspection requirements as developed during the CIP Implementation Process.	**Objective Met**	Quarterly Review (including comparisons of monitoring data) CICG Inspections Bi-Annual Audits
To ensure processes identified fully capture the intent of the CIP.	All cumulative impacts are captured.	**Objective Met**	Bi-annual Audits CICG
All Cumulative Impacts identified are appropriately managed and mitigated.	No failure to manage identified cumulative impacts. No regulatory infringements.	**Objective Met**	Quarterly Review Nil regulatory infringements received
Mitigation measures identified are adequate to manage identified cumulative impacts.	No additional impacts occur as a result of cumulative impacts or failed mitigation measures.	**Objective Met**	Annual Compliance Report (this report)
Inclusion of stakeholders.	CIP processes adequately addresses requirement and inclusion of stakeholders. Respond to cumulative impact notification within 24 hours and investigation outcomes within five business days.	**Objective Met**	Quarterly Review Annual Compliance Report
To manage cumulative impacts collaboratively.	WSA and SM-WSA representatives in attendance at all CIP meetings. Incidents and complaints closed out within the specified timeframes.	**Opportunity for Improvement**	Quarterly Review CICG

6.1 Implementation of Cumulative Impact Management

On approval of the CIP in April 2022, WSA established a Cumulative Impacts (CI) tracker in order for WSA and SM-WSA to assess all Main Works Contractors baseline schedules/ programs to proactively identify potential cumulative impacts for the next quarter and ensure mitigation measures are implemented to avoid any cumulative impacts. Any confirmed cumulative impacts are registered using the cumulative impacts form and provided to WSA. The CI tracker remains a shared responsibility by SM-WSA and WSA to manage and is reviewed continuously.

Cumulative Impacts across SM-WSA and WSA projects are further reduced through the Out-of-Hours (OOH) process by SM-WSA Contractors providing when planned OOH works are to be undertaken in order to assess against WSA project-wide OOH. Any locations with planned OOH overlaps occurring are tracked and managed closely through interface with project management teams in such a way as to avoid any overlaps, which may have an impact on the surrounding environment and sensitive receivers.

Where environmental monitoring (air quality, noise, and water quality) across SM-WSA and WSA projects have shown any exceedances to the acceptable criteria under the AEPR's. These have been investigated and further monitoring undertaken where required. This data is shared by SM-WSA and WSA to determine whether a CI is identified, or other influences may be impacting results and closed appropriately.

6.2 Forums, Meetings and Reviews

Cumulative Impacts are monitored and mitigated through a number of forums in which SM-WSA and WSA representatives attend.

- SM-WSA Weekly Construction Interface Meetings – All SM-WSA and WSA Main Works Contractors.
- SM-WSA Monthly Cumulative Impacts Control Group (CICG) SM-WSA and WSA Representatives.
- SM-WSA Monthly Cumulative Impacts Control Group (CICG) SM-WSA and M12 and BDA Representatives.
- CIP Quarterly Review- alternatively chaired by SM-WSA and WSA for each quarter.
- Annual Joint Review undertaken by WSA and SM-WSA of the CIP within the reporting period to ensure compliance against the requirements of CIP is occurring and identify any opportunities for improvements.
- WSA and SM-WSA have worked collaboratively to undertake reviews of revised SM-WSA Approved Plans including cumulative impacts.
- SM-WSA participation in the CIP Annual Review audit
- WSA and SM-WSA review of the CIP suitability and comments provided to WSA for inclusion in revised CIP.

6.3 Community Complaints – Cumulative Impacts

For the reporting period, there have been three (3) community complaints in relation to cumulative impacts, which have been responded through from a WSA and SM-WSA assessment and further investigation of cumulative impacts. Once the potential CI complaints were provided to SM-WSA by WSA counterparts, SM-WSA contractors have provided the required information, including monitoring data and mitigation measures in place to close out any complaint investigation reports and comply with their obligations under the Airport Plan, CEMPs, CIP and contractual agreements. Joint investigation undertaken between SM-WSA and WSA of the three (3) complaints found that they were not a cumulative impact and closed appropriately.

6.4 Confirmed Cumulative Impacts

For the reporting period, there were zero (0) confirmed CI in relation to environmental aspects.

All potential CI investigations have been undertaken collaboratively and closed by WSA and SM-WSA.

6.5 Lessons Learnt

Through system reviews and continuous improvement, on review of the CIP objectives and targets for Cumulative Impacts undertaken by WSA and SM-WSA. It is noted that for the previous reporting period, it was incorrectly reported that eight (8) confirmed Cumulative Impacts occurred. Only one (1) confirmed Cumulative impact occurred and this was in relation to traffic congestion.

6.6 Cumulative Impacts Training

In order to implement the CIP effectively, CI requirements and training have been provided by WSA to SM-WSA in order to ensure that all SM-WSA personnel actively involved in the planning and delivery of the associated works are aware of the requirements within this plan. CIP training and awareness has been undertaken by SM-WSA Contractors through inclusion in on Airport site inductions.

7. Sustainability

7.1 Sustainability Plan

The Sydney Metro - Western Sydney Airport (SM-WSA) Sustainability Plan sets out the vision to demonstrate best-practice sustainability in project delivery and operation. Compliance reporting for the purposes of this Annual Report will be against the January 2022 Sustainability Plan. It is noted that the Sustainability Plan and compliance reporting is for the whole WSA project, including On and Off Airport areas. The Sustainability Plan outlines key objectives aligned to the six sustainability principles set out in the Sydney Metro Sustainability Framework, and the initiatives and targets which will be implemented to achieve these across the WSA project lifecycle.

The six sustainability principles are shown in the figure below. The following section details the WSA sustainability targets associated with each principle and Appendix 1 details how compliance has been met for each of the targets during the reporting period.

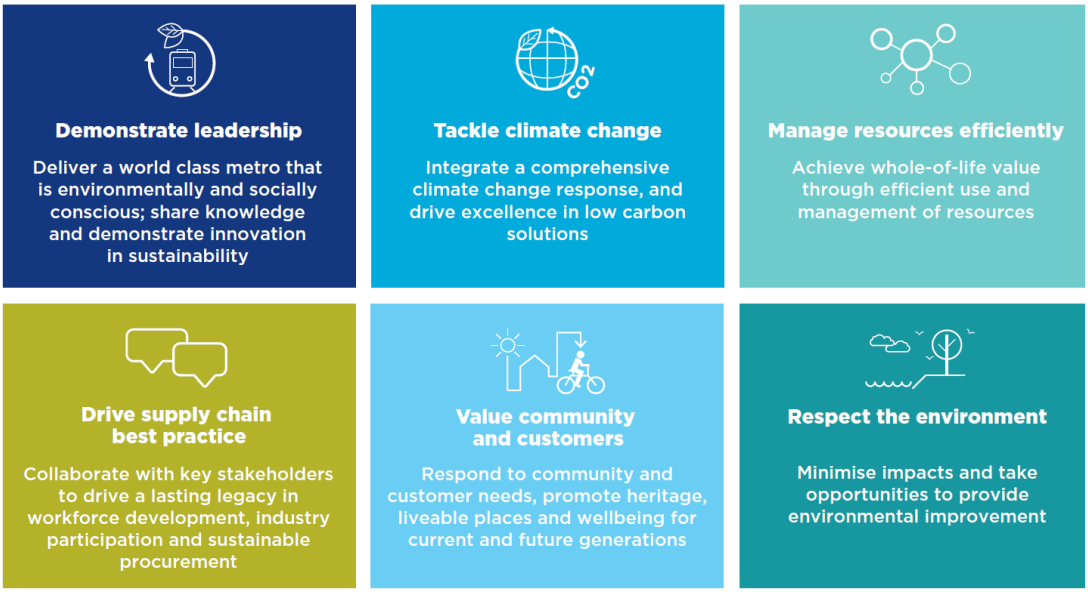


Figure 21: Sydney Metro Sustainability Principles

Detailed design and construction are critical project stages for sustainability; many of the initiatives and targets developed during the planning stage are implemented or realised during these stages, with long-lasting positive impacts to be gained from successes. The Environmental Management System (EMS) ensures that the required outcomes are achieved through a collaborative process. Sydney Metro's Environment and

Sustainability Statement of Commitment and Sustainability Framework have also been integrated into the EMS. Figure 22 outlines this system and shows the relationship between key documents within the Sydney Metro EMS and the Delivery Partner's EMS.

The Sustainability Management Plans, developed for each major construction package by the Delivery Partner, capture governance and design requirements, translating Project-wide targets and initiatives outlined in this Plan to package-specific requirements as per the contract requirements. These plans vary in scope, responding to the specific features of the different delivery packages.

The Sustainability Reports, provided at regular intervals by the Delivery Partners on each major construction package, provide data and qualitative information for assessing progress against the planned initiatives and targets.

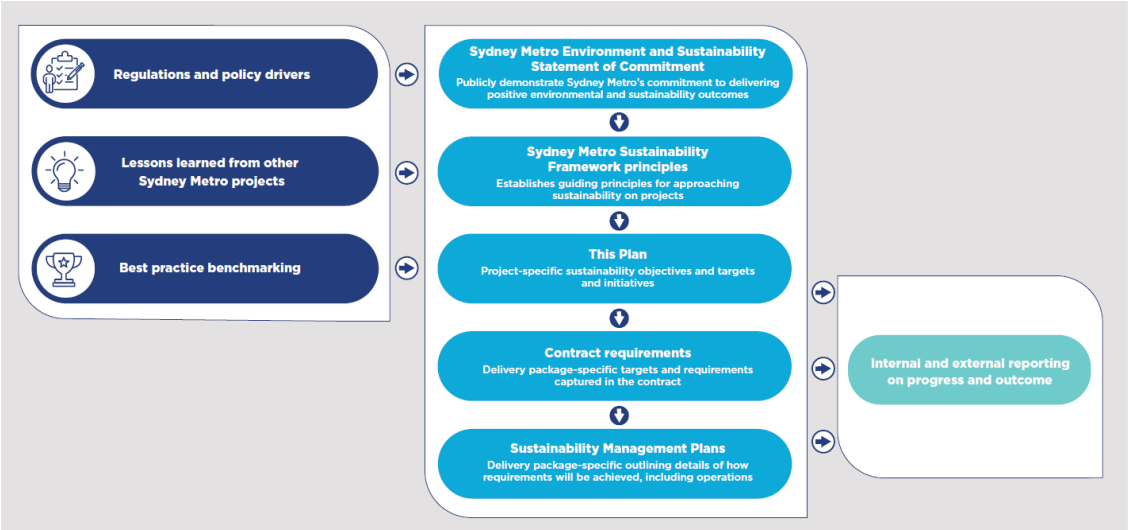


Figure 22: Integrating sustainability into detailed design

7.2 Sustainability Targets

7.2.1 Demonstrate Leadership

Sustainability Principle #1: Deliver a world class metro that is environmentally and socially conscious; share knowledge and demonstrate innovation in sustainability.

This principle drives and underpins the other five. By using nationally recognised accreditation tools, such as the Infrastructure Sustainability (IS) Rating Tool, independent third parties can verify the sustainability performance of our projects against best practice industry standards.

The SM-WSA Sustainability Plan[1] is published on the SM website and includes performance benchmarks for the IS Design and As-Built Base Case Framework as Appendix E of the Plan.

To ensure transparency the annual SM Sustainability Report[2] is published on the SM website and includes SM WSA's performance against sustainability targets included within the SM-WSA Sustainability Plan.

Both SBT and SCAW packages are on track to achieve 'Leading' IS As-Built Rating. In the reporting period both the SBT and SCAW packages submitted the second (2nd) round IS Design Rating to the Infrastructure

[1] (https://www.sydneymetro.info/sites/default/files/2022-02/SM-WSA-Sustainability-Plan.pdf)
[2] (https://www.sydneymetro.info/media/document/41561)

Sustainability Council (ISC) independent verifiers for review and verification. Both SBT and SCAW packages were unable to achieve a 'Leading' rating at the interim Design Stage Rating. The omissions which led to this outcome were reviewed and actions agreed in each project's independent sustainability audit to support the achievement of the overall 'Leading' As-Built Rating. Both packages continue to work on their As-Built Ratings and are targeting final verification of the ratings by mid-2025.

The SSTOM package is progressively submitting their IS Rating to the ISC independent verifiers in the next reporting period starting in December 2024, and are on track to achieve a 'Leading' Design and As-Built Rating.

The SSTOM package has registered six (6) stations and two (2) Maintenance Facility buildings with the Green Building Council of Australia (GBCA) to achieve a Green Star Buildings rating. All stations and buildings are targeting 5 stars. Q4 2024/Q1 2025 is targeted to submit all round one (1) design documentation to the GBCA for independent review.

The SBT package has achieved IS Design Rating verification for the following industry recognised innovations - additional innovations are anticipated to be verified in the IS As-Built Rating and will be reported in the next period.:

- Glass Fibre Reinforced Polymer (GFRP) Rockbolt
    - GFRP rock-bolts have been used on SBT within the headwalls at Claremont, St Marys, Aerotropolis, and Bringelly. GFRP have a reduced embodied carbon impact (about 60% lower) than standard steel bolts. GFRP bolts also offer superior durability and a lower environmental impact.
- GuardDog Drain Filter
    - CPBG is using GuardDog Drain Filter at the SBT St Mary's site as an innovative sediment control mitigation measure. The GuardDog Drain Filter provides benefits beyond the business as usual approach, significantly improving stormwater sediment control and hydrocarbon pollution control onsite. The filter is made from 100% recycled materials.
- Contamination management
    - Activated carbon was injected to act as a permeable reactive barrier to manage the migration of chlorinated hydrocarbons towards the St Marys station.

The SCAW package has achieved IS Design Rating verification for the following industry recognised innovations - additional innovations are anticipated to be verified in the IS As-Built Rating and will be reported in the next period.:

- Recycled Crushed Glass (RCG)
    - The project utilised RCG for roadworks at Luddenham Road, Twin Creeks at a rate of 7.2%. RCG substitutes virgin sand use and equates to a twenty one percent (21%) reduction in carbon dioxide equivalent emissions.

The SSTOM package has identified a number of innovations that will be reviewed by ISC in the next reporting period.

To facilitate sustainability-related knowledge sharing, Sydney Metro holds quarterly Sustainability Forums. The forums are attended by project delivery partners and Sydney Metro Sustainability professionals as well as industry subject matter experts. During the reporting period the SBT, SCAW, SSTOM and Sydney Metro WSA Sustainability Managers attended all of the forums held.

External engagement and collaboration activities in the reporting period include:

- The Sydney Metro WSA Senior Sustainability Manger participates in a bi-monthly knowledge share with Transport for NSW (TfNSW), Western Sydney Airport Corporation (WSA Co), Western Parkland City Authority (WPCA) and others (as required) to facilitate engagement and collaboration with external stakeholders.
- Sydney Metro are currently in discussion with Western Sydney University on research partnership opportunities on restoration methods for endangered Cumberland Plain plant communities.
- Sydney Metro engaged E2Designlab to assess the projects approach to net zero water and review opportunities in the SSTOM projects civil design for water sensitive urban design (WSUD). Workshops were held with Sydney Metro, Penrith City Council and SSTOM to discuss opportunities to improve WSUD in precinct design.

Table 17: Leadership Objectives and Targets

Objective	Target	Measurement	Evidence
Ensure transparency and assurance of project sustainability outcomes	Publish performance benchmarks	**Objective met**	Sustainability Plan
	Publicly report on performance against targets	**Objective met**	Sydney Metro Annual Sustainability Report Sydney Metro Annual Report
	Obtain an Infrastructure Sustainability rating for relevant infrastructure; "Leading" for design and as-built, "Excellent" for operations	**Objective on track**	QSR IS rating verification
	Obtain at least a 5 Star Green Star rating for relevant buildings and precincts	**Objective on track**	QSR
Encourage innovation that delivers sustainability benefits	Deliver at least five industry recognised innovations	**Objective on track.**	QSR IS rating verification
Facilitate knowledge sharing and collaboration	Sydney Metro to facilitate sustainability-related knowledge share sessions within the Project on a quarterly basis	**Objective met**	Contractor Sustainability Forums
	Engage and collaborate with stakeholders (e.g. other local projects, councils, industry bodies) on sustainability-related matters on a bi-annual basis	**Objective met**	Bi-monthly Interagency Circular Economy meeting

7.2.2 Tackle Climate Change

Sustainability Principle #2: Integrate a comprehensive climate change response, and drive excellence in low carbon solutions.

SM-WSA addresses climate change, both in terms of adaptation (actions that address the effects of climate change) and mitigation (efforts to reduce or prevent emission of heat-trapping gases).

Adapting to climate change

During the 120-year design life of the Project, hazards relating to changes in the climate will likely increase and worsen. The risks resulting from changes in these hazards are considered through the lens of the Project's specific vulnerabilities and exposure in the Project's climate change risk assessment framework. This

framework informs understanding of the Project's risks and allows for adequate planning and adaption to the impacts.

A preliminary risk assessment was undertaken by SM to inform necessary adaptive measures (that are within the Project's control) for early design. This assessment and the resulting adaptation measures have been updated and refined throughout the project life cycle by each of the WSA delivery partners for SBT, SCAW and SSTOM in collaboration with SM and relevant external stakeholders. Climate change risks are included in the project master risk register and managed through a project-wide risk management process by SM.

The climate change risk assessment includes the best available climate change data for the Project location (including far future projections out to 2100) under a worst-case climate scenario, and identifies potential changes to relevant climate variables.

Design was finalised in the previous reporting period and there were no inherent or residual rated 'very high' nor 'high' climate change risks for the SBT and SCAW packages.

For the SBT package there were thirteen (13) risks with an inherent risk rating of 'medium' and eight (8) risks with an inherent risk rating of 'low'. Following the application of adaptation measures, nine (9) risks with an inherent rating of 'medium' have been reassessed as 'low'.

For the SCAW package there were fourteen (14) risks with an inherent risk rating of 'medium' and twelve (12) risks with an inherent risk rating of 'low'. Following the application of adaptation measures, thirteen (13) risks with an inherent rating of 'medium' have been reassessed as 'low'.

During the current reporting period the SBT and SCAW package delivery partners continued to implement the adaptation measures identified in their climate change risk assessments through construction.

SSTOM has been working collaboratively with Sydney Metro to revise and update the risk assessment as part of the project design process in accordance with the following standards and guidelines:

- Transport for NSW Climate Risk Assessment Guidelines (SD-081)
- Australian Standard: AS 5334-2013: Climate Change Adaptation for Settlements and Infrastructure: A Risk-based Approach (Standards Australia, 2013).
- AS/NZS ISO 31000:2018 Risk Management – Principles and Guidelines and ISO/IEC 31010:2019 Risk Management – Risk assessment techniques
- Infrastructure Sustainability Council (ISC) IS Technical Manual Version 1.2 (ISCA, 2018)
- NSW Government's Climate Risk Ready Guide (Department of Planning, Industry and Environment, 2020)
- Australian Government's Climate Change Impacts & Risk Management – A Guide for Business and Government (Department of the Environment and Heritage – Australian Greenhouse Office, 2006).

The SSTOM package is currently on track with the climate change objectives and targets. More information can be provided in the next reporting period when design is finalised.

Mitigating climate change

Sydney Metro is committed to minimising the Project's carbon footprint through reducing energy intensity, improving energy efficiency, using on-site and off-site renewables and offsetting residual carbon, to achieve net zero carbon emissions.

For the Project, net zero carbon emissions can be defined as no net change in carbon (greenhouse gas) emissions in the atmosphere as a result of the infrastructure existing. In practice this means to design, construct and operate the infrastructure in a way which does not result in a net addition of carbon emissions to the atmosphere, including emission generated in activities undertaken and embedded within materials used

throughout the Project's life cycle. The WSA project is on track to achieve third party net zero carbon emissions certification. In the current reporting period SM engaged a carbon offset advisor and are currently conducting internal workshops to develop guiding principles and carbon offset procurement strategy.

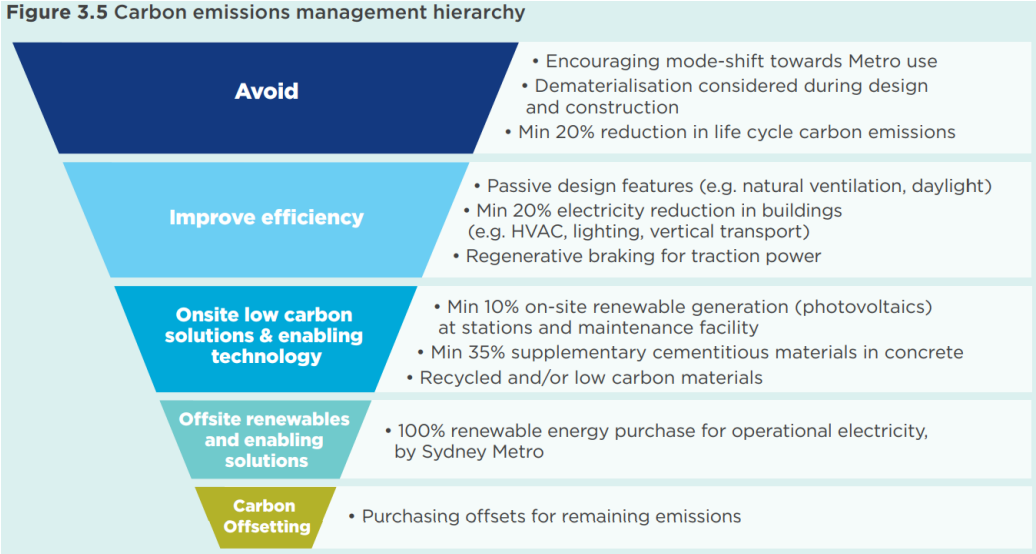


Figure 23: Carbon emissions management

SBT has purchased approved offsets for at least 75% of the carbon emissions associated with consumption of fuel and electricity during construction. The offsets are Australian Carbon Credit Units (ACCUs), generated from biodiversity projects located in Western NSW. The project will purchase additional offsets at project completion to ensure that 100% of all Scope 1 and Scope 2 emissions, as defined in National Greenhouse and Energy Reporting (NGER) are offset, as required by the contract.

SCAW has purchased approved offsets for at least 75% of the carbon emissions associated with consumption of fuel during construction (noting the SCAW project does not have an electricity connection, and no electricity was used during the reporting period). The offsets are ACCUs, generated from biodiversity projects. The project will purchase additional offsets at project completion to ensure that 100% of all Scope 1 and Scope 2 emissions, as defined in NGER are offset, as required by the contract.

SSTOM has purchased approved offsets for approximately 80% of carbon emissions associated with their estimated Scope 1 emissions. The offsets are ACCUs generated from biodiversity projects in NSW and QLD. The offset of construction related Scope 2 emissions are in progress. The project will purchase additional offsets at project completion to ensure that 100% of Scope 1 and Scope 2 emissions, as defined in NGER are offset, as required by the contract.

SBT and SCAW are on track to achieve at least a 20% reduction in carbon emissions across the infrastructure life cycle, when compared to business as usual. Their modelling and reporting are being reviewed and will be verified as part of the IS As-Built Rating process currently underway. SSTOM is undertaking modelling and reporting on how they will achieve at least a 20% reduction, which will be finalised once the majority of detailed design has been completed and will be reported in the next reporting period.

The Luddenham at-grade carpark is designed for 5% electric vehicle (EV) charging available on day one and 15% of spaces EV ready. Bus layovers are future proofed for operation of electric buses with spatial provision for charging infrastructure. The SSTOM project continues to investigate further opportunities for EV charging integration through design.

The SSTOM design includes more than 2,500 kWp of on-site renewable energy through the installation of solar photovoltaic systems. Modelling indicates that this system is expected to generate approximately 77% of the annual low voltage energy consumption in the stations and at the stabling facility.

Table 18: Climate Change Objectives and Targets

Objective	Target	Measurement	Evidence
Deliver and operate infrastructure that is resilient to the impacts of climate change	Identify and implement adaptation measures to reduce 100 per cent of all very high and high climate risks (to at least a medium)	**Objective met for SBT and SCAW** **Objective on track for SSTOM**	QSR Climate Change Risk Assessment
	Identify and implement adaptation measures to reduce all medium climate risks as low as reasonably practicable, with at least 50 per cent reduced to low	**Objective met for SBT and SCAW** **Objective on track for SSTOM**	QSR Climate Change Risk Assessment
	Capture data on the impacts of, and response to climate-related events on customers, staff, service and infrastructure to enable continuous improvement	**Objective on track**	Sydney Metro Climate Change Risk Management Procedure
Establish and implement energy efficiency measures	Report on operational electricity consumption	**Objective on track**	Monthly reporting Sydney Metro Annual Sustainability Report Sydney Metro Annual Report
	Achieve at least 20 per cent improvement on the minimum performance requirements stipulated in the National Construction Code (NCC) for stations and relevant buildings	**Objective on track**	Sustainable Design Report
Reduce and offset carbon emissions	Achieve third party net zero carbon emissions certification	**Objective on track.**	Sydney Metro Annual Sustainability Report Sydney Metro Annual Report
	Achieve at least a 20 per cent reduction in carbon emissions across the infrastructure life cycle, when compared to business as usual	**Objective on track**	Sustainable Design Report QSR
	Offset at least 25 per cent of the carbon emissions associated with consumption of fuel and electricity during construction through the purchase of approved offsets or renewable energy	**Objective met for SBT and SCAW** **Objective on track for SSTOM**	Monthly reporting QSR
	Source at least 10 per cent of the low voltage electricity required at stations and the stabling facility from on-site renewable energy sources	**Objective on track**	Sustainable Design Report QSR
	Target minimum 20 per cent of parking spots safeguarded for electric vehicle (EV) charging points and provision for electric bus charging in suitable locations	**Objective on track**	Place, Urban Design and Corridor Landscape Plan (PUDCLP)- Roadworks & Precinct – Civil

			Design Reports
	Offset 100 per cent of the carbon emissions associated with consumption of electricity during operation	**Objective on track**	Public commitment to net zero carbon emissions. TfNSW Net Zero & Climate Change Policy
	Report on carbon emissions from construction and operations	**Objective met. (Noting emissions from operations is only applicable to the SSTOM package)**	Monthly reporting QSR Sydney Metro Annual Sustainability Report Sydney Metro Annual Report

7.2.3 Manage Resources Efficiently

Sustainability Principle #3: Achieve whole-of-life value through efficient use and management of resources

SM-WSA aims to efficiently use and manage resources and reduce the environmental footprint of materials consumed and waste generated. To facilitate this each project has prepared a Sustainability Management Plan which details how the design uses resources efficiently. In addition, the SBT, SCAW, and SSTOM packages' Sustainability Managers held Sustainability in Design workshops to provide additional guidance and encourage collaborative innovative ideas for the project designs.

Water

Water is an increasingly scarce resource. Potable (drinking quality water) and non-potable water, required for construction and operation of the Project are modelled in a water balance study to enable the identification of the best opportunities to use non-potable water instead of potable water and minimise the quantities of both potable and non-potable water used.

Water use (potable and non-potable) during SBT and SCAW construction has been monitored and reported on during the reporting period.

The SBT and SCAW water balance modelling indicates that construction potable water use will be reduced by at least 10% on each package compared to business as usual. The verified IS Design Rating for each package during the reporting period indicates that the SBT and SCAW projects will reduce water use by 16% and 19.5% respectively compared to business-as-usual. The final reduction for SBT and SCAW will be verified in the IS As-Built verification process and reported in the next period. The SSTOM water balance modelling indicates that construction potable water use will be reduced by 23.8% compared to business as usual.

Construction water use is being reported monthly to SM.

SBT monthly reporting indicates that the percentage of water use from non-potable sources throughout construction is 51.6%. Non-potable water sources for the SBT project primarily comprised of treated groundwater but also water captured onsite. SCAW monthly reporting indicates that 64.6% of water use is from non-potable water captured onsite in sediment basins, dams, or rainwater tanks. The final figures will be confirmed in the next reporting period based on the water balance model verified as part of the IS Rating As-Built submission.

The SSTOM water balance study estimates that 46.7% of water use during construction and operations is to be replaced with water from non-potable sources. This includes water captured in rainwater tanks and site process water (concrete batch plant) recycling during construction, and connecting to the recycled water network and recycling train wash water during operations. Note, the majority of lifecycle water use is associated with WSA operations.

Contractual requirements to reuse at least 80% of concrete production operation water in concrete production at batching plants have been passed through in all relevant sub-contracts for the SBT and SCAW packages. Quarterly sustainability reporting and audit results indicate this is being achieved. The SSTOM water balance study indicates that an average of 63% replacement of potable water is expected across the batching plants. SSTOM will continue to work with the batching plant operator to maximise the replacement rate over the project lifespan.

Waste

The SBT, SCAW and SSTOM packages monitor and report on waste monthly to SM. In the reporting period all packages have beneficially reused 100% of reusable spoil.

All 3 packages are achieving the target to recycle or beneficially reuse at least 90% of construction and demolition waste. The SBT, SCAW and SSTOM packages are recycling or beneficially reusing 90.2%, 95.1% and 96.8% respectively.

SBT is achieving an office waste reuse/recycling rate of 67%, exceeding the 60% target. Reporting to date indicates SCAW is recycling or beneficially reusing 21% of office waste below the 60% target. Initiatives to improve the office waste recycling rate as well as reporting accuracy have been implemented and the recycling rate is expected to improve as a result.

The SSTOM package is achieving an office waste reuse/ recycling rate of 33%. SSTOM are proactively working with the construction site teams and the waste contractor to improve this rate, including improved waste segregation (up to 6 bins), educational material, awards/ recognition for most improved sites, and publishing of metrics in internal newsletters. As a result, SSTOM are reporting improved office waste reuse/ recycling rate, with some sites close to 60%.

SSTOM have produced an Operational Waste Management Strategy which estimates a 41% diversion of customer waste from the station and plazas in operations. It is estimated that 47% of Stabling and Maintenance Facility waste is to be recycled, projecting below the 80% target. The strategy identifies initiatives and approaches to improve recycling rates in operation and will be finalised close to the end of construction.

Materials

To minimise the embodied impacts of concrete, SM-WSA projects are required to use at least 35% supplementary cementitious materials project-wide and prioritise the use of alternate binder systems on non-structural elements.

The SBT project has achieved a very high percentage of supplementary cementitious materials used within the precast tunnel lining segments by replacing 48% of cement with slag.

Reporting to date indicates that the SBT and SCAW packages are achieving 44% and 37% per cent supplementary cementitious materials use respectively. The objective has been met for the SBT and SCAW projects during the reporting period. The SSTOM package is forecasting an overall cement replacement rate by weight of 55%. In the reporting period, SSTOM have used 58% supplementary cementitious material within Project works.

To increase the use of recycled materials within the construction industry SM- WSA projects are required to prioritise products made from recycled content. The following lists some of the recycled content products used in the construction of the:

SBT package:

1. Recycled plastic segment guidance rods have been used onsite (145,000 rods procured)
2. Reused timber dunnage has been used on the project to transport and store the precast segments onsite

3. Guard dog recycled drain filters have been used as an innovative sediment control recycled material product at the St Mary's site

SCAW package:

1. Bidim Green, a geosynthetic material made with Australian recycled plastics has been used in drainage applications on the SCAW Project
2. Use of biodiesel (a renewable fuel sourced from used vegetable oils or animal fats)
3. Replacing manufactured sand used in drainage with recycled crushed glass
4. 40% Reclaimed Asphalt Pavement (RAP) with 6% recycled glass utilised for the wearing course on the driveway from Elizabeth Drive to the main site compound and for the driveway at the Luddenham Rd compound
5. Recycled Densely Graded Base (DGB) across the project for all road base

The SSTOM package continues to investigate a variety of opportunities to incorporate recycled materials through design development. More information can be provided in the next reporting period.

The SBT and SCAW packages are achieving the target to minimise the embodied impacts of steel through the use of at least 50% Australian steel, including concrete reinforcing and structural steel. The SBT and SCAW projects are using 81% and 89% of Australian steel respectively. The SSTOM project is predicted to use 86% Australian steel by weight based on executed supply contracts to date.

The SBT, SCAW and SSTOM packages are sourcing 100% of all timber products from either reused timber, post-consumer recycled timber, Forest Stewardship Council or Programme for the Endorsement of Forest Certification certified sources.

Table 19: Resource Management Objectives and Targets

Objective	Target	Measurement	Evidence
Minimise the use of potable water and maximise opportunities for reuse of non-potable water sources	Reduce potable water use by at least 10 per cent compared to business-as-usual, and monitor consumption throughout construction and operations	**Objective met For SBT and SCAW** **Objective on track for SSTOM**	Monthly reporting QSR Sustainable Design Report
	Demonstrate at least 33 per cent of water used is from non-potable sources throughout construction and operations	**Objective met for SBT and SCAW** **Objective on track for SSTOM**	Monthly reporting QSR Sustainable Design Report
	Reuse at least 80 per cent of concrete production operation water in concrete production at on-site and off-site batching plants	**Objective met for SBT and SCAW** **Opportunity for Improvement for SSTOM**	QSR
	Reuse at least 80 per cent of train wash water at the stabling	**Objective on track**	Sustainable Design Report
Minimise waste throughout the project life cycle	Beneficially reuse 100 per cent of reusable spoil, in accordance with the Spoil Management Hierarchy	**Objective on met for SBT and SCAW** **Objective on track for SSTOM**	Monthly reporting QSR
	Recycle or beneficially reuse at least 95 per cent of construction and demolition waste	**Objective met for SBT and SCAW** **Objective on track for SSTOM**	Monthly reporting QSR

Objective	Target	Measurement	Evidence
	Recycle or beneficially reuse at least 60 per cent of office waste	**Opportunity for Improvement for SBT, SCAW and SSTOM**	Monthly reporting QSR
	Recycle or beneficially reuse at least 40 per cent of customer waste	**Object on track**	Operational Waste Management Plan
	Recycle or beneficially reuse at least 80 per cent of maintenance waste	**Opportunity for improvement**	Operational Waste Management Plan
Reduce materials consumption, reduce the embodied carbon and increase use of recycled materials	Minimise the embodied impacts of concrete through the use of at least 35 per cent supplementary cementitious materials project-wide and prioritise the use of alternate binder systems on non-structural elements	**Objective met for SBT and SCAW** **Objective on track for SSTOM**	Monthly reporting QSR
	Prioritise products made from recycled content, with a minimum of six products used in the construction phase	**Objective met for SBT and SCAW** **Objective on track for SSTOM**	Sustainable Design Report QSR
Implement environmentally responsible sourcing practices	Minimise the embodied impacts of steel through the use of at least 50 per cent Australian steel, including concrete reinforcing and structural steel	**Objective met for SBT and SCAW** **Objective on track for SSTOM**	Sustainable Design Report QSR
	Source 100 per cent of all timber products from either reused timber, post-consumer recycled timber, Forest Stewardship Council or Programme for the Endorsement of Forest Certification certified sources	**Objective met for SBT and SCAW** **Objective on track for SSTOM**	Sustainable Design Report QSR

7.2.4 Drive Supply Chain Best Practice

Sustainability Principle #4: Collaborate with key stakeholders to drive a lasting legacy in workforce development, industry participation and sustainable procurement.

SM-WSA aims to collaborate with key stakeholders to drive a lasting legacy in workforce development, industry participation and sustainable procurement. Each project has detailed workforce development, industry participation and procurement requirements to maximise the broader social legacy of the project.

All contractors have delivered initiatives to increase workforce diversity during the reporting period. The SBT and SCAW packages have successfully met SM targets around skills development and the delivery of training in skills shortage areas, and the SSTOM package is on track. The SBT and SCAW packages have successfully delivered on all SM targets and initiatives related to local employment and small to medium enterprises. The SSTOM package has met ninety five percent (95%) of the targets and are expected to significantly exceed the requirements by the end of construction. SBT and SCAW have delivered multiple programs and initiatives related to relating to Science, Technology, Engineering and Mathematics (STEM) disciplines, as well as other educational programs. Additionally, they have conducted high school and other work experience programs. SM has approved SSTOM educational programs for implementation – more information can be provided in the next reporting period.

SBT and SCAW have identified their high impact suppliers and provided them with sustainability training. This included training through the Supply Chain Sustainability School for suppliers including concrete, steel and

waste services suppliers. SSTOM continues to engage suppliers and utilises sustainability evaluations during procurement to identify and provide training to high impact suppliers. Sustainability training including sustainable procurement objectives are provided during inductions. Suppliers are also engaged during the procurement process in relation to modern slavery and responsible/ethical sourcing.

No reported instances of actual or potential environmental or social risk were identified in the SBT, SCAW and SSTOM project supply chains. All 3 packages have developed Sustainable Procurement Policies and procedures/ plans. In conducting supply chain due diligence, SBT and SCAW have employed the ESG database Bureau Van Dijk to vet supply chain participants.

SSTOM is on track to provide the environmental product declaration for the trains in line with the handover of the first train.

The SBT and SCAW packages have engaged six (6) social enterprises or social benefit organisations each during construction. The SSTOM package has engaged seven (7) during construction to date.

Table 20: Supply Chain Objectives and Targets

Objective	Target	Measurement	Evidence
Influence Delivery Partners, subcontractors and materials suppliers	Provide sustainability training to all high impact suppliers (those that potentially have significant environmental, social or socio-economic impacts)	**Objective met for SBT and SCAW.** **On track for SSTOM.**	QSR
Increase supply chain transparency and responsibility	All reported instances of actual or potential environmental or social risk in the supply chain will be investigated	**Objective met (none identified) for SBT and SCAW.** **On track for SSTOM.**	QSR Sustainable Procurement Plan
	Require environmental product declarations for trains	**Objective on track**	QSR Sustainable Procurement Plan
Deliver a positive workforce development and industry participation legacy	• Engage at least 15 social enterprises or social benefit organisations during construction and operations	**Objective met.**	QSR Workforce Development, Industry and Aboriginal Participation Plan

7.2.5 Value Community and Customers

Sustainability Principle #5: Respond to community and customer needs, promote heritage, liveable places and wellbeing for current and future generations

The WSA project aims to respond to community and customer needs, promote heritage, liveable places and wellbeing for current and future generations.

The WSA project has established a Connecting with Country Working Group (Working Group). Sydney Metro is excited to be part of the pilot project for Government Architect NSW's Draft Connecting with Ngura (Country) Framework. A Connecting with Ngura (Country) document has been prepared which outlines the thematic framework to inspire design and generate responses which acknowledge and are respectful and meaningful to the Traditional Custodians and knowledge holders of this Country and its broader Aboriginal communities. The responses to Country arising from this document might find expression in architecture, landscape, public art, sustainability, materials, colour, public events, heritage interpretation, engineering or other activities associated with the WSA project. SSTOM is currently exploring these responses through the design of stations, precincts and landscaping.

'The Dharug people and other close neighbouring groups have obligations to care for the Country where this project will be located. They are the custodians who care for the wellbeing of her systems now and into the future for the coming generations. Dharug people need to heal their Country, and they have a responsibility to care for the people who are on Country.' (Source: Sydney Metro, 2021, Connecting with Ngura (Country) Sydney Metro – Western Sydney Airport)

Sydney Metro supports and anticipates ongoing collaboration between our delivery partners, the Working Group, Aboriginal people and knowledge holders.

In response, all stations have been designed with heritage interpretation and Connecting with Country principles by the SSTOM project. A heritage interpretation plan has been developed for all stations which outlines the site context and interpretation elements.

The Working Group met with the ecological restoration specialist team onsite to discuss the proposed approach to landscaping and restoring the corridor. A heartfelt Welcome to Country was given by the Working Group, who then generously shared their cultural knowledge and advice for caring for the land including the importance of water and wildlife in the ecosystem, the opportunities for use of fire and opportunities for involvement of traditional custodians. Positive feedback was received about their approach to promoting natural regeneration of existing bushland, creating natural habitat using site won materials and focusing on adaptive restoration.

The project's corridor landscaping approach is being developed and throughout the process SM has actively engaged with Aboriginal knowledge holders and the Working Group to develop the current corridor landscaping approach. The corridor landscaping approach was recognised for excellence in infrastructure landscaping at the 2024 NSW Landscape Architecture Awards and 2024 National Landscape Architecture Awards.

SM-WSA aims to deliver targeted community benefits to local communities that provide positive social outcomes during the Project's construction phase and that continue to benefit local communities and provide positive social outcomes beyond the Project's construction phase. Examples of initiatives delivered in the reporting period are listed below:

SBT package:

1. Donating equipment to Penrith Men's shed including a work bench, portable dust collector, drill press, and cordless drills
2. Constructing footpaths (enabling disability access to) and supporting with landscaping works at the Bringelly school
3. Donations and sponsorships for a number of local charity organisations.

SCAW package:

1. Shade sails and outdoor seating installed to support Mulgoa public school outdoor education program
2. Property works and security upgrades at DV West which provides domestic violence services and crisis accommodation
3. Snake awareness training provided over two (2) days to the community and also at two (2) local primary schools

SSTOM package:

1. 2 days of volunteering and a fundraising event tied to 2024 City2Surf to support to support the organisation ReLove furnish homes of women and children impacted by domestic violence, people experiencing homelessness and people seeking asylum.

2. Partnership with Western Sydney Women 2024 International Women's Day including investment and delivery of a keynote speaker.

The SBT and SCAW projects will finish the delivery of all their community benefit initiatives by December 2024. Further community benefit initiatives are being investigated by the SSTOM project and will be reported in the next reporting period.

Table 21: Community Focus Objectives and Targets

Objective	Target	Measurement	Evidence
Protect and promote Aboriginal and non-Aboriginal heritage and culture	Each station to include heritage interpretation	**Objective on track**	Heritage Interpretation Plans
	Engage with Aboriginal knowledge holders to develop corridor landscaping approach	**Objective met.**	Corridor Restoration Plan
Promote community and customer wellbeing	Report on customer centric design at the completion of each design phase for stations, validating that the design meets customer needs, delivers an easy travel experience and addresses each of the nine Transport for NSW satisfaction drivers: timeliness, comfort, ticketing, convenience, accessibility, cleanliness, safety & security, information and customer service	**Objective on track**	Customer Centric Design (CCD) Reports
	Target 75 per cent of the project surface area (excluding track) to comprise elements which reduce the Urban Heat Island effect, including vegetation and permeable or lighter coloured surfaces	**Objective on track**	Sustainable Design Report
	Use Opal data to monitor Metro usage associated with precinct activation approaches	**Objective on track**	Operational Commitment
Enable and promote active transport access and public transport usage	Each station to include safe and, where possible, weather protected access to bicycle parking and safeguard for future expansion	**Objective on track**	Architectural Drawings and reports
Deliver community benefits	Deliver at least 20 initiatives that benefit local communities and provide positive social outcomes during the Project's construction phase	**Objective on track**	QSR
	Deliver at least 20 initiatives that continue to benefit local communities and provide positive social outcomes beyond the Project's construction phase	**Objective on track**	QSR
	Ensure delivery of at least 5 per cent affordable housing at precincts with residential development	**This target is not applicable**	Not applicable

7.2.6 Respect the environment

Sustainability Principle #6: Minimise impacts and take opportunities to provide environmental improvements

Environmental impacts are primarily managed through the Project's Construction Environmental Management Framework (progress is reported in sections above). Targets to: Ensure environmental management plans are established and demonstrate works compliant with these plans; and Target zero major pollution incidents, are

on track on the SBT and SCAW projects. The sections above (Sections 6 and 7) provide detailed information on compliance during the reporting period.

During the reporting period the SBT and SCAW packages have neared completion and the SSTOM project has progressively taken over these sites.

Biodiversity conservation efforts are progressing with Sydney Metro to commence corridor restoration works in the next reporting period. 53% of precinct areas are projected to have tree canopy cover in the SSTOM design. Further, station and plaza landscaping has been designed with a high percentage of Australian native species, with a minimum of 73% native species across all locations.

The development of corridor restoration works is ongoing, but the corridor landscaping approach is aspiring to 100% use of Australian native species, with a priority of species within the Cumberland Plain Woodland. Landscape design is being developed by ecological restoration specialists with experience in the restoration of Cumberland Plain Woodlands. The corridor restorations works will also use seed collected from the project footprint during the previous reporting period, amounting to 24kg of seed available to use.

Table 22: Environmental Protection Objectives and Targets

Objective	Target	Measurement	Evidence
Provide and promote green infrastructure and biodiversity	Demonstrate a minimum 5 per cent improvement in ecological value in the corridor area	**Objective on track**	Ecological and Biodiversity Assessment and Management Plan
	Target at least 25 per cent tree canopy cover in precinct areas, and aspire to 40 per canopy cover across the project area*	**Objective on track**	Sustainable Design Report
	At least 50 per cent of station and plaza landscaping to use Australian native species*	**Objective on track**	Sustainable Design Report
	At least 90 per cent and aspiring to 100 per cent of corridor landscaping to use Australian native species, prioritising endemic plants to preserve Cumberland Plains identity in the Western Sydney region	**Objective on track.**	Corridor Landscape Strategy
	Integrate water sensitive urban design solutions, including the provision of vegetated swales where feasible and at least 40 per cent surface area around stations and corridor (excluding track) to be permeable	**Objective on track**	QSR
Minimise environmental impact	Ensure environmental management plans are established, and demonstrate works compliant with these plans	**Refer to section 4 - Environmental Aspects**	
	Target zero major pollution incidents	**Refer to section 5.1 - Incidents**	

8. Community Communications Strategy

8.1 Overarching Community Communication Strategy

Sydney Metro – Western Sydney Airport prepared the Overarching Community Communication Strategy (OCCS) to guide Sydney Metro's approach to stakeholder and community liaison including engagement with communities, stakeholders, and businesses. The OCCS has been used as a framework for community engagement across all Sydney Metro projects and contracts and is accessible on our Sydney Metro website.

Contract specific Community Communications Plans (CCP) are also developed by appointed (project delivery communication teams) to address contract and site-specific needs of the community, stakeholders and businesses.

The OCCS and CCPs are supported by a Construction Complaints Management System (CCMS) which outlines the framework for managing complaints, enquiries and escalation processes throughout the project lifecycle. The CCMS also outlines the process for reporting complaints.

8.2 Communication activities

Sydney Metro – Western Sydney Airport project maintains an open line of communication between the project and its stakeholders via:

- A 24-hour 1800 number
- A postal address
- Sydney Metro website
- Sydney Metro email.

Our stakeholders are regularly kept informed through several mediums including:

- **Quarterly community newsletter** - Distributed by mail, email and saved on the Sydney Metro website.
- **Monthly community notifications** - Distributed by mail, email and saved on the Sydney Metro website.
- **Community events-** alerts from Sydney Metro connect app and posted on our Sydney Metro website.

During this reporting period, the Communications Team transition from all three contractors to providing the community with a joint notification of works. This has saved community members receiving 3 notifications per station each month.

The SM-WSA Communications team undertook 54 community engagement activities across the Sydney Metro – Western Sydney Airport alignment from September 2023 to September 2024 and interacted with over 10,300 community members.

8.2 Complaints resolution

As outlined in our OCCS, CCS, our process for dealing with complaints is to provide an initial response to the stakeholder within two hours. The complaint is then investigated by the responsible contractor and corrective actions put in place where applicable. The stakeholder is informed about the outcomes of the investigation and mitigation methods implemented.

In the reporting period of September 2023 to September 2024, the project received no direct complaints related to the SM-WSA project on Airport Land. In the previous reporting period, we received five complaints.

The Sydney Metro – Western Sydney Airport Communications Team utilises Consultation Manager software to register and track all stakeholder interactions and generate reports that are sent to relevant teams. Regular reporting is conducted weekly and monthly.

Appendices

Appendix 1: Airport Plan Conditions of Approval compliance table

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6	**Rail Conditions**		
3.11.6.37	**Rail Preparatory Activities**		
3.11.6.37.1	If an Approver determines that an activity for the Rail Development is a Preparatory Activity for paragraph (e) of the definition of 'Preparatory Activities', the Approver may require the Rail Authority to prepare and submit for approval a plan in relation to the carrying out of that Preparatory Activity.	All SM-WSA Approved Plans for Construction – Construction (Rail) Plan, CEMP's were approved prior to main works commencing as such Preparatory Activities have only been undertaken within WSA Stage 2 locations. These have been approved by WSA and are consistent with project approvals and requirements	Compliant
3.11.6.37.2	In carrying out a Preparatory Activity for the Rail Development, the Rail Authority must:		
3.11.6.37.2a	(a) implement any plan approved in accordance with subcondition (1), except to the extent that the plan is inconsistent with any subsequently approved Rail CEMP or the approved Construction (Rail) Plan; and	All preparatory activities carried out on SM-WSA in WSA Stage 2 locations have been consistent with SM-WSA Approved Plans and WSA Approved Plans.	Compliant
3.11.6.37.2b	(b) not act inconsistently with any approved Rail CEMP or the approved Construction (Rail) Plan. *Note: Preparatory Activities can generally commence before all Rail CEMPs are approved. If a Rail CEMP has been approved, however, Preparatory Activities must not be carried out inconsistently with the approved Rail CEMP.*	All preparatory activities completed following approval of the CEMPs and Construction Plan on SM-WSA in WSA Stage 2 locations were not undertaken inconsistently with the Approved Plans.	Compliant
3.11.6.38	**Construction (Rail) Plan**		
3.11.6.38.1	The Rail Authority must not commence Rail Construction Works until a Construction (Rail) Plan for the Airport Site and Associated Sites has been prepared and approved in accordance with this condition.	Main Construction did not occur prior to the approval of the Construction Plan on SM-WSA. Construction (Rail) Plan Rev 4 approved 10/03/22, Rev 5 approved 14/08/23 and remains available at: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20CRP%20Rev%2005.pdf	Compliant

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.38.2	The Rail Authority must:		
3.11.6.38.2a	a) prepare; and	Construction (Rail) Plan prepared and approved in accordance with the requirements of the Airport Plan. This is addressed throughout the Construction (Rail) Plan.	Compliant
3.11.6.38.2b	b) submit to an Approver for approval; a Construction (Rail) Plan in relation to the carrying out of the Rail Development.	Construction (Rail) Plan Rev 4 approved 10/03/22, Rev 5 submitted to the Approver on 13/07/23 and approved 14/08/23 and most current Construction (Rail) Plan available at: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20CRP%20Rev%2005.pdf	Compliant
3.11.6.38.3	The criteria for approval of the Construction (Rail) Plan are that an Approver is satisfied that the Construction (Rail) Plan:	Provided to SM-WSA in Approvals letter within Construction (Rail) Plan Rev 5 approved 14/08/23 and available at: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20CRP%20Rev%2005.pdf	Compliant
3.11.6.38.3a	(a) sets out: (i) the program and timetable for carrying out the Rail Development; (ii) details of the construction methodology to be used for carrying out the Rail Development; (iii) details, not inconsistent with the Land Use Plan in Part 2 of the Airport Plan, of the size and location of the parts of the Airport Site or an Associated Site on which Rail Construction Works are planned to occur; and (iv) measures to avoid or minimise, to the extent possible, impacts on parts of the Airport Site that have important biodiversity values that are outside of the Construction Impact Zone and Rail Construction Impact Zone;	Construction (Rail) Plan Section 4 Construction methods sets out the program for SM-WSA works. Construction (Rail) Plan Section 10 addresses Compliance with the Land Use Plan inclusive of Land Use Categories, BD2 Business Development (Reservation) and AD4 Aviation Reservation. Vegetation clearing for SM-WSA is defined in Section 8.2 of the Construction (Rail) Plan and denotes no other clearing is permissible on Airport. No go zones and project boundary fencing have been maintained and ensure biodiversity values are retained.	Compliant
3.11.6.38.3b	(b) is consistent with the Construction Plan; and	Stakeholder review undertaken with WSA to ensure consistency with WSA Construction Plan on 11/07/23 and endorsement provided to SM-WSA.	Compliant

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.38.3c	(c) is otherwise appropriate.	Construction (Rail) Plan Rev 4 approved 10/03/22, Rev 5 submitted to the Approver on 13/07/23 and received approval 14/08/23.	Compliant
3.11.6.38.5	The approved Construction (Rail) Plan may provide for Rail Construction Works to be carried out in phases that commence at different times for different parts of the Airport Site or an Associated Site. If it does, the Rail Authority may prepare a CEMP in relation to one or more phases, and the criteria for approval of such a CEMP are taken to exclude any matter irrelevant to the phases for which approval is sought. A variation to a CEMP must be submitted for approval in accordance with condition 49 (Variation of Approved Plans), prior to commencement of any new phase.	Construction (Rail) Plan Section 4 Construction methods sets out the program for SM-WSA works. Within the reporting period, variation to a CEMP was submitted for approval in accordance with condition 49 (Variation of Approved Plans) on 13/07/23, prior to commencement of any new phase.	Compliant
3.11.6.39	**Rail Construction Environmental Management Plans**		
3.11.6.39.1	The Rail Authority must not:		
3.11.6.39.1a	a) commence Rail Construction Works until each and all of the CEMPs specified in paragraph (2) have been prepared and approved in accordance with this condition; or	All Rail Rev 5 CEMP's were submitted to the Approver on 21/02/22 and approved 10/02/22, All Rail Rev 6 CEMP's were submitted to the Approver on 13/07/23 and approved 10/02/23, which are currently in use across all scopes of on Airport works.	Compliant
3.11.6.39.1b	(b) carry out any Rail Development inconsistently with any of the approved Rail CEMPs.	All Construction works approved under the Rail Development have been carried out in accordance with the Approved Rail CEMP's. These have been provided to all Main Works Contractors and reflected in their On Airport Compliance Reports.	Compliant
3.11.6.39.2	The Rail Authority must prepare and submit to an Approver for approval;	All Rail Rev 5 CEMP's were submitted to the Approver on 21/02/22 and approved 10/02/22, All Rail Rev 6 CEMP's were submitted to the Approver on 13/07/23 and approved 10/02/23.	Compliant
3.11.6.39.2a	(a) a Noise and Vibration CEMP;	Noise and Vibration CEMP Rev 5 approved 10/03/22. Noise and Vibration CEMP Rev 6 approved 14 August 2023 and is available on the SM-WSA website at the following location:	Compliant

Approval Condition ID	Condition	Compliance Details	Compliance Status
		https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20NVMP%20Rev%2006.pdf	
3.11.6.39.2b	(b) a Biodiversity CEMP;	Biodiversity CEMP Rev 5 approved 19/04/22. Noise and Vibration CEMP Rev 6 approved 14 August 2023 and is available on the SM-WSA website at the following location: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20BMP%20Rev%2006.pdf	Compliant
3.11.6.39.2c	(c) a Soil and Water CEMP;	Soil and Water CEMP Rev 5 approved 10/03/22. Soil and Water CEMP Rev 6 approved 14 August 2023 and is available on the SM-WSA website at the following location: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20SWMP%20Rev%2006.pdf	Compliant
3.11.6.39.2d	(d) a Traffic and Access CEMP;	Traffic and Access CEMP Rev 5 approved 10/03/22. Traffic and Access CEMP Rev 6 approved 14 August 2023 and is available on the SM-WSA website at the following location: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On-Airport%29%20-%20TAMP%20Rev%2006.pdf	Compliant
3.11.6.39.2e	(e) an Air Quality CEMP;	Air Quality CEMP Rev 5 approved 10/03/22. Air Quality CEMP Rev 6 approved 14 August 2023 and is available on the SM-WSA website at the following location: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20AQMP%20Rev%2006.pdf	Compliant
3.11.6.39.2f	(f) an Aboriginal Cultural Heritage CEMP;	Aboriginal Cultural Heritage CEMP Rev 5 approved 10/03/22. Aboriginal Cultural Heritage CEMP Rev 6 approved 14 August 2023 and is available on the SM-WSA website at the following location: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20ACHMP%20Rev%2006.pdf	Compliant
3.11.6.39.2g	(g) a European and Other Heritage CEMP;	European and Other Heritage CEMP Rev 5 approved 10/03/22.	Compliant

Approval Condition ID	Condition	Compliance Details	Compliance Status
		European and Other Heritage CEMP Rev 6 approved 14 August 2023 and is available on the SM-WSA website at the following location: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20EOHMP%20Rev%2006.pdf	
3.11.6.39.2h	(h) a Waste and Resources CEMP; and	Waste and Resources CEMP Rev 5 approved 10/03/22. Waste and Resources CEMP Rev 6 approved 14 August 2023 and is available on the SM-WSA website at the following location: chhttps://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20WRMP%20Rev%2006.pdf	Compliant
3.11.6.39.2i	(i) a Visual and Landscape CEMP in relation to the carrying out of the Rail Development.	Visual and Landscape CEMP Rev 5 approved 10/03/22. Visual and Landscape CEMP Rev 6 approved 14 August 2023 and is available on the SM-WSA website at the following location: https://www.sydneymetro.info/sites/default/files/2023-08/SM-WSA%20%28On%20-%20Airport%29%20-%20VLMP%20Rev%2006.pdf	Compliant
3.11.6.39.3	The criteria for approval of each of the Rail CEMPs are that an Approver is satisfied that:		
3.11.6.39.3a	(a) the CEMP complies with the mitigation measures and other requirements set out in Table 8-1 and Table 8-3 of the EIA which are relevant to that CEMP;	Table 4-4 and Table 7-1 of the WR CEMP details how Table 8-1 and Table 8-3 of the EIA has been taken into account. Table 4-4 and Table 7-1 of the AQ CEMP details how Table 8-1 and Table 8-3 of the EIA has been taken into account. Table 4-4 and Table 7-1 of the ACH CEMP details how Table 8-1 and Table 8-3 of the EIA has been taken into account. Table 4-6 and Table 7-1 of the BIO CEMP details how Table 8-1 and Table 8-3 of the EIA has been taken into account. Table 4-4 and Table 7-1 of the EOH CEMP details how Table 8-1 and Table 8-3 of the EIA has been taken into account. Table 4-5 and Table 9-1 of the NV CEMP details how Table 8-1 and Table 8-3 of the EIA has been taken into account. Table 4-5 and Table 7-1 of the SW CEMP details how Table 8-1 and Table 8-3 of the EIA has been taken into account.	Compliant

Approval Condition ID	Condition	Compliance Details	Compliance Status
		Table 4-4 and Table 7-1 of the VL CEMP details how Table 8-1 and Table 8-3 of the EIA has been taken into account. Table 4-5 and Table 7-1 of the VL CEMP details how Table 8-1 and Table 8-3 of the EIA has been taken into account.	
3.11.6.39.3b	(b) the Rail Authority, in preparing the CEMP has taken into account any performance outcomes specified in Table 8-2 of the EIA which are relevant to that CEMP; and	Section 7 of the WR CEMP details how Table 8-2 of the EIA has been taken into account. Section 7 of the AQ CEMP details how Table 8-2 of the EIA has been taken into account. Section 7 of the ACH CEMP details how Table 8-2 of the EIA has been taken into account. Section 7 of the BIO CEMP details how Table 8-2 of the EIA has been taken into account. Section 7 of the EOH CEMP details how Table 8-2 of the EIA has been taken into account. Section 9 of the NV CEMP details how Table 8-2 of the EIA has been taken into account. Section 7 of the SW CEMP details how Table 8-2 of the EIA has been taken into account. Section 7 of the VL CEMP details how Table 8-2 of the EIA has been taken into account. Section 7 of the VL CEMP details how Table 8-2 of the EIA has been taken into account	Compliant
3.11.6.39.3c	(c) the CEMP is otherwise appropriate.	All Rev 5 CEMPs reviewed by WSA and approved by an Approver 10/03/22, Rev 5 reviewed by WSA on 11/07/23, endorsed and submitted to the Approver on 13/07/23, receiving approval 14/08/23.	Compliant
3.11.6.39.4	The Rail Authority must ensure that:		
3.11.6.39.4a	(a) a Rail CEMP is to the extent possible, consistent with a CEMP of the Site Occupier; and	All SM-WSA CEMP's were developed noting the requirement for consistency with the WSA CEMP. All CEMP's have been reviewed in line with this requirement and is demonstrated throughout all SM-WSA CEMP's	Compliant
3.11.6.39.4b	(b) no Rail CEMP is inconsistent with the approved Construction (Rail) Plan.	The project details and scope of works of each CEMP references the Construction (Rail) Plan and is referenced in each CEMP.	Compliant
3.11.6.40	**Rail Community Communications Strategy**		
3.11.6.40.1	The Rail Authority must not:		

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.40.1a	(a) commence Rail Construction Works until a Community Communications Strategy has been prepared and approved in accordance with this condition; or	Overarching Community Communications Strategy (OCCS)- https://www.sydneymetro.info/media/document/35761	Compliant
3.11.6.40.1b	(b) carry out any Rail Development inconsistently with the approved Community Communications Strategy.	Overarching Community Communications Strategy (OCCS)- https://www.sydneymetro.info/media/document/35761	Compliant
3.11.6.40.2	The Rail Authority must:		
3.11.6.40.2a	(a) prepare; and	Overarching Community Communications Strategy (OCCS) Rev 2.2 was submitted to the Approver on 3/02/22 and approved 22/04/22. Overarching Community Communications Strategy (OCCS) Rev 4 was submitted to the Approver on 22/01/24 and approved 11/04/2024. - https://www.sydneymetro.info/media/document/35761	Compliant
3.11.6.40.2b	(b) submit to an Approver for approval; a Community Communications Strategy in relation to the construction of the Rail Development.	OCCS final version 4 was reviewed and approved 11/04/2024.	Compliant
3.11.6.40.3	The criteria for approval of the Community Communications Strategy are that an Approver is satisfied that the Community Communications Strategy:	-	-
3.11.6.40.3a	(a) identifies relevant communities, individuals or organisations to be consulted during construction;	Community demographics Sydney Metro uses area demographics and census data to better understand the communities in which we operate. The information we gather ensures we provide accessible information to people from all backgrounds including: • people with languages other than English (LOTE) • culturally and linguistically diverse communities (CALD) • vulnerable and marginalised groups • Aboriginal and Torres Strait Islander Communities (ATSI) • diverse communities	Compliant

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.40.3b	(b) identifies procedures for the regular distribution of information;	• Newsletters • Sydney Metro direct mail email updates • Construction email updates • Fact sheets • Photography and videography • Information videos • Site signage and hoarding banners • CALD Newsletters and fact sheets	Compliant
3.11.6.40.3c	(c) identifies procedures for the community to provide feedback and to resolve issues	• Community information line • Community email address • Community post box • CALD Translation services	Compliant
3.11.6.40.3d	(d) is otherwise appropriate	Overarching Community Communications Strategy (OCCS) Rev 2.2 was submitted to the Approver on 3/02/22 and approved 22/04/22. Overarching Community Communications Strategy (OCCS) Rev 4 was submitted to the Approver on 22/01/24 and approved 11/04/2024.	Compliant
3.11.6.40.4	The Rail Authority must write a statement to the Approver specifying that the Rail Authority is satisfied that the Community Communications Strategy complies with the requirements set out in subcondition (3) every 12 months after the Community Communications Strategy is approved.	A statement was provided by the Rail Authority to the Approver confirming the OCCS complied with subcondition (3) on 22/01/2024.	Compliant
3.11.6.40.5	When a statement under subcondition (4) is provided to the Approver, the Rail Authority must also provide the Approver a mark-up of all variations to the Community Communications Strategy in the past 12 months.	A marked-up Revision 4 of the OCCS was provided to the Approver for approval in line with 3.11.6.40.4 for the reporting period on 22/01/24.	Compliant
3.11.6.40.6	This condition ceases to have effect 12 months after the end of the Rail Construction Period.	-	Not Triggered

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.41	**Rail Sustainability Plan**		
3.11.6.41.1	The Rail Authority must not:		
3.11.6.41.1a	(a) commence Rail Construction Works until a Sustainability Plan has been prepared and approved in accordance with this condition; or	Sydney Metro has prepared a linewide Sustainability Plan which was submitted to the Approver on 17/01/2022 and approved on 21/04/2022 for use on Airport. The SBT, SCAW and SSTOM projects have each prepared a Sustainability Management Plan that aligns with the objectives and targets set out in the WSA Sustainability Plan.	Compliant
3.11.6.41.1b	(b) carry out any Rail Development inconsistently with the Approved Sustainability Plan.	Compliance with the Sustainability Plan and Sustainability Management Plans is monitored and reported on. In addition, internal and external audits are undertaken to assess compliance and identify opportunities for improvement.	Compliant
3.11.6.41.2	The Rail Authority must:		
3.11.6.41.2a	(a) prepare; and	The SM-WSA Sustainability Plan was prepared and submitted to the Approver on 17/01/2022.	Compliant
3.11.6.41.2b	(b) submit to an Approver for approval; a Sustainability Plan in relation to the construction of the Rail Development.	The SM-WSA Sustainability Plan was prepared and submitted to the Approver on 17/01/2022 and approved on 21/04/2022 and can be located at: https://www.sydneymetro.info/sites/default/files/2022-02/SMWSA-Sustainability-Plan.pdf	Compliant
3.11.6.41.3	The criteria for approval of the Sustainability Plan are that an Approver is satisfied that the Sustainability Plan complies with the requirements in section 8.2.4, Table 8-2 and Table 8-3 of the EIA, and is otherwise appropriate.	The SM-WSA Sustainability Plan has been reviewed and approved by the department in accordance with the project's environmental approvals process and is consistent with SM-WSA EIA requirements.	Compliant
3.11.6.42	**Cumulative Impacts Plan**		

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.42.1	The Rail Authority must not commence Rail Construction Works until a Cumulative Impacts Plan has been approved in accordance with this condition.	WSA have provided an approved Cumulative Impacts Plan Rev J approved 19/04/2022 to SM-WSA and can be located at: https://wsiairport.com.au/sites/default/files/2022-07/WSA_Cumulative%20Impacts%20Plan.pdf	Compliant
3.11.6.42.2	The ALC must:		
3.11.6.42.2a	(a) prepare; and	ALC Deliverable	-
3.11.6.42.2b	(b) submit to an Approver for approval; a Cumulative Impacts Plan in relation to cumulative impacts arising from the concurrent construction of the Airport Stage 1 Development and the Rail Development.	ALC Deliverable	-
3.11.6.42.3	The criteria for approval of the Cumulative Impacts Plan are that an Approver is satisfied that the Cumulative Impacts Plan:	ALC Deliverable	-
3.11.6.42.3a	(a) sets out: (i) co-ordination and consultation requirements between the following stakeholders as relevant to manage the interface of projects under construction at the same time: the ALC, the Rail Authority, Transport for NSW, Western Parkland City Authority, Sydney Water, emergency service providers and utility providers; (ii) the responsibility for management of the impacts set out in the Cumulative Impacts Plan; (iii) the relevant environmental management framework relating to construction of the Airport Stage 1 Development and the Rail Development; and (iv) the process for proactively identifying and managing cumulative impacts;	ALC Deliverable	-
3.11.6.42.3b	(b) has been prepared in consultation with the Rail Authority; and	Consultation with SM-WSA was undertaken during development of the Cumulative Impacts Plan and remains ongoing.	Compliant

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.42.3c	(c) is otherwise appropriate.	Consultation with SM-WSA was undertaken during development of the Cumulative Impacts Plan and remains ongoing. Cumulative Impacts Plan Rev J was approved by the Approver on 19 April 2022.	Compliant
3.11.6.42.4	Each of the Rail Authority and the ALC must not act inconsistently with the approved Cumulative Impacts Plan.	All Approved CEMP's detail requirements of the Cumulative Impacts Plan including the Construction (Rail) Plan.	Compliant
3.11.6.43	**Rail Biodiversity Offsets**		
3.11.6.43.1	The Rail Authority must not commence Rail Development until the Staging Report has been submitted in accordance with subconditions (3) and (4), and the Rail Biodiversity Offset Strategy has been approved in accordance with subconditions (5), (6) and (7).	The Biodiversity Staging Report and Biodiversity Offset Strategy was submitted on 3/11/21 for on-airport lands and was approved with no further comments on 3/12/21.	Compliant
3.11.6.43.2	Clearing of plant community types, threatened ecological communities, or threatened species must not exceed the amounts specified in the Biodiversity Development Assessment Report at Appendix C of the EIA.	All vegetation clearing has been carried out in with the Rail Biodiversity Offset Strategy and has not exceeded the amounts specified in the Biodiversity Development Assessment Report at Appendix C of the EIA. This is addressed in Section 4.3 of this report.	Compliant
3.11.6.43.3	The Rail Authority must:		
3.11.6.43.3a	(a) prepare; and	Airport Biodiversity Staging Report was submitted to DAWE on 9/03/2022 and approved 29/03/2022.	Compliant
3.11.6.43.3b	(b) submit to an Approver for information; a Staging Report in relation to the construction of the Rail Development.	Airport Biodiversity Staging Report was submitted to DAWE 9/03/2022, approved 29/03/2022 and provided to Commonwealth for information.	Compliant
3.11.6.43.4	The Staging Report must set out:		
3.11.6.43.4a	(a) how the construction of the Rail Development will be staged, including details of vegetation clearing and other activities to be carried out in each stage;	Addressed in Section 3- Project Staging of the Airport Biodiversity Staging Report.	Compliant
3.11.6.43.4b	(b) mapping and delineation of the spatial location of each stage; and	Addressed in Section 3.4- Location of each biodiversity offset area of the Airport Biodiversity Staging Report.	Compliant

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.43.4c	(c) the general timing of when construction of each stage will commence and finish.	Addressed in Section 3.3- Indicative timing of the Airport Biodiversity Staging Report.	Compliant
3.11.6.43.5	The Rail Authority must:		
3.11.6.43.5a	(a) prepare; and	Biodiversity Offset Strategy for on-airport lands was submitted to DAWE on 9/03/2022.	Compliant
3.11.6.43.5b	(b) submit to an Approver for approval; a Rail Biodiversity Offset Strategy in relation to carrying out the Rail Development. a Rail Biodiversity Offset Strategy in relation to carrying out the Rail Development.	Biodiversity Offset Strategy for on-airport lands was submitted to DAWE on 9/03/2022 and approved by an Approver on 29/03/2022.	Compliant
3.11.6.43.6	The Rail Biodiversity Offset Strategy must:		
3.11.6.43.6a	(a) be prepared by a suitably qualified expert;	Biodiversity Offset Strategy for on-airport lands was prepared by a suitably qualified expert Consultant/ an accredited BAM assessor	Compliant
3.11.6.43.6b	(b) be based on and informed by a Biodiversity Development Assessment Report at Appendix C of the EIA; and	The Biodiversity Offset Strategy for on-airport lands has been prepared by an accredited BAM assessor (see Section 2.2.1) and is informed by the Revised BDAR which has been prepared in accordance with BAM (see BOS Section 1.2).	Compliant
3.11.6.43.6c	(c) prepared in accordance with the Biodiversity Assessment Methodology.	The Biodiversity Offset Strategy for on-airport lands has been prepared by an accredited BAM assessor (see Section 2.2.1) and is informed by the Revised BDAR which has been prepared in accordance with BAM (see BOS Section 1.2).	Compliant
3.11.6.43.7	The criteria for approval of the Rail Biodiversity Offset Strategy are that an Approver is satisfied the Rail Biodiversity Offset Strategy:	The biodiversity offset requirements are outlined in Section 4.1 of this Biodiversity Offset Strategy for on-airport lands.	Compliant
3.11.6.43.7a	(a) set outs: (i) the maximum number and class of biodiversity credits that may be required to offset the impacts of the Rail Development on biodiversity values, consistent with the quantum identified in the EIA and Biodiversity Development Assessment Report at Appendix C of the EIA;	Section 7 of the Biodiversity Offset Strategy for on-airport lands (BOS) outlines a process for review and revision of the BOS based on final design. Offsets required per construction stage/area are outlined in Section 5.2 of this BOS. The methods for satisfying the offset requirement are outlined in Section 5.1 of the BOS. The BOS is consistent with the offsetting strategy outlined in the Revised BDAR.	Compliant

Approval Condition ID	Condition	Compliance Details	Compliance Status
	(ii) a process for quantifying the impacts to biodiversity based on the final design of the Rail Development and quantifying the final number and class of biodiversity credits required to offset the impacts of Rail Development on biodiversity values; (iii) details of how the credit requirement related to each stage of construction defined in the Staging Report will be determined and reported; and (iv) how the offset requirement will be satisfied, including the timing to secure offsets in relation to each stage of construction defined the Staging Report; and	The BOS is consistent with the principles of the EPBC Act and the EPBC Act Environmental Offsets Policy 2012 (see Appendix A).	
3.11.6.43.7b	(b) is consistent with the offsetting strategy included in the Biodiversity Development Assessment Report at Appendix C of the EIA and the principles of the EPBC Act Environmental Offsets Policy.	Section 7 of the Biodiversity Offset Strategy for on-airport lands (BOS) outlines a process for review and revision of the BOS based on final design. Offsets required per construction stage/area are outlined in Section 5.2 of this BOS. The methods for satisfying the offset requirement are outlined in Section 5.1 of the BOS. The BOS is consistent with the offsetting strategy outlined in the Revised BDAR. The BOS is consistent with the principles of the EPBC Act and the EPBC Act Environmental Offsets Policy 2012 (see Appendix A).	Compliant
3.11.6.43.8	The Rail Authority must implement the approved Rail Biodiversity Offset Strategy.	The Biodiversity Offset Strategy has been implemented on SM-WSA and details of compliance are detailed within Section 4.3 of this Report.	Compliant
3.11.6.43.9	The Rail Authority must:		
3.11.6.43.9a	(a) prepare; and	Not relevant at this stage	Not triggered
3.11.6.43.9b	(b) submit to an Approver for information; a Completion Report in relation to the Rail Development no later than 6 months after the end of the Rail Construction Period, or by a later time agreed in writing by an Approver. a Completion Report in relation to the Rail Development no later than 6 months after the end of the Rail Construction Period, or by a later time agreed in writing by an Approver.	Not relevant at this stage	Not triggered
3.11.6.43.10	The Completion Report must set out:	Not relevant at this stage	Not triggered

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.43.10a	(a) shapefiles of the Rail Construction Impact Zone shown in the EIA and Biodiversity Development Assessment Report at Appendix C of the EIA with a comparison to the refined construction footprint;	Not relevant at this stage	Not triggered
3.11.6.43.10b	(b) final quantification of the biodiversity offset requirements, determined in accordance with subcondition (7)(a)(ii);	Not relevant at this stage	Not triggered
3.11.6.43.10c	(c) details of how the biodiversity offset requirements, determined in accordance with subcondition (7)(a)(iv), have been satisfied; and	Not relevant at this stage	Not triggered
3.11.6.43.10d	(d) evidence of the legal security mechanism used to secure an offset.	Not relevant at this stage	Not triggered
3.11.6.43.11	If the Approver believes on reasonable grounds that:	-	Not triggered
3.11.6.43.11a	(a) this condition has been contravened; and	-	Not triggered
3.11.6.43.11b	(b) a variation or a request from the Rail Authority for a specified variation (as the case may be) will address the contravention; the Approver may:	-	Not triggered
3.11.6.43.11c	(c) vary an approved Rail Biodiversity Offset Strategy; or	-	Not triggered
3.11.6.43.11d	(d) request in writing that the Rail Authority prepare and seek approval for a specified variation of an approved Rail Biodiversity Offset Strategy in accordance with condition 49.	-	Not triggered
3.11.6.44	**Rail Operational Environmental Management Plan**		
3.11.6.44.1	The Rail Authority must not:		

Approval Condition ID	Condition	Compliance Details	Compliance Status
3.11.6.44.1a	(a) commence Rail Operations until a Rail OEMP has been prepared in accordance with this condition; or	Not relevant at this stage	Not triggered
3.11.6.44.1b	(b) operate any development described in section 3.10 of Part 3 of the Airport Plan inconsistently with the Rail OEMP.	Not relevant at this stage	Not triggered
3.11.6.44.2	The Rail Authority must prepare a Rail OEMP in relation to the operation of the developments described in section 3.10 of Part 3 of the Airport Plan which addresses the relevant requirements in section 8.3, Table 8-1, Table 8-2 and Table 8-3 of the EIA and is otherwise appropriate.	Not relevant at this stage	Not triggered
3.11.6.44.3	In preparing a Rail OEMP under subcondition (2), the Rail Authority must consult with the ALC.	Not relevant at this stage	Not triggered