



Independent Environmental Audit Report 4 (IA4)

Sydney Metro

Sydney Metro Western Sydney Airport (SSI 10051)
Stations, Systems, Trains, Operations and Maintenance
(SSTOM)

Audit Date: 11 August 2025

Morasey Ref: MESYM: 2025105-03

Morasey Environment Pty Ltd

ABN: 17 637 707 647

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EXECUTIVE SUMMARY

This report presents the findings of the Independent Environmental Audit (IEA) conducted by Morasey Environment Pty Ltd for Sydney Metro Western Sydney Airport (WSA) - Stations, Systems, Trains, Operations and Maintenance (SSTOM). This audit is the 8th IEA conducted for the WSA project, and the 4th IEA conducted for SSTOM.

The temporal period covered by the audit is between the date of the 3rd SSTOM IEA on 6th February 2025 to the date of the site inspection for this IEA 4 (IA4) on 11th August 2025. The environmental performance of the project was assessed at the time of the site inspection.

The details of the Development are as follows:

Application Number:	SSI 10051
Applicant:	Sydney Metro
Consent Authority:	Minister for Planning and Public Spaces
Land:	Land in the suburbs of Oxley Park, North St Marys, St Marys, Werrington, Werrington County, Kingswood, Claremont Meadows, Caddens, St Clair, Erskine Park, Orchard Hills, Luddenham, Greendale, Badgerys Creek, Kemps Creek and Bringelly, in the City of Penrith and City of Liverpool local government areas.
Date of Consent:	23 July 2021
Description:	Development of the Sydney Metro Western Sydney Airport project comprising: • construction and operation of approximately 23 kilometres of railway track between the T1 Western Line rail line and the proposed Western Sydney Aerotropolis in Bringelly, • construction and operation of new stations and associated ancillary infrastructure at St Marys, Orchard Hills, Luddenham and the Aerotropolis Core precinct, • interchange links with the existing T1 Western Line rail line, • construction and operation of a train stabling and maintenance facility, including an operational control centre, • construction and operation of associated rail infrastructure facilities, • construction of tunnels, bridges, viaducts and associated works, • site preparation and enabling earthworks, including land remediation, • associated ancillary infrastructure and works.

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSI 10051 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan (CEMP) and Sub-plans. Specifically, this audit was required to satisfy Condition A36 of SSI 10051 which requires Independent Audits of the development to be carried out in accordance with the Independent Audit Post Approval Requirements (IAPARs) prepared by the NSW Department of Planning, Housing and Infrastructure (DPHI), dated May 2020.

This Audit has been conducted in accordance with the IAPARs, and AS/NZS ISO 19011:2014 – Guidelines for Auditing Management Systems. The IAPARs require Independent Audits to be conducted every 26 weeks during Construction, until which time the project becomes operational.

In summary, a total of **222 conditions** were assessed. **Five non-compliances** were identified, all of which had been self-reported by the Project during the audit period. **Four Observations** with recommendation for improvement were identified. Positive observations have been reported in **Section 4.7** of this audit report and in commentary documented throughout the audit.

There were no other matters considered relevant by the auditor.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of the Audit Scope. The level of implementation of these requirements on site was also observed as high.

The Auditor would like to thank the Auditees from Sydney Metro and the contractor, Parklife Metro for their organisation, cooperation and support during the audit.

Independent Environmental Audit Report 4

Sydney Metro

Western Sydney Airport

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

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1. INTRODUCTION

This report presents the findings of the Independent Environmental Audit (IEA) conducted by Morasey Environment Pty Ltd for Sydney Metro Western Sydney Airport (SM-WSA), Stations, Systems, Trains, Operations and Maintenance (SSTOM). This audit is the 8th IEA conducted for the SM-WSA project, and the 4th IEA conducted for SSTOM and has been conducted in accordance with the NSW Department of Planning, Housing and Infrastructure (DPHI) Independent Audit Post Approval Requirements, May 2020 (IAPARs).

The project was approved as State Significant Infrastructure (SSI 10051) on 23rd July 2021. Modification 1 (MOD 1) was approved on 14th April 2022, and MOD 2 was approved on 20th December 2024.

1.1 The Project

1.1.1 Overview

The SM-WSA project involves the construction and operation of a new 23 kilometre metro rail line between St Marys and the Western Sydney Aerotropolis, within the Penrith and Liverpool local government areas. The Metro will provide an interchange with the Sydney Trains network at St Marys. Refer to **Figure 1** for an overview of the SM-WSA Project.

The project includes tunnels between St Marys and Orchard Hills, and between Western Sydney International Airport and Aerotropolis Core, and surface and viaduct rail between Orchard Hills and Western Sydney Airport.

The project is a committed initiative identified in the Greater Sydney Region Plan: A Metropolis of Three Cities – connecting people (Greater Sydney Commission, 2018), Building Momentum: NSW State Infrastructure Strategy 2018-2038 (Infrastructure NSW, 2018) and Future Transport Strategy 2056 (TfNSW, 2018).

The SM-WSA Environmental Impact Statement (EIS) was prepared in October 2020, which assessed the impacts of the construction and operation of the Project. The Project EIS was placed on public exhibition for a period of six weeks from 21 October to 2 December 2020. The Project was declared Critical State Significant Infrastructure (CSSI) and is listed in Schedule 5 of *State Environmental Planning Policy (State and Regional Development)*.

The Stage of the SM-WSA Project that is the subject of this audit is Stations, Systems, Trains, Operations and Maintenance (SSTOM), and includes the following:

- Station design and fit-out, urban and landscape design, precinct and transport integration works
- Finishing works and testing and commissioning
- Operation of the Western Sydney Airport metro service (operation of SM-WSA will be managed by separate Operational Environmental Management Plan (OEMP) and Sub-plans).

An overview of the SSTOM project is presented in **Figure 2**.

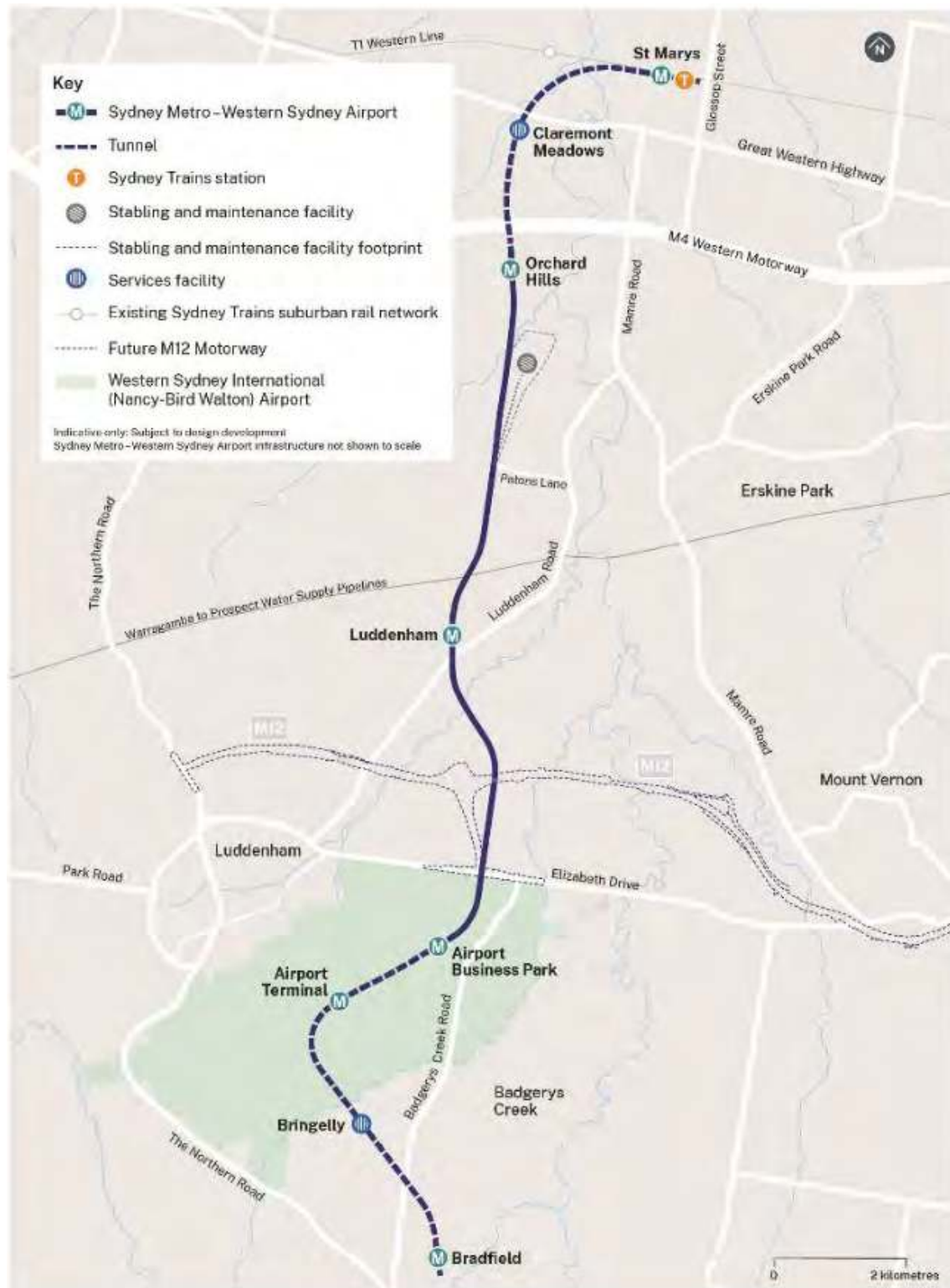


Figure 1: Key Features SM-WSA, Source: Parklife Metro CEMP, Rev02, 19/12/2024

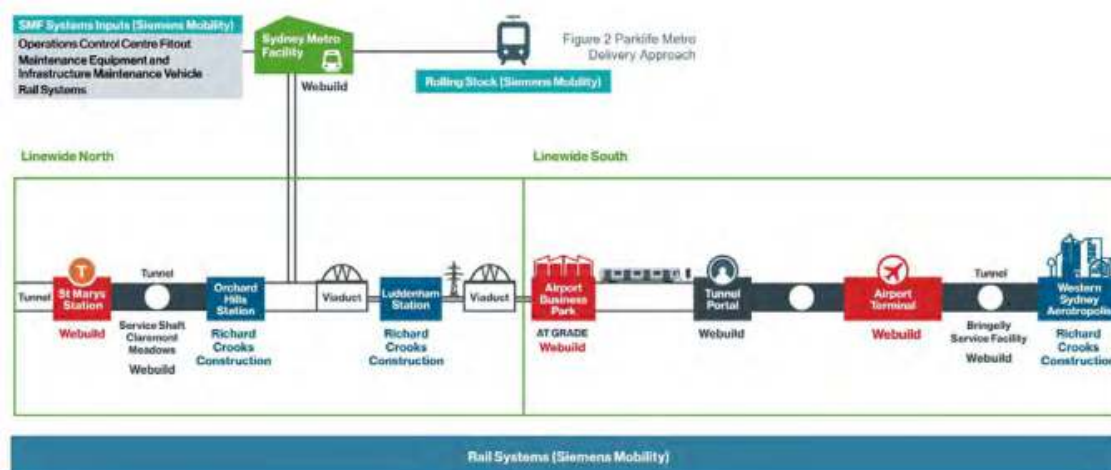


Figure 2: Overview of SSTOM Works, Source: Parklife Metro CEMP, Rev02, 19/12/2024

1.1.2 Planning Approval

Details of the project are as follows:

Application Number:	SSI 10051
Applicant:	Sydney Metro
Consent Authority:	Minister for Planning and Public Spaces
Land:	Land in the suburbs of Oxley Park, North St Marys, St Marys, Werrington, Werrington County, Kingswood, Claremont Meadows, Caddens, St Clair, Erskine Park, Orchard Hills, Luddenham, Greendale, Badgerys Creek, Kemps Creek and Bringelly, in the City of Penrith and City of Liverpool local government areas.
Date of Consent:	23 July 2021

The SM-WSA Project was approved by the Minister for Planning and Public Spaces on 23 July 2021 (SSI 10051) under section 5.19 of the *Environmental Planning and Assessment Act 1997* (EP&A Act). Construction commenced in 2021 and is expected to be completed in 2026.

1.1.3 Changes to the Project

The following section describes any approved changes to the project since the time of the planning approval (SSI 10051), within the audit period.

a. Modifications

SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement.

SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends and amends **Condition E13** to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and **Condition E57** so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request.

b. Consistency Assessments

There were no Consistency Assessments (CA) for SSTOM determined by Sydney Metro during the audit period and has been considered during the audit period.

c. Environmental Reviews

There was one Environmental Review (ER) determined by Sydney Metro during the audit period and has been considered during the audit:

Environmental Review - ER005 was prepared to assess consistency with the EIS for revisions to the project boundary in two work locations within the M12 construction footprint:

- Area 1: At the M12 Elizabeth Drive offramp, just north of Construction Area K-PS1 and K-PS1a (SCAW Portion 3).
- Area 2: At Elizabeth Drive just north of Construction Area L-TA1 (SCAW Portion 5) and the Western Sydney Airport boundary.

The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 17th June 2025.

1.1.4 Project Staging

The SM-WSA Staging Report, Revision 11.0, October 2024 was prepared and structured to address the requirements of Conditions of Approval (CoA) A10 to A16 of the CSSI 10051 planning approval. The stages of the project comprise of:

- Advanced and Enabling Works (AEW)
- Station Boxes and Tunnelling (SBT)
- Surface and Civil Alignment Works (SCAW)
- Stations, Systems, Trains, Operations and Maintenance (SSTOM)

This audit is focussed on the last stage of works, SSTOM. The Principal Contractor for SSTOM is Parklife Metro (PLM). Appendix A of the Staging Report sets out the applicability of Conditions of Approval to each stage. The current version of the Staging Report (Revision 11.0) was utilised during this audit to inform applicable conditions to the audit stage.

1.1.5 Audit Period

The audit period is between the date of SSTOM Independent Audit 3 (IA3) on 6th February 2025 to the date of the site inspection for this Independent Audit 4 (IA4) on 11th August 2025. The status of site documentation was confined in time to between these dates. The environmental performance of the project was assessed at the time of the site inspection on 11th August 2025. The following activities were undertaken during the audit period:

St Mary's Station (STM):

- Station box wall and suspended slabs using Fiber Reinforced Polymer (FRP)
- Pre-cast beam and plank installation
- Hydro-demolition of concrete defects
- Corbel construction tie-in works
- Tunnel fit out (cable trays and brackets)

- Linewide deliveries to the tunnel.

Orchard Hills Station (OHE):

- Station box form reo pour (FRP)
- Concrete batch plant operations
- Delivery of construction materials to laydown areas
- Flash butt welding works
- Kent Road internal upgrade works
- Tunnel fit-out cable tray (MEP) and sleeper install works
- Concrete stockpiling in preparation for crushing for reuse as road base.

Luddenham Station (LUD):

- Detailed excavation and concrete works
- FRP above-ground works
- In-ground electrical conduit installation
- Site-won stockpiling
- Precinct works commenced.

Bradfield Station (BRD) (Formerly Aerotropolis Core AEC):

- Station box FRP
- Interface management ongoing with Western Parkland City Authority (WPCA) Contractor – WEM Civil
- Beam lifts and plank installation
- Construction of permanent car park
- Relocation of site offices was completed, and removal of old offices
- Construction of new water basin
- Removal of topsoil earth berm on eastern boundary to allow for geotechnically stable fill replacement

LINEWIDE

Stabling and Maintenance Facility (SMF):

- Earthworks scope for Stockpile PS-102 and the surface area of the SMF utility construction
- Sub-station construction ongoing; Transformer installation works
- Substation joint bay works/service installation on Patons Lane
- Delivery of materials
- Permanent drainage works and the construction of the permanent basin
- Combined service route (CSR) works
- Construction of the Maintenance and Administration (M&A) and Operations Control Centre (OCC) buildings ongoing (structural steel and roof installation commenced)
- Topsoil amelioration works

- Removal of temporary swales.

Claremont Meadows Services Facility (CMSF):

- Site establishment
- Ventilation systems: Two of four fans are operating. Noise levels are below predicted levels
- Tunnel fit-out works – rail in tunnel, sleepers being delivered via the shaft
- Delivery of sleepers to the site.

Bringelly Services Facility (BSF):

- Rear laydown complete. Topsoil stockpiles to have additional winter grass added
- Ventilation systems: two of four fans are operating. While noise levels are below predicted levels, PLM are investigating additional mitigation measures
- Track installation works. Rail in tunnels with sleepers being installed via the shaft
- New nest boxes have been installed as recommended by the AMBS Ecology and Heritage report
- Topsoil stockpiles have had additional winter grass hydroseeding added. Targeted weed spraying has occurred on the stockpiles.

Portion 1 (Lansdowne Rd to Patons Lane):

- Site establishment works complete
- Underground rail line crossing (ULX) piling works
- CSR works
- Sewerage service installation work
- Galvanised steel trough (GST) installation
- Crane pad construction completed
- Track construction works ongoing for standard hours and Out of Hours Works (OOHW) (EPL Community Agreement OOHW approved and commenced on 10/06).

Portion 3 (Luddenham Road to M12):

- SR works
- Sleeper installation
- Track slab defect rectification works
- Rail pulling and installation works complete
- Works on the viaduct, waterproofing heading north
- OOHW
- Weed management is ongoing, with significant dieback observed of the Sticky Night Shade.

Portion 4 (M12 to Elizabeth Drive):

- Rail welding ceased
- CSR/GST work on hold until rail site possession is completed
- Tree surveys for CSR trenching, pending survey for credit usage

- Rail sleeper installation
- Concrete Placement Unit (CPU) installation commenced.

Project wide:

- Weed spraying is ongoing across the alignment.
- Rail pulling into the Northern down tunnel is completed
- Rail pulling into the Southern down tunnel
- Tunnel fit out including cable trays/brackets, sleepers and concrete pours.
-

1.2 Audit Objectives

The objective of this Independent Audit is to satisfy SSI 10051 Condition A36, which states:

Independent Audits of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020)

The Independent Audit has been undertaken to meet the requirements of the Independent Audit Post Approval Requirements (IAPARs), which sets out the audit methodology and reporting requirements for the Independent Audit.

1.3 Audit Scope

The Independent Audit comprises of four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance, and Reporting. IA4 covers the period from 6th February 2025 to 11th August 2025 (the 'audit period').

The scope of the Independent Audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- An assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;

- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

The audit commenced with a site inspection on 11th August 2025 and pertains to post-approval requirements and compliance during Construction of the following stages:

- SSTOM (commencement of Construction, dated 8th August 2023).

1.4 Audit Team and Auditor Approval

In accordance with Condition of Approval (CoA) A36-A40 of SSI 10051, and Section 3.1 of the Independent Audit Post Approval Requirements (IAPAR), independent audits must only be undertaken by a suitably qualified, experienced and independent auditor; the appointment of the auditor agreed in writing by the Planning Secretary before each audit is commissioned.

Table 1 presents the audit team for SM-WSA SSTOM IA4.

Table 1: Audit Team

Name & Position	Company	Audit Role	Certification
██████ ██████	Morasey Environment Pty Ltd	Lead Auditor	Exemplar Global Certified, Principal Auditor, Environmental Management Systems Auditor, (Certificate No. 111000)
██████ ██████	Trigalana Environmental Pty Ltd	Alternate Auditor	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor, (Certificate No. 120416)

The Audit Team was approved by the Department of Planning, Housing and Infrastructure (the Department | DPHI) in correspondence dated 7th August 2025. The Department's Letter of Agreement to the Audit Team is included as **Attachment 2** and the Auditor's Declaration of independence is included as **Attachment 3**.

2. AUDIT METHODOLOGY

The Independent Audit was conducted in a manner consistent with below reference documents and evidence submitted for review during the audit:

- Independent Audit Post Approval Requirements (NSW DPIE, May 2020)
- ISO 14001: 2015 Environmental Management Systems
- AS/NZS ISO 19011:2019 – Guidelines for Auditing Management Systems

2.1 Audit Planning and Scope Development

The auditee organisations (together referred to as the Auditee/s or Project team) were identified as follows:

- **The Proponent:** Sydney Metro
- **The SSTOM Contractor:** ParkLife Metro (PLM).

Personnel representing the Auditees is identified in **Table 2** below. Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditees
- Confirm the DPHI approved audit team
- Confirm the audit objectives, scope, audit period and indicative audit program
- Consult with DPHI on the audit scope.

2.1.1 Agency Consultation

Section 3.2 of the IAPARs requires the auditor to “consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit”.

The NSW Department of Planning, Housing and Infrastructure (DPHI), NSW Environment Protection Authority (EPA), Penrith and Liverpool City Councils were consulted via email on 8th August 2025 to obtain input on the scope of the Independent Audit and confirm any key issues they would like examined, relating to post-approval requirements and compliance. DPHI responded on 27th August 2025 and did not require any additional issues or consultation to be included within the scope of the Independent Audit that is not already captured by SSI 10051.

A summary of the key issues and areas of focus raised by stakeholders during consultation is presented in **Table 2**.

Consultation is also discussed in **Section 4.6** and consultation records are presented in **Attachment 4**.

Table 2: Key issues and areas of focus raised during stakeholder consultation

Stakeholder	Key Issues	How Addressed including Section Reference
DPHI	Scope consultation correspondence was issued to DPHI on 8th August 2025. DPHI responded on 27th August 2025: <i>“NSW Planning does not require any additional issues or consultation to be included within the scope of the Independent Audit that is not already captured by SSI 10051, as modified, and the proposed scope you have listed below”.</i>	N/A
NSW EPA	Scope consultation correspondence issued to NSW EPA on 8th August 2025. EPA responded on 15th August 2025 as follows: <i>“An environment protection licence, No. 21807 (licence), is in force for activities being undertaken for the SSTOM project. A copy of the licence, associated notices and a list of non-compliances reported in the annual return is publicly available on the EPA’s POEO Public Register at Environment & Heritage PRPOEO The EPA has considered the scope of works you have provided and has identified the following key issues for consideration during the audit:</i> <i>• Conditions E92-E99 Soils and contamination—whether management of contamination identified at multiple locations has been consistent with requirements of the applicable Conditions of Approval.</i> <i>• Condition E128 Construction requirements, Erosion and sediment controls – whether the erosion and sediment controls have been/are being implemented and maintained before undertaking any work and during maintenance or construction activities consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).</i> <i>• Actual impacts compared to predicted impacts documented in the environmental impact assessment – impacts to surface waters”.</i>	Refer to Audit Table, Conditions E92-E99. Contamination issues were examined during the audit, including monitoring for the groundwater plume at St Marys Station, and for the unexpected finds of asbestos encountered during the audit period. No opportunities for improvement were raised. Refer to Audit Table, Condition E128 for findings in relation to erosion and sediment controls. Overall, ERSED risks had reduced since the previous independent audit, progressive ESCPs were being prepared and implemented, and there were no opportunities for improvement raised in relation to ERSED after the site inspection conducted on 11/9/2025. In relation to actual vs predicted surface water impacts, it is noted that a minor amendment to the Soil and Water Management Plan was approved by the ER during the audit period. The amendment was made after a review of the current surface water quality monitoring program and included changes to the number and location of surface water monitoring points to make the data obtained more meaningful and targeted. Refer to the Audit Table, Condition C14 for details.
Liverpool City Council	Scope consultation correspondence was issued to Liverpool City Council (LCC) on 8th August 2025. No response was received from LCC.	N/A
Penrith City Council	Scope consultation correspondence issued to Penrith City Council (PCC) on 8th August 2025. PCC responded on 22nd August 2025 raising	The CTMP for St Marys Station was updated to Rev3, dated 8/8/2025 during the IA4

Stakeholder	Key Issues	How Addressed including Section Reference
	matters associated with traffic management at Phillip Street, St Marys Station. Refer to Attachment 4 for a copy of consultation records.	audit period. Section 6.2 of the CTMP was added and describes issues identified with the Phillip Street / Access Road A Intersection Sightline, which was also raised during consultation for IA4 with Penrith City Council: <i>"In January 2025 in response to a potential road safety risk identified by a member of the community Parklife Metro JV installed regulatory signage on Phillip Street, St Marys prohibiting on street parking. The regulatory signage was installed without notification to Council or approval. The signage remains in place to this day without the necessary consultation being undertaken or approvals being received"</i>. In response to community-raised concerns about the sightline at the intersection of Access Road A and Phillip Street, a sightline assessment was undertaken. The assessment found that the installation of No Stopping parking restriction signage along the north side of Phillip Street will resolve the sightline concerns raised. Correspondence from PLM's Traffic Manager, dated 26/8/2025 states <i>"The updated CTMP has now been shared with Council informally, incorporating the technical assessment undertaken by our appointed traffic engineering consultant, which was previously shared with Council on 28 January 2025. Upon receipt of this formal commentary, we will make improvements to our internal processes to ensure any future traffic safety issues are resolved in a timely manner in consultation with Council."</i> Refer to the Audit Table, Condition E103 for formal observation and recommendation made in relation to the above.

The Auditor performed a document review, prepared an Audit Plan and prepared an Initial Request for Information (RFI), which were distributed to the Auditees in preparation for the Independent Audit.

2.2 Auditees

Table 3 identifies the Auditees and other personnel involved in the audit process.

Table 3: Auditees and key personnel

Organisation	Position	Name	Involvement
Sydney Metro	Environment Manager Western Sydney Airport Project Delivery	██████████	Opening meeting, Site inspection, Interviews & provision of evidence
Sydney Metro	A/Senior Manager – Environment Western Sydney Airport	██████████	Opening & Closing meetings, Interviews & provision of evidence
Sydney Metro	Environment Coordinator Western Sydney Airport Project Delivery	██████████	Opening & Closing meetings, Interviews & provision of evidence
Sydney Metro	Director Environment	██████████	Closing meeting
Sydney Metro	Director Project Environment, Sustainability & Planning Western Sydney Airport	██████████	Closing meeting
Sydney Metro	Environmental Manager Western Sydney Airport	██████████	Provision of evidence, Closing meeting
ParkLife Metro (PLM)	Environment Manager	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
PLM	Senior Environmental Advisor	██████████	Opening meetings, Site inspection, Interviews & provision of evidence
PLM	Environmental Advisor	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
PLM	Environmental Advisor	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
PLM	Environmental Coordinator	██████████	Opening meeting, Site inspection, Interviews & provision of evidence
PLM	Site Supervisor - Civil	██████████	Site inspection – Linewide Portion 1&4
PLM	Site Supervisor – Rail	██████████	Site inspection – Linewide Portion 1&4
PLM	Environmental Advisor	██████████	Site inspection – OHE
PLM	Site Supervisor	██████████	Site inspection – Claremont Meadows Service Facility
PLM	Site Supervisor	██████████	Site inspection – St Marys Station

Organisation	Position	Name	Involvement
HBI	Environmental Representative	[REDACTED]	Interview

2.3 Site Inspection and Meetings

The site inspection, opening and closing meetings were held with Project personnel as identified in **Table 3**. The site inspection was conducted on 11th August 2025 and covered the following areas:

- Linewide Portion 1
- Linewide Portion 4
- Orchard Hills Station
- Claremont Meadows Service Facility
- St Marys Station

NB: *The scope of the site inspection sites was approved by DPHI during consultation for IA4, with a focus agreed on the northern sites for the IA4 audit period (the southern sites were audited during the IA3 audit period).*

Site inspection photos, observations and notes are presented **Section 6**.

The opening meeting was held on site on 11th August 2025. During the opening meeting, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed.

A closing meeting was held remotely (via Teams) with Sydney Metro and PLM on 12th September 2025. At the closing meeting, preliminary audit findings were presented, including a summary of preliminary Non-compliances, Observations and Recommendations.

2.4 Interviews and verification of evidence

The Independent Audit included the review of publicly available and requested documents, records and registers to evaluate compliance. Interviews with key project personnel were conducted and further documentary evidence was also sought to verify responses provided by Auditees.

Refer to **Section 2.2** for details on the personnel interviewed. Audit interviews and verification of evidence sessions were conducted with the Auditees as follows:

- Environmental Representative: 22nd August 2025
- PLM & Sydney Metro: 15th August 2025.

In addition to the above, the Auditor requested further information, to obtain evidence that was not accessible on project websites or available during the audit interviews and document reviews/in past RFIs. These requests were provided promptly by the Auditees within required timeframes.

2.5 Generating audit findings

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

- Correspondence from DPHI and other stakeholders
- Records, documents and specialist reports
- Interviews with relevant personnel
- Figures, plans and photographs
- Site inspection
- Monitoring data and analysis.

Other applicable approvals, permits or Project-specific environmental requirements (as documented within the Audit Table in **Attachment 1**).

2.6 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR, as listed in **Table 4**, below:

Table 4: Compliance descriptors from Table 2 of the IAPAR

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

Observations and notes have also been made to provide context, and/or identify any opportunities for improvement. This includes positive observations where the project has applied initiatives beyond compliance requirements.

2.6.1 Evaluation of post audit approval documentation

The Auditor assessed whether post approval documents:

- were developed in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate
- have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

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

- there are any non-compliances resulting from the implementation of the document; or

- whether there are any opportunities for improvement.

2.6.2 Review

The Draft Independent Audit Report was distributed to the Auditees for review to ensure content is factual and representative. Audit findings have been determined independent of the Auditees, DPHI and any other parties, and based on the evidence assessed during the audit.

3. LIMITATIONS

The audit has been prepared in accordance with the associated proposal and Morasey's Terms and Conditions. This report is for the sole purposes of the Client. Except as required by law, no third party may use or rely on this Report unless otherwise agreed by Morasey in writing.

The site inspection component of the audit was limited to observable aspects that could be noted during a 'walk through' inspection of the construction site. Sampling or monitoring was not included in the scope of this audit. Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The matters raised in this report are only those which came to our attention during the course of performing our assessment and are not necessarily a comprehensive statement of all the weaknesses that may exist or improvements that might be made. Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of construction/operation and their responsibility to prevent and detect irregularities.

Recommendations and suggestions for improvement should be assessed by management for their full commercial impact before they are implemented. We have generally used and relied upon information supplied as being regarded as authoritative and reliable, but no warranty of completeness, accuracy, or reliability is given. The document review conducted during this assessment was limited to those documents and information supplied as part of the audit. The audit scope did not include the independent verification of these sources unless otherwise noted within the report. The scope of this audit does not extend to the verification of items assessed by the Certifier prior to issuing of a certificate for any stage. Morasey will not accept any liability for inaccurate conclusions if the information provided was incomplete, inaccurate, withheld, misrepresented or otherwise not fully disclosed.

To the best of Morasey's knowledge, the facts and matters described in this report reasonably represent the Client's intentions at the time of which Morasey issued the report to the Client. However, the passage of time, the manifestation of latent conditions or the impact of future events (including a change in applicable law) may have resulted in a variation of the report and its possible impact. Morasey will not be liable to update or revise the report to take into account any events or emergent circumstances or facts occurring or becoming apparent after the date of issue of the report.

This Report does not purport to give legal advice; legal advice can only be given by qualified legal practitioners. To the extent permitted by law, Morasey expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report (including without limitation matters arising from any negligent act or omission of Morasey). Morasey does not admit that any action, liability or claim may exist or be available to any third party.

4. AUDIT FINDINGS

The following sections provide a summary of the findings of the audit. The Audit Table is provided in **Attachment 1** and includes details of the evidence collected, observed and provided in support of compliance with the audit criteria. Evidence collected during the site inspection and interviews with personnel has also been included.

4.1 Approvals and documents audited, and evidence sighted

Key documentation reviewed during the audit is listed below. A more comprehensive list of documents and evidence sighted in relation to each Condition of Approval is detailed within the Audit Table (**Attachment 1**):

- ParkLife Metro SSTOM Construction Environment Management Plan (CEMP), Rev 02 19/12/2024
- ParkLife Metro SSTOM Air Quality Management Sub Plan (AQMP), Rev 02, 11/10/2024
- ParkLife Metro SSTOM Construction Traffic Management Plan (CTMP) Orchard Hills Station, Rev02, dated 11/6/2024
- ParkLife Metro SSTOM Construction Traffic Management Plan (CTMP) St Marys Station, Rev01, dated 3/4/2024
- ParkLife Metro SSTOM Flora and Fauna Management Sub Plan (FFMP), Rev 03, 12/12/2024
- ParkLife Metro SSTOM Noise and Vibration Management Sub-plan (NVMP), Rev 03, 12/12/2024
- ParkLife Metro SSTOM Non-Aboriginal Heritage Management Sub Plan (NAHMP), Rev 02.01, 12/12/2024
- ParkLife Metro SSTOM Soil and Water Management Sub Plan (SWMP), Rev 03, 12/12/2024
- ParkLife Metro SSTOM Visual Amenity Management Sub Plan (VAMP), Rev 01, 17/12/2024
- ParkLife Metro SSTOM Waste Management Sub Plan (WMP), Rev 02, 12/12/2024
- ParkLife Metro SSTOM - Noise and Vibration Construction Monitoring Report 3 Aug 2024-Jan 2025 Rev01, dated 10/4/2025
- ParkLife Metro SSTOM - Surface Water Construction Monitoring Report 1 August 2024 Rev01, dated 8/11/2024
- ParkLife Metro SSTOM Air Quality Construction Monitoring Report 1 August 2024 Rev01, dated 25/10/2024
- ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807
- ParkLife Metro SSTOM Small Business Owners Engagement Plan, St Marys, Rev0, dated 10/11/2023
- ParkLife Metro Project website: <https://parklifemetro.com.au/project/>
- SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills, Rev12, dated 20/6/2025
- SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Claremont Meadows, Rev01, 2/4/2025
- SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), St Marys, Rev07, dated 2/4/2024
- SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Linewide Portion 4, Rev01, dated 26/2/2025

- SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Linewide Portion 1, Rev04, dated 5/8/2025
- Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF Ver 2, 9/12/2024
- Sydney Metro Western Sydney Airport Environmental Impact Statement (WSA EIS), dated October 2020) (the EIS)
- Sydney Metro Western Sydney Airport Submissions Report, submitted April 2021
- Sydney Metro Western Sydney Airport Response to Submissions Report (RtS), dated December 2020
- Sydney Metro Western Sydney Airport Modification 1 – Biodiversity Credits (SSI-10051-MOD-1) Modification Assessment Report, DPHI 2022
- Sydney Metro Western Sydney Airport Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022
- Sydney Metro – Western Sydney Airport, SSI-10051, Request for Modification to Conditions E13 and E57, correspondence dated 12 August 2024
- Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024
- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 October 2024
- Sydney Metro Project website: <https://www.sydneymetro.info/documents>
- SM-WSA SSTOM Environmental Review - ER005 M12 Corridor Interface Work Areas and Water Utility Installation Rev 2.0 Final, dated 17/6/2025
- SM-WSA Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024
- SM-WSA SSTOM Complaints Report – Feb-August 2025
- SM-WSA Non-Aboriginal Archaeological Research Design, Artefact, April 2021
- SM-WSA Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024
- SM-WSA Out of Hours Work Protocol v2.0, dated 8/11/2021
- SM-WSA Sustainability Plan, January 2022
- SM-WSA Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024
- SM-WSA NSW (Off-airport) Wastewater Discharge Impact Assessment (WDIA), Station Boxes and Tunnelling Works (SBT), RevA.02, dated 17/11/2022
- Construction Worker Car Parking Strategy, St Marys Station Rev0, dated 1/12/2023
- Sydney Metro West (Stage 2) Tunnel Spoil Order, November 2022 (Resource Recovery Order under Part 9, Clause 93 of the POEO (Waste) Regulation 2014)
- Sydney Metro West (Stage 2) Tunnel Spoil Exemption, November 2022 (Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the POEO (Waste) Regulation 2014)
- SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/2022
- Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206, dated 5/12/2023 (St Marys Station)
- Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53823, dated 8/1/2025 (Claremont Meadows Service Facility).

4.2 Non-Compliances, Observations and Actions

This Section presents findings from the 4th Independent Audit (IA4). A summary of the number of conditions assessed and compliance status from IA4 is presented in **Table 5**. An overview of each finding and recommendation is presented in **Table 6**.

The Audit Table is provided in **Attachment 1** and includes details of the evidence collected, observed and provided support of compliance with the audit criteria.

Table 5: Summary of conditions assessed and compliance status

SSI 10051 Part	No. Conditions Assessed	Compliance Status			
		Compliant	Non-Compliant	Not Triggered	Observation
Part A	47	38	0	9	0
Part B	11	7	0	4	0
Part C	22	20	1	0	0
Part D	8	0	0	8	0
Part E	134	73	4	57	4
TOTAL	222	138	5	78	4

In summary, a total of **222 conditions** were assessed. **Five non-compliances** were identified, all of which had been self-reported by the Project during the audit period. **Four Observations** with recommendation for improvement were identified.

A summary of findings from IA4 has been presented in **Table 6**. Positive observations are discussed in **Section 4.7**.

Findings from the previous Independent Audit (IA3) were also reviewed. The Auditor was satisfied that all findings from IA3 were closed with adequate evidence presented in support of the findings.

The findings from the previous audit (IA3) are presented in **Table 7**.

Table 6: Summary of Compliance Status – IA4 (11 August 2025)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DATE & STATUS
SELF-REPORTED NON-COMPLIANCES					
IA4 – NC01	C10	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction.	NCR 010 (1/3/2025): Condition C10 (Flora & Fauna Management Plan - Mitigation measure FF_M7) & REMM LV2. The TPZ was not established which is a requirement of the Flora and Fauna Subplan. Notification of the NC to DPHI was on 16/3/2025 and not within the required 7-day timeframe. Refer also to Condition A44.	Nil	N/A CLOSED
IA4-NC02	E38	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 6:00pm Saturdays; and (c) at no time on Sundays or public holidays.	NCR 008 was raised against Condition E38 on 13/2/2025. Parklife Metro received a complaint on 13 February 2025 at 05:40 with regards to noise, truck movement and light spill. The issue was investigated and was identified that there was a miscommunication with timing between the Parklife Metro supervisor and DMT float driver. This resulted in a frontend loader driving onto the float and removed off site via Gate 1 onto Lansdowne Road, outside of standard construction hours and without an	Nil	N/A CLOSED

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DATE & STATUS
			approved OOH permit.		
IA4-NC03	E105	Local roads proposed to be used by Heavy Vehicles to directly access ancillary facilities / construction sites that are not identified in the documents listed in Condition A1 must be approved by the Planning Secretary and be included in the CTMP.	NCR 011 (31/3/2025): Condition E105. A Cono (PLM sub-contractor) dump truck was observed delivering materials to an Orchard Hills SSTOM site (Linewide North – Lansdowne to Patons Lane) via local roads that are not covered under an approved HVLR / CTMP. Notification of the NC to DPHI was on 4/4/2025, within the required 7-day timeframe. Refer also to Condition A44.	Nil	N/A CLOSED
IA4-NC04	E105		NCR 012 (15/7/2025): Condition E105 & E106. On 11/7/2025 at approximately 8:45am, a Boral agitator truck was observed on Lethbridge Street, St Marys delivering concrete to the St Marys Station site. Following an investigation, it was confirmed the concrete agitator utilised Chapel, Lethbridge and Station Streets which are not approved within the St Marys CTMP for HV haulage. Refer also to Condition A44.	Nil	N/A CLOSED
IA4-NC05	E121	The proponent must consult with WaterNSW regarding design, construction and operational management where the proposal	The construction methodology for viaduct concrete works over the Warragamba Pipeline that was agreed with WaterNSW was not	Nil	N/A CLOSED

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
		interacts with the Warragamba to Prospect Water Supply Pipeline, and ensure that proposed construction and operational agreements are consistent with the "Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines" and implement all practical measures to protect the Warragamba to Prospect Water Supply Pipelines infrastructure, or as otherwise agreed to by WaterNSW.	followed when a concrete boom delivering concrete to the viaduct entered the 'no slew zone'. Refer also to Condition A44.		
OBSERVATIONS					
IA4 – OBS 1	E103	Construction Traffic Management Plans (CTMPs) must be prepared in accordance with the Construction Traffic Management Framework. A copy of the CTMPs must be submitted to the Planning Secretary for information before the commencement of any construction in the area identified and managed within the relevant CTMP.	Penrith City Council provided feedback to audit consultation indicating inadequate consultation had been undertaken by PLM in relation to traffic safety measures on the corner of Phillip Street and Access Road A. Upon examination of all evidence the auditor agrees that communication channels in relation to traffic management and consultation with PCC should be improved.	Devise and implement improvements to PLM internal processes to ensure any future traffic safety issues are resolved in a timely manner in consultation with Council, including obtaining approval for the erection of No Stopping signage on Council roads.	Responsible Person: PLM Project Manager Due Date: Prior to IA5 Status: OPEN
IA4 – OBS 2	E107	Before any local road is used by a Heavy Vehicle for the purposes of construction of the CSSI, a Road Dilapidation Report must be prepared for the road. A copy of the Road Dilapidation Report must be	The Land Surveys Orchard Hills Road Condition Report, dated 21/3/2025 was submitted to PCC on 26/5/25, more than 3 weeks after the survey was completed.	Nil	N/A

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
		provided to the Relevant Road Authority(s) within three (3) weeks of completion of the survey and at no later than one (1) month before the road being used by Heavy Vehicles associated with the construction of the CSSI.			
IA4 – OBS 3	E133	Make good provisions for groundwater users must be provided in the event of a material decline in water supply levels, quality or quantity from registered existing bores associated with groundwater changes from either construction and/or ongoing operational dewatering caused by the CSSI.	A reference to compliance with Condition E133 could not be found in Groundwater the CMRs.	Consider including reference to Condition E133 in the next Groundwater CMR.	Responsible Person: PLM Project Manager Due Date: Prior to IA5 Status: OPEN
IA4 – OBS 4	E134	The Proponent must submit a revised Groundwater Modelling Report to the Planning Secretary for information before bulk excavation at the relevant construction location. The Groundwater Modelling Report must include: (a) for each construction site where excavation will be undertaken, cumulative (additive) impacts from nearby developments, parallel transport projects and nearby excavation associated with the CSSI; (b) predicted incidental	A reference to compliance with Condition E134 could not be found in Groundwater the CMRs.	Consider including reference to Condition E134 in the next Groundwater CMR.	Responsible Person: PLM Project Manager Due Date: Prior to IA5 Status: OPEN

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DATE & STATUS
		groundwater take (dewatering) including cumulative project effects; (c) potential impacts of the CSSI or detail and demonstrate why the CSSI will not have lasting impacts to the groundwater system, ongoing groundwater incidental take and groundwater level drawdown effects; (d) actions required to minimise the risk of inflows (including in the event the CSSI are delayed or do not progress) and a strategy for accounting for any water taken beyond the life of the operation of the CSSI; (e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and (f) a schematic of the conceptual hydrogeological model.			

Table 7: Review of previous audit findings – IA3 (6 February 2025)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA4 ASSESSMENT & STATUS
NON-COMPLIANCES					
IA3 – NC01	C10	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction.	There was one notification of Non-Compliance (NC) submitted to DPHI for SSTOM during the audit period. The NC was raised against Condition C10 (& REMM LV2) and related to flora and fauna management at the SMF site. The NC Report states "<i>To marginally extend the SMF car park area, the PLM construction team removed the 'tree protection zone (TPZ)' flagging and signage and stripped topsoil within the no-go zone without a permit to perform such works. Topsoil stripping was conducted with a 2-tonne excavator and encroached to within 4m of the tree. The shallow topsoil stripping went to a maximum depth of 50mm and did not expose or any tree roots</i>". Photos taken during topsoil reinstatement works were attached to the NC report, and reinstatement of the area was inspected during the audit and appeared adequate.	Nil	N/A CLOSED
OBSERVATIONS					
IA3 – NC02	C22	The results of the Construction Monitoring Programs must be submitted to the Planning Secretary,	A Groundwater CMR for SSTOM was not available for review at the time of this IA3, and there was no	Nil – addressed by PLM by raising NC report	After the NC was identified during the audit, a self-reported NCR was raised by PLM and

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA4 ASSESSMENT & STATUS
		ER and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.	evidence of submission to DPHI or other relevant regulatory agencies.		submitted to DPHI on 27/02/2025. A copy of the NCR report was provided as evidence. CLOSED
IA3 – OBS 1	C10	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction.	IBCs of liquid waste, tins of hazardous chemicals and other miscellaneous materials were stored at the Bringelly Facility without adequate cover, labelling or secondary containment.	Review the area and ensure all storage of liquid wastes and chemicals is in accordance with AS1940:2017 The storage and handling of flammable and combustible liquids. Dispose of liquid wastes as per the Waste Management Sub-Plan.	During IA4, PLM provided evidence of clean-up of IBCs of liquid waste, tins of hazardous chemicals and other miscellaneous materials were stored at the Bringelly Facility. Actions were raised and closed out in SAI. Status: CLOSED
IA3 – OBS 2			During the site inspection a significant number of cigarette butts were observed littered around the Bradfield Station site compound and surrounding areas, despite designated smoking areas nearby and sign-posted.	Re-communicate the requirement to utilise designated smoking areas, including bins provided for cigarette butts as per the Waste Management Sub-Plan.	During IA4, PLM provided evidence of current ESCPs displayed at Linewide P1 and OHE. Status: CLOSED
IA3 – OBS 3	E128	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).	It was noted that the PESCP displayed at Bradfield Station did not reflect current site conditions in relation to swales. The correct PESCP was presented during the audit interviews on 7/2/2025 and PLM committed to displaying the correct PESCP on site.	Review ESCPs displayed on site to ensure the current conditions are reflected and the correct version is displayed. It is noted that the current version of the ESCP was available on site, but the wrong version had been displayed.	During IA4, PLM provided evidence of a waste management toolbox and a pre-start for cigarette butts, dated 25/2/25. This site was not re-inspected during the audit. Status: CLOSED

4.3 Adequacy of Environmental Management Plan, Sub-plans and Post-Approval documents

As part of the Independent Audit, the Auditor reviewed the CEMP, Sub-plans and environmental post-approval documents for each stage (refer Section 4.1 for references) and conducted a high level assessment whether the above documents:

- have been developed in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate
- have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

The Auditor also assessed the adequacy of post approval documents (on the basis of whether):

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

The Project's post-approval documents have been reviewed, endorsed and approved by required parties – Sydney Metro, the ER, and DPHI. The endorsements and approvals confirm that the relevant requirements from the Project Approval, the EIS and RtS have been incorporated. This is further reviewed and evidenced in the Audit Table (refer **Attachment 1**).

The CEMP, Sub Plans, Strategies and Construction Monitoring Programs prepared for the Project are of high quality. The evidence reviewed and/or sighted during this Independent Audit indicates that these documents are being implemented; with no non-compliances raised against the mitigations measures within.

4.4 Complaints

Complaints are recorded in Consultation Manager, a TfNSW database. ParkLife Metro has a contract obligation to provide three Place Manager roles for SSTOM. The contractor reports Daily Complaints to the NSW Environment Protection Authority (NSW EPA) in accordance with Environmental Protection Licence (EPL) requirements and a Weekly Complaints Report is distributed to DPHI and the Environmental Representative (ER). The ER Project Monthly Report summarises all complaints for the month.

Complaints within the reporting period have been predominantly related to Noise and vibration, including consultation and notification of out of hours work. There were 32 complaints received during the audit period, 20 of which were related to these issues. Other isolated issues raised by complainants and recorded in the complaints register included property damage, air quality, visual amenity, and light spill. Evidence of close-out of complaints was sighted and recorded on the complaints register and appeared to be adequate. Auditees advised there are no repeat complainants known to the project.

The overall number of complaints received is thought to be generally low in relation to the activities undertaken during the audit period, considering the scale of activities and the number of out of hours works events conducted across multiple sites, along with an increase in intensity of noise associated with the project activities.

The complaints register indicates that Sydney Metro and its contractors for each stage have adequately responded to the complaints.

4.4.1 Cumulative Impacts

A review of the Complaints Management System process in relation to the management of potential cumulative impacts from nearby projects, including interface works and other Sydney Metro WSA Packages was conducted during the audit.

Potential exists for cumulative impacts from SSTOM with other nearby PLM project sites, particularly at Linewide and SMF. Cumulative impact assessments are undertaken by PLM during OOH works planning. Cumulative impacts from interfaces and other nearby construction sites have historically been managed through monthly Cumulative Impact Meetings. Sydney Metro undertakes periodic meetings with surrounding projects (including M12 and Bradfield Delivery Authority (BDA) works).

Auditees advised M12 West works (e.g. Luddenham Road and Elizabeth Drive) have reduced to landscaping and rehabilitation / finishing works, thereby reducing the potential for cumulative impacts with this project. Cumulative impact meetings with Sydney Metro were being held monthly but since this interface has reduced, meetings have now ceased with the last meeting held on 12/3/2025. Sydney Metro is still in contact with M12 representatives and conducts informal discussions with them prior to WSA CI meetings.

Issues discussed in meetings included a lookahead for out of hours work at each location, and potential for cumulative impacts related to environmental aspects including Surface water management, Air quality, and Heavy Vehicle (HV) movements during peak hours.

Auditees advised traffic and access impacts have reduced with the completion of SCAW and SBT import and tunnelling works, which has resulted in significant improvements to surface water quality, dust emissions and noise and vibration impacts. It was noted that truck movements associated with SSTOM have increased since the previous audit period due to import activities, spoil movement and deliveries.

Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site, though it is noted this is an ongoing focus for the project.

4.5 Incidents and Non-Compliances

The Incident and Non-Compliance Register was reviewed during the audit.

Non-compliances identified during the audit period have been discussed in **Section 4.2**. Environmental incidents and non-compliances raised during the audit period were recorded on the Project's Incident and Non-Compliance Register.

No environmental incidents were raised that would require notification under the planning approval within the audit period. Review of the Monthly ER Reports to DPHI aligned with the above reporting of environmental incidents and non-compliances.

4.6 Actual vs Predicted Impacts

A qualitative assessment has been undertaken as part of this Independent Audit to assess actual versus predicted impacts for works conducted during the audit period, considering below:

- The extent to which the Project has been altered to that assessed and approved in the EIS and RtS during the audit period
- Incidents and non-compliance during the audit period
- Complaints during the audit period
- Compliance with the Project Approval during the audit period
- Review of key scope consultation issues and area of concerns, and
- High -level assessment of adequacy and implementation of post approval documents.

Qualitative assessment findings are summarised below:

- SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement.
- One Environmental Review (ER) was determined by Sydney Metro during the audit period and has been considered during the audit (refer **Section 1.1.3** for details). The proposed changes were deemed to be consistent with the EIS and Submissions Report.
- Refer to **Section 4.5** for incidents and non-compliances recorded within the audit period.
- Refer to **Section 4.4** for complaints recorded within the audit period.
- Compliance with the project approval is tracked on an ongoing basis by the Sydney Metro and Contractor Environment Teams. Compliance tracking at a high level is included in a Compliance Tracking Register. The ER has also been engaged and provides support in the management of compliance with the planning approval and reports monthly to DPHI as required. The project prepared the 3rd Six-Monthly Noise and Vibration Monitoring Report, covering the period up to February 2025. The 2nd Annual Surface Water and Air Quality Construction Monitoring Reports were being prepared at the time of the audit, covering the period up to August 2025. The groundwater monitoring program had commenced and CMRs for Groundwater had been prepared and submitted to DPHI, noted as an improvement since a NC was raised against Condition C22 during the previous audit.
- The Auditor consulted with DPHI, NSW EPA, Liverpool and Penrith City Councils on 8th August 2025 to obtain input on the scope of the Independent Audit in accordance with Section 3.2 of the IAPAR. DPHI responded on 27th August 2025 and indicated *"NSW Planning does not require any additional issues or consultation to be included within the scope of the Independent Audit that is not already captured by SSI 10051, as modified, and the proposed scope you have listed below"*. A summary of the key issues and areas of focus raised by stakeholders during consultation is

presented in **Table 2**. Refer to **Section 4.6** and consultation records are presented in **Attachment 4**. The Audit Table in **Attachment 1** includes audit evidence and findings in relation to each applicable condition.

- Refer **Section 4.3** for a high -level assessment of the adequacy and implementation of post approval documents.

4.7 Environmental Performance

The environmental performance of the Project during the audit period was considered by the Auditor to be of a high standard. Refer to the following **positive observations**:

- The strategic and ongoing stabilisation of exposed surfaces including haul roads and batters to reduce the risk of erosion and sediment runoff, and the preparation and implementation of Progressive Erosion and Sediment Control Plans (ESCPs) for each site.
- Process in place for the management of potential cumulative impacts from other SM-WSA projects operating concurrently with SSTOM.
- Implementation of the Out of Hours Works (OOHW) process including preparation of Detailed Noise and Vibration Impact Statements (DNVIS') and OOHW Approvals, e.g. concrete beams at St Marys.

There were no agency notices, Penalty notices or Prosecutions known to have been raised in relation to the project during the audit period.

Further assessment of environmental performance has been documented using photos, observations and notes from the site inspection. Refer **Section 6**.

5. AUDIT CONCLUSIONS

This Audit Report presents the findings from the 8th Independent Audit conducted for the SM-WSA project, and the 4th IEA conducted for SSTOM, covering the period from 6th February 2025 to 11th August 2025.

In summary, a total of **222 conditions** were assessed. **Five non-compliances** were identified, all of which had been self-reported by the Project during the audit period. **Four Observations** with recommendation for improvement were identified. Positive observations have been reported in **Section 4.7** of this audit report and in commentary documented throughout the audit.

There were no other matters considered relevant by the auditor.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of the Audit Scope. The level of implementation of these requirements on site was also observed as high.

The Auditor would like to thank the Auditees from Sydney Metro and the contractor, Parklife Metro for their organisation, cooperation and support during the audit.

6. SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS

LINEWIDE PORTION 4

The rail team were undertaking work on the tracks including drilling for posts in preparation for handover to the civils team to continue CSR works.

Linewide Portion 4 was handed over from SCAW in December 2024. A Community Agreement was in place for out of hours works (M-F 24/7 & Sat 6am-6pm).



Photos 1 & 2: Concrete washout bay and laydown. Weeds had been sprayed within the laydown. BND has been engaged to conduct weed management and maintenance of landscaped areas across the project.



Photos 3 & 4: Sydney Water swale discharging to bioretention basin and Sydney Metro basin. Dewatering is not required from the Sydney Metro basin.

LINEWIDE PORTION 1



Photo 5: Rail & CSR works



Photo 6: Labelled stockpiles in laydown area



Photo 7: Sediment basin



Photo 8: Swale to sediment basin



Photo 9: Discharge swale from sediment basin line with polymer



Photo 10: Swale to sediment basin with check dams and geofabric lining



Photo 11: Linewide Portion 1C –Stockpile / laydown area near WaterNSW pipeline. Tree protection zones in place



Photo 12: CSR works complete and backfill and stabilisation scheduled to commence

PORTION 3 LINEWIDE

Photos 13 & 14: Water in low points between crane pads under the viaduct – to be transported via vac truck back to Claremont Meadows Service Facility for treatment

ORCHARD HILLS STATION

Steel fixing and bracket installation in the station box was underway. Materials were being craned in. Base slab pours were complete with the last wall pours planned for the near future. The station box would then be lidded and operate as a tanked structure (~Oct 2025)



Photo 15: Diesel and ULP stored in flammable liquid cabinet



Photo 16: Main site access – no tracking onto public road observed



Photo 17: Site compound and stabilised internal haul road



Photo 18: Refuelling of diesel cell underway. Spill kit in place and operator observing



Photos 19 & 20: Batters stabilised with shotcrete and ballast base to reduce ERSR risk



Photo 21 & 22: Concrete pour underway for operations building. Noise mats installed along resident-facing wall of building.



Photo 23: Sediment / holding basin for site runoff, including from wheel wash. Water is reused for dust suppression or transported to the WTP at Claremont Meadows



Photo 24: The wheel wash was being emptied with dirty water discharged to the sediment basin



Photo 25: The wheel wash was in use and effective



Photo 26:



Photos 26-28: IBCs containing sulfuric acid were stored on bunds prior to transport offsite. The acid is no longer required after decommissioning of the WTP. Oil stored in IBC – to be identified and removed from site if not required



Photo 29: Concrete stockpiled for future crushing for internal road construction during standard construction hours



Photo 30: Sediment basin in place and in use for dust suppression



Photos 31 & 32: Sediment basin – water reused for dust suppression or pumped to Claremont Meadows WTP. stand pipe for dust suppression



Photo 33: Stockpiling



Photo 34: Sediment basin in place and in use for dust suppression

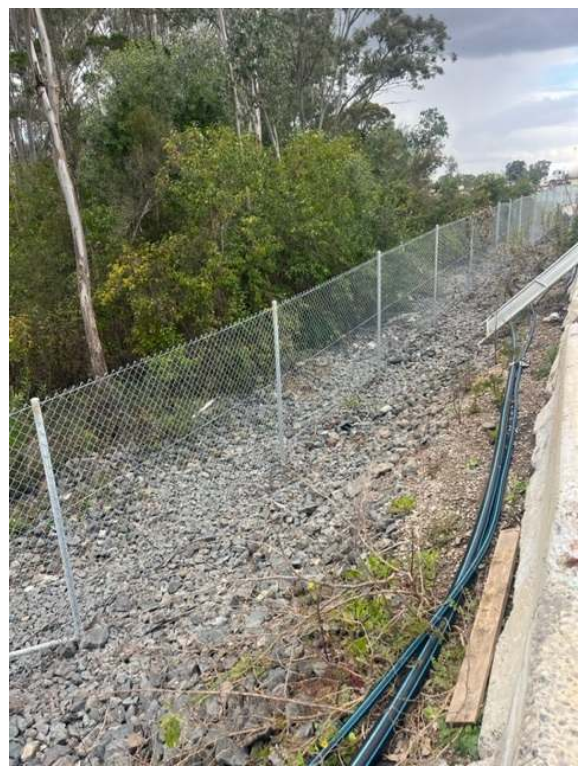


Photo 35: Site boundary stabilised and no offsite impact observed

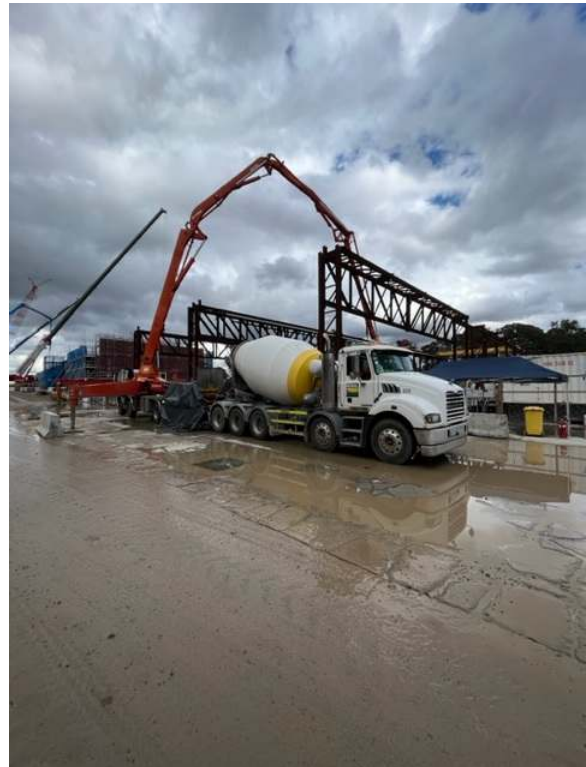


Photo 36: Concrete pumping to station box for track slab. Controls in place as required



Photo 37: ERSed controls in place and no offsite impact observed on opposite side of earth bund



Photo 38: Noise wall in place and weed management ongoing



Photos 39 & 40: Concrete batching plant in operation (M-F 5am-10pm; Sat 6am-6pm).



Photos 41: No tracking observed onto public road

Photo 42: Water diverted to holding basin from concrete batching plant. Water is reused in the



Photos 43 & 44: Sediment basin associated with licensed discharge point on other side of the road and Stand pipe for dust suppression



Photos 45 & 46: Wheel wash and signage at front gate

CLAREMONT MEADOWS SERVICE FACILITY

The site was handed over from SBT on 15/1/25. Deliveries and tunnel fit-out are approved to be undertaken 24/7.



Photos 47 & 48: Tree protection zones in place



Photo 49: Site compound and laydown



Photo 50: Holding basin associated with Water treatment plant



Photos 51 & 52: Water treatment plant operational – discharge to sewer via Trade Waste Agreement



Photo 53: Shaft for deliveries into tunnel & ventilation system



Photo 54: Noise wall well maintained

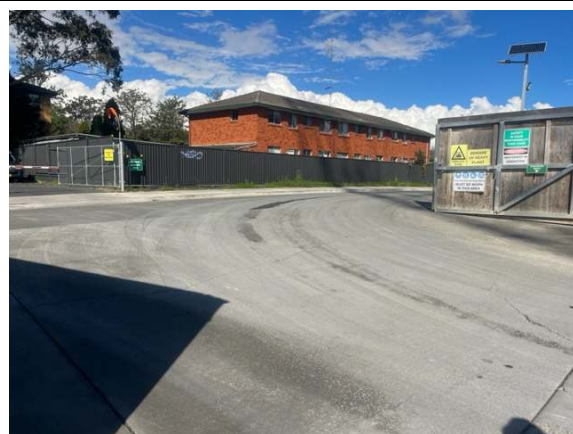
ST MARYS STATION**Photos 55:** Project car park**Photos 56:** Construction parking signage**Photos 57 & 58:** Site exit clean and no signs of tracking onto public road**Photo 59:** Water treatment plant operational with discharge to sewer under TWA**Photo 60:** Diesel storage tank – self-bunded and compliant GHS signage



Photo 61: Diesel fuel cell - self-bunded and compliant GHS signage



Photo 62: Rainwater accumulating in low points was pumped to the WTP



Photo 63: Diesel Cranes operational for lifts into station box. A 250m3 slab pour was underway



Photo 64: Noise blankets along street frontage – no gaps identified



Photos 65 & 66: Station box. FRP works ongoing. Level B2 slab pour underway. Groundwater and rainwater seepage is pumped to the WTP. Working hours M-F 7am-6pm; Sat 8am-1pm

Independent Environmental Audit Report

Sydney Metro

Western Sydney Airport (SSI 10051)

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

Attachment 1: Independent Audit Table

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heilborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
PART A ADMINISTRATIVE CONDITIONS				
GENERAL				
A1	The Proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the: (a) Sydney Metro – Western Sydney Airport Environmental Impact Statement dated 21 October 2020; and (b) Sydney Metro – Western Sydney Airport Submissions Report submitted April 2021 (c) Sydney Metro – Western Sydney Airport. NSW Infrastructure Approval (SSI_10051) – Request for modification of Condition E4, dated March 2022; and (d) Sydney Metro – Western Sydney Airport, SSI-10051, Request for Modification to Conditions E13 and E57.	• Sydney Metro - Western Sydney Airport Environmental Impact Statement (WSA EIS), dated October 2020 (the EIS) • Sydney Metro WSA Submissions Report, submitted April 2021 • Sydney Metro WSA Response to Submissions Report (RIS), dated December 2020 • Sydney Metro WSA Modification 1 – Biodiversity Credits (SSI-10051-MOD-1) Modification Assessment Report, DPHI 2022 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022 • Sydney Metro – Western Sydney Airport, SSI-10051, Request for Modification to Conditions E13 and E57, correspondence dated 12 August 2024 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • Environmental Review - ER005 M12 Corridor Interface Work Areas and Water Utility Installation Rev 2.0 Final, dated 17/6/2025	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout. Refer also to the review of the Sydney Metro WSA Modification 1 – Biodiversity Credits (SSI-10051-MOD-1), SSI-10051-MOD-2, corresponding Modification Assessment Reports, as well as Consistency Assessments prepared during the audit period in the body of the audit report. SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement. SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends Condition E13 to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and Condition E57 so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request. There was one Environmental Review prepared and approved during the audit period: Environmental Review - ER005 was prepared to assess consistency with the EIS for revisions to the project boundary in two work locations within the M12 construction footprint: • Area 1: At the M12 Elizabeth Drive offramp, just north of Construction Area K-PS1 and K-PS1a (SCAW Portion 3). • Area 2: At Elizabeth Drive just north of Construction Area L-TA1 (SCAW Portion 5) and the Western Sydney Airport boundary The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 17th June 2025.
A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	• Refer evidence throughout this audit table	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout.
A3	In the event of an inconsistency between: (a) the terms of this approval and any document listed in Condition A1 inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in Condition A1 inclusive, the most recent document will prevail to the extent of the inconsistency. Note: For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • Environmental Review - ER005 M12 Corridor Interface Work Areas and Water Utility Installation Rev 2.0 Final, dated 17/6/2025	C	SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement. SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends Condition E13 to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and Condition E57 so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request. Potential inconsistencies were assessed by the Consistency Assessment (CA) and Environmental Review process. There was one Environmental Review prepared and approved during the audit period: Environmental Review - ER005 was prepared to assess consistency with the EIS for revisions to the project boundary in two work locations within the M12 construction footprint: • Area 1: At the M12 Elizabeth Drive offramp, just north of Construction Area K-PS1 and K-PS1a (SCAW Portion 3). • Area 2: At Elizabeth Drive just north of Construction Area L-TA1 (SCAW Portion 5) and the Western Sydney Airport boundary The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 17th June 2025.
A4	In the event that there are differing interpretations of the conditions of this approval, including in relation to a condition of this approval, the Planning Secretary's interpretation is final.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Sydney Metro Letter to DPHI RE: SMWSA CoA clarification in accordance with Condition A4, dated 13/11/2024 • DPHI Letter to Sydney Metro RE: Request for the Planning Secretary's interpretation under Condition A4 (E118 Road Traffic and Safety), dated 25.11.2024 • Post Approval Form_20241112225702, Submission of A4 Clarification MOD1 E118, PA-517, dated 12/11/2024	C	A potential differing interpretation of the terms of the approval was identified during the audit period. Sydney Metro are in the process of seeking clarification with DPHI on Condition E118 requirements in relation to the delivery of traffic performance at intersections. One intersection upgrade (Mamre Road and Great Western Highway) was originally identified as required to increase project performance, though consultation with Penrith City Council has identified some additional intersection upgrades that they would like included. Consultation with Penrith CC is ongoing to resolve the number of intersection upgrades required. Associated works had not yet commenced at the time of the audit. Refer also to Condition E118 . Discussions were ongoing during the IA4 audit period.
A5	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to: (a) the environmental performance of the CSSI; (b) any document or correspondence in relation to the CSSI; (c) any notification given to the Planning Secretary under the terms of this approval; (d) any audit of the construction or operation of the CSSI; (e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); (f) the carrying out of any additional monitoring or mitigation measures; and (g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	C	There were no directions known to be issued by the Planning Secretary during the audit period.

Item
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Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heilborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A6	Where the terms of this approval require a document or monitoring program to be prepared or a review to be undertaken in consultation with identified parties, evidence of the consultation undertaken must be submitted to the Planning Secretary with the document. The evidence must include: (a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval; (b) a log of the dates of engagement or attempted engagement with the identified party and a summary of the issues raised by them; (c) documentation of the follow-up with the identified party(s) where feedback has not been provided to confirm that the party(s) has none or has failed to provide feedback after repeated requests; (d) outline of the issues raised by the identified party(s) and how they have been addressed; and (e) description of the outstanding issues raised by the identified party(s) and the reasons why they have not been addressed.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Interview with ER, 22/08/2025	C	As per conditions requiring consultation throughout this audit table, including in relation to monitoring programs and document review. Monitoring programs have been incorporated into CEMP Sub-plans are were approved by DPHI prior to construction commencement.
A7	This approval lapses five (5) years after the date on which it is granted, unless work has physically commenced on or before that date.	Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023	C	Approval for SSI-10051 was granted on 23/7/2021. Notifications of commencement of Construction were submitted to DPHI (as per Conditions A34 & A35) for each stage. The Notification of Commencement of Construction for SSTOM was dated 1/8/2023 for commencement on 8/8/2023 and was within the five year commencement period.
A8	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of this approval.	SSI-10051 Approval, dated 23/7/2021	C	Noted.
A9	Any document that must be submitted or action taken within a timeframe specified in or under the conditions of this approval may be submitted or undertaken within a later timeframe agreed with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident under Condition A41 .	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - DPHI Letter to Sydney Metro RE: Sydney Metro - Western Sydney Airport - Request to extend IE Audit - Metro WSA, dated 28/7/2025	C	A request for an extension of time to undertake the projects Independent Environmental Audits as per Conditions A36-40 of SSI No. 10051 and the IAPARs (2020) was submitted to NSW Planning on 22/7/2025. NSW Planning notes the request seeks to commence the audit site inspection on 18/8/2025 (rather than 4/8/2025) as a result of procurement. The Planning Secretary agreed to the extension request in accordance with Schedule 2, Condition A9 of the Approval.
STAGING				
A10	The CSSI may be constructed and operated in stages. Where staged construction and/or operation is proposed, a Staging Report must be prepared. The Staging Report must be submitted to the Planning Secretary for information no later than one (1) month before the lodgement of any CEMP or CEMP sub plan for the first of the proposed stages of construction (or if only staged operation is proposed, one (1) month before the commencement of operation of the first of the proposed stages of operation), unless otherwise agreed with the Planning Secretary.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement of the SMWSA Staging Report Rev8, dated 28/2/2023 - ER Endorsement Staging Report V11, dated 11/10/2024 - Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023 - SSI-10051, Independent Audit No.1 – Audit Report (SSTOM only), GHD, April 2024 (WSA IEA Independent Audit No. 5 (IA5), 17/4/2024	C	The initial preparation of the Staging Report, ER Endorsement and Submission was not within the audit period. The initial Independent Environmental Audit (IEA) for SSTOM, SM-WSA SSTOM IA1 verified compliance with Condition A10 . Commencement of Construction for SSTOM was notified to DPHI as 8/8/2023 (in a letter dated 1/8/2023). As verified during IA1, the Staging Report Rev9 was submitted to DPHI via the Major Projects portal prior to commencement of Construction of the SSTOM stage of works.
A11	The Staging Report must: (a) set out how construction of the whole of the CSSI will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; (b) if staged operation is proposed, set out how the operation of the whole of the CSSI will be staged, including details of each stage and the general timing of when operation of each stage will commence; (c) specify conditions that apply to each stage of construction and operation including how compliance with conditions will be achieved across and between each of the stages of the CSSI; (d) set out mechanisms for managing any cumulative impacts arising from the proposed staging; and (e) for the purposes of informing Conditions C2, C7 and C17 , include an assessment of the predicted level of environmental risk and potential level of community concern posed by the construction activities required to construct each stage of the CSSI. With respect to (e) above, the risk assessment must use an appropriate process consistent with AS/NZS ISO 31000: 2018; Risk Management - Guidelines and must be endorsed by the ER . Note: 1. A <i>Staging Report</i> may reflect the staged construction and operation of the project through geographical activities, temporal activities or activity-based staging. 2. The risk matrix must reflect the stages of construction identified in the <i>Staging Report</i>	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024 - Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement of the SMWSA Staging Report Rev8, dated 28/2/2023 - ER Endorsement Staging Report V11, dated 11/10/2024	C	The Staging Report addresses each part (a) - (e) of Condition A11 , as set out in the Staging Report compliance table, as verified during the audit, and the allocation of conditions of approval is included in the Staging Report. The allocation of conditions to SSTOM in the Staging Report has been used to determine the scope for this audit. ER Endorsement of the Staging Report Rev08 was provided as evidence and included reference to endorsement of the risk assessment associated with the Staging Report as per Condition A11(e) . The Staging Report was up to Revision 11 during the audit period (dated, 11 Oct 2024).
A12	The CSSI must be staged in accordance with the Staging Report , and submitted for information to the Planning Secretary.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement Staging Report V11, dated 11/10/2024 - Post Approval Form_20241011054404 (SSI-10051-PA-506), WSA CSSI 10051 Staging Report (Rev 11), dated 11/10/2024 - Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024	C	The Staging Report Rev11, dated 11/10/2024 was submitted to DPHI for information on 11/10/2024. The Staging Report Revision 11 was revised to include the following: - Minor update to definitions and abbreviations - Updated timing of stages - Administrative updates related to the renaming of Aerotropolis to Bradfield Station - Review of the applicability of Conditions E8 to E12 to reflect their applicability to the SSTOM stage. - Review the applicability of REMM NA13 to reflect applicability to the SSTOM stage. There were no non-compliances with implementation of the Staging Report identified during the audit.

Item
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Auditee/ Client: ParkLife Metro / Sydney Metro
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Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A13	Where staging is proposed, the terms of this approval that apply or are relevant to the work or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024 - Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement Staging Report V11, dated 11/10/2024	C	SSTOM, and allocation of conditions of approval is included in the Staging Report. The allocation of conditions to SSTOM in the Staging Report Rev11 has been used to determine the scope of this audit.
A14	Where changes are proposed to the staging of construction or operation, a revised Staging Report must be prepared and submitted to the Planning Secretary for information before the commencement of changes to the stage of construction or the stage of operation.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement Staging Report V11, dated 11/10/2024 - Post Approval Form, 20241011054404 (SSI-10051-PA-506), WSA CSSI 10051 Staging Report (Rev 11), dated 11/10/2024 - Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024	C	The Staging Report Rev11, dated 11/10/2024 was submitted to DPHI for information on 11/10/2024. The Staging Report Revision 11 was revised to include the following: - Minor update to definitions and abbreviations - Updated timing of stages - Administrative updates related to the renaming of Aerotropolis to Bradfield Station - Review of the applicability of Conditions E8 to E12 to reflect their applicability to the SSTOM stage. - Review the applicability of REMM NA13 to reflect applicability to the SSTOM stage.
A15	Where changes are proposed to the risk assessment related to the staging of construction or operation, a revised Staging Report must be submitted to the Planning Secretary for information one (1) month before the lodgement of any CEMP or CEMP sub plan associated with the stage where change in risk assessment is proposed.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement Staging Report V11, dated 11/10/2024 - Post Approval Form, 20241011054404 (SSI-10051-PA-506), WSA CSSI 10051 Staging Report (Rev 11), dated 11/10/2024 - Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024	C	Strategies, plans and programs have been submitted as per the SSTOM project described in the Staging Report. Rev 11 of the Staging Report was updated to include the following: - Minor update to definitions and abbreviations - Updated timing of stages - Administrative updates related to the renaming of Aerotropolis to Bradfield Station - Review of the applicability of Conditions E8 to E12 to reflect their applicability to the SSTOM stage. - Review the applicability of REMM NA13 to reflect applicability to the SSTOM stage.
A16	The Proponent may submit any strategies, plans or programs required by this approval on a progressive basis, within each stage of the CSSI. Notes: 1. While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to ensure that the existing activities on site are covered by suitable strategies, plans or programs at all times; and 2. If the submission of any strategy, plan or program is to be submitted on a progressive basis, then the relevant strategy, plan or program must clearly describe the activities to which the strategy, plan or program applies, the relationship of this activity to any future activities within the stage, and the trigger for updating the strategy, plan or program. 3. The staged submission of strategies, plans or programs may reflect the construction and operation of the project through geographical activities, temporal activities or activity-based staging.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement Staging Report V11, dated 11/10/2024 - Post Approval Form, 20241011054404 (SSI-10051-PA-506), WSA CSSI 10051 Staging Report (Rev 11), dated 11/10/2024 - Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024	C	Strategies, plans and programs have been submitted as per the SSTOM project described in the Staging Report. Rev 11 of the Staging Report was updated to include the following: - Minor update to definitions and abbreviations - Updated timing of stages - Administrative updates related to the renaming of Aerotropolis to Bradfield Station - Review of the applicability of Conditions E8 to E12 to reflect their applicability to the SSTOM stage. - Review the applicability of REMM NA13 to reflect applicability to the SSTOM stage. Refer to Audit Table Part C for submission of CEMP and Sub-plans and timing verification.
ANCILLARY FACILITIES				
Ancillary Facilities				
A17	Ancillary facilities that are not identified by description and location in the documents listed in Condition A1 can only be established and used in each case if: (a) they are located within or immediately adjacent to the Construction Boundary of the CSSI; and (b) they are not located next to sensitive land use(s) (including where an access road is between the facility and the receiver), unless the landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location; and (c) they have no impacts on Heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and (d) the establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts. Note: This condition does not apply to any ancillary facilities or work that are exempt or complying development, established before the commencement of construction under this approval or minor ancillary facilities established under Condition A22.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Construction Environment Management Plan (CEMP), SSTOM, Rev 02 19/12/2024	NT	The following Ancillary Facilities are listed for proposed use in Section 1.5 of the CEMP. - St Marys - Claremont Meadows - Orchard Hills - Stabling and Maintenance Facility - Luddenham Road - Elizabeth Drive - Bringley - Bradfield - Linewide As per Section 1.7 of the CEMP, "where the proposed ancillary facility complies with Condition A17, this CEMP will be updated to include the ancillary facility. In accordance with Condition C3, the revised CEMP will be submitted to the ER for review and endorsement prior to establishment of the respective ancillary facility". There were no SSTOM A17 Ancillary Facility Assessments approved during the audit period. No A17 AFs are known to have been established during the project.

Item
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Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
SITE ESTABLISHMENT WORK				
Site Establishment Management Plan				
A18	Before establishment of any ancillary facility (excluding exempt or complying development, minor ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A22 and those considered in an approved CEMP), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facilities. The Site Establishment Management Plan must be prepared in consultation with the Relevant Council(s) and relevant government agencies. The Site Establishment Management Plan must include: (a) a description of activities to be undertaken during establishment of the ancillary facility (including scheduling and duration of work to be undertaken at the site); (b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s); (c) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of site establishment work; (d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to: (i) meet the performance outcomes stated in the documents listed in Condition A1; and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and (e) a program for monitoring the performance outcomes, including a program for construction noise monitoring, where appropriate or required. Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each ancillary facility.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Construction Environment Management Plan (CEMP), SSTOM, Rev 02 19/12/2024 • SM - WSA Independent Audit No.6 – Combined Response to Findings, 8/10/2024	NT	There were no Site Establishment Management Plans prepared for SSTOM under Condition A18 during the project. The following Ancillary Facilities are listed for proposed use in Section 1.5 of the CEMP: • St Marys • Claremont Meadows • Orchard Hills • Stabling and Maintenance Facility • Luddenham Road • Elizabeth Drive • Bringelly • Aerotropolis The SSTOM CEMP Rev 02 19/12/2024 was updated to include a process for the potential use and preparation of a SEMP as per recommendation in IA2 (WSA IA6).
A19	With the exception of a Site Establishment Management Plan expressly nominated by the Planning Secretary to be endorsed by the ER , all Site Establishment Management Plans must be submitted to the Planning Secretary for approval one (1) month before the establishment of any ancillary facilities.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	There were no Site Establishment Management Plans prepared for SSTOM under Condition A18 during the project.
A20	A Site Establishment Management Plan expressly nominated by the Planning Secretary to be endorsed by the ER must be submitted to the ER for endorsement one (1) month before the establishment of that ancillary facility or as otherwise agreed with the ER .	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	There were no Site Establishment Management Plans prepared for SSTOM under Condition A18 during the project.
Use of Ancillary Facilities				
A21	The use of ancillary facility for construction must not commence until the CEMP required by Condition C1 relevant CEMP Sub-plans required by Condition C5 and relevant Construction Monitoring Programs required by Condition C13 have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable). Note: This condition does not apply to Condition A22 or where the use of an ancillary facility is Low Impact Work or for Low Impact Work.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	C	There were no new construction ancillary facilities approved for use during the audit period, including Minor Ancillary Facilities (MAFs) established under Condition A22. Some ancillary facilities proposed for use by SSTOM were established by other SM-WSA Contracts including SCAW and SBT, and in these cases use commenced prior to SSTOM project commencement.
Minor Ancillary Facilities				
A22	Lunch sheds, office sheds, portable toilet facilities and the like, can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria: (a) are located within or adjacent to the Construction Boundary; and (b) have been assessed by the ER to have - (i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the ICNG, traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts; and (ii) minimal environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and Heritage items beyond those already approved under other terms of this approval.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Interview with ER, 22/08/2025 • Site inspection, 11/08/2025 • SM - WSA Independent Audit No.6 – Combined Response to Findings, 8/10/2024 • PLM SSTOM CEMP Rev02, dated 19/12/2024 • Email from PLM to the ER with updated ECMs, dated 28/1/2025	C	After observations raised during IEA #2 in August 2024, PLM, Sydney Metro and the ER reviewed the Condition A22 process and updated the PLM CEMP accordingly to clarify the process for the establishment of MAFs under Condition A22. Revised Environmental Control Maps (ECMs) are issued to the ER for information prior to the establishment of a new site compound / MAF. If there is a potential environmental issue/risk, an A22 checklist will be prepared and issued for review. An email from PLM to the ER with updated ECMs was sighted during the audit, email dated 28/1/2025. There were no A22 MAF assessments or due diligence assessments conducted under Condition A22 during the audit period. The project has determined that MAFs established to date are located in areas already assessed by the documents listed in Condition A1 (i.e. within the project boundary and identified as indicative office and amenities locations in the EIS). Maps in the EIS, Chapter 8 Project Description (e.g. Figure 8-11) and Table 8-3 set out indicative office & amenities locations. Assessment by the ER is understood to only be required where agreed the MAFs have not already been assessed in the EIS or Submissions Report.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4_WSA_SSTOM_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Boundary screening				
A23	Boundary screening must be erected around ancillary facilities that are adjacent to sensitive land use(s) for the duration that the ancillary facility is in use unless otherwise agreed with relevant affected residents, business operators or landowners.	• Site inspection, 11/08/2025	C	Sites inspected during the audit (i.e. St Marys and Orchard Hills stations, Portion 1 & 4 Linewide, Clarendon Meadows Service Facility) were predominantly surrounded by hoarding and/or Sydney Metro branding.
A24	Boundary screening required under Condition A23 must minimise visual impacts on adjacent sensitive land use(s).	• Site inspection, 11/08/2025	C	As per Condition A23 .
INDEPENDENT APPOINTMENTS				
A25	All Independent Appointments required by the terms of this approval must have regard to the Department's guideline <i>Seeking approval from the Department for the appointment of independent experts</i> (DPIE, 2020) and hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	• Interview with ER, 22/08/2025 • DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	DPHI has approved the independent appointment of the ER for the project. Supporting letter from HBI includes details of ER experience and suitability. The Complaints Mediator (not activated for SSTOM) was appointed previously.
A26	The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must: (a) facilitate and assist the Planning Secretary in any such audit, and (b) make it a term of their engagement of an Independent Appointment that the Independent Appointment facilitate and assist the Planning Secretary in any such audit.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	A DPHI audit of an Independent Appointment is not known to have occurred during the audit period.
A27	Upon completion of an audit under Conditions A26 above, the Planning Secretary may withdraw its approval of an Independent Appointment should they consider the Independent Appointment has not exercised their functions in accordance with this approval. <i>Note: Conditions A26 and A27 apply to all Independent Appointments including the ER and Independent Auditor.</i>	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	The auditor is not aware of any formal withdrawals of independent appointments by DPHI during the audit period.
ENVIRONMENT REPRESENTATIVE				
A28	Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	• DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023 • Post Approval Form_20230321040318 (SSI-10051-PA-197), Approval of Additional ER, submitted 21/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.
A29	The proposed ER must be a suitably qualified and experienced person(s) who was not involved in the preparation of the documents listed in Condition A1 , and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it.	• DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.
A30	The Proponent may engage more than one ER for the CSSI, in which case the functions to be exercised by an ER under the terms of this approval may be carried out by any ER that is approved by the Planning Secretary for the purposes of the CSSI.	• DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan".
A31	The ER must meet the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).	• DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023 • Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_WSA, dated 9/3/2022	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan". Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_WSA, dated 9/3/2022 includes statements and CV of ER Brett McLennan and supporting evidence of meeting the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heilborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A32	For the duration of the work until the commencement of operation, or as agreed with the Planning Secretary, the approved ER must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval; (c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community; (d) review documents identified in Conditions A10, A18, A20, C1, C5 and C13 and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) endorse the documents before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or (ii) endorse the documents before the implementation of such documents (if those documents are only required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary / Department); (iii) provide a written statement to the Planning Secretary advising the documents have been endorsed. (e) for documents that are required to be submitted to the Planning Secretary / Department for information under (d)(i) above, the documents must be submitted as soon as practicable to the Planning Secretary / Department after endorsement by the ER, unless otherwise agreed by the Planning Secretary; (f) regularly monitor the implementation of the documents listed in Conditions A10, A18, A20, C1, C5 and C13 to ensure implementation is being carried out in accordance with the document and the terms of this approval; (g) as may be requested by the Planning Secretary, help plan or attend audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A36; (h) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints received directly by the Department; (i) consider or assess the impacts of minor ancillary facilities as required by Condition A22; and (j) consider any minor amendments to be made to the Site Establishment Management Plan, CEMP, CEMP Sub-plans and construction monitoring programs without increasing impacts to nearby sensitive land use(s), and are consistent with the terms of this approval and the Site Establishment Management Plan, CEMP, CEMP Sub-plans and construction monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval. (k) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports". The Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the CSSI or as otherwise agreed by the Planning Secretary; and (l) assess the impacts of activities as required by the Low Impact Work definition.	• Interview with ER, 22/08/2025 • Sydney Metro WSA ER Monthly Report February 2025, dated 7/3/2025 • Sydney Metro WSA ER Monthly Report March 2025, dated 7/4/2025 • Sydney Metro WSA ER Monthly Report April 2025, dated 6/5/2025 • Sydney Metro WSA ER Monthly Report May 2025, dated 6/6/2025 • Sydney Metro WSA ER Monthly Report June 2025, dated 7/7/2025 • Sydney Metro WSA SSTOM ER Inspection Reports, dated 12/2/2025, 18/2/2025, 25/2/2025, 4/3/25, 11/3/25, 18/3/25, 25/3/25, 1/4/25, 8/4/25, 15/4/25, 29/4/25, 6/5/25, 13/5/25, 20/5/25, 27/5/25, 3/6/25, 17/6/25 & 24/6/25 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 • ER Endorsement Staging Report V11, dated 11/10/2024 • Construction Environment Management Plan (CEMP), SSTOM, Rev 02 19/12/2024 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER Endorsement of CEMP Rev 2.1, letter dated 3/2/2025 • ER endorsement of AQMP Rev 2.0, letter dated 3/2/2025 • ER Endorsement of AQCMP Rev 2.0, letter dated 3/2/2025 • ER Endorsement of FFMP Rev 3.0, letter dated 3/2/2025 • ER Endorsement of NAMP Rev 2.0, letter dated 3/2/2025 • ER Endorsement of NVMP Rev 3.0, letter dated 3/2/2025 • ER Endorsement of NVCMP Rev 3.0, letter dated 3/2/2025 • ER endorsement of SWMP Rev 3.0, letter dated 3/2/2025 • ER Endorsement of SWQCM Rev 3.0, letter dated 3/2/2025 • ER Endorsement of VAMP Rev 1.0, letter dated 3/2/2025 • ER Endorsement of WMP Rev 2.0, letter dated 3/2/2025 • ER endorsement of GWMP Rev 0.0, letter dated 11/7/2023 • ER Endorsement of PLM CEMP Rev 02, dated 19/12/2024 and Groundwater Monitoring Program Rev02, dated 19/12/2024 • ER Endorsement of Aboriginal Cultural Heritage Management Plan Rev 9.0 • Letter from Sydney Metro to DPHI RE: Sydney Metro - Western Sydney Airport Submission of revised SSTOM Annual Review of Construction Environmental Management Plan and Sub-Plans for information, Condition A32(e), dated 3/2/2025	C	(a) No formal communication has been received from DPHI requiring ER response within the audit period. (b) The ER provides information to the Planning Secretary predominantly via reports and meetings. ER Monthly Reports include relevant information on incidents, non-compliances and complaints. A monthly meeting with DPHI is held to discuss environmental issues and concerns. Quarterly meetings with DPHI and Sydney Metro are also attended by the ER. (c) ER recommendations are included in ER Inspection Reports, which are in the form of Corrective Actions and Improvement Opportunities related to environmental management. Fortnightly project meetings are attended by the ER with Sydney Metro & PLM. The ER also holds informal meetings with PLM fortnightly. (d) Documents reviewed by the ER during the audit period are documented in the ER Monthly Reports. (e) Submission of documents to DPHI after ER endorsement was verified throughout the audit. (f) The implementation of the documents listed in Conditions A10, C1 and C13 is predominantly monitored during ER site inspections, which are generally fortnightly (though may be more frequent dependent on the scope of work and associated risk). The implementation of Condition A18 and A20 has not been relevant during the audit period. (g) There has been no request made by the Planning Secretary to the ER to assist with audits during the audit period. (h) There has been no request made by the Planning Secretary to the ER to assist in the resolution of community complaints during the audit period. (i) The ER was not required to consider or assess the impacts of minor ancillary facilities as required by Condition A22 during the audit period. (j) Minor amendments to the documents listed in Condition A32(j) have been approved by the ER as required. (k) ER Monthly reports are prepared and submitted to DPHI as required. (l) No low impact works were approved during the reporting period. ER inspections are conducted weekly-fortnightly to cover the area required. Issues identified by the ER at PLM sites included the clear signage of no-go zones adjacent to the pipeline at Linewide P1 for vibration impacts; Housekeeping / litter observed at STM; Tracking observed onto Lansdowne Road to Blaxland Creek and Patons Road from the SMF and Kent Road from Orchard Hills Station; Maintenance of swales at Claremont Meadows Services Facility and other general minor ERSED issues; Rubbish observed in spill kits; Stockpile identification/signage; Weed management at SMF and project-wide; Installation of noise blankets at Claremont Meadows Services Facility and STM; Bunding of portable fuel containers; Limited car parking at Orchard Hills Station. Evidence of close-out of each issue raised by the ER was sighted by the auditor and closed-out in SAI 360.
A33	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition A32 (including preparation of the ER monthly report), as well as: (a) the Complaints Register (to be provided on a weekly basis or as requested); and (b) a copy of any assessment carried out by the Proponent of whether proposed work is consistent with the approval (which must be provided to the ER before the commencement of the subject work).	• Interview with ER, 22/08/2025 • Consistency Assessment - SM006 Revised footprint for the Luddenham Road construction site Rev 0.5 Final, dated 9/1/2025	C	The ER advised all required information has been provided to them by the Proponent in order for them to undertake their duty, including complaints reports (weekly) and monthly complaints summaries. Consistency Assessments and Environmental Reviews are provided to the ER for information as they are prepared.
NOTIFICATION OF COMMENCEMENT				
A34	The Department, and relevant Councils must be notified in writing of the date of commencement of construction at least seven (7) days before the commencement of construction.	• Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 • Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023 • Post Approval Form_20230801014014 (SSI-10051-PA-279), SSTOM Notification of Construction Commencement, 1/8/2023	C	Notification of commencement of Construction for SSTOM was submitted to DPHI on 1/8/2023 for commencement date 8/8/2023, 7 days prior to commencement of Construction.
A35	If construction of the CSSI is to be staged, the Department, Liverpool City Council and Penrith City Council must be notified in writing at least seven (7) days before the commencement of each stage, of the date of the commencement of that stage.	• Email to Liverpool City Council RE: Sydney Metro - WSA: Notification of Commencement of Staged Construction (CoA A35) SSTOM, dated 1/8/2023 • Email to Penrith City Council RE: Sydney Metro - WSA: Notification of Commencement of Staged Construction (CoA A35) SSTOM, dated 1/8/2023	C	Notification of commencement of Construction for SSTOM was submitted to Liverpool City Council and Penrith City Council on 1/8/2023 for commencement date 8/8/2023, 7 days prior to commencement of Construction.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
INDEPENDENT ENVIRONMENTAL AUDIT				
A36	Independent Audits of the CSSI must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020).	• DPHI Letter, Sydney Metro Western Sydney Airport – Auditor nomination - Construction #8, Ref: SSI-10051-PA-622, dated 7/8/2025 • DPHI Letter to Sydney Metro RE: Sydney Metro - Western Sydney Airport - Request to extend IE Audit - Metro WSA, dated 28/7/2025	C	This audit (SSTOM IA8 SSI-10051, dated 11/8/2025) is being conducted in accordance with the Independent Audit Post Approval Requirements (2020). Refer to Condition A9 for approved request for extension of audit timeframe to 18/8/2025.
A37	Notwithstanding Condition A36 , the Proponent may prepare an audit program to outline the scope and timing of each independent audit that will be undertaken during construction. If prepared, the audit program must be developed in consultation with, and approved by, the Planning Secretary prior to commencement of the first audit and implemented throughout construction.	• DPHI Independent Audit Post Approval Requirements, 2020 • This audit (SSTOM IA8 SSI-10051, dated 11/08/2025) • Auditor Declaration of Independence Form, SSI-10051, J. Heltborg	C	Noted.
A38	Proposed independent auditors must be approved by the Planning Secretary before the commencement of an Independent Audit .	• DPHI Letter, Sydney Metro Western Sydney Airport – Auditor nomination - Construction #8, Ref: SSI-10051-PA-622, dated 7/8/2025	C	DPHI Letter approves the appointment of Ms Josephine Heltborg as Lead Auditor and Mr Richard Peterson as Alternate Auditor as the audit team to conduct the 8th Construction phase Independent Audit (IA8) pursuant to SSI-10051.
A39	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (DPIE, 2020), upon giving at least four (4) weeks' notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.	• This audit (SSTOM IA8 SSI-10051, dated 11/08/2025) • DPHI Letter, Sydney Metro Western Sydney Airport – Auditor nomination - Construction #8, Ref: SSI-10051-PA-622, dated 7/8/2025	C	This audit (SSTOM IA8 SSI-10051, dated 11/08/2025) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with Condition A39 for SSTOM IA8 will be verified during the 9th SM-WSA Independent Audit (IA9).
A40	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within two (2) months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020) unless otherwise agreed by the Planning Secretary...	• This audit (SSTOM IA8 SSI-10051, dated 11/08/2025) • SSI-10051, Independent Audit No.3 – Audit Report (SSTOM), Morasey, February 2025 (WSA IEA Independent Audit No. 7 (IA7), 6/2/2025) • SM - WSA Independent Audit No.7 – Combined Response to Findings, 17/4/2025 • Evidence of submission of SM-WSA Submission of Independent Audit Report #3 & #7 to DPHI, 17/4/2025 (SSI-10051-PA-582) & reference to: • Independent Audit No.7 – Audit Report, Wolf peak, February 2025 (SBT, SCAW, AEW FSM) • Independent Environmental Audit Report No.3, Morasey, February 2025 (SSTOM) • SM-WSA Independent Audit No.7 and No.3 – Combined response to findings • DPHI Letter to Sydney Metro RE: Sydney Metro Western Sydney Airport (SSI-10051) – extension to submission date for seventh independent audit report, dated 25/3/2025	C	This audit (SSTOM IA8 SSI-10051, dated 11/08/2025) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with Condition A40 for IA8 will be verified during the 9th SM-WSA Independent Audit (IA9). The IA7 SSTOM Audit Report, including the Proponent's response to audit findings, was submitted to the Planning Secretary on 17/4/2025. While the submission was not within 2 months of the IA7 SSTOM site inspection on 6/2/2025, a letter from DPHI dated 25/3/2025 confirms granting of an extension for submission of the 7th IEA report to 18/4/2025. The 7th IEA report was issued prior to the extended deadline.
INCIDENT AND NON-COMPLIANCE NOTIFICATION AND REPORTING				
Incident Notification, Reporting and Response				
A41	The Planning Secretary must be notified via phone or in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. Any notification via phone must be followed up by a notification in writing via the Major Projects website within 24 hours of the initial phone call. The written notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the location and general nature of the incident.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, EVT-0002148, dated 18/7/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, EVT-0002147, dated 18/7/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, (EIR-), dated 17/6/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, (EIR-023), dated 2/4/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, (EIR-021), dated 10/3/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, (EIR-028), dated 21/7/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, (EIR-019), dated 4/3/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, (EIR-018), dated 14/2/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, (EIR-016), dated 10/2/2025	NT	No incidents triggering notification to DPHI occurred during the audit period. Class 3 (minor) environmental incident reports raised during the audit period were provided for review and discussed with auditees and agreed not to trigger DPHI notification. Class 3 (minor) environmental incidents related mainly to small hydrocarbon spills. On 18/7/25 a chemical storage bund was observed to have overflowed spilling approximately 10L of water potentially containing diluted hydrocarbons (no offsite release). On 4/3/25 water was observed seeping through deteriorated controls and through a pipe located at the end of the sump at Orchard Hills North site. As a result, water had migrated outside of project boundary. Actions taken were recorded in the incident reports and verified as closed in SAI360.
A42	Any incident within or potentially affecting the Controlled Areas of the WaterNSW Pipelines corridor must also be reported to WaterNSW on the WaterNSW 24-hour Incident Notification Number 1800 061 069.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Auditees advised the WaterNSW pipeline is not located within the current work area for SSTOM.
A43	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A .	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	No incidents triggering notification to DPHI occurred during the audit period.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Non-Compliance Notification				
A44	The Planning Secretary must be notified in writing via the Major Projects website within seven (7) days after the Proponent becomes aware of any non-compliance with the terms of this approval.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/08/2025 NCR 008 - Orchard Hills CoA E38 250213 Rev01, dated 13/2/2025 - DPHI Submission - NCR 008 - Orchard Hills E38 (SSI-10051-PA-559), dated 18/2/2025 NCR 009 - Project Wide CoA C22 250226 Rev01, dated 26/2/2025 - DPHI Submission - NCR 009 - Project Wide CoA C22 250226 (SSI-10051-PA-560), dated 27/2/2025 NCR 010 - BSF Vegetation Damage and TPZ, dated 11/3/2025 - DPHI Submission - SSI-10051 SSTOM NCR-010 (SSI-10051-PA-568), dated 16/3/2025 NCR 011 - Concrete spill and unapproved HV route, dated 31/3/2025 - DPHI Submission - SSTOM NCR 011 - E105 Non-Compliance (SSI-10051-PA-572), dated 4/4/2025 NCR 012 - Concrete Truck on Unapproved HV Route, dated 15/7/2025 - DPHI Submission - SSI-10051 SSTOM NCR-012 (SSI-10051-PA-620), dated 18/7/2025 NCR 013 - Warragamba Pipeline no slew zone breach, dated 24/7/2025 - DPHI Submission - SSI-10051 SSTOM NCR-013 (SSI-10051-PA-625), dated 30/7/2025	C	There were six notifications of Non-Compliance (NC) submitted to DPHI for SSTOM during the audit period. On 10/3/25 an NC was raised against Condition C10 (Flora and Fauna Management Plan - Mitigation measure FF_M7) and REMM LV2 due to a non-compliant tree protection zone (TPZ) at Linewide Portion 1. Actions were raised for an adequate TPZ to be installed and monitoring of tree health for 4 weeks to assess whether damage has occurred. NCR 008 (13/2/2025): Condition E38. Out of hours delivery without approval, Lansdowne Road. Notification of the NC to DPHI was on 18/2/2025, within the required 7-day timeframe. Refer also to Condition E38. NCR 009 (26/2/2025): Condition C22 (Groundwater Monitoring Program). PLM Groundwater Monitoring Program (Section 8.5.1) requires that groundwater level and quality results will be submitted to DPHI water, and Sydney Metro within 60 days of the reporting period. PLM failed to report the results within this 60-day period unless otherwise agreed with DPHI Water. PLM conducted Round 1 (R1) groundwater monitoring (for the period December 2023-August 2024) following previous contractor SBT's monitoring (for the period July-November 2023). PLM also undertook Round 2 (R2) groundwater monitoring (for the period August-November 2024). Both R1 and R2 reports were not submitted to DPHI and SM within 60 days of the reporting period. Notification of the NC to DPHI was on 27/2/2025, within the required 7-day timeframe. Refer also to Condition E22. NB: NCR009 was identified during IA3 and reported in the IA3 audit report so does not need to be raised as an NC during the IA4 audit period. NCR 010 (11/3/2025): Condition C10 (Flora & Fauna Management Plan - Mitigation measure FF_M7) & REMM LV2. The TPZ was not established which is a requirement of the Flora and Fauna Subplan at Bringelly Services Facility. Notification of the NC to DPHI was on 16/3/2025 and within the required 7-day timeframe. Refer also to Condition C10. NCR 011 (31/3/2025): Condition E105. A Cono (PLM sub-contractor) dump truck was observed delivering materials to an Orchard Hills SSTOM site (Linewide North - Lansdowne to Patons Lane) via local roads that are not covered under an approved HVLR / CTMP. Notification of the NC to DPHI was on 4/4/2025, within the required 7-day timeframe. Refer also to Condition E105. NCR 012 (15/7/2025): Condition E105. On 11/7/2025 at approximately 8:45am, a Boral agitator truck was observed on Lethbridge Street, St Marys delivering concrete to the St Marys Station site. Following an investigation, it was confirmed the concrete agitator utilised Chapel, Lethbridge and Station Streets which are not approved within the St Marys CTMP for HV haulage. Refer also to Condition E105. NCR 013 (24/7/2025): Condition E121. The construction methodology for viaduct concrete works over the Warragamba Pipeline that was agreed with WaterNSW was not followed when a concrete boom delivering concrete to the viaduct entered the 'no slew zone'. Refer also to Condition E121.
A45	A non-compliance notification must identify the CSSI (including the application number for it), set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be undertaken to address the non-compliance. <i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i>	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/08/2025 NCR 008 - Orchard Hills CoA E38 250213 Rev01, dated 13/2/2025 NCR 009 Project Wide CoA C22 250226 Rev01, dated 26/2/2025 NCR 010 - BSF Vegetation Damage and TPZ, dated 1/3/2025 NCR 011 EIR22, Concrete spill and unapproved HV route, dated 31/3/2025 NCR 012 NCR-012, Concrete Truck on Unapproved HV Route, dated 15/7/2025	C	There were five notifications of Non-Compliance (NC) submitted to DPHI for SSTOM during the audit period. Details in the NCR reports submitted to DPHI complied with the requirements of Condition A45.
IDENTIFICATION OF WORKFORCE				
A46	All Heavy Vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and application number to enable immediate identification by a person viewing the Heavy Vehicle standing 20 metres away.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/08/2025 - Photo of covered spoil truck sighted, dated 1/8/2025 with clear signage	C	A photo of a covered spoil truck was sighted as evidence during the audit, dated 1/8/2025 with clear signage displayed. There was no active spoil haulage observed at the time of the audit site inspection.
A47	The CSSI name, application number, telephone number, postal address and email address required under Condition B3 must be available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also be provided on the website required under Condition B11 .	- Site inspection, 11/08/2025 - Project website: https://parklifemetro.com.au/project/ - SM - WSA Independent Audit No.6 - Combined Response to Findings, 8/10/2024	C	A review of public facing signage under Condition A47 was conducted by PLM after the last IEA (IA2) where non-compliant signage was observed at Orchard Hills Station. During the site inspection for IA4 signage observed was deemed to be compliant.
PART B				
COMMUNITY INFORMATION AND REPORTING				
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT				
Community Communication				
B1	The Overarching Community Communication Strategy as provided in the documents listed in Condition A1 , or updated Strategy must be implemented for the duration of the work. Should the Overarching Community Communication Strategy be updated, a copy must be provided to the Planning Secretary for information.	- SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 - Post Approval submission form (PA-465) to DPHI, WSA OCCS Rev 5, dated 12/8/2024 - DPHE Letter to Sydney Metro RE: Receipt of SM-WSA OCCS Rev 5, dated 31/7/2024, dated 20/8/2024 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - SSTOM Complaints Register February-August 2025	C	The Community Communication Strategy (CCS) is a Sydney Metro document that sets out the mechanisms for which communication between the community and key stakeholders will be carried out. The CCS addresses who (the Proponent, Independent Appointments and/or construction contractor) will engage with the community, relevant councils and agencies, how they will engage and the timing of engagements. Submission to and receipt from DPHI sighted for updated OCCS Rev5, dated 31/7/2024.

Item
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Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
COMPLAINTS MANAGEMENT SYSTEM				
B2	A Complaints Management System must be prepared and implemented before the commencement of any work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the CSSI.	- SSTOM Complaints Register February-August 2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - SM-WSA Cumulative Impact Meeting Minutes #012 12/2/2025 - SM-WSA Cumulative Impact Meeting Minutes #013 19/3/2025 - SM-WSA Cumulative Impact Meeting Minutes #014 16/4/2025 - SM-WSA Cumulative Impact Meeting Minutes #015 14/5/2025 - SM-WSA Cumulative Impact Meeting Minutes #016 25/6/2025 - SM-WSA Cumulative Impact Meeting Minutes #017 16/7/2025 - SM-WSA M12 Cumulative Impact Meeting Minutes #006 12/2/2025 - SM-WSA M12 Cumulative Impact Meeting Minutes #007 12/3/2025	C	Complaints are recorded in Consultation Manager (CM), a TINSW database. PLM has a contract obligation to provide 3x Place Manager roles for SSTOM. The contractor reports Daily Complaints to the EPA in accordance with EPL requirements. A Weekly Complaints Report is distributed to DPHI and the ER. The ER Project Monthly Report summarises complaints attributed to the project for the month. Complaints within the reporting period have been focussed on predominantly related to Noise and vibration, including consultation and notification of out of hours work. There were 32 complaints received during the audit period, 20 of which were related to these issues. Other isolated issues raised by complainants and recorded in the complaints register included property damage, air quality, visual amenity, and light spill. Evidence of close-out of complaints was sighted and recorded on the complaints register and appeared to be adequate. Auditees advised there are no repeat complainants known to the project. Potential exists for cumulative impacts from SSTOM with other nearby PLM project sites, particularly at Linewide and SMF. Cumulative impact assessments are undertaken by PLM during OOH works planning. Refer to noise conditions for more information. Cumulative impacts from interfaces and other nearby construction sites have historically been managed through monthly Cumulative Impact Meetings. Sydney Metro undertakes periodic meetings with surrounding projects (including M12 and Bradfield Delivery Authority (BDA) works). Auditees advised M12 West works (e.g. Luddenham Road and Elizabeth Drive) have reduced to landscaping and rehabilitation / finishing works, thereby reducing the potential for cumulative impacts with this project. Cumulative impact meetings with Sydney Metro were being held monthly but since this interface has reduced, meetings have now ceased with the last meeting held on 12/3/2025. Sydney Metro is still in contact with M12 representatives and conducts informal discussions with them prior to WSA CI meetings. Sydney Metro BDA meetings are led by PLM via delivery interface meetings – no minutes are produced. Outcomes of both meetings are referenced and discussed as appropriate within fortnightly formal Environmental Working Group minutes or in informal discussions with PLM. Recent meeting minutes were provided as evidence and included attendees from Sydney Metro, SSTOM and FSM (AEW) Environment and Project management teams. Issues discussed in meetings included a lookahead for out of hours work at each location, and potential for cumulative impacts related to environmental aspects including Surface water management, Air quality, and Heavy Vehicle (HV) movements during peak hours. Auditees advised traffic and access impacts have reduced with the completion of SCAW and SBT import and tunnelling works, which has resulted in significant improvements to surface water quality, dust emissions and noise and vibration impacts. It was noted that truck movements associated with SSTOM have increased since the previous audit period due to import activities, spoil movement and deliveries. Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site, though it is noted this is an ongoing focus for the project.
B3	The following information must be available to facilitate community enquiries and manage complaints before the commencement of work and for 12 months following the completion of construction: (a) a 24- hour telephone number for the registration of complaints and enquiries about the CSSI; (b) a postal address to which written complaints and enquiries may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved. This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.	- SSTOM Complaints Register February-August 2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025	C	(a) A project 1800 number (1800 717 703) has been established (b) Project postal address: Sydney Metro, PO Box K659, Haymarket NSW 1240 (c) A project email address (whbtl@transport.nsw.gov.au) has been established and can be accessed via the Contact Us link on the ParkLife Metro website (d) A mediation system has been established (refer B8-B10) The above information is available on the project website, on shade cloth around construction sites, and is included in community notifications.
B4	A Complaints Register must be maintained recording information on all complaints received about the CSSI during the carrying out of any work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the: (a) number of complaints received; (b) date and time of the complaint; (c) number of people (in the household) affected in relation to a complaint, if relevant; (d) method by which the complaint was made; (e) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (f) issue of the complaint; (g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and (h) if no action was taken, the reason(s) why no action was taken.	- SSTOM Complaints Register February-August 2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025	C	The SSTOM Complaints Register for the audit period was sighted. The Complaints Register is updated as complaints are received. The Contractor provides a copy of the Complaints Register to TINSW daily. Sydney Metro provides a copy of the Complaints Register to DPHI weekly. A copy is also provided to the ER weekly. Complaints within the reporting period have been focussed on predominantly related to Noise and vibration, including consultation and notification of out of hours work. There were 32 complaints received during the audit period, 20 of which were related to these issues. Other isolated issues raised by complainants and recorded in the complaints register included property damage, air quality, visual amenity, and light spill. Evidence of close-out of complaints was sighted and recorded on the complaints register and appeared to be adequate. Auditees advised there are no repeat complainants known to the project.
B5	Complainants must be advised of the following information before, or as soon as practicable after, providing personal information: (a) the Complaints Register may be forwarded to government agencies, including the Department (Department of Planning Industry and Environment, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150), to allow them to undertake their regulatory duties; (b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies; (c) the supply of personal information by the complainant is voluntary; and (d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement). The Collection Statement must be included on the Proponent or development website to make prospective complainants aware of their rights under the <i>Privacy and Personal Information Protection Act 1998</i> (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.	- SSTOM Complaints Register February-August 2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Complainants Privacy Collection Statement: https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice	C	Auditees provided a summary of information describing how the information specified in Condition B5 is communicated to complainants. - The Complainants Privacy Collection Statement was available on the PLM website - https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice and Sydney Metro website - https://www.sydneymetro.info/privacy-statement-use-sydney-metro-website - A Privacy Management Plan has been prepared and was available on the Sydney Metro website - https://www.sydneymetro.info/media/document/42641 - ParkLife Metro has prepared a SSTOM Community Communications Strategy – Delivery - https://parklifemetro.com.au/wp-content/uploads/2023/11/SMW-SASSM-PLD-1NL-PC-PLN-000065-Community-Communications-Strategy-Rev-0 The above documents were reviewed and meet the requirements of Condition B5.

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Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B6	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request. <i>Note: Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.</i>	- SSTOM Complaints Register February-August 2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025	C	Sydney Metro provides a copy of the Complaints Register to DPHI weekly.
B7	A Community Complaints Mediator that is independent of the design and construction personnel must be engaged by the Proponent, upon the referral of the complaint by the ER in accordance with the Overarching Community Communication Strategy .	- SSTOM Complaints Register February-August 2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 - Sydney Metro WSA Construction Complaints Management System	NT	In accordance with the Sydney Metro WSA Construction Complaints Management System, issues and complaint escalation to independent mediation would be at the recommendation of the ER following a thorough review of the complaint information in consideration of the project planning and assessment process. The Director, Project Communication may also refer a complaint to independent mediation at any point in the complaint. There have been no complaints referred to mediation during the course of the SSTOM project.
B8	The role of the Community Complaints Mediator is to provide independent mediation services for any reasonable and unresolved complaint referred by the ER where a member of the public is not satisfied by the Proponent's response. Where a Community Complaints Mediator is required, a mediator accredited under the National Mediator Accreditation System (NMAS), administered by the Mediator Standards Board must be appointed.	- SSTOM Complaints Register February-August 2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 - Sydney Metro WSA Construction Complaints Management System	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for SSTOM during the audit period.
B9	The Community Complaints Mediator will: (a) review any unresolved disputes, referred by the ER in accordance with the Overarching Community Communication Strategy ; (b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes; and (c) provide a copy of the recommendations, and the Proponent's response to the recommendations, to the Planning Secretary within one month of the recommendations being made.	- SSTOM Complaints Register February-August 2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for SSTOM during the audit period.
B10	Community Complaints Mediation will not be enacted before the Complaints Management System required by Condition B2 has been executed for a complaint and will not consider issues such as property acquisition, where other dispute processes are provided for in this approval, statute or clear government policy and resolution processes are available, or matters which are not within the scope of this CSSI.	- SSTOM Complaints Register February-August 2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for SSTOM during the audit period.
PROVISION OF ELECTRONIC INFORMATION				
B11	A website or webpage providing information in relation to the CSSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 24 months following the completion of all stages of construction of the CSSI. Up-to-date information (excluding confidential, private, commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including: (a) information on the current implementation status of the CSSI; (b) a copy of the documents listed in Condition A1, and any documentation relating to any modifications made to the CSSI or the terms of this approval; (c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval, or links to the referenced documents where available; (d) a copy of each statutory approval, licence or permit required and obtained in relation to the CSSI, or where the issuing agency maintains a website of approvals, licences or permits, a link to that website; (e) a current copy of each document required under the terms of this approval, which must be published within one (1) week of its approval or before the commencement of any work to which they relate or before their implementation, as the case may be; and (f) a copy of the audit reports required under this approval. Where the information / document relates to a particular work or is required to be implemented, it must be published before the commencement of the relevant work to which it relates or before its implementation. All information required in this condition is to be provided on the website or webpage, and easy to navigate.	- PLM Project website: https://parklifemetro.com.au/project/ - Sydney Metro Document Library: https://www.sydneymetro.info/documents - Construction Environment Management Plan (CEMP), SSTOM, Rev 02 19/12/2024 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025	C	A project website had been established for SSTOM: https://parklifemetro.com.au/project/. Sydney Metro also maintains a project website: https://www.sydneymetro.info/documents (a) Work Updates including current and past work activity notifications were available on the Sydney Metro project website and addressed the current scope of work at the time of the audit, including out of hours works. The website includes documentation required under Condition A1 including CEMPs, communication strategies and reports, sustainability documents etc. (b) & (c) Documents listed in Condition A1 were available on the website: https://www.sydneymetro.info/documents, and included the EIS Chapters & Appendices, Submissions Report and overarching documents associated with the project approval, e.g. Ministers Conditions of Approval, Unexpected Contamination Finds Protocol, and WSA Staging Report Rev 11, 11 Oct 2024. (d) Project approval & the contractor EPL was on the website. (e) A current copy of most documents requested as evidence during the audit was available on the project website. (f) The previous SSTOM Independent Audit Report (SSTOM IA3/ WSA IA7) was on the project website. The website was generally easy to navigate and documents searched for by the Auditor were located in a timely manner. A draft direction is under discussion regarding publishing of information on the WSA website, though no changes had been confirmed at the time of the audit.

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Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
PART C				
CONSTRUCTION ENVIRONMENTAL MANAGEMENT				
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN				
C1	Construction Environmental Management Plans (CEMPs) and CEMP Sub-plans must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during construction.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • Construction Environment Management Plan (CEMP), SSTOM, Rev 02 19/12/2024 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • SM-WSA Environmental Impact Statement, Appendix F - Construction Environmental Management Framework (CEMF), September 2020 • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206 (St Marys), dated 5/12/2023 (St Marys) • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53823 (Claremont Meadows), dated 8/1/2025 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024	C	Appendix C of the Staging Report documents applicable CEMP requirements for each stage, which have been addressed in the CEMP, endorsed by the ER and approved by DPHI. The CEMP includes reference to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). Section 3.4 (f) of the SM-WSA CEMP addresses the preparation of CEMPs and requires <i>"The Principal Contractor CEMP will cover the requirements of the relevant planning approval documentation, the conditions of all other permits and licences, the Principal Contractor's corporate EMS, the environmental provisions of the contract documentation and this Construction Environmental Management Framework"</i>. Section 12.2 (a)(viii) of the CEMP addresses Soil and Water and requires <i>"Principal Contractors will develop and implement a Soil and Water Management Plan for all off-airport works ... will include as a minimum: The requirements of any applicable licence conditions"</i>. A review of the CEMP and Sub-plans undertaken during this IEA3 did not identify any gaps with CEMP requirements.
C2	With the exception of any CEMPs expressly nominated by the Planning Secretary to be endorsed by the ER, all CEMPs must be submitted to the Planning Secretary for approval. <i>Note: The Planning Secretary will consider the assessment of the predicted level of environmental risk and potential level of community concern required under Condition A11(e) when deciding whether any CEMP's may be endorsed by the ER.</i>	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • Construction Environment Management Plan (CEMP), SSTOM, Rev 02 19/12/2024 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER endorsement of GWMP Rev0.0, letter dated 11/7/2023 • ER endorsement of AQMP Rev0.0, letter dated 27/6/2023 • ER endorsement of SWMP Rev0.0, letter dated 26/6/2023 • ER Endorsement of Surface Water Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023	C	The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for SSTOM commenced on 8/8/2023, after DPHI approval.
C3	The CEMP(s) not requiring the Planning Secretary's approval must be submitted to the ER for endorsement no later than one (1) month before the commencement of construction or where instruction is staged no later than one (1) month before the commencement of that stage. That CEMP must obtain the endorsement of the ER as being consistent with the conditions of this approval and all undertakings made in the documents listed in Condition A1.	• Construction Environment Management Plan (CEMP), SSTOM, Rev 02 19/12/2024 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER Endorsement of CEMP Rev0.0, letter dated 27/6/2023 • ER endorsement of AQMP Rev0.0, letter dated 27/6/2023 • ER Endorsement of AQCMP Rev 0.0, dated 28/6/2023 • ER Endorsement of FFMP Rev 2.0, letter dated 27/3/2024 • ER endorsement of GWMP Rev0.0, letter dated 11/7/2023 • ER Endorsement of NAHMP Rev 0.0, letter dated 26/6/2023 • ER Endorsement of NVMP Rev 0.0, letter dated 27/6/2023 • ER Endorsement of NVCMP Rev 0.0, letter dated 28/6/2023 • ER endorsement of SWMP Rev0.0, letter dated 26/6/2023 • ER Endorsement of SWQCMP Rev 0.0, letter dated 28/6/2023 • ER Endorsement of VAMP Rev 0.0, letter dated 31/7/2023 • ER Endorsement of WMP Rev 1.0, letter dated 31/7/2023 • ER Endorsement of Aboriginal Cultural Heritage Management Plan Rev 9.0 • Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023 • Letter to DPE - SSI 10051 Submission of Endorsed SSTOM CEMP, dated 28/6/2023 • Post Approval Form_20230628225726, Submission of endorsed SSTOM CEMP, 28/6/2024	C	The WSA SSTOM CEMP & Sub-plans were: • Endorsed by the ER on 26/6/2023 (SWMP, NAHMP), 27/6/2023 (CEMP, AQMP, & NVMP), 11/7/2023 (GWMP), 31/7/2023 (VAMP, WMP), 27/3/2024 (FFMP) • Submitted to DPHI on 28/6/2023 • Approved by DPHI in a letter dated 4/8/2023 • Construction for SSTOM commenced on 8/8/2023, after DPHI approval. SSTOM CEMP & Sub-plans were submitted to DPHI for approval no later than one month before the commencement of SSTOM in accordance with Condition C3. The SSTOM CEMP & Sub-plans include requirements relevant to MOD-1 (approved 14/4/2022) to amend Condition E4 to reduce the biodiversity offset credit requirement. DPHI approved the WSA SSTOM CEMP, Sub-plans and Monitoring Programs in a letter dated 4/8/2023. Notifications of commencement of construction were submitted to DPHI (as per Conditions A34 & A35) for each stage. Commencement of Construction for SSTOM was on 1/8/2023 for commencement date 8/8/2023. The original CEMP and Sub-plans (Rev 0.0) were endorsed by the ER on 27/6/2023, more than one month prior to the commencement of construction date for SSTOM.

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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations															
C4	Any CEMP to be approved by the Planning Secretary must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	- Construction Environment Management Plan (CEMP), SSTOM, Rev 02 19/12/2024 - DPHI CEMP & Sub-plan approval letter: - WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 - ER Endorsement of CEMP Rev0.0, letter dated 27/6/2023 - Letter to DPE - SSI 10051 Submission of Endorsed SSTOM CEMP, dated 28/6/2023 - Post Approval Form_20230628225726, Submission of endorsed SSTOM CEMP, 28/6/2024	C	The WSA SSTOM CEMP Rev 0.0 was: - Endorsed by the ER on 27/6/2023 - Submitted to DPHI on 28/6/2023 - Approved by DPHI in a letter dated 4/8/2023 - Construction for SSTOM commenced on 8/8/2023 The SSTOM CEMP was submitted to DPHI for approval no later than one month before the commencement of SSTOM in accordance with Condition C3 and C4.															
C5	Of the CEMP Sub-plans required under Condition C1, the following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan. Details of issues raised by a government agency during consultation (as required by Condition A6) must be provided with the relevant CEMP Sub-plan when submitted to the Planning Secretary / ER (whichever is applicable). Where a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why. <table border="1"><thead><tr><th></th><th>Required CEMP Sub-plan</th><th>Relevant government agencies to be consulted for each CEMP Sub-plan</th></tr></thead><tbody><tr><td>(a)</td><td>Noise and vibration</td><td>Relevant Councils and WaterNSW (in relation to its assets)</td></tr><tr><td>(b)</td><td>Flora and fauna</td><td>DPIE EES, DPI Fisheries, and Relevant Councils</td></tr><tr><td>(c)</td><td>Soil and Water</td><td>DPI Fisheries, and Relevant Councils</td></tr><tr><td>(d)</td><td>Non-Aboriginal heritage</td><td>Relevant Councils, WaterNSW and Heritage NSW</td></tr></tbody></table> temporal activities or activity based staging.		Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan	(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)	(b)	Flora and fauna	DPIE EES, DPI Fisheries, and Relevant Councils	(c)	Soil and Water	DPI Fisheries, and Relevant Councils	(d)	Non-Aboriginal heritage	Relevant Councils, WaterNSW and Heritage NSW	- Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 - Construction Environment Management Plan (CEMP), SSTOM, Rev 02 19/12/2024 - Noise and Vibration Management Sub-plan (NVMP), SSTOM, Rev 03, 12/12/2024 - Flora and Fauna Management Sub Plan (FFMP), Rev 03, 12/12/2024 - Air Quality Management Sub Plan (AQMP), SSTOM, Rev 02, 11/10/2024 - Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024 - Non-Aboriginal Heritage Management Sub Plan (HMP), SSTOM, Rev 02.01, 12/12/2024 - Waste Management Sub Plan (WMP), SSTOM, Rev 02, 12/12/2024 - Visual Amenity Management Sub Plan (VAMP), Rev 01, 17/12/2024 - DPHI CEMP & Sub-plan approval letter: - WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 Consultation Report is attached to each Sub-Plan.	C	Partially Applicable as per the table in Appendix B of the Staging Report Rev 11, 11 Oct 2024 Table 4-2 of the Staging Report lists the following Sub-plans as applicable to SSTOM: a) Noise and Vibration Management Sub-plan and monitoring program b) Flora and Fauna Sub-plan c) Soil and Water Sub-plan and monitoring program d) Non-Aboriginal Heritage Sub-plan The details of agency consultation are included in each relevant Sub-plan. Consultation with agencies, and the approval of the original WSA SSTOM CEMP & Sub-plans was not conducted within the current reporting period. DPHI approved the WSA SSTOM CEMP & Sub-plans, which included the verification of agency consultation as per Condition C5, in a letter dated 4/8/2023.
	Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan																	
(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)																	
(b)	Flora and fauna	DPIE EES, DPI Fisheries, and Relevant Councils																	
(c)	Soil and Water	DPI Fisheries, and Relevant Councils																	
(d)	Non-Aboriginal heritage	Relevant Councils, WaterNSW and Heritage NSW																	
C6	The CEMP Sub-plans must state how: (a) the environmental performance outcomes identified in the documents listed in Condition A1 will be achieved; (b) the mitigation measures identified in the documents listed in Condition A1 will be implemented; (c) the relevant terms of this approval will be complied with; and (d) issues requiring management during construction (including cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART principles.	- SSTOM CEMP, Rev 02 19/12/2024 - SSTOM NVMP, Rev 03, 12/12/2024 - SSTOM FFMP, Rev 03, 12/12/2024 - SSTOM AQMP, Rev 02, 11/10/2024 - SSTOM SWMP, Rev 03, 12/12/2024 - SSTOM HMP, Rev 02.01, 12/12/2024 - SSTOM WMP, Rev 02, 12/12/2024 - SSTOM VAMP, Rev 01, 17/12/2024 - DPHI CEMP & Sub-plan approval letter: - WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023.															
C7	With the exception of any CEMP Sub-plans expressly nominated by the Planning Secretary to be endorsed by the ER, all CEMP Sub-plans must be submitted to the Planning Secretary for approval.	- SSTOM FFMP, Rev 02, 13/3/2024 - Sydney Metro WSA SSI 10051 MOD 1 Approval, dated 14/4/2024 - DPHI CEMP & Sub-plan approval letter: - WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	DPHI approval of the WSA SSTOM CEMP & Sub-plans was not within the current audit period. Compliance with Condition C7 was verified during a previous audit (IA1). The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023.															
C8	The CEMP Sub-plans not requiring the Planning Secretary's approval must obtain the endorsement of the ER as being in accordance with the conditions of approval and all relevant undertakings made in the documents listed in Condition A1 . Any of these CEMP Sub-plans must be submitted to the ER with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	- ER endorsement of GWMP Rev0.0, letter dated 11/7/2023 - ER endorsement of AQMP Rev0.0, letter dated 27/6/2023	C	The documents required by CEMP and not requiring DPHI approval - Groundwater Monitoring Program and AQMP have been endorsed by the ER.															
C9	Any of the CEMP Sub-plans to be approved by the Planning Secretary must be submitted to the Planning Secretary with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	- DPHI CEMP & Sub-plan approval letter: - WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	As per the DPHI approval letter, the CEMP, Sub-plans and associated monitoring programs were submitted in compliance with Condition C9 .															

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C10	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans , as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER , must be implemented for the duration of construction.	• SSTOM CEMP, Rev 02 19/12/2024 • SSTOM NVMP, Rev 03, 12/12/2024 • SSTOM FFMP, Rev 03, 12/12/2024 • SSTOM AQMP, Rev 02, 11/10/2024 • SSTOM SWMP, Rev 03, 12/12/2024 • SSTOM HMP, Rev 02.01, 12/12/2024 • SSTOM WMP, Rev 02, 12/12/2024 • SSTOM VAMP, Rev 00, Rev 01, 17/12/2024 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER endorsement of GWMP Rev0.0, letter dated 11/7/2023 • ER endorsement of AQMP Rev0.0, letter dated 27/6/2023 • NCR 010 - BSF Vegetation Damage and TPZ, dated 1/3/2025 • DPHI Submission - SSI-10051 SSTOM NCR-010 (SSI-10051-PA-568), dated 16/3/2025	NC	DPHI approval of the original WSA SSTOM CEMP & Sub-plans was not within the current audit period. Compliance with Condition C10 was verified during IEA #1. The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023. The implementation of the CEMP & Sub-plans was verified during the audit site inspection and as noted throughout the audit. Self-Reported Non-Compliance 01: NCR 010 (1/3/2025): Condition C10 (Flora & Fauna Management Plan - Mitigation measure FF_M7) & REMM LV2. The TPZ was not established which is a requirement of the Flora and Fauna Subplan. Notification of the NC to DPHI was on 16/3/2025 and not within the required 7-day timeframe. Refer also to Condition A44.
C11	In addition to the relevant requirements of the CEMF , the Flora and Fauna CEMP Sub-plan must include but not be limited to: (a) details of how the requirements of Conditions E11 will be met; (b) details of a dewatering plan of farm dams including: (i) supervision of dewatering by a suitably qualified ecologist; (ii) a methodology for the transfer of native fauna species known to inhabit and/or use the dam; (iii) the location and suitability of the proposed relocation sites; and (iv) any potential impacts of relocating the fauna to the relocation sites; (c) protocols for incidental finds of threatened species and ecological communities within the construction boundary.	• ER Endorsement of FFMP Rev 2.0, letter dated 27/3/2024 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • Interview with Sydney Metro & ParkLife Metro, 15/08/2025	C	The WSA SSTOM Flora and Fauna CEMP Sub-plan was endorsed by the ER on 27/3/2024. A detailed review of compliance of the WSA SSTOM Flora and Fauna CEMP Sub-plan with Condition C11 was conducted during IA1 and found to meet the relevant requirements.
C12	In addition to the relevant requirements of the CEMF , the Soil and Water CEMP Sub-Plan must include but not be limited to: (a) details how the requirements of Conditions E127, E128 and E129 will be met; and (b) the unexpected contaminated finds protocol required by Condition E98 .	• ER endorsement of SWMP Rev0.0, letter dated 26/6/2023 • ER Endorsement of SWQCMF Rev 0.0, letter dated 28/6/2023 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024 • Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 03, 12/12/2024 (SWMP, Appendix B) • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206, dated 5/12/2023 • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53823 (Claremont Meadows), dated 8/1/2025	C	The WSA SSTOM Soil and Water CEMP Sub-plan was endorsed by the ER on 26/6/2023. The WSA SSTOM Soil and Water CEMP Sub-plan was approved by DPHI on 4/8/2023. WSA SSTOM construction commenced on 8/8/2023, after Soil and Water CEMP Sub-plan endorsement and DPHI approval. Minor amendments to the CEMP and Sub-plans have been approved by the ER as required. A detailed review of compliance of the WSA SSTOM Soil and Water CEMP Sub-plan with Condition C12 was conducted during IA1 and found to meet the relevant requirements, including how Conditions E127, E128 and E129 will be met. Refer to Conditions E127, E128 and E129 for more information.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations															
CONSTRUCTION MONITORING PROGRAMS																			
C13	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies (as required by Condition A6) identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP. Where a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why. <table><tr><th></th><th>Required Construction Monitoring Programs</th><th>Relevant government agencies to be consulted for each Construction Monitoring Program</th></tr><tr><td>(a)</td><td>Noise and vibration</td><td>Relevant Councils and WaterNSW (in relation to its assets)</td></tr><tr><td>(b)</td><td>Surface water quality</td><td>DPIE Water, DPI Fisheries, and Relevant Councils</td></tr><tr><td>(c)</td><td>Groundwater</td><td>DPIE Water</td></tr><tr><td>(d)</td><td>Air Quality</td><td>Relevant Councils</td></tr></table>		Required Construction Monitoring Programs	Relevant government agencies to be consulted for each Construction Monitoring Program	(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)	(b)	Surface water quality	DPIE Water, DPI Fisheries, and Relevant Councils	(c)	Groundwater	DPIE Water	(d)	Air Quality	Relevant Councils	• SSTOM CEMP, Rev 02 19/12/2024 • NVMP, SSTOM, Rev 03, 12/12/2024, includes: • Noise and Vibration Monitoring Program • SSTOM AQMP, Rev 02, 11/10/2024, includes: • Air Quality Construction Monitoring Program • SSTOM SWMP, Rev 03, 12/12/2024, includes: • Surface Water Monitoring Program • Groundwater Monitoring Program, Rev 02, dated 19/12/2024 • Groundwater Management Procedure, Rev F, dated 3/10/2024 • ER Endorsement of PLM Sub-plans and monitoring reports, letter dated 18/12/2024: - Flora and Fauna Management Sub-plan Rev 03, dated 12/12/2024 - Non-Aboriginal Heritage Management Sub-plan Rev 02, dated 12/12/2024 - Waste Management Sub-plan Rev 02, dated 12/12/2024 - Noise and Vibration Management Sub-Plan Rev 03, dated 12/12/2024 - Noise and Vibration Monitoring Program Rev 03, dated 12/12/2024 - Air Quality Monitoring Program Rev 02, dated 12/12/2024 - Surface Water Quality Monitoring Program Rev 03, dated 16/12/2024 - Visual Amenity Management Sub-Plan Rev 01, dated 17/12/2024 • ER Endorsement of Air Quality Management Plan Rev 2.0 Version 1, letter dated 15/11/2024 • ER Endorsement of CEMP and Groundwater Monitoring Program, letter dated 15/11/2024 - Construction Environmental Management Plan Rev 02, dated 19/12/2024 - Groundwater Monitoring Plan Rev 02, dated 19/12/2024 • ER Endorsement of Noise and Vibration Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 • ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 • ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	Partially Applicable as per the table in Appendix B of the Staging Report Rev 10, 22 May 2024 Table 4-2 of the Staging Report lists the following Sub-plans as applicable to SSTOM: a) Noise and Vibration Monitoring Program - Included in Sub-plan b) Surface Water Quality Monitoring Program - Included in Sub-plan c) Groundwater Monitoring Program - Included in Sub-plan d) Air Quality Monitoring Program - Included in Sub-plan DPHI Water were consulted on 19/5/2023 during preparation of the groundwater monitoring program. DPE Water provided recommendations regarding monitoring data presentation, reporting and water and enhancements to the monitoring bore network and Trigger Action Response Plan. Compliance with Condition C13 was verified during IA1. Details of consultation with the relevant government agencies is documented in each relevant Sub-plan. The WSA SSTOM CEMP and Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI in a letter dated 4/8/2023.
	Required Construction Monitoring Programs	Relevant government agencies to be consulted for each Construction Monitoring Program																	
(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)																	
(b)	Surface water quality	DPIE Water, DPI Fisheries, and Relevant Councils																	
(c)	Groundwater	DPIE Water																	
(d)	Air Quality	Relevant Councils																	
C14	Each Construction Monitoring Program must provide: (a) details of baseline data available including the period of baseline monitoring; (b) details of baseline data to be obtained and when; (c) details of all monitoring of the project to be undertaken; (d) the parameters of the project to be monitored; (e) the frequency of monitoring to be undertaken; (f) the location of monitoring; (g) the reporting of monitoring results and analysis results against relevant criteria; (h) details of the methods that will be used to analyse the monitoring data; (i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicated unacceptable project impacts; (j) a consideration of SMART principles; (k) any consultation to be undertaken in relation to the monitoring programs; and (l) any specific requirements as required by Conditions C15 to C16.	• Interview with ER, 22/08/2025 • SSTOM CEMP, Rev 02 19/12/2024 • NVMP, SSTOM, Rev 03, 12/12/2024, includes: • Noise and Vibration Monitoring Program • SSTOM AQMP, Rev 02, 11/10/2024, includes: • Air Quality Construction Monitoring Program • SSTOM SWMP, Rev 03, 12/12/2024, includes: • Surface Water Monitoring Program • Groundwater Monitoring Program, Rev A, dated 11/5/2023 • ER Endorsement of Noise and Vibration Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 • ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 • ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023 • ER Endorsement of Surface Quality Construction Monitoring Program Revision 4, letter dated 13/8/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	Construction monitoring programs for Noise & Vibration, Air Quality and Soil & Water were reviewed as part of the audit. All parts (a)-(l) of Condition C14 were included in each monitoring program. The WSA SSTOM Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI (in the case of the Noise & Vibration and Surface Water monitoring programs) in a letter dated 4/8/2023. A review of the surface water quality monitoring program and associated monitoring locations was undertaken in consultation with the ER to ensure the most effective locations have been selected. The review resulted in an overall reduction in the number of monitoring of locations. Two monitoring locations (SW1 and SW2) in South Creek, associated with the St Marys station project were removed due to no discharge occurring from the St Marys site. Monitoring locations SW7, SW9 & SW10 were also removed (Badgerys Creek) as they were not considered effective in monitoring construction impacts. An ER Endorsement letter summarising the approval of these changes was sighted, dated 13/8/2025.															
C15	The Noise and Vibration Construction Monitoring Program must include: (a) noise and vibration monitoring at representative residential and other locations (including at the worst-affected residences), subject to property owner approval, to confirm construction noise and vibration levels; (b) monitoring undertaken during the day, evening and night-time periods throughout the construction period and cover the range of activities being undertaken; (c) method and frequency for reporting monitoring results; and (d) a process to undertake real time noise and vibration monitoring. The results of the monitoring must be readily available to the construction team, the Proponent and ER. The Planning Secretary and EPA must be provided with access to the results on request.	• SSTOM CEMP, Rev 02 19/12/2024 • NVMP, SSTOM, Rev 03, 12/12/2024, includes: • Noise and Vibration Monitoring Program • ER Endorsement of Noise and Vibration Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	The Noise & Vibration monitoring program (part of the WSA SSTOM Construction NVMP) was reviewed as part of the audit. All parts (a)-(d) of Condition C15 were included in the monitoring program. The WSA SSTOM Noise and Vibration construction monitoring program was endorsed by the ER in a letter dated 28/6/2023 and approved by DPHI in a letter dated 4/8/2023.															

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C16	Groundwater Construction Monitoring Program must include: (a) groundwater monitoring networks at each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1; (b) detail of the location of all monitoring bores with nested sites to monitor both shallow and deep groundwater levels and quality; (c) define the location of saltwater interception monitoring where sentinel groundwater monitoring bores will be installed between the saline sources and that of each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1; (d) results from existing monitoring bores; (e) monitoring and gauging of groundwater inflow to the excavations predicted to intercept groundwater in the documents listed in Condition A1, appropriate trigger action response plan for all predicted groundwater impacts upon each noted neighbouring groundwater system component for each excavation construction site; (f) trigger levels for groundwater quality, salinity and groundwater drawdown in monitoring bores and / or other groundwater users; (g) daily measurement of the amount of water discharged from the water treatment plants; (h) water quality testing of the water discharged from treatment plants; (i) management and mitigation measures and criteria, including measures to address impacts on groundwater dependent ecosystems; (j) groundwater inflow to the excavations to enable a full accounting of the groundwater take from the Sydney Basin Central Groundwater Source; (k) reporting of groundwater gauging at excavations, groundwater monitoring, groundwater trigger events and action responses; and (l) methods for providing the data collected to Sydney Water where discharges are directed to their assets.	- SSTOM SWMP, Rev 03, 12/12/2024, includes: - Surface Water Monitoring Program - Groundwater Construction Monitoring Program, Rev 2, dated 19/12/2024 - ER Endorsement of Groundwater Monitoring Program Rev 0, letter dated 11/7/2025 - ER Endorsement of Groundwater Monitoring Program Rev 2, letter dated 15/1/2025	C	The Groundwater Construction Monitoring Program forms part of the SWMP and was Rev0 was endorsed by the ER in a letter dated 11/7/2023. Section 1.3.1 Conditions of Approval, and Table 1 of the Groundwater Monitoring Program detail how these conditions have been addressed. A Groundwater Management Procedure is provided in Appendix G of the SWMP, which includes the Groundwater Monitoring Program. The Groundwater Monitoring Program was reviewed to align with the SBT Groundwater Monitoring Program , and implementation commenced upon endorsed / approval by the ER. Auditees advised that a number of the groundwater monitoring wells established for the SBT Groundwater Monitoring Program had been destroyed during construction. PLM has engaged Coffey to install a number of new wells, and groundwater monitoring is being conducted by ADE. The first round of monitoring for the new wells was conducted late July/early August 2025. Two earlier rounds of groundwater monitoring were conducted by ADE on the SBT wells. The groundwater monitoring program was updated during the IA4 audit period to Rev2 (Groundwater Construction Monitoring Program, Rev 2, dated 19/12/2024) and is currently undergoing an annual review along with all other PLM management plans and programs.
C17	With the exception of any Construction Monitoring Programs expressly nominated by the Planning Secretary to be endorsed by the ER , all Construction Monitoring Programs must be submitted to the Planning Secretary for approval.	- DPHI CEMP & Sub-plan approval letter: - WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 - Sydney Metro WSA Staging Report Rev11, Oct 2024	C	The WSA SSTOM Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI (in the case of the Noise & Vibration and Surface Water monitoring programs) in a letter dated 4/8/2023. The Sydney Metro WSA Staging Report sets out the requirement for ER Endorsement and DPHI approval roles for the SSTOM CEMP, Sub-plans and monitoring programs, which have been applied for the project.
C18	The Construction Monitoring Programs not requiring the Planning Secretary's approval must obtain the endorsement of the ER as being in accordance with the conditions of approval and all undertakings made in the documents listed in Condition A1 . Any of these Construction Monitoring Programs must be submitted to the ER for endorsement at least one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	- ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 - Groundwater Construction Monitoring Program, Rev 2, dated 19/12/2024 - ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023 - Sydney Metro WSA Staging Report Rev11, Oct 2024	C	ER Endorsement Letters were sighted for the SSTOM Air Quality and Groundwater Construction monitoring programs. As set out in Table 4-6 of the Sydney Metro WSA Staging Report, the Air Quality and Groundwater Construction monitoring programs require ER Review and Endorsement only (i.e. no requirement for approval of the Planning Secretary). The SSTOM Air Quality and Groundwater Construction monitoring programs, were approved by the ER in letters dated 28/6/2023 and 11/7/2023 respectively. Construction for SSTOM commenced on 8/8/2023. SSTOM CEMP & Sub-plans (and Construction Monitoring Programs within) were submitted to the ER for endorsement no later than one month before the commencement of SSTOM in accordance with Condition C18.
C19	Any of the Construction Monitoring Programs which require Planning Secretary approval must be endorsed by the ER and then submitted to the Planning Secretary for approval at least one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	- SSTOM CEMP, Rev 02 19/12/2024 - ER Endorsement of CEMP Rev 02, letter dated 15/1/2025 - NVMP, SSTOM, Rev 03, 12/12/2024, includes: - Noise and Vibration Monitoring Program - SSTOM SWMP, Rev 03, 12/12/2024, includes: - Surface Water Monitoring Program - DPHI CEMP & Sub-plan approval letter: - WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	The WSA SSTOM CEMP and Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI in a letter dated 4/8/2023. As set out in the Sydney Metro WSA Staging Report, the Noise & Vibration and Surface Water Construction monitoring programs require DPHI approval. Construction for SSTOM commenced on 8/8/2023. SSTOM CEMP & Sub-plans (and Construction Monitoring Programs within) were submitted to the Planning Secretary for approval no later than one month before the commencement of SSTOM in accordance with Condition C19.
C20	Unless otherwise agreed with the Planning Secretary, construction must not commence until the Planning Secretary has approved, or the ER has endorsed (whichever is applicable), all of the required Construction Monitoring Programs and all relevant baseline data for the specific construction activity has been collected.	- ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 - Groundwater Construction Monitoring Program, Rev 2, dated 19/12/2024 - ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023 - ER Endorsement of Groundwater Monitoring Plan Rev 02, letter dated 15/1/2025 - Sydney Metro WSA Staging Report Rev11, 11 Oct 2024 - DPHI CEMP & Sub-plan approval letter: - WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 - Baseline Noise Measurement Plan ver.A dated 24 Feb 2023 - Groundwater Monitoring Program Rev A - Air Quality Construction Monitoring Program Rev 0.0 - Soil and Water Management Plan, Rev 00	C	The WSA SSTOM Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023. Stage 2 CEMP & Sub-plans (and Construction Monitoring Programs within) were submitted to DPHI for approval no later than one month before the commencement of SSTOM in accordance with Condition C20. Baseline data for air quality, noise, groundwater and surface water quality were verified to be included in the corresponding CEMP Sub-plans, endorsed by the ER and approved by DPHI.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C21	The Construction Monitoring Programs , as approved by the Planning Secretary or the ER has endorsed (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary or the ER (whichever is applicable), whichever is the greater.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • SSTOM AQMP, AQMP, Rev 02, 11/10/2024 • Appendix B Air Quality Monitoring Program • NVMP, SSTOM, Rev 03, 12/12/2024 • Appendix B Noise & Vibration Monitoring Program • SSTOM SWMP, Rev 03, 12/12/2024 • Surface Water Monitoring Program - Appendix B • Groundwater Construction Monitoring Program, Rev 2, dated 19/12/2024 • ER Endorsement of Groundwater Monitoring Plan Rev 02, letter dated 15/1/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 2 Feb-July 2024 Rev 01, dated 9/10/2024 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 3 Aug 2024-Jan 2025 Rev01, dated 10/4/2025 • Submission to DPHI (SSI-10051-PA-579), dated 22/4/2025 • Sydney Metro WSA - SSTOM - Surface Water Construction Monitoring Report 1 August 2024 Rev01, dated 8/11/2024 • Sydney Metro WSA SSTOM Air Quality Construction Monitoring Report 1 August 2024 Rev01, dated 25/10/2024 • EPL 21807 Monitoring Report March 2025 • EPL 21807 Monitoring Report April 2025 • EPL 21807 Monitoring Report May 2025 • EPL 21807 Monitoring Report June 2025 • EPL 21807 Monitoring Report July 2025	C	Reporting timeframes for SSTOM Construction Monitoring Programs are summarised below: - Noise & Vibration Monitoring Program - Six-monthly - Air Quality Monitoring Program - Annual - Surface Water Monitoring Program - Annual - Groundwater Monitoring Program - Six-monthly The 2nd Noise & Vibration Monitoring Report for SSTOM was prepared, dated August 2024 and covers the monitoring period from Aug 2023 - July 2024. Note: Construction Monitoring Reports for the current reporting period for Noise& Vibration, Air Quality, Groundwater and Surface Water were under preparation at the time of this audit. The SSTOM Noise & Vibration Construction Monitoring Report August 2024 sets out the results of implementation of the Noise & Vibration Construction Monitoring Program. Noise mitigation measures as per Condition E74 are set out in the WSA SSTOM NVMP, and are defined for specific scenarios in Out of Hours Work (OOHW) Permits. EPL noise and vibration monitoring reports are available on the ParkLife Metro website and also demonstrate evidence of implementation of the Noise & Vibration Construction Monitoring Program. The SSTOM Surface Water and Air Quality CMRs August 2024 set out the results of implementation of the Surface Water and Air Quality Construction Monitoring Program. Previous Groundwater CMRs were provided for review during the audit and set out the results of implementation of the Groundwater Construction Monitoring Program. ER Monthly Reports and ER Inspection Reports also provide evidence of the review and implementation of monitoring requirements as set out in monitoring programs. EPL Monitoring Reports are prepared monthly and were available on the PLM project website. EPL Monitoring Reports include the results of Weather, Noise & Vibration, Water, Surface Water and Discharge to water monitoring.
C22	The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, ER and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program .	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • SSTOM AQMP, Rev 02, 11/10/2024 • Appendix B Air Quality Monitoring Program • NVMP, SSTOM, Rev 03, 12/12/2024 • Appendix B Noise & Vibration Monitoring Program • SSTOM SWMP, Rev 03, 12/12/2024 • Surface Water Monitoring Program - Appendix B • Groundwater Monitoring Program, Rev02, dated 9/12/2024 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 2 Feb-July 2024 Rev 01, dated 9/10/2024 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 3 Aug 2024-Jan 2025 Rev01, dated 10/4/2025 • Submission to DPHI (SSI-10051-PA-579), dated 22/4/2025 • NV Monitoring Report 3 Submission to EPA, LCC & PCC, dated 16/4/2025 • NV Monitoring Report 2, SW Monitoring Report 2 & AQ Monitoring Report Aug 2024 Submission to EPA, dated 2/12/2024 • NV Monitoring Report 2, SW Monitoring Report 2 & AQ Monitoring Report Aug 2024 Submission to Liverpool Council, dated 2/12/2024 • NV Monitoring Report 2, SW Monitoring Report 2 & AQ Monitoring Report Aug 2024 Submission to Penrith Council, dated 2/12/2024 • Sydney Metro WSA - SSTOM - Surface Water Construction Monitoring Report 1 August 2024 Rev01, dated 8/11/2024 • Sydney Metro WSA SSTOM Air Quality Construction Monitoring Report 1 August 2024 Rev01, dated 25/10/2024 • Construction Monitoring Reports AQ & SuWater Aug 2024 Submission to DPHI (PA-532), dated 11/12/2024 • DPHI Receipt of Annual SWMR & AQMP Rev01 Aug 2023-July 2024, dated 19/12/2024 • AQ & SuWater Monitoring Reports Aug 2024 Submission to EPA, dated 2/12/2024 • AQ & SuWater Monitoring Reports Aug 2024 Submission to Liverpool Council, dated 2/12/2024 • AQ & SuWater Monitoring Reports Aug 2024 Submission to Penrith Council, dated 2/12/2024 • Groundwater Management Procedure RevF, dated 3/10/2024	C	A six-monthly reporting frequency is specified in the Noise and Vibration Monitoring Program. Section 6.3.1 of the NV Monitoring Program states <i>"The Construction Monitoring Reports will be submitted to the Planning Secretary, ER, Water NSW (where applicable and in accordance with REMM NV2) and the EPA upon request, in accordance with Condition C22. The Construction Monitoring Reports will be submitted six-monthly for the duration of SSTOM Works"</i>. The SSTOM Noise & Vibration CMR 3 covers the period Sept 2024-Feb 2025 and was submitted to DPHI on 22/4/2025, within the 6-monthly timeframe (SSTOM NVCMR 2 August 2024 was submitted to DPHI on 21/10/2024). Evidence of submission of the SSTOM Noise & Vibration Construction Monitoring Report 3, dated 10/4/2025 to EPA and Councils was sighted. Submission to DPHI was dated 22/4/2025 and submission to Councils and NSW EPA was dated 16/4/2025. It is understood that vibratory work around the WaterNSW canal had not been undertaken so submission to WaterNSW was not triggered. The SSTOM Surface Water CMR August 2024 covers the period from Aug 2023 - July 2024, dated 8/11/2024. The SSTOM Air Quality CMR August 2024 covers the period from Aug 2023 - July 2024, dated 25/10/2024. The SSTOM Surface Water and Air Quality CMRs August 2024 were submitted to DPHI on 11/12/2024. The above CMRs are required to be submitted annually. The 2nd SW & AQ CMRs cover the period Aug 2024-July 2025 and were not complete at the time of this IA4, though the annual submission timeframe had not been triggered. The Groundwater Monitoring Program is set out in Appendix B of the Groundwater Management Procedure (Appendix G of the SWMP) and has been adapted from the Groundwater Monitoring Program prepared by CPBG, the contractors responsible for constructing the SBT Works. Section 8.5 sets out reporting and requires 6-monthly CMRs to be prepared and to include a comparison of observed levels to model predictions (and GDE SSTVs established in Section 6.4, where relevant) and groundwater quality to SSTV and baseline data. Groundwater CMRs require submission to the ER, DPHI, Sydney Water (if connection to a Sydney Water asset is required), and EPA (upon request). PLM conducted Round 1 (R1) groundwater monitoring (for the period December 2023-August 2024) following previous contractor SBT's monitoring (for the period July-November 2023). PLM also undertook Round 2 (R2) groundwater monitoring (for the period August-November 2024). Both R1 and R2 CMRs were not submitted to DPHI within 60 days of the reporting period, which was identified as an NC during IA3. Since IA3, both CMRs have been prepared and were provided as evidence during the audit. Groundwater Construction Monitoring Report Rev02, dated 13/3/2025 was submitted to DPHI on 2/5/2025 and other relevant regulatory agencies including DPE Water and Sydney Water. NB: After the NC was identified during the audit, a self-reported NCR was raised by PLM and submitted to DPHI on 27/02/2025. A copy of the NCR report was provided as evidence. Refer to Condition A44 - this NC has not been raised again during this IA4 audit period as it was raised in the IA3 audit report.

Item
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Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro_IA4_WSA_SSTOM_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
		• SM-WSA SSTOM Groundwater Construction Monitoring Report Rev02, dated 13/3/2025 • SM-WSA SSTOM Groundwater Monitoring Report Nov 2024 Rev01, dated 15/4/2025 • Submission of Groundwater CMRs 1 & 2 to DPIE Water (8/5/2025) & Sydney Water (7/5/2025) • Non-Compliance Report NCR 009 Project Wide CoA C22 250226 Rev01, dated 26/2/2025 • Post Approval Form_20250227041348 NCR 009 Project Wide CoA C22 250226, lodged 27/2/2025 • Post Approval Form_20250502025809 SSTOM GW monitoring report #2 Aug24 - Nov 24, lodged 28/3/2025		
PART E KEY ISSUE CONDITIONS				
AIR QUALITY				
E1	All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.	• Site inspection, 11/08/2025 • Interview with Auditees, 15/8/2025	C	Dust suppression measures were observed during the site inspection including hoses, wheel washes, application of polymer and shotcreting of batters (e.g. Orchard Hills), and the use of water carts. Site accesses were mainly constructed with hardstand, or stabilised with rumble grids in place. There were no odours noted during the audit site inspection. Wheel washes utilising recycled water were in use at St Marys and Orchard Hills. Water carts were available, but not required for use at the time of the site inspection due to 7mm of rain prior to the audit. Sweepers were observed in use on internal hardstand and along site accesses and adjoining public roads, effectively reducing tracking. Auditees explained the process in place that would trigger stop works due to dust risk. If the wind speed is >54km/h, (e.g. 17/1/25), a visual inspection is undertaken and a formal Observation is raised. Observations of water cart use, visible dust and construction activities had been raised. Works are stopped if dust is excessive / at risk of leaving the site boundary. PLM has committed to the ongoing review and management of haul roads. Dust risk from haul roads was not raised as a significant issue during IA4, and the stabilisation of internal haul roads was noted to have improved since IA3.
BIODIVERSITY AND TREES				
Biodiversity Credits				
E2	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Flora and Fauna Management Plan, Rev03 dated 12/12/2024 • Site inspection, 11/8/2025 • Leneco Tree Survey and Pre-clearing Assessment, Cosgroves Creek Bridge, dated 20/9/2024 • PLM Pre-clearing Inspection Checklist and Permit, Cosgrove Creek Boreholes, dated 22/11/2024 • PLM Post-clearing Report, Cosgroves Creek Boreholes, dated 28/11/2024 • Wolfpeak Pre-clearing Inspection for Patons Lane, Orchard Hills, dated 14/1/2025 • Wolfpeak Post-clearance Report_SMF, dated 26/5/2025	C	The clearing of the majority of trees for the SM-WSA corridor was undertaken by SCAW prior to the SSTOM works commencing. During clearing and grubbing SCAW collected and stored separately any useful removed landscape materials for re-use in the project in fauna crossings, etc. For SSTOM, tree clearing was undertaken at Cosgrove's Creek in Portion 3 Linewide (PCT) to allow geotechnical investigations to occur for a future ATC bridge crossing. PLM conducted a Pre-clearing Inspection with Permit, which was dated 22/11/2024 for works from 28/11/24 to 28/11/24. Checks undertaken include verification that the vegetation to be removed is clearly delineated and that retained trees are sign-posted as 'no-go' zones and fenced off. A Post-clearing inspection was conducted and report prepared after clearing for the Cosgrove Creek Boreholes, dated 28/11/2024. The report confirms no clearing was undertaken outside the flagged Environmental No Go Zone. No additional work was conducted in this area during the current audit period. Tree clearing was also undertaken at Bradfield Station during the IA3 audit period for the extension of a car park, and included one native tree (non-EEC) and one non-native tree. Tree clearing was undertaken at the SMF, Patons Lane, Orchard Hills during the IA4 audit period. Three native trees, forming part of a plant community (PCT 835) were removed for future internal road construction and future drainage (permanent works). Pre- and post-clearing inspections were provided for review. The pre-clearing surveys did not identify any unmarked hollow nor fauna present on or near the trees prior to felling. An arborist carried out the tree removals. One hollow was identified in Tree 7 the first day of felling. The inspected hollow was empty but contained an abandoned nest and Magpie feather inside it. In Tree 1, another internally facing hollow was identified after felling took place. This section of the tree was retained for repurposing as fauna habitat. The loss of hollows will be offset through the establishment of purpose-built nest boxes where hollows cannot be salvaged and reinstalled into surrounding bushland areas. Refer to Condition E11 for details on nest box monitoring.

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Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E3	Impacts to plant community types must not exceed those identified in the documents listed in Condition A1 , unless otherwise approved by the Planning Secretary. In requesting the Planning Secretary's approval, an assessment of the additional impact(s) to plant community types and an updated ecosystem and / or species credit requirement under Condition E4 below, if required, must be provided.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/8/2025 - Flora and Fauna Management Plan, Rev 03, 12/12/2024 - Letter from SM to DPHI RE: Condition E7 - Evidence of the retirement of credits or payment to secure offsets, dated 13/5/2024 - Post Approval Form_20240514005704, SSTOM - CoA E7 letter, DPHI Submission, dated 14/5/2024 - Leneco Tree Survey and Pre-clearing Assessment, Cosgroves Creek Bridge, dated 20/9/2024 - PLM Pre-clearing Inspection Checklist and Permit, Cosgrove Creek Boreholes, dated 22/11/2024 - PLM Post-clearing Report, Cosgroves Creek Boreholes, dated 28/11/2024	C	Section 6.2 of the FFMP states "Sites will be handed over to Parklife Metro D&C generally cleared and stabilised with all major earthworks completed and for this reason SSTOM Works have limited potential to impact biodiversity. However until detailed design is further progressed, and the full extent of clearing is completed by prior Works contractors, Parklife Metro D&C is unable to confirm if any areas will require clearing as part of SSTOM Works". On 13/5/2024 Sydney Metro issued a letter to DPHI summarising Condition E3 biodiversity credit allocation and submission of proof of retirement credits. SSTOM has been allocated one biodiversity credit for PCT 724, one biodiversity credit for PCT 1800, and one biodiversity credit for PCT <i>Southern Myotis</i>. The existing environment had been significantly altered by the time of handover to the SSTOM package contractor and ecosystem credits had been retired. In a letter to DPHI, dated 13/5/2024, in relation to the retirement of additional credits per Condition E3, Sydney Metro submitted evidence of payment to the Biodiversity Conservation Fund (BCF) prior to removal of native vegetation along Kent Road associated with utility works for the SSTOM construction stage. The letter refers to an attached certificate (BCF295) issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the <i>Biodiversity Conservation Act 2016</i> (BC Act) as evidence of payment into the BCF in satisfaction of CoA E5 as it relates to the SSTOM construction stage. The letter also notes "the BCF payment documented in the section 6.33 certificates only relate to the additional credits sought under CoA E3 per the Department's approval ... Should SM/WSA need to retire further credits for their works, another submission to the Department would be made". For SSTOM, tree clearing has been undertaken at Cosgrove Creek in Portion 3 Linewide (PCT) to allow geotechnical investigations to occur for a future ATC bridge crossing. PLM conducted a Pre-clearing Inspection with Permit, which was dated 22/11/2024 for works from 26/11/24 to 28/11/24. Refer to Condition E2 for details on pre-and post-clearance inspections conducted by PLM. Leneco Ecologists conducted a Tree Survey and Pre-clearing Assessment for the Cosgroves Creek Bridge area, dated 20/9/2024. Members of Plant Community Type (PCT) 1800 will need to be cleared from this area for construction of a future ATC bridge. Minor clearing was also undertaken to facilitate geotechnical works (boreholes) in the area on 26-28/11/2024. Leneco confirmed the vegetation that will be impacted by the Project at Cosgrove Creek was mapped in the Sydney Metro – Western Sydney Airport Revised Biodiversity Development Assessment Report to include: - PCT 1800 Swamp Oak Forest in the thinned condition class (PCT 1800_thinned) <i>Southern myotis</i> (presumed presence) associated with the PCT 1800_thinned vegetation zone. Leneco also calculated biodiversity offsets associated with the clearing based on Table 12.7 and 12.9 of the Revised BDAR: - PCT 1800_thinned: 145 ecosystem credits for 4.31 ha, therefore 33.64 credits / ha <i>Southern Myotis</i> (assumed presence polygon) for PCT 1800_thinned: 122 credits for 3.60 ha, therefore 33.88 credits / ha. Therefore for 0.01 ha, the associated offsets for this activity were estimated as: 0.01ha of PCT 1800_thinned = < 1 credits (0.34 credits) 0.01 ha of <i>Southern Myotis</i> (assumed presence polygon) for PCT 1800_thinned = <1 credits (0.34 credits). SSTOM has been allocated one biodiversity credit for PCT 724, one biodiversity credit for PCT 1800, and one biodiversity credit for PCT <i>Southern Myotis</i>. Refer Condition E4 for more information.
E4	Prior to impacts on the biodiversity values set out in Table 3 and Table 4 , the number and classes of ecosystem credits and species credits (like-for-like) must be retired. Note: Credits have been calculated using the <i>Biodiversity Assessment Method</i> .	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/8/2025 - Flora and Fauna Management Plan, Rev 03, 12/12/2024 - Letter from SM to DPHI RE: Condition E7 - Evidence of the retirement of credits or payment to secure offsets, dated 13/5/2024 - Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 28/10/2024 - Leneco Tree Survey and Pre-clearing Assessment, Cosgroves Creek Bridge, dated 20/9/2024 - Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 25/2/2025	C	As per previous audit finding on SBT and SCAW, ecosystem credits have been retired prior to impact during previous construction activities. The first SSTOM package had an unexpected find (PCT 724) and Sydney Metro sought to increase the number of credits. This was requested on 30 April 2024 and approved by DPHI on 9 May 2024 (ref. SSI-10051-PA-404). On 13/5/2024 Sydney Metro issued a letter to DPHI summarising Condition E3 biodiversity credit allocation and submission of proof of retirement credits. On 28/10/2024 and 25/2/2025 Sydney Metro issued a further letters to DPHI submitting evidence of retirement of credits, or payment into the Biodiversity Conservation Fund (BCF), prior to removal of native vegetation associated with enabling works for the SSTOM construction stage. Certificates issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the <i>Biodiversity Conservation Act 2016</i> (BC Act) were attached to the letters as evidence of payment into the BCF. Retirement credit reports issued by the BCT were also attached to the letter as evidence of retirement of credits in satisfaction of Condition E5. NB: The BCF payment documented in the section 6.33 certificates and the credit retirement reports relates to the whole of the SM-WSA, not only SSTOM. SSTOM has been allocated one biodiversity credit for PCT 724, one biodiversity credit for PCT 1800, and one biodiversity credit for PCT <i>Southern Myotis</i>. As per the FFMP, Section 6.3, any approved biodiversity offsets allowed for in the SSTOM Works footprint and contained in Condition E4 or E5 will be monitored and tracked by the Parklife Metro D&C Environment Manager during construction. Sydney Metro is responsible for the requirements of Condition E4, E5, E6 and E7 and will offset any residual impacts to Key Fish Habitat in accordance with the Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update) in accordance with Conditions E8, E9 and E10.

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Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E5	The requirement to retire like-for-like ecosystem credits and species credits in Condition E4 may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem credits and species credits.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Site inspection, 11/8/2025 • Flora and Fauna Management Plan, Rev 03, 12/12/2024 • Letter from SM to DPHI RE: Condition E7 - Evidence of the retirement of credits or payment to secure offsets, dated 13/5/2024 • Post Approval Form_20240514005704, SSTOM - CoA E7 letter, DPHI Submission, dated 14/5/2024 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 28/10/2024 • Leneco Tree Survey and Pre-clearing Assessment, Cosgroves Creek Bridge, dated 20/9/2024 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 25/2/2025	C	Section 4 of the FFMP refers to BDAR, EIS and Submissions Report. The existing environment had been significantly altered by the time of handover to SSTOM package contractor and ecosystem credits had been retired. On 28/10/2024 and 25/2/2025 Sydney Metro issued a further letters to DPHI submitting evidence of retirement of credits, or payment into the Biodiversity Conservation Fund (BCF), prior to removal of native vegetation associated with enabling works for the SSTOM construction stage. Certificates issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the Biodiversity Conservation Act 2016 (BC Act) were attached to the letters as evidence of payment into the BCF. Retirement credit reports issued by the BCT were also attached to the letter as evidence of retirement of credits in satisfaction of Condition E5. NB: The BCF payment documented in the section 6.33 certificates and the credit retirement reports relates to the whole of the SM-WSA, not only SSTOM. The maximum number of credits has been purchased - (as managed by the Sydney Metro Planning team). At this stage it is not expected that more credits would be required. Refer to Condition E7 for more information.
E6	Where evidence of compliance with the Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits for the purpose of applying the variation rules has been provided to the Planning Secretary, variation rules may be applied to retire the relevant ecosystem credits and species credits as set out in the BAM Biodiversity Credit Report (Variation).	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Site inspection, 11/8/2025 • Flora and Fauna Management Plan, Rev 03, 12/12/2024	NT	The existing environment had been significantly altered by the time of handover to the SSTOM package contractor and ecosystem credits had been retired. Noting SSTOM have triggered the requirements for biodiversity offsets (Oct 2024 and Feb 2025), these credits have come from Biodiversity Conservation Fund (BCF) payments and not credit retirements. Evidence of this has been provided via Condition E7 documentation. Therefore, this condition has not been triggered during the reporting period. For context, it was "switched on" for SSTOM as part of the Rev 10 Staging Report update in case it was required for possible future works.
E7	Evidence of the retirement of credits in satisfaction of Condition E4 or payment to the Biodiversity Conservation Fund in satisfaction of Condition E5 must be provided to the Planning Secretary prior to impacts on the biodiversity values.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Site inspection, 11/8/2025 • Flora and Fauna Management Plan, Rev 03, 12/12/2024 • Letter from SM to DPHI RE: Condition E7 - Evidence of the retirement of credits or payment to secure offsets, dated 13/5/2024 • Post Approval Form_20240514005704, SSTOM - CoA E7 letter, DPHI Submission, dated 14/5/2024 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 28/10/2024 • DPHI Submission (PA-511) - Evidence of the retirement of credits or payment to secure offsets, dated 28/10/2024 • DPHI Receipt of submission - Evidence of the retirement of credits or payment to secure offsets, dated 12/11/2024 • Leneco Tree Survey and Pre-clearing Assessment, Cosgroves Creek Bridge, dated 20/9/2024 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 5/2/2025 • Post Approval Form_20250207002021, SM-WSA Evidence of the retirement of credits, DPHI Submission, dated 7/2/2025	C	The existing environment had been significantly altered by the time of handover to the SSTOM package contractor and ecosystem credits had been retired. In a letter to DPHI, dated 13/5/2024, in relation to the retirement of additional credits per Condition E3, Sydney Metro submitted evidence of payment into the Biodiversity Conservation Fund (BCF) prior to removal of native vegetation along Kent Road associated with utility works for the SSTOM construction stage. The letter refers to an attached certificate (BCF295) issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the Biodiversity Conservation Act 2016 (BC Act) as evidence of payment into the BCF in satisfaction of Condition E5 as it relates to the SSTOM construction stage. The letter also notes <i>"the BCF payment documented in the section 6.33 certificates only relate to the additional credits sought under CoA E3 per the Departments approval ... Should SMWSA need to retire further credits for their works, another submission to the Department would be made"</i>. On 28/10/2024 and 25/2/2025 Sydney Metro issued a further letters to DPHI submitting evidence of retirement of credits, or payment into the Biodiversity Conservation Fund (BCF), prior to removal of native vegetation associated with enabling works for the SSTOM construction stage. Certificates issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the Biodiversity Conservation Act 2016 (BC Act) were attached to the letters as evidence of payment into the BCF. Retirement credit reports issued by the BCT were also attached to the letter as evidence of retirement of credits in satisfaction of Condition E5. NB: The BCF payment documented in the section 6.33 certificates and the credit retirement reports relates to the whole of the SM-WSA, not only SSTOM. Current reassessment of retirement of credits is underway by Sydney Metro to transfer credits from SCAW to PLM.

Item
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Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Key Fish Habitat				
E8	The Proponent must minimise impacts to Key Fish Habitat (KFH) as defined in <i>Policy and Guidelines for Fish Habitat Conservation and Management</i> (DPI, 2013 update). Residual impacts to KFH, following the implementation of habitat rehabilitation or other environmental compensation measures, must be offset at a ratio of 2:1 habitat offset requirement in accordance with the <i>Policy and Guidelines for Fish Habitat Conservation and Management</i> (DPI, 2013 update) and in consultation with DPI Fisheries.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/8/2025	NT	Works that would trigger Condition E8 , e.g. creek crossing at Cosgrove Creek (Portion 3 Linewide) had not commenced at the time of the audit. Planned for late 2025 or early 2026.
E9	Where offsets are required in accordance with Condition E8 , payment of the habitat offset requirement must be made to the DPI Fish Conservation Trust Fund prior to the commencement of Work that impacts KFH.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/8/2025	NT	As per Condition E8 . Unlikely to be triggered for SSTOM.
E10	Where offsets are required in accordance with Condition E8 , the Proponent must submit to the Planning Secretary a receipt confirming payment to the DPI Fish Conservation Trust Fund within one (1) month of making the payment.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/8/2025	NT	As per Condition E8 . Unlikely to be triggered for SSTOM.
Nest Boxes				
E11	Nest Boxes must be installed one (1) month prior to any removal of existing tree hollows and/or the release of any captured hollow dependent fauna.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/8/2025 - PLM Nest Box Monitoring February 2025 Rev00, dated 11/4/2025	C	Monitoring of nest boxes has been inherited by SSTOM at Linewide North and Bringelly. Nest box monitoring commenced in mid-February 2025, and the 1st monitoring report was provided as evidence, dated 11/4/2025. Monitoring is undertaken six-monthly. The 2nd round of nest box monitoring was recently been completed by AMBS, thought the report was not available at the time of the audit. It is noted that a tree hollow was identified from one of the trees removed from SMF during the audit period, but was only identified in the post-clearing inspection. PLM advised a nest box was installed once this was made known, and details will be included in the 2nd monitoring report.
Re-use of Timber				
E12	Prior to vegetation clearing, the Proponent must identify where it is practicable for the CSSI to reuse native trees and vegetation that are to be removed. If it is not possible for the CSSI to reuse removed native trees and vegetation, the Proponent must consult with the relevant council(s), NSW National Parks & Wildlife Service, Western Sydney Parklands Trust, Greater Sydney Local Land Services, Landcare groups, DPI Fisheries and any additional relevant government agencies to determine if: (a) hollows, tree trunks (greater than 25-30 centimetres in diameter and 2-3 metres in length), mulch, bush rock and root balls salvaged from native vegetation impacted by the CSSI; and (b) collected plant material, seeds and/or propagated plants from native vegetation impacted by the CSSI, could be used by others in habitat enhancement and rehabilitation work, before pursuing other disposal options.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/8/2025 - Stage 2 Place, Urban Design and Corridor Landscape Plan (PUDCLP) RevF v2, 9/12/2024 - Consolidated Tree Survey (SCAW, SBT, AEW, SSTOM), 19/8/2025	NT	Vegetation removed by PLM is being stockpiled for later use during rehabilitation of the CSSI. As documented in the Stage 2 PUDCLP: "The clearing of trees for the construction of the rail alignment within the corridor was undertaken by SCAW prior to the SSTOM works commencing. During the clearing and grubbing SCAW collected and stored separately any useful removed landscape materials for re-use in the project in fauna crossings, etc. This collected and stored landscape material from SCAW has been reviewed by SSTOM and incorporated into the landscape design of the SSTOM project for use in the fauna crossings, etc. At this stage of the project ParkLife Metro does not have access to the nominated project site to undertake a tree survey and this access is not granted until significantly after the submission of this Stage 2 PUDCLP. As such, ParkLife are not able to confirm if there are any existing trees or vegetation that need to be removed. However, surveys and consultation will be undertaken with the relevant authorities once site access is granted. It is noted that this will be undertaken prior to proceeding with construction works". A tree survey/register was available during IA4 and includes SSTOM trees removed at SMF, Linewide Portion 3, and Bradfield Station.
E13	Revegetation and the provision of replacement trees must be informed by a Tree Survey undertaken during detailed design. The Tree Survey must identify the number, type and location of any trees to be removed, except for trees that are offset under Condition E4. The Tree Survey must be submitted to the Planning Secretary for information with the Place, Urban Design and Corridor Landscape Plan required under Condition E79, one (1) month before the commencement of operation. Where trees are to be removed, the Proponent must provide a net increase in the number of replacement trees at a ratio of 2:1, except trees that are offset under Condition E4. Replacement trees must have a minimum pot size consistent with the relevant authority's plans / programs / strategies for vegetation management, street planting, or open space landscaping, or as agreed by the relevant authority(ies). Replacement trees must be planted before the commencement of operation. <i>Note: For the purposes of this condition, the relevant authority is that State or local government authority that owns or manages the land on which the replacement trees will be planted.</i>	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Stage 1 Place, Urban Design and Corridor Landscape Plan (PUDCLP) Ver 0, November 2023 - Stage 2 Place, Urban Design and Corridor Landscape Plan (PUDCLP) RevF v2, 9/12/2024 - Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 - Consolidated Tree Survey (SCAW, SBT, AEW, SSTOM), 19/8/2025	NT	As per Section 1.6 of the Stage 1 Place, Urban Design and Corridor Landscape Plan (PUDCLP), the clearing of trees for the corridor was undertaken by SCAW prior to the SSTOM works commencing. Section 1.5.2 of the PUDCLP states "The provision of replacement trees is a key outcome of the project. New tree planting is to be at a ratio of 2:1, except trees that are offset under Condition E4 (biodiversity credits). This requirement will be addressed in the Corridor Landscape Master Plan in the future Stage 2 SSTOM PUDCLP". The SSTOM project has been left with felled hollow-bearing trees from SCAW for reuse as habitat features at the Orchard Hills Station site. MOD 2 was determined on 20/12/2024 and amends Condition E13 to decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and Condition E57 so that information on consultation, respite and out of hours work information be provided to the EPA and Planning Secretary on request. PLM presented a Consolidated Tree Survey for SSTOM as evidence during the audit. The tree survey includes the tree location, species, heights, diameter and GPS coordinates for each tree, and specifies whether the tree has been removed or is approved for removal. Revegetation and tree replacement had not commenced at the time of the audit, and is required prior to the commencement of operation. A tree survey/register was available during IA4 and includes SSTOM trees removed at SMF, Linewide Portion 3, and Bradfield Station. NB: The process for tracking biodiversity offsets and credits is managed by Sydney Metro and was not considered any further here as is outside the scope of the audit.

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations																										
Watercourse Crossings																														
E14	The Proponent must design the watercourse crossings and the east-west regional corridor (Patons Lane) crossing to achieve the following objectives: (a) design of viaducts to retain and minimise clearing/disturbance of native vegetation and maximise native plant growth under the structures; (i) maintain and/or improve riparian/terrestrial connectivity under the viaduct and bridge structures to maximise the corridor function; (ii) maximise the viaduct and bridge structures span over the riparian corridor and/or remnant native vegetation whichever is the widest; (iii) minimise the clearing/disturbance of native vegetation and native riparian vegetation; and (iv) maximise light and moisture penetration under the viaduct and bridge structures to support native plant growth; (b) design of culverts and other crossings incorporate the following into the design to provide for movement of aquatic and terrestrial fauna, (j) elevated "dry" cells to encourage terrestrial movement, and recessed "wet" cells to facilitate the movement of aquatic fauna; (ii) maximise light penetration into the culvert structures; (iii) a naturalised base along the bed of the culvert; and 'fauna furniture' (such as rocks, logs, ropes and ledges) to facilitate fauna movement to maintain connectivity and provide fauna passage; (c) design of scour protection using natural solutions such as the revegetation of banks with local native species; and (d) details of remnant native vegetation including riparian vegetation. The Proponent must consult with DPIE EES, DPI Fisheries and engage suitably qualified experts in fauna crossing design to achieve the outcomes of this condition. Note: These design objectives must form part of the Place, Urban Design and Corridor Landscape Plan required under Condition E79.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Stage 1 Place, Urban Design and Corridor Landscape Plan (PUDCLP) Ver 0, November 2023 • Stage 2 Place, Urban Design and Corridor Landscape Plan (PUDCLP) RevF v2, 9/12/2024 • PUDCLP - Luddenham and SMF (Rev 0)_FINAL for IC	NT	The Stage 1 SSTOM PUDCLP refers to the SCAW PUDCLP for requirements and design of fauna crossings which states that fauna crossing proposals will be reviewed with DPIE EES and DPI Fisheries. The requirement to consult with these stakeholders has not occurred for design, and is due to commence in the near future but the date has not been confirmed at the time of the audit. Sections 1.5 and 1.6 of the SSTOM Stage 1 PUDCLP state <i>"This requirement is not applicable to the scope of this Stage 1 SSTOM PUDCLP as it only applies to the design of the rail corridor, and does not apply to the Luddenham Station building or the Stabling and Maintenance Facility which Stage 1 PUDCLP addresses"</i>. NB: Three future watercourse crossings are proposed later in the project for the Linewide portion of the SSTOM Project.																										
FLOODING																														
E15	The CSSI must be designed and constructed with the objective of not exceeding the flood impacts presented in the documents listed in Condition A1 or the flood impact criteria in Table 5, whichever is greater, within and in the vicinity of the CSSI for all flood events up to and including the one (1) per cent Annual Exceedance Probability (AEP) flood event. Table 5: Flood Impact Criteria <table><tr><th>Parameter</th><th>Location</th><th>Criteria</th></tr><tr><td rowspan="4">Afflux</td><td rowspan="2">Land zoned as residential, industrial or commercial, and critical infrastructure</td><td>Maximum 10 mm to buildings that are flood prone in existing conditions</td></tr><tr><td>No new above floor flooding</td></tr><tr><td rowspan="2">Roads</td><td>Maximum 50 mm where flooding is below floor level</td></tr><tr><td>Maximum 50 mm</td></tr><tr><td rowspan="2">Velocity</td><td rowspan="2">Land zoned as rural, primary production, environment or public recreation</td><td>Maximum 100 mm</td></tr><tr><td></td></tr><tr><td rowspan="2">Flood hazard</td><td>Residential and commercial land</td><td>Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent</td></tr><tr><td>Roads</td><td>No increase in the flood hazard or risk to life</td></tr><tr><td rowspan="3">Flood duration</td><td>Residential and commercial buildings</td><td>No increase in the flood hazard or risk to life</td></tr><tr><td>Roads</td><td>No increase in the flood hazard or risk to life</td></tr><tr><td>Crown land, open space, farming, grazing and cropping land</td><td>No increase in the flood hazard or risk to life</td></tr></table> the same outcome must be incorporated into the detailed design of the CSSI.	Parameter	Location	Criteria	Afflux	Land zoned as residential, industrial or commercial, and critical infrastructure	Maximum 10 mm to buildings that are flood prone in existing conditions	No new above floor flooding	Roads	Maximum 50 mm where flooding is below floor level	Maximum 50 mm	Velocity	Land zoned as rural, primary production, environment or public recreation	Maximum 100 mm		Flood hazard	Residential and commercial land	Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent	Roads	No increase in the flood hazard or risk to life	Flood duration	Residential and commercial buildings	No increase in the flood hazard or risk to life	Roads	No increase in the flood hazard or risk to life	Crown land, open space, farming, grazing and cropping land	No increase in the flood hazard or risk to life	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Flood Modelling Report Design Stage 1 Rev A 6/7/2023 • Flood Modelling Report Design Stage 2, dated 17/4/2024 • SSTOM SWMP, Rev 03, 12/12/2024 • PUDCLP Stage 2	NT	It is understood that the flood design is ongoing. It is the responsibility of the design engineers and nominated review parties as per Condition E15 to verify compliance with Condition E15 once all information is made available. Flooding is considered with regard to Condition E15 during design and construction. The requirements of Condition E15 relating to design will be addressed in the Design Reports and noted in the approved Soil and Water Management Sub-plan. Examples of design reports showing compliance with flood modelling parameters being met by design were sighted. As per the flood modelling report provided for review, there are no departures or concessions applicable. It is noted that further compliance review is to be undertaken in future revisions of the flood modelling report. Section 6.1.1.3 of the PLM Flood Modelling Report Design Stage 2, dated 17/4/2024 addressed flood impacts from SSTOM versus Aerotropolis Core Precinct Design and states <i>"SSTOM accordingly has no responsibility to demonstrate conformance to SSI 10051 E15 since the impacts outside of the works area are generated by the Precinct Design and the flood mitigations for the Precinct Design are basins outside the limits of SSTOM works"</i>. Section 6 of the PLM Flood Modelling Report Design Stage 2, dated 17/4/2024 addresses compliance with Condition E15 for a number of locations and scenarios. Table 10 of the PLM Flood Modelling Report Design Stage 2, dated 17/4/2024 sets out assumptions, dependencies and constraints associated with flood modelling. NB: It is not the role of the Auditor to ensure flood modelling is completed to meet the requirements of Conditions E15-E18. The Auditor relies on statements provided by suitably qualified and experienced flood engineers or other specialists that may be engaged by the project to ensure the project meets compliance with flood-related conditions. Relevant extracts of the PLM flood design reports were reviewed during the audit, which does not constitute a full audit of flood-related requirements, which is the responsibility of the Proponent and Contractor. The PUDCLP Stage 2 states <i>"The measures identified in the Environmental Impact Statement (EIS) have been incorporated into the detailed design of the CSSI to limit flooding impacts. The CSSI has been designed in accordance with the project performance outcomes for flooding as well as the mitigation measures identified in the EIS"</i>.
Parameter	Location	Criteria																												
Afflux	Land zoned as residential, industrial or commercial, and critical infrastructure	Maximum 10 mm to buildings that are flood prone in existing conditions																												
		No new above floor flooding																												
	Roads	Maximum 50 mm where flooding is below floor level																												
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Velocity	Land zoned as rural, primary production, environment or public recreation	Maximum 100 mm																												
Flood hazard	Residential and commercial land	Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent																												
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E16	Updated modelling that incorporates these measures and is calibrated and validated with consideration of the results of the Wianamatta-South Creek Catchment Flood Assessment prepared by Infrastructure NSW as part of Stage 2 of the South Creek Sector Review must be prepared by a suitably qualified flood consultant. The modelling must identify changes in post-development flood behaviour including cumulative flood impacts associated with Western Sydney International Airport and the M12, where this information is available, prior to detailed design being finalised.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Flood Modelling Report Design Stage 1 Rev A 6/7/2023 - Flood Modelling Report Design Stage 2, dated 17/4/2024 - SSTOM SWMP, Rev 03, 12/12/2024	NT	As per the flood modelling report, there are no departures or concessions applicable. It is noted that further compliance review is to be undertaken in future revisions of the flood modelling report as design is finalised. As per Section 3.5, Table 10 of the Flood Modelling Report Design Stage 2, dated 17/4/2024, "certified FIW models from SBT & SCAW Contracts are provided to SSTOM. Accordingly, SSTOM is dependent on the inherited Flood Models and prior conformance documented by the SCAW/SBT reports to CoA E16 which is applicable to all Construction contracts for SM-WSA". "It is noted that the SCAW permanent design scenario within the inherited SCAW flood model is not amended by SSTOM. SSTOM only amends the permanent design scenario to account for works undertaken by SSTOM. The SSTOM permanent design scenario flood assessment is accordingly the cumulative flood assessment of SBT, SCAW and SSTOM works. The SCAW inherited flood model (dependency) is: SMWVSASCA-CPU-SWD-EW000-SD-M3D245000.A.S3.A.01.zip & SMWVSASCA-CPU-SWD-EW000SD-M3D-245001.A.S3.A.01.zip received March 2023. Regarding the Flood Modelling undertaken by SBT, SCAW and WSI provided to SSTOM by SM. SSTOM assumes that: * Flood modelling provided to SSTOM by SM is fit for purpose of the SM-WSA Project * Flood modelling provided to SSTOM by SM is conforming to the SSI CoA and PS requirements applicable the prior model development". NB: It is not the role of the Auditor to ensure flood modelling is completed to meet the requirements of Conditions E15-E18. The Auditor relies on statements provided by suitably qualified and experienced flood engineers or other specialists that may be engaged by the project to ensure the project meets compliance with flood-related conditions. Relevant extracts of the PLM flood design reports were reviewed during the audit, which does not constitute a full audit of flood-related requirements, which is the responsibility of the Proponent and Contractor.
E17	Where flooding characteristics exceed the levels identified in Condition E15 above the Proponent must undertake the following: (a) consult with affected landowners for properties adversely flood affected as a result of the CSSI regarding appropriate mitigations; and (b) consult with the NSW State Emergency Service (SES) and Relevant Council(s) regarding the management of any continuous and residual flood risk from rarer flood events larger than the 1 per cent AEP and up to the probable maximum flood. In the event that the Proponent and the affected landowner cannot agree on the measures to mitigate the impact as described in Condition E15 , the Proponent must engage a suitably qualified and experienced independent person to advise and assist in determining the impact and relevant mitigation measures.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Flood Modelling Report Design Stage 1 Rev A 6/7/2023 - Flood Modelling Report Design Stage 2, dated 17/4/2024 - SSTOM SWMP, Rev 03, 12/12/2024	NT	This condition has not been triggered to-date for the SSTOM package. Condition E17 provides a mechanism to mitigate floodplain impacts which are non-conforming to the E15 flood impact criteria. According to the Flood Modelling Report Design Stage 2, dated 17/4/2024, the project is conforming to Condition E15 .
E18	Flood information including flood reports, models and geographic information system outputs must be provided to the DPIE PDPS, Relevant Council(s), DPIE EES and the SES in order to assist in preparing relevant documents and to reflect changes in flood behaviour as a result of the CSSI. The DPIE PDPS, Relevant Council(s), DPIE EES and the SES must be notified in writing that the information is available no later than one (1) month following the completion of construction. Information requested by the DPIE PDPS, Relevant Council(s), DPIE EES or the SES must be provided no later than six (6) months following the completion of construction or within another timeframe agreed with the DPIE PDPS, Relevant Council(s), DPIE EES and the SES. The project flood models and data must be uploaded to the NSW Flood Data Portal and access must be provided to the DPIE PDPS, Relevant Council(s), DPIE EES and SES no later than one (1) month following the completion of construction.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Flood Modelling Report Design Stage 1 Rev A 6/7/2023 - Flood Modelling Report Design Stage 2, dated 17/4/2024 - SSTOM SWMP, Rev 03, 12/12/2024	NT	This condition has not been triggered as construction is still underway.
HERITAGE				
NON-ABORIGINAL HERITAGE				
E19	The Proponent must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in Condition A1 . Unexpected heritage finds identified by the CSSI must be managed in accordance with the Unexpected Heritage Finds and Human Remains Procedure outlined in Conditions E34 to E36. Consideration of avoidance and redesign to protect unexpected finds of state heritage significance must be addressed where this condition applies.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Non-Aboriginal Heritage Management Plan (NAHMP), Rev 02.01, 12/12/2024 - Unexpected Heritage Find Recording Form, dated 3/2/2025 - Email correspondence, PLM & Unearthed Archaeology RE: (Potential) Cow Bone Finding on Linewide Portion 3, dated 3/2/2025	C	Section 4 of the Non-Aboriginal Heritage Management Plan (NAHMP) lists Non-Aboriginal heritage items that could potentially be impacted by the SSTOM works. There has been no known damage to Heritage items during the project. On 3/2/2025 an animal bone was uncovered at Linewide Portion 3 Site and the Unexpected Heritage Finds Procedure was implemented. An Unexpected Heritage Finds Recording Form was completed, dated 3/2/2025 and included details of the find - "Excavation works were currently underway to develop a trench. Bones were found at a 1m depth below ground. Clear evidence of backfilled material over the top of the bones from previous excavation prior to SSTOM. Several large animal bones, likely cow bones, were uncovered during excavation works". Email correspondence between PLM & Unearthed Archaeology RE: (Potential) Cow Bone Finding on Linewide Portion 3, dated 3/2/2025 was also sighted and confirmed the bones were animal bones and that works could proceed without further intervention. No unexpected finds of state heritage significance have been encountered.
E20	The dismantling and reassembly of the jib crane at St Marys Station, if required, must only be undertaken under the supervision of a consultant experienced in the conservation of heritage machinery.	Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Management of the jib crane at St Marys is set out in Section 6.8.1 of the NAHMP, and would require preparation of a detailed methodology should the jib crane require relocation. Exclusion zones are set out in Section 6.11 of the NAHMP and will include the jib crane and Goods Shed within the St Marys Railway Station Group. It is understood that disassembly of the jib crane is unlikely to be required during SSTOM.

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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E21	The St Marys Goods Shed must not be destroyed, modified or otherwise adversely affected, except as identified in the documents listed in Condition A1.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Non-Aboriginal Heritage Management Plan (NAHMP), Rev 02.01, 12/12/2024	C	No damage has reportedly occurred to the St Marys Goods Shed during the audit period. Exclusion zones are set out in Section 6.11 of the NAHMP and will include the jib crane and Good Shed within the St Marys Railway Station Group.
E22	The Archaeological Research Design included in the documents listed in Condition A1 must be implemented during construction.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro – Western Sydney Airport Non-Aboriginal Archaeological Research Design, Artefact, April 2021 - Non-Aboriginal Heritage Management Plan (NAHMP), Rev 02.01, 12/12/2024	NT	The Archaeological Research Design (ARD) forms Appendix K to the Submissions Report. The ARD is relevant at St Marys and will form part of the future precinct works for services. The requirement for an Archaeological Method Statement (AMS) on the project are set out in Section 6.6 of the SSTOM NAHMP. An activity-specific AMS will be required for SSTOM works for ground disturbing activities in the area of the St Marys Goods Yard and Shed, and the Excavation Director will determine whether monitoring or a test excavation program is necessary. Ground disturbing works had not been undertaken by SSTOM in this area at the time of the audit. Archaeological excavations under an AMS had not been conducted at the time of the audit, but would be required to be undertaken in accordance with the Archaeological Research Design and Excavation Methodology(s), as set out in Section 6.7 of the NAHMP.
E23	Before commencement of archaeological excavation, the Proponent must, in consultation with Heritage NSW, nominate a suitably qualified Excavation Director , who complies with Heritage Council of NSW's <i>Criteria for Assessment of Excavation Director</i> (September 2019), to oversee and advise on matters associated with historical archaeology for the approval of the Planning Secretary. The Excavation Director must be present to oversee excavation, advise on archaeological issues, advise on the duration and extent of oversight required during archaeological excavations consistent with the Archaeological Research Design and Excavation Methodology(s) identified in the documents listed in Condition A1 . More than one Excavation Director may be engaged for CSSI to exercise the functions required under the conditions of this approval.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro – Western Sydney Airport Non-Aboriginal Archaeological Research Design, Artefact, April 2021 - Letter from SM to DPHI RE SMWSA - CoA E23 - Submission of Nominated Excavation Director, dated 16/8/2023 - Letter from DPHI to SM RE: Excavation Direction Nomination / Approval, dated 5/9/2023	NT	No archaeological excavation has been undertaken to date for SSTOM. An Excavation Director was nominated/approved for the project in a letter from DPHI dated 5/9/2023.
E24	Archival photographic digital recording must be undertaken for all listed heritage items which will be affected by the CSSI. The recordings must be undertaken prior to the commencement of Work which may impact the items and documented in an Archival Recording Report . The recordings must include buildings, structures and landscape features and detailed maps showing the location of features. The archival recording must be prepared in accordance with <i>How to Prepare Archival Records of Heritage Items</i> (NSW Heritage Office, 1998) and <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> (NSW Heritage Office, 2006).	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Existing Condition Survey Report, Tram Sheds, St Marys, Rev 0, Land Surveys, 30/5/2023 - SMWSA - St Marys Station: Goods Shed alteration to ground level elevation, Statement of Heritage Impact, June 2022 - St Marys Railway Station, Archival Recording - Final Report, Biosis, Rev1, dated 11/1/2022 - Submission to DPHI, dated 30/10/2023	C	Archival recording reports for the St Marys Goods Shed have been prepared. The heritage-listed jib crane is covered in the 2022 Biosis Archival Recording Report. While outside the scope of this audit, auditees confirmed the report was prepared after the commencement of Construction, but prior to potential physical impact in the subject areas.
E25	The Archival Recording Report must be submitted to the Planning Secretary, relevant councils and Heritage NSW for information within 12 months of completing all work described in the documents listed in Condition A1 in relation to heritage items. Copies of the Archival Recording Report must also be provided to relevant local historical societies.	Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Not triggered within the audit period.
E26	Following completion of all work described in the documents listed in Condition A1 in relation to heritage items, a non-Aboriginal Archaeological Excavation Report including the details of further historical research either undertaken or to be carried out and archaeological excavations (with artefact analysis and identification of a final repository for finds) and addressing the research design, must be prepared in accordance with any guidelines and standards required by the Heritage Council of NSW and Heritage NSW.	Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Not triggered within the audit period.
E27	The non-Aboriginal Archaeological Excavation Report must be submitted to the Planning Secretary, relevant councils and Heritage NSW for information within 12 months of completing all Work described in the documents listed in Condition A1 in relation to heritage items. Copies of the Report must also be provided to relevant local historical societies and local libraries.	Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Not triggered within the audit period.
ABORIGINAL HERITAGE				
E28	All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects or places of cultural significance except as authorised by this approval.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 - ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 - SSTOM Environmental Control Map (ECM), Linewide Luddenham South, SMWSASSM-PLD-SWD-SW000-EV-ECM-000001, Rev00 dated 8/11/2024 Page 4 of 8	C	In November 2022 a Walk on Country was undertaken with the Connect with Country Working Group. Two culturally modified trees were identified by the group at Cosgrove Creek, noted by one of the attendees as having been in an area obscured by vegetation and inaccessible due to poor ground conditions and flooding during earlier surveys. The two trees were recorded on 23 November 2022 by Working Group representative Erin Wilkins (Darug Custodial Aboriginal Corporation (DCAC)) and Colin Davison (Sydney Metro Aboriginal Cultural Heritage Advisor). They were subsequently registered in AHIMS as sites Cosgrove Creek scar tree 1 (45-5-5667) and Cosgrove Creek scar tree 2 (45-5-5668). Auditees advised the trees are located within the SSTOM Linewide Portion 3 project boundary but are not within the construction footprint and marked on ECMs. No other AHIMS sites are known to occur within the project boundary. No damage is known to have occurred to the listed Aboriginal cultural heritage sites and works. Works in the Cosgrove Creek area (close to identified scar trees) to date were limited to geotechnical investigation, including minor tree removal. The scar trees are located about 150m from this work area. The SSTOM ECM001, Linewide Luddenham South, Rev00 dated 8/11/2024 Page 4 of 8 shows the location of 2 scar trees within a designated Environmental No-Go zone.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4_WSA_SSTOM_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E29	The Registered Aboriginal Parties (RAPs) must be kept regularly informed about the CSSI. The RAPs must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the CSSI throughout construction.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 - ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 - Quarterly Registered Aboriginal Party (RAP) update, June 2025	C	Evidence to support ongoing consultation with Registered Aboriginal Parties (RAPs) was provided via the Quarterly Registered Aboriginal Party (RAP) update, June 2025. The Aboriginal Cultural Heritage Excavation Report for Sydney Metro – Western Sydney Airport was finalised in early March 2024, to fulfil Condition E32. The report was prepared by AECOM, in consultation with RAPs. The final report was distributed to all RAPs registered on the Sydney Metro – Western Sydney Airport project on 8 March 2024. Section 2 of the report provides an overview of the Aboriginal community consultation undertaken to inform the preparation of the project's original and revised ACHARs, as well as the off-airport ACHMP. RAP participation in the SM-WSA salvage program is also detailed. No Aboriginal cultural heritage test and salvage excavations have been undertaken for SSTOM.
E30	The Aboriginal Cultural Heritage Management Plan included in the documents listed in Condition A1 must be updated to include: (a) a methodology for the completion of pedestrian surveys for all areas within the project footprint yet to be surveyed; (b) procedures for undertaking further test excavation and, if necessary, salvage excavations prior to the commencement of works in areas subject to further test excavation; (c) mapping that clearly outlines all areas yet to be subject to survey, test excavations, and salvage excavations; (d) a procedure to update mapping following the completion of survey, test excavations, and salvage excavations that detail the archaeological works conducted across the project footprint; (e) a procedure for updating the predictive model following the identification of new Aboriginal heritage items; and (f) a procedure to report and update the effectiveness of the following the completion of survey, test excavation activities or significant artefact finds. The updated Plan must be submitted to the Planning Secretary for information prior to works in areas identified for further test excavations. <i>Note: Salvage excavations in the areas identified for salvage in documents in Condition A1, may occur prior to additional test excavations occurring.</i>	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 - ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 - DPHI Submission (PA-541) Aboriginal Cultural Heritage Management Plan, dated 19/12/2024 - Quarterly Registered Aboriginal Party (RAP) update, June 2024 - Sydney Metro WSA Independent Audit No.5 – Audit Report (SSTOM), GHD February 2024	C	A detailed review of the Aboriginal Cultural Heritage Management Plan (ACHMP) was conducted as part of the initial IEA and found to comply with Condition E30. The ACHMP was updated to Rev10 on 24/11/2024 and endorsed by the ER on 17/12/2024. Amendment to the plan included: - Update to consultation - Renaming Aerotropolis Station to Bradfield Station - Minor administrative updates The ACHMP was submitted to DPHI on 19/12/2024.
E31	The updated Aboriginal Cultural Heritage Management Plan must be implemented for the duration of salvage activities and construction.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 - ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024	NT	The two trees were recorded on 23 November 2022 by Working Group representative Erin Wilkins (Darug Custodial Aboriginal Corporation (DCAC)) and Colin Davison (Sydney Metro Aboriginal Cultural Heritage Advisor). They were subsequently registered in AHIMS as sites Cosgrove Creek scar tree 1 (45-5-5667) and Cosgrove Creek scar tree 2 (45-5-5668). Auditees advised the trees are located within the SSTOM Linewide Portion 3 project boundary but are not within the construction footprint and are marked on ECMS.
E32	At the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s) must be prepared by a suitably qualified person. The Aboriginal Cultural Heritage Excavation Report(s) must: (a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and (b) document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds). The RAPs must be given a minimum of 28 days to consider the report(s) and provide comments before the report(s) is finalised. The final report(s) must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, Gandangara LALC and Deerrubbin LALC, the RAPs and local libraries within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 - ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 - Sydney Metro WSA Independent Audit No.5 – Audit Report (SSTOM), GHD February 2024	C	The Aboriginal Cultural Heritage Excavation Report for Sydney Metro – Western Sydney Airport was finalised in early March 2024, to fulfil Condition E32. The report was prepared by AECOM, in consultation with RAPs. The final report was distributed to all RAPs registered on the Sydney Metro – Western Sydney Airport project on 8 March 2024. In the report, efforts were documented to salvage archaeological artefacts from four subsurface sites as well as from two surface sites. No Aboriginal cultural heritage test and salvage excavations have been undertaken for SSTOM.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E33	Where previously unidentified Aboriginal objects or places of cultural significance are discovered, all work must immediately stop in the vicinity of the affected area. Works potentially affecting the previously unidentified objects or places must not recommence until Heritage NSW has been informed. The measures to consider and manage this process must be specified in the Unexpected Heritage Finds and Human Remains Procedure required by Condition E34 and include registration in the Aboriginal Heritage Information Management System (AHIMS), where required.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 - ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024	NT	No previously unidentified Aboriginal objects or places of cultural significance have been discovered for SSTOM.
Unexpected Finds and Human Remains				
E34	An Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected heritage finds (heritage items and values) in accordance with any guidelines and standards prepared by the Heritage Council of NSW or Heritage NSW.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - SSTOM NAHMP, Rev 02.01, 12/12/2024 - Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024	C	The Unexpected Heritage Finds and Human Remains Procedure is included in the ACHMP.
E35	The Unexpected Heritage Finds and Human Remains Procedure must be prepared by a suitably qualified and experienced heritage specialist in consultation with the Heritage Council of NSW (with respect to non-Aboriginal cultural heritage) and in relation to Aboriginal cultural heritage, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010) and submitted to the Planning Secretary for information no later than one (1) month before the commencement of construction.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Aboriginal Cultural Heritage Management Plan Rev 02.01, 12/12/2024 - Unexpected Heritage Find Recording Form, dated 3/2/2025 - Email correspondence, PLM & Unearthed Archaeology RE: (Potential) Cow Bone Finding on Linewide Portion 3, dated 3/2/2025	C	Unexpected Aboriginal heritage finds are to be managed in accordance with Section 6.24 of Sydney Metro's Unexpected Heritage Finds Procedure [SM-18-00105232], Appendix A to the ACHMP. Unexpected finds are addressed in Section 4.3 of the ACHMP. Two sites have been recorded to date following these unexpected find procedures (for the wider WSA project). In November 2022 a Walk on Country was undertaken with the Connect with Country Working Group. Two culturally modified trees were identified by the group at Cosgrove Creek. On 3/2/2025 an animal bone was uncovered and the Unexpected Heritage Finds Procedure was implemented for SSTOM. Refer to Condition E19 for details. No unexpected finds of state heritage significance have been encountered.
E36	The Unexpected Heritage Finds and Human Remains Procedure must be prepared by a suitably qualified and experienced heritage specialist in consultation with the Heritage Council of NSW (with respect to non-Aboriginal cultural heritage) and in relation to Aboriginal cultural heritage, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010) and submitted to the Planning Secretary for information no later than one (1) month before the commencement of construction.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024 - Unexpected Heritage Find Recording Form, dated 3/2/2025 - Email correspondence, PLM & Unearthed Archaeology RE: (Potential) Cow Bone Finding on Linewide Portion 3, dated 3/2/2025	C	On 3/2/2025 an animal bone was uncovered and the Unexpected Heritage Finds Procedure was implemented for SSTOM. Refer to Condition E19 for details. No unexpected finds of state heritage significance have been encountered.
NOISE AND VIBRATION				
Land Use Survey				
E37	A detailed land use survey must be undertaken to confirm sensitive land use(s) (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration and construction ground-borne noise. The survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of work which generates construction noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Detailed Noise and Vibration Impact Statements required under Condition E47 .	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Interview with ER 7/2/2025 - NVMP, SSTOM, Rev 03, 12/12/2024 - SM-WSA SSTOM Noise and Vibration Construction Monitoring Report, August 2024 - SM-WSA SSTOM DNVIS Orchard Hills Rev05, 7/4/2025 - SM-WSA SSTOM DNVIS Claremont Meadows Service Facility OOH Works Rev00, 13/1/2025 - SSTOM Land Use Survey, Rev 01, 21239.1.1 - Environment Protection Licence (EPL) 21807	C	The SSTOM CNVMP identifies noise catchment areas (NCAs) and sensitive receivers potentially exposed to project noise. NCAs are identified in Land Use Surveys and classify land uses into: Residential, Commercial, Child Care, Recreational, Education, Industrial, Place of Worship and Shed. Sensitive receiver information is determined via the Land Use Survey in the Detailed Noise and Vibration Impact Assessment (DNVIS). A DNVIS is prepared for each project site to predict the impact of project activities on nearby receivers, including noise and vibration sensitive receivers. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels (NMLs) requiring Additional Mitigation Measures (AMMs), which are documented in Section 7.2 of each DNVIS. There were two DNVIS' prepared during the audit period and assessed out of hours work (OOHW) for the following activities and locations: - Orchard Hills - DNVIS updated to include 24/7 fit-out works, and - Claremont Meadows Service Facility A Land Use Survey was prepared for each assessment and forms Appendix B to each DNVIS. The DNVIS' are provided to the ER for review and the subject works are not permitted to commence until the DNVIS has been finalised. Refer to Condition E47 for further discussion of the assessment of OOHW and the DNVIS process.
Construction Hours				
E38	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 6:00pm Saturdays; and (c) at no time on Sundays or public holidays.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - NVMP, SSTOM, Rev 03, 12/12/2024 - SM-WSA SSTOM DNVIS Orchard Hills Rev05, 7/4/2025 - SM-WSA SSTOM DNVIS Claremont Meadows Service Facility OOH Works Rev00, 13/1/2025 - Environment Protection Licence (EPL) 21807 - NCR 008 - Orchard Hills CoA E38 250213 Rev01, dated 13/2/2025 - DPHI Submission - NCR 008 - Orchard Hills E38 (SSI-10051-PA-559), dated 18/2/2025	NC	Construction hours are documented in the SSTOM CNVMP and the DNVIS for each project site/activity. The SSTOM Orchard Hills DNVIS (April 2025) was updated to allow works for tunnel and underground station box fit out works 24 hours a day, seven days a week. The DNVIS predicts impacts related to the following activities for varying Day, Evening and Night periods: Concrete batching plant; Compound use; Concrete pours; Concrete finishing; Formwork installation and steel reinforcement fixing; Tunnel support; Heavy vehicle movement; Laydown; Tunnel fit-out via dive/tunnel portal prior to rail installation; Tunnel Fit-out via Dive/Tunnel Portal Post Rail Installation; Water treatment plant; Material craneage; Pre cast beam installation; and Earthworks. The DNVIS includes the verification of compliance against each applicable SSI 10051 Condition of Approval and EPL Condition and recommends whether the proposed works can be managed to comply with SSI 10051 and the EPL. OOHW takes place as permitted by EPL 21807. Self-Reported Non-Compliance 02: NCR 008 was raised against Condition E38 on 13/2/2025. Parklife Metro received a complaint on 13 February 2025 at 05:40 with regards to noise, truck movement and light spill. The issue was investigated and was identified that there was a miscommunication with timing between the Parklife Metro supervisor and DMT float driver. This resulted in a front loader driving onto the float and removed off site via Gate 1 onto Lansdowne Road, outside of standard construction hours and without an approved OOH permit.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Highly Noise Intensive Work				
E39	Except as permitted by an EPL or approved in accordance with the Out-of-Hours Works Protocol required by Condition E42, highly noise intensive work that result in an exceedance of the applicable NML at the same receiver must only be undertaken: (a) between the hours of 8:00 am to 6:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) if continuously, then not exceeding three (3) hours, with a minimum cessation of work of not less than one (1) hour. For the purposes of this condition, 'continuously' includes any period during which there is less than one (1) hour between ceasing and recommencing any of the work.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - NVMP, SSTOM, Rev 03, 12/12/2024	NT	Auditees advised there have been no highly noise intensive works conducted for SSTOM to date. Small scopes of work have been undertaken such as hammering out concrete washout bays but are understood not to trigger the intent of Condition E39 .
E40	This approval does not permit blasting.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - NVMP, SSTOM, Rev 03, 12/12/2024	NT	No blasting is known to have been undertaken for the project.
Variation to Work Hours				
E41	Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances: (a) Safety and Emergencies, including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or (b) Low impact, including: (i) construction that causes LAeq(15 minute) noise levels: • no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and • no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and (ii) construction that causes: • continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006); or • intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006); or (c) By Approval, including: (i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or (ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E42; or (iii) negotiated agreements with directly affected residents and sensitive land user(s); or (d) By Prescribed Activity, including: (i) tunnelling and ancillary support activities (excluding cut and cover tunnelling and surface works not directly supporting tunnelling) are permitted 24 hours a day, seven days a week; or (ii) grout batching at the Orchard Hills construction site is permitted 24 hours per day, seven days per week; or (iii) delivery of material that is required to be delivered outside of standard construction hours in Condition E38 to directly support tunnelling activities, except between the hours 10:00 pm and 7:00 am to / from the Orchard Hills ancillary facility; or (iv) haulage of spoil generated through tunnelling is permitted 24 hours per day, seven days per week except between the hours of 10:00 pm and 7:00 am to / from the Orchard Hills construction site; or (v) works within an acoustic enclosure are permitted 24 hours a day, seven days a week where there is no exceedance of noise levels or intermittent vibration levels under Low impact circumstances identified in Condition E41(b), unless otherwise agreed with the Planning Secretary; or (vi) tunnel and underground station box fit out works are permitted 24 hours per day, seven days per week. On becoming aware of the need for emergency work in accordance with (a)(ii) above, the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. The Proponent must use best endeavours to notify as soon as practicable all noise and/or vibration affected sensitive land user(s) of the likely impact and duration of those work. Notes: 1. Tunnelling does not include station box excavation. 2. Tunnelling ancillary support activities includes logistics support and material handling and delivery.	- Interview with ER, 22/08/2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro WSA ER Monthly Report February 2025, dated 7/3/2025 - Sydney Metro WSA ER Monthly Report March 2025, dated 7/4/2025 - Sydney Metro WSA ER Monthly Report April 2025, dated 6/5/2025 - Sydney Metro WSA ER Monthly Report May 2025, dated 6/6/2025 - Sydney Metro WSA ER Monthly Report June 2025, dated 7/7/2025 - ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3 - SM-WSA SSTOM OOHW Permit_047_OHE concrete batch plant Rev02, approved 24/7/2025 - SM-WSA SSTOM OOHW Permit_048 SMF Extended Concrete Works Rev02, approved 24/7/2025 - SM-WSA SSTOM OOHW Permit_073_SMF Substation Works, approved 11/6/2025 - Attended monitoring 99_SMF Concreting, dated 13/2/2025 - Attended Monitoring 134_OHE Batch Plant Operations, 27/3/2025 - E41 – PLM OOHW Register (to 21/8/2025) - E41(c) (iii) – PLM The Stabling and Maintenance Facility Earthworks Community Agreement E1.3 Report, Rev00, dated 15/5/2024 - SM-WSA SSTOM DNVIS Orchard Hills Rev05, 7/4/2025 - SM-WSA SSTOM DNVIS Claremont Meadows Service Facility OOH Works Rev00, 13/1/2025 - SMF Extended Hours CSR Community Agreement E1.3 Report Rev00, dated 13/1/2024 - Linewide North Extended Hours Community Agreement E1.3 Report Rev00, dated 1/5/2025 - Linewide South Extended Hours Community Agreement E1.3 Report Rev02, dated 15/7/2025	C	(a) Condition E68(a) was not triggered during the audit period. (b) (i) Low Impact Works undertaken during the audit period included internal substation fit out works, testing, commissioning, and defect rectification at the SMF. These activities are approved via an Out of Hours Works (OOHW) Permit process. The SSTOM OOHW Register was provided for review during the audit and includes a proposed calendar of works so potential cumulative impacts can be assessed. According to the Register, OOHW undertaken during the audit period included: • STM Station Box FRP Works (14/11/23-31/12/25) • OHE Station Box FRP Works (20/6/24-31/12/25) • BRD Station Box FRP Works (14/11/23-31/12/25) • STM Precast beam Installation, St Marys, Night Work (10/3/25-31/4/26) • BRD Precast beam Installation, Bradfield, Night Work (25/11/24-31/5/26) • OHE concrete Batch Plant Operation (26/11/24-31/12/25) • SMF Extended concrete works for M & A and OCC Building (3/12/24-31/12/25) • Linewide South track construction works (24/2/25-30/11/25) • SMF Combined service route (18/2/25-31/12/25) • CMSF 24/7 tunnel support activities (19/2/25-21/12/25) • OHE 24/7 tunnel support activities (gantry crane) (23/25-22/12/25) • Bringley Shaft 24/7 tunnel fit out works (10/2/25-10/2/26) • STM 24/7 material cranes/ tunnel activities (25/25-21/12/25) • Linewide-North Rail pulling - OHE station (22/5/25-31/8/25) • Linewide-North Track construction works (20/5/25-19/5/26) OOHW Permit #73 for OOHW at the Stabling and Maintenance Facility (SMF) for internal substation fit out works, testing, commissioning, and defect rectification was sighted, for works planned from 8/6/2025-30/11/2025. Justification of the works to be undertaken OOH was provided and was due to being assessed to be NML compliant and can be approved under conditions L5.3 of EPL. Attended noise monitoring was not undertaken to verify compliance with this activity; PLM advised as the works were low risk no monitoring was required. Data is reported six-monthly in the Noise and Vibration Construction Monitoring Report (CMR) to DPHI. The SSTOM Noise and Vibration CMR, February 2025 was made available for review during the audit, and submission to DPHI verified. (Refer also Condition C21). (ii) - Not triggered. (iii) - Not triggered. (c) Three OOHW Permits were sighted for SSTOM OOHW categorised under Condition E41(c): • SM-WSA SSTOM OOHW Permit_047_OHE concrete batch plant Rev02, approved 24/7/2025 • SM-WSA SSTOM OOHW Permit_048 SMF Extended Concrete Works Rev02, approved 24/7/2025 • SM-WSA SSTOM OOHW Permit_073_SMF Substation Works, approved 11/6/2025 (d) No OOHW permits were issued by prescribed activity under Condition E41(d) during the audit period. Auditees advised an EPL variation was sought for various prescribed activities, which means any prescribed activities under (d) are assessed under Condition E41(c).

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Out-Of-Hours Work Protocol – Work not subject to an EPL				
E42	An Out-Of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of work (not subject to an EPL) that is outside the hours defined in Conditions E38 and E39. The Protocol must be approved by the Planning Secretary before commencement of the out-of-hours work. The Protocol must be prepared in consultation with the ER. The Protocol must provide: (a) justification for why out-of-hours work need to occur; (b) identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: (i) the ER reviews all proposed out-of-hours activities and confirms their risk levels; (ii) low risk activities that can be approved by the ER; and (iii) high risk activities that are approved by the Planning Secretary; (c) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria; (d) a process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of Condition E56. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land user(s) would be exposed to, including the number of noise awakening events; (e) procedures to facilitate the coordination of out-of-hours work including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided; and (f) notification arrangements for affected receivers for all approved out-of-hours works and notification to the Planning Secretary of approved low risk out-of-hours works. This condition does not apply if the requirements of Condition E41 are met. Note: <i>Out-of-hours work is any work that occurs outside the construction hours identified in Condition E38 and E39.</i>	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - NVMP, SSTOM, Rev 03, 12/12/2024 - Sydney Metro WSA Out of Hours Work Protocol v2.0, dated 8/11/2021	C	Reference to the OOHW Protocol is included in the SSTOM CNVMP, but all out of hours works during the audit period were reportedly conducted under the project EPL for PLM. Refer previous audits for details of OOHW Protocol approval and consultation, and verification of Protocol contents in accordance with Condition E42.
Construction Noise Management Levels and Vibration Criteria				
E43	Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria: (a) construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009); (b) preferred vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); (c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives" (for human exposure); (d) BS 7385 Part 2-1993 'Evaluation and measurement for vibration in buildings Part 2' as they are 'applicable to Australian conditions'; and (e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage). Any work identified as exceeding the noise management levels and / or vibration criteria must be managed in accordance with the Noise and Vibration CEMP Sub-plan. Note: <i>The ICNG identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction Noise Management Level.</i>	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - NVMP, SSTOM, Rev 03, 12/12/2024 - SM-WSA SSTOM OOHW Permit_047_OHE concrete batch plant Rev02, approved 24/7/2025 - SM-WSA SSTOM OOHW Permit_046 SMF Extended Concrete Works Rev02, approved 24/7/2025 - SM-WSA SSTOM OOHW Permit_073_SMF Substation Works, approved 11/6/2025 - Attended monitoring 99_SMF Concreting, dated 13/2/2025 - Attended Monitoring 134_OHE Batch Plant Operations, 27/3/2025 - SM-WSA SSTOM DNVIS Orchard Hills Rev05, 7/4/2025 - SM-WSA SSTOM DNVIS Claremont Meadows Service Facility OOH Works Rev00, 13/1/2025	C	Noise and vibration standards and guidelines adopted for the Project are listed in Section 6 of the SSTOM NVMP. Section 6.4 of the SSTOM NVMP addresses Condition E43 and the recommended limits outlined in Section 6.4.1 summarise the recommended limits outlined in DIN 4150 to ensure minimal risk of cosmetic damage to residential and industrial buildings. In accordance with CSSI 10051, a DNVIS is to be prepared for each construction site before construction noise and vibration impacts commence for any work that may exceed the NMLs, vibration criteria and / or ground borne noise levels specified in Conditions E43 and E44 at any residence outside construction hours identified in Condition E38, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under Condition E87. Each DNVIS includes the verification of compliance against each applicable SSI 10051 Condition of Approval, and EPL Conditions and recommends whether the proposed works can be managed to comply with SSI 10051 and the EPL. A sample of OOH Permits was reviewed during the audit: - SM-WSA SSTOM OOHW Permit_047_OHE concrete batch plant Rev02, approved 24/7/2025 - SM-WSA SSTOM OOHW Permit_048 SMF Extended Concrete Works Rev02, approved 24/7/2025 - SM-WSA SSTOM OOHW Permit_073_SMF Substation Works, approved 11/6/2025 Mitigation measures are included in each OOHW Permit. Auditees advised there were no potentially vibration impacted receivers identified during the audit period.
E44	All reasonable and feasible mitigation measures must be applied when the following residential ground-borne noise levels are exceeded: (a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and (b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A). The mitigation measures must be outlined in the Noise and Vibration CEMP Sub-plan, including in any Out-of-Hours Work Protocol, required by Condition E42.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - NVMP, SSTOM, Rev 03, 12/12/2024 - SSTOM Complaints Register	C	Ground-borne noise has not been identified as an issue relevant to SSTOM during the audit period. Ground-borne noise criteria is set out in Section 6.2 of the SSTOM NVMP. Potential impacts associated with ground-borne noise are set out in Section 7.2.3 of the SSTOM NVMP. PLM has predicted that ground-borne noise impacts for SSTOM are expected to be negligible and are not anticipated to result in negative community reaction. The application of mitigation measures in Section 9 of the CNVMP for the control of airborne noise emissions and vibration is expected to adequately address ground-borne noise. There were no complaints received related to ground-borne noise during the audit period.
E45	Noise generating work in the vicinity of potentially-affected community, religious, educational institutions and noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) resulting in noise levels above the NMLs must not be timetabled within sensitive periods, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - NVMP, SSTOM, Rev 03, 12/12/2024	NT	Auditees advised Condition E45 has not been relevant during the audit period.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
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Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Construction Noise and Vibration Mitigation and Management				
E46	Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise and vibration levels are minimised around sensitive land use(s). Practices may include, but are not limited to: (a) use of regularly serviced low sound power equipment; (b) at source control, temporary noise barriers (including the arrangement of plant and equipment) around noisy equipment and activities such as rock hammering and concrete cutting; (c) use of non-tonal reversing alarms; and (d) use of alternative construction and demolition techniques.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • SM-WSA SSTOM Noise and Vibration Construction Monitoring Report 1, August 2024 • SM-WSA SSTOM Noise and Vibration Construction Monitoring Report 2, February 2025 • Site inspection, dated 11/8/2025 • SM-WSA SSTOM DNVIS Orchard Hills Rev05, 7/4/2025 • SM-WSA SSTOM DNVIS Claremont Meadows Service Facility OOH Works Rev00, 13/1/2025 • PLM Work Order Inspection, Excavator, dated 15/7/2025 • PLM Work Order Inspection, Excavator Rubber Duck, dated 15/7/2025 • PLM Work Order Inspection, Telehandler, dated 24/6/2025 • Environment Protection Licence (EPL) 21807	C	Noise mitigation measures as per Condition E46 are set out in the SSTOM NVMP, and are defined for specific scenarios in DNVIS' and Out of Hours Work (OOHW) Permits. (a) Plant and equipment service records are managed via the MEX system. Sound Power Level measurements were previously reviewed for the tower crane at St Marys (IA2), and recommendations for the application of acoustic shields was in the process of being implemented. Verification records for noise mitigation from the crane was sighted, dated 2/10/2024 and 4/11/2024. Sound Power Level measurements for the Orchard Hills generator were also provided for review during the previous audit (IA2). Refer E41(b)(i) for more information. (b) At source noise controls were observed during the site inspection. Noise blankets had been placed around generators, and plans were in place for the installation of a noise wall between the site and adjacent residents at the Bringelly service facility. A row of site containers formed a noise wall along the site boundary adjacent to the concrete batching plant at Orchard Hills. Noise mats were also observed to be installed on a construction fence along the boundary at Bradfield Station (photo sighted), along the top of the fence at the Claremont Meadows Service Facility, and along the top of the station box and site boundary at St Marys station. (c) Pre-start checks include a check for reversing alarms (no beepers allowed). (d) Examples of the use of alternative construction and demolition techniques was discussed and included a the use of day makers utilising batteries or solar rather than generators, e.g. Bradfield Station. There was no demolition undertaken during the audit period.
E47	Detailed Noise and Vibration Impact Statements (DNVIS) must be prepared for any work that may exceed the NMLs, vibration criteria and / or ground-borne noise levels specified in Conditions E43 and E44 at any residence outside construction hours identified in Condition E38 , or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under Condition E37 . The DNVIS must include specific mitigation measures identified through consultation with affected sensitive land user(s) and the mitigation measures must be implemented for the duration of the works. A copy of the DNVIS must be provided to the ER before the commencement of the associated works. The Planning Secretary and the EPA may request a copy (ies) of the DNVIS .	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Interview with ER 22/8/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 1, August 2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 2, February 2025 • SM-WSA SSTOM DNVIS Orchard Hills Rev05, 7/4/2025 • SM-WSA SSTOM DNVIS Claremont Meadows Service Facility OOH Works Rev00, 13/1/2025 • Environment Protection Licence (EPL) 21807 • Linewide North Extended Hours Community Agreement E1.3 Report Rev00, dated 1/5/2025 • Linewide South Extended Hours Community Agreement E1.3 Report Rev02, dated 15/7/2025	C	DNVIS' have been prepared for each project site (and for specific activities) for SSTOM and were available on the project website. There were two DNVIS' provided for review during the audit and assessed out of hours work (OOHW) for the following activities and locations: • SM-WSA SSTOM DNVIS Orchard Hills Rev05, 7/4/2025 • SM-WSA SSTOM DNVIS Claremont Meadows Service Facility OOH Works Rev00, 13/1/2025 A Land Use Survey was prepared for each assessment and forms Appendix B to each corresponding DNVIS. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels (NMLs) requiring Additional Mitigation Measures (AMMs), which are documented in Section 7.2 of each DNVIS. Sensitive receiver information in the DNVIS is captured from the attached Land Use Survey. The closest sensitive receiver to the Claremont Meadows Service Facility OOHW (DNVIS, Jan 2025) is identified in Section 3.2 as "residences in close proximity to the site including: To the west, approximately 40 m from the Site, across Gipps Road and behind a traffic noise barrier that is approximately 3.6 m in height; and To the east, approximately 240 m from the Site (isolated residence at 2 to 52 Puttland Street, Claremont Meadows. " The closest sensitive receivers to the Orchard Hills OOHW (DNVIS, April 2025) are identified in Section 3.2 as "residences in close proximity to the site: Along Kent Road, Along Samuel Marsden Road, Along Lansdowne Road, and North of the IM. The closest other noise sensitive receiver, this being a child care centre (Kids Academy Early Learning), is located at the intersection of Doncaster Avenue and Caddens Road and is approximately 800 m from the edge of the SSTOM works. Furthermore, the child care centre only operates Monday to Friday, between 7.00 am and 6.00 pm, which is outside the hours that these works are proposed". The above DNVIS' did not trigger the requirement for any additional consultation with sensitive receivers, or community agreements. Mitigation measures in each DNVIS, Section 7.1 note that "consultation with affected receivers as per CCS will be ongoing". The DNVIS' are provided to the ER for review and the subject works are not permitted to commence until the DNVIS has been finalised. Implementation of the specific mitigation measures is verified by the PLM Environment Manager, and the ER during construction, as evidenced in ER inspection reports. PLM advised they are conducting ongoing coordination with other contractors to ensure that respite periods are maintained throughout the works. Two Community Agreements are in place for Linewide (north and south) and include a commitment to reduce the number of plant being used at one time during OOH work.
E48	Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before works that generate vibration commences in the vicinity of those properties. If the potential exceedance is to occur more than once or extend over a period of 24 hours, owners and occupiers must be provided a schedule of potential exceedances on a monthly basis for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Noise and Vibration CEMP Sub-plan.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 1, August 2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 2, February 2025 • Sydney Metro WSA ER Monthly Report February 2025, dated 7/3/2025 • Sydney Metro WSA ER Monthly Report March 2025, dated 7/4/2025 • Sydney Metro WSA ER Monthly Report April 2025, dated 6/5/2025 • Sydney Metro WSA ER Monthly Report May 2025, dated 6/6/2025 • Sydney Metro WSA ER Monthly Report June 2025, dated 7/7/2025 • VMS Australia Unattended Vibration Monitoring Report 01, Warragamba Pipeline, Orchard Hills NSW 2748, 9/4/25-11-4/25, dated 16/4/2025	NT	Vibration monitoring results are summarised in ER Monthly Reports and Construction Monitoring Reports. There were no vibratory activities with the potential to affect buildings, structures or receivers identified during the audit period. Vibration monitoring for due diligence purposes was undertaken on Linewide Portion 1 to demonstrate no impact to the Warragamba pipeline. No vibratory exceedances were identified. The requirement to identify properties at risk of cosmetic damage is addressed in Section 6.4 of the SSTOM NVMP. Vibration screening criteria for cosmetic damage is listed in Table 17 of the SSTOM NVMP. The list of potentially affected residents for any particular scope is included in the DNVIS and/or OOHW Permit, rather than in the NVMP. It is understood that notification to properties at risk of exceeding vibration screening criteria would generally be captured in the notification process for noisy works. The Goods Shed at St Marys is expected to trigger the requirement for vibration monitoring later in the project. No SSTOM works have been undertaken within the minimum working distance of the Goods Shed to date. This is expected to be triggered once the St Marys precinct works commence. Section 6.4.3 of the SSTOM NVMP sets out the requirements for work near vibration sensitive structures, including heritage-listed structures. The EIS (Technical Paper 2) identified heritage receivers relevant to noise and vibration impacts associated with SSTOM Works which are summarised in in Table 25 of the SSTOM NVMP and include: St Marys Railway Station Group, Queen Street St Marys Post-War Commercial Building, St Marys Munitions Workers Housing, Four Winds - Dwelling & Brick House (Claremont Meadows), Warragamba to Prospect Water Supply Pipelines and McGarvie-Smith Farm (off-airport corridor).

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E49	Where sensitive land use(s) are identified in Appendix B as exceeding the highly noise affected criteria during typical case construction, mitigation measures must be implemented with the objective of reducing typical case construction noise below the highly noise affected criteria at each relevant sensitive land use(s). Activities that would exceed highly noise affected criteria during typical case construction must not commence until the measures identified in this condition have been implemented, unless otherwise agreed with the Planning Secretary. <i>Note: Mitigation measures may include path barrier controls such as acoustic sheds and/or noise walls, at-property treatment, or a combination of path and at-property treatment.</i>	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 1, August 2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 2, February 2025	NT	There have been no sensitive land use(s) identified for SSTOM exceeding the highly noise affected criteria during typical case construction during the audit period. The St Marys Station site has the closest residents to the project site and construction activities, but Condition E49 has not been triggered to date for SSTOM. There is one sensitive receiver located adjacent to Linewide Portion 1 (resident) that is likely to trigger Condition E49 during future track construction out of hours works.
E50	For all construction sites where acoustic sheds are installed, the sheds must be designed, constructed and operated to minimise noise emissions. This would include the following considerations: (a) all significant noise producing equipment that would be used during the night-time would be inside the sheds, where feasible and reasonable; (b) noise generating ventilation systems such as compressors, scrubbers, etc, would be located inside the sheds and external air intake/discharge ports would be appropriately acoustically treated; and (c) the doors of acoustic sheds would be kept closed during the night-time period. Where night-time vehicle access is required at sites with nearby residences, the shed entrances would be designed and constructed to minimise noise breakout.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 1, August 2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 2, February 2025	NT	There are no acoustic sheds on SSTOM.
E51	Where Condition E49 determines that at-property treatment (temporary or permanent) is the appropriate measure to reduce noise impacts, this at-property treatment must be offered to landowners of residential properties for habitable living spaces, unless other mitigation or management measures are agreed to by the landowner. Landowners must be advised of the range of options that can be installed at or in their property and given a choice as to which of these they agree to have installed. A copy of all guidelines and procedures that will be used to determine at-property treatment at their residence must be provided to the landowner.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 1, August 2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 2, February 2025	NT	Condition E51 has not been triggered to date for SSTOM.
E52	Any offer for at-property treatment or the application of other noise mitigation measures in accordance with Condition E51 , does not expire until the noise impacts specified in Condition E49 , affecting that property are completed, even if the landowner initially refuses the offer. <i>Note : If an offer has been made but is not accepted, this does not preclude the commencement of construction under Condition E49.</i>	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 1, August 2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 2, February 2025	NT	There has been no application of at-property treatment or other noise mitigation measures applicable to Condition E52 to date for SSTOM.
E53	The implementation of at-property treatment does not preclude the application of other noise and vibration mitigation and management measures including temporary and long term accommodation.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 1, August 2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 2, February 2025	NT	There has been no application of at-property treatment or other noise mitigation measures applicable to Condition E53 to date for SSTOM.
Construction Vibration Mitigation - Heritage Items				
E54	Vibration testing must be conducted during vibration generating activities that have the potential to impact on Heritage items to verify minimum working distances to prevent cosmetic damage. In the event that the vibration testing and attended monitoring shows that the preferred values for vibration are likely to be exceeded, the Proponent must review the construction methodology and, if necessary, implement additional mitigation measures. Such measures must include, but not be limited to, review or modification of excavation techniques.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ER Interview, 22/8/2025	NT	There has been no vibration monitoring conducted for SSTOM to date and no vibration generating activities identified within minimum working distances with the potential to impact on heritage items. Refer pipeline vibration monitoring, Condition E48 .
E55	The Proponent must seek the advice of a heritage specialist on methods and locations for installing equipment used for vibration, movement and noise monitoring at Heritage items.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report, August 2024 • SMWSA SSTOM Noise and Vibration Construction Monitoring Report 2, February 2025	NT	Vibration monitoring equipment was installed on the Goods Shed by SBT prior to their works commencing, and has remained in place during the SSTOM project. Pipeline vibration monitor was not attached to the heritage item. NB: SSTOM will seek advice as to whether Condition E55 needs to be re-verified prior to the commencement of vibratory activities within minimum working distance of the St Marys Goods Shed.

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Utility Coordination and Respite				
E56	All work undertaken for the delivery of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided. The Proponent must: (a) reschedule any work to provide respite to impacted noise sensitive land use(s) so that the respite is achieved in accordance with Condition E57; or (b) consider the provision of alternative respite or mitigation to impacted noise sensitive land use(s); and (c) provide documentary evidence to the ER in support of any decision made by the Proponent in relation to respite or mitigation. The consideration of respite must also include all other approved Critical SSI, SSI and SSD projects which may cause cumulative and / or consecutive impacts at receivers affected by the delivery of the CSSI.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • Environmental Review ER 002 - Kent Road Watermain, approved 27/3/2024 • Environmental Review ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 29/4/2024 • SM-WSA SSTOM DNVIS Orchard Hills Rev05, 7/4/2025 • SM-WSA SSTOM DNVIS Claremont Meadows Service Facility OOH Works Rev00, 13/1/2025 • SM-WSA Cumulative Impact Meeting Minutes #012 12/2/2025 • SM-WSA Cumulative Impact Meeting Minutes #013 19/3/2025 • SM-WSA Cumulative Impact Meeting Minutes #014 16/4/2025 • SM-WSA Cumulative Impact Meeting Minutes #015 14/5/2025 • SM-WSA Cumulative Impact Meeting Minutes #016 25/6/2025 • SM-WSA Cumulative Impact Meeting Minutes #017 16/7/2025 • SM-WSA M12 Cumulative Impact Meeting Minutes #006 12/2/2025 • SM-WSA M12 Cumulative Impact Meeting Minutes #007 12/3/2025	C	Auditees advised there have been no circumstances where Condition E56 has become relevant during SSTOM to date. Third party works relevant to Condition E56 will be managed as per the DNVIS and OOHW procedures discussed elsewhere during the audit. The process for coordination and respite is defined in the CNVMP. Environmental Reviews have been prepared for utility works on Kent Street & Samuel Marsden Roads, Orchard Hills. These works had not commenced at the time of the audit (IA4), but are expected to be included in future OOHW Permits and have been assessed in a specific DNVIS (Orchard Hills Utilities Rev00, dated 30/4/2024). PLM plan to undertake future works in the St Marys precinct that is likely to trigger utility coordination and respite provisions under Condition E56. PLM advised CSR works had commenced in the SMF during standard working hours only within the project boundary. Potential exists for cumulative impacts from SSTOM with other nearby PLM project sites, particularly at Linewide and SMF. Cumulative impact assessments are undertaken by PLM during OOH works planning. Refer to noise conditions for more information. Cumulative impacts from interfaces and other nearby construction sites have historically been managed through monthly Cumulative Impact Meetings. Sydney Metro undertakes periodic meetings with surrounding projects (including M12 and Bradfield Delivery Authority (BDA) works). Auditees advised M12 West works (e.g. Luddenham Road and Elizabeth Drive) have reduced to landscaping and rehabilitation / finishing works, thereby reducing the potential for cumulative impacts with this project. Cumulative impact meetings with Sydney Metro were being held monthly but since this interface has reduced, meetings have now ceased with the last meeting held on 12/3/2025. Sydney Metro is still in contact with M12 representatives and conducts informal discussions with them prior to WSA CI meetings. Sydney Metro BDA meetings are led by PLM via delivery interface meetings – no minutes are produced. Outcomes of both meetings are referenced and discussed as appropriate within fortnightly formal Environmental Working Group minutes or in informal discussions with PLM. Recent meeting minutes were provided as evidence and included attendees from Sydney Metro, SSTOM and FSM (AEW) Environment and Project management teams. Issues discussed in meetings included a lookahead for out of hours work at each location, and potential for cumulative impacts related to environmental aspects including Surface water management, Air quality, and Heavy Vehicle (HV) movements during peak hours. Auditees advised traffic and access impacts have reduced with the completion of SCAW and SBT import and tunnelling works, which has resulted in significant improvements to surface water quality, dust emissions and noise and vibration impacts. It was noted that truck movements associated with SSTOM have increased since the previous audit period due to import activities, spoil movement and deliveries. Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site, though it is noted this is an ongoing focus for the project.
Out-of-Hours Works – Community Consultation on Respite				
E57	In order to undertake out-of-hours work outside the work hours specified under Condition E38, appropriate respite periods for the out-of-hours work must be identified in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with: (a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work; (b) a description of the potential work, location and duration of the out-of-hours work; (c) the noise characteristics and likely noise levels of the work; and (d) likely mitigation and management measures which aim to achieve the relevant NMLs under Condition E43 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers). The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the ER before the out of hours work commences, and to the EPA and the Planning Secretary on request. Note: Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the RBL at any residence.	• Interview with ER, 22/08/2025 • Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • PLM SSTOM - SMF - E57 St Marys Station Consultation Report, Rev09, dated 19/6/2025 • PLM OHW - E57 Orchard Hills Station Consultation Report, Rev07, dated 20/6/2025 • PLM STOM - E57 Bradfield Metro Station Consultation Report, Rev02, dated 18/12/2024 • PLM SSTOM - SMF - E57 The Stabling and Maintenance Facility Consultation Report, Rev03, dated 17/12/2024 • SM-WSA SSTOM DNVIS Orchard Hills Rev05, 7/4/2025 • SM-WSA SSTOM DNVIS Claremont Meadows Service Facility OOH Works Rev00, 13/1/2025	C	The application of Condition E57 for SSTOM is usually via a case by case assessment for RO and AA offers for sensitive receivers. The Sydney Metro SSTOM Communications Manager was interviewed during a previous audit and outlined the consultation process for OOHW, which remained the same during IA4. E57 Consultation Reports were reviewed for Orchard Hills Station (OHE) and St Marys Station. Out of hours work at OHE includes Ongoing oversized plant and equipment deliveries; Extended work hours for concreting and supporting formwork, Concrete batch plant operations; Utility investigation and installation works - Caddens and Kent Road; Tunnel and underground station box fit-out; and Pre-caste beam installation. Out of hours work at St Marys Station includes Ongoing extended hours for concrete works and supporting formwork; Extended work hours for OSOM deliveries; Extended work hours for precast beam installation; and Tunnel and underground station box fit-out. E57 Consultation Reports provide a summary of consultation undertaken in accordance with Condition E57 with respect to out of hours works activities at each site, and include at least a 3-month lookahead for proposed activities at each site. Maps of the distribution area are also included in the Consultation Reports. Community Notifications are uploaded to the Sydney Metro website and were current at the time of the audit. Where impacted properties have not been able to be reached by door-knocking, 'SWMY' slips are left at the property that include contact details to get in touch. E57 Consultation Reports were also available on the PLM project website. PLM is conducting ongoing coordination with other contractors to ensure that respite periods are maintained throughout the works. Evidence was sighted of the E57 Report provided to the ER as required. MOD 2 was determined on 20/12/2024 and amends Condition E13 to decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and Condition E57 so that information on consultation, respite and out of hours work information be provided to the EPA and Planning Secretary on request.

Item
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Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heilborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro_IA4_WSA_SSTOM_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Noise Mitigation - Operational Noise and Vibration Mitigation Measures				
E58	The Proponent must prepare an Operational Noise and Vibration Review (ONVR) to confirm noise and vibration mitigation measures that would be implemented for the Operation of the CSSI for the ultimate service. The ONVR must be prepared as part of the iterative design development and in consultation with the EPA, relevant council(s), other relevant stakeholders and must: (a) identify appropriate Operational noise and vibration objectives and levels for surrounding development, including existing and potential future (as known at the time of ONVR preparation) sensitive land use(s); (b) confirm the operational noise and vibration predictions based on the expected final design. Confirmation must be based on an appropriately calibrated noise model; (c) identify sensitive land uses that are predicted to exceed: (i) noise criteria set out in the Rail Infrastructure Noise Guideline (EPA, 2013), Noise Policy for Industry (EPA, 2017); and (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006); (d) identify all noise and vibration mitigation measures including location, type and timing of mitigation measures, with a focus on: (i) source control and design; (ii) at the receiver (if relevant); and (iii) 'best practice' achievable noise and vibration outcome for each activity; (e) describe how the final suite of mitigation measures will achieve: (i) the noise criteria outlined in the Rail Infrastructure Noise Guideline (EPA, 2013) and Noise Policy for Industry (EPA, 2017); and (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006); (f) include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures being offered; (g) include procedures for operational noise and vibration complaints management, including investigation and monitoring (subject to complainant agreement). The ONVR must be verified by an independent acoustic expert and submitted to the Planning Secretary for approval before the implementation of any operational noise mitigation measures. The Proponent must implement the identified noise and vibration control measures and make the ONVR publicly available. Note: The design of noise barriers and the like must be undertaken in consultation with the relevant stakeholders, including affected landowners and businesses (or a representative of a business), Western Parklands City Authority and relevant council(s) as part of the Place, Urban Design and Corridor Landscape Plan required under Condition E79.	Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	PLM's designer was preparing an Operational Noise and Vibration Review (ONVR) at the time of the audit. Consultation had commenced with the NSW EPA. The ONVR was not available for review during the audit as it remained in draft.
E59	Operational noise mitigation measures as identified in Condition E58 that will not be physically affected by work, must be implemented within six months of submitting the ONVR, unless otherwise agreed by the Planning Secretary. Where implementation of operational noise mitigation measures are not proposed to be implemented in accordance with this requirement, the Proponent must submit to the Planning Secretary a report providing justification as to why, along with details of temporary measures that would be implemented to reduce construction noise impacts, until such time that the operational noise mitigation measures are implemented.	Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Not triggered during the audit period.

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Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E60	Within 12 months of the commencement of operation of the CSSI, the Proponent must undertake monitoring of operational noise to compare actual noise performance of the CSSI against the noise performance predicted in the review of noise mitigation measures required by Condition E58. An Operational Noise and Vibration Compliance Report (ONVCR) must be prepared to document this monitoring and include, but not necessarily be limited to: (a) noise and vibration monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under Condition E58; (b) methodology, location and frequency of noise and vibration monitoring undertaken, including monitoring sites at which CSSI noise and vibration levels are ascertained, with specific reference to locations indicative of impacts on receivers; (c) a review of the performance of the CSSI against the: (i) operational noise levels in terms of criteria and noise goals established in the <i>NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017)</i>; (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in <i>Assessing Vibration: a Technical Guideline (DECC, 2006)</i>; (d) details of any complaints and enquiries received in relation to Operational noise and vibration generated by the CSSI (between the date of commencement of Operation and the date the report was prepared); (e) an assessment of the performance and effectiveness of applied noise and vibration mitigation measures together with a review and if necessary, reassessment of mitigation measures; (f) identification of: (i) additional measures to meet the criteria outlined in the <i>NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017)</i>; (ii) additional measures to meet the vibration goals for human exposure for existing sensitive land, as presented in <i>Assessing Vibration: a Technical Guideline (DECC, 2006)</i>; (iii) when these measures are to be implemented; and (iv) how their effectiveness is to be measured and reported to the Planning Secretary and the EPA. The ONVCR must be submitted to the Planning Secretary and the EPA within 60 days of completing the Operational noise and vibration monitoring and made publicly available. Note: Refer to Condition B5 about how personal information will be handled.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Not triggered during the audit period.
PLACE, URBAN DESIGN AND VISUAL AMENITY				
Construction Sites				
E61	Wayfinding information must be incorporated on temporary hoardings to guide pedestrians around the St Marys construction site and enhance their understanding and experience of the locality and space.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Site inspection 11/8/2025 • St Marys wayfinding signage, sighted 11/8/2025	C	Wayfinding signage was installed on the hoarding around the St Marys station site, as observed during the site inspection .
E62	The CSSI must be constructed in a manner that minimises visual impacts of construction sites including temporary landscaping and vegetative screening, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, wherever practicable.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Site inspection 11/8/2025	C	Visual mitigation measures observed to be installed during the site inspection at St Marys and Orchard Hills stations included: Hoarding around the project site, and a spoil bund and retained remnant vegetation at the rear of the Orchard Hills site. Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There have been no complaints re visual impacts during the audit period.
Design Requirements and Strategic Context				
E63	The CSSI must be designed with consideration of: (a) the design objectives, principles and guidelines identified in documents listed in Condition A1; (b) the principles and objectives of the draft Connecting with Country Framework; (c) relevant land use changes, masterplans and initiatives, where this information is known and/or available; (d) existing and proposed future local context and character; and (e) transport and land use integration and system functionality in the context of precincts, to the extent it is known and/or defined. Responses to items (a) – (e) must be reviewed by the Design Review Panel (DRP) to inform the design of permanent built works and landscape design of the CSSI. The outcome of the DRP review must be provided to the Planning Secretary prior to the submission of the Place, Urban Design and Corridor Landscape Plan (PUDCLP). Note: In accordance with Condition A10 and Condition A16, the requirements of this condition can be staged.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 • SMWSA SSTOM – Stage 1 PUDCLP – E63 Compliance Statement, 23/11/24 • SMWSA SSTOM – Stage 2 PUDCLP – E63 Compliance Statement, 26/11/24 • GANSW DRP Response Condition E63 - SMWSA SSTOM - Stage 3 PUDCLP - E63 Compliance Statement, dated 26/11/2024 • DPHI Submission (PA-526) - E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 29/11/2024 • DPHI Receipt of E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 19/12/2024	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 has been prepared to address the requirements of Condition E63. SSTOM – Stage 2 PUDCLP – E63 Compliance Statement, 23/11/24 was provided as evidence and outlines compliance with Condition E63, as verified by ParkLife Metro. The memo was submitted to the Planning Secretary for information prior to lodgement of the SSTOM PUDCLP: a) The D&C Contractor's design objectives, principles and guidelines have been documented within our Architectural Design Strategy (SMWSASSM-PLD SWD-SW000-AT-RPT-030000), implemented within the developed design and align with the intent of the EIS and Submissions Report. b) The D&C Contractor's response to the draft Connecting with Country Framework is documented within our Architectural Design Strategy (SMWSASSM-PLD SWD-SW000-AT RPT-030000). In addition to establishing the Linewide response to the Connecting with Country Framework, each of the station designs is supported by a "Station Design Response" which articulates how the overall framework has been applied at each specific site. The Connecting with Country framework has been a foundation of our design development since the earliest stage of the Tender. c) Where known, land use and master plans have been considered in design development. d) Existing conditions and future planning outcomes (where known) were considered in the design development. e) Transport and land use integration and system functionality (where defined) has been suitably considered in the design development. As per PLM's SSTOM contract, DRP consultation began in January 2023 on a bi-weekly basis in order to ensure that design excellence is being achieved.

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Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Design Guidance and Standards - Lighting and Security				
E64	The CSSI must be constructed and operated with the objective of minimising light spill to surrounding properties. All lighting associated with the CSSI must be consistent with the requirements of: (a) ASINZS 4282:2019 <i>Control of the obtrusive effects of outdoor lighting, relevant Australian Standards in the series ASINZS 1158 - Lighting for Roads and Public Spaces;</i> (b) NASF Guideline E: <i>Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports;</i> and (c) NASF Guideline C: <i>Managing the risk of wildlife strikes in the vicinity of airports.</i> Mitigation measures must be provided to manage residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ER Inspection Reports • SSTOM Complaints Register February - August 2025 • Sydney Metro WSA SSTOM CEMP, Rev 02 19/12/2024 • OOHW Permits	C	The OOHW approval process includes an assessment of controls to be applied to minimise light spill during construction. Mitigation measures to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners are included in the approval process during night works. Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There were two complaints received regarding light spill from Orchard Hills during the audit period. The issue was rectified promptly in both instances and no recurrence is known to have occurred.
Design Guidance and Standards - Active Transport				
E65	Designs must have regard to the Movement and Place Framework relevant guidance including the <i>Walking Space Guide: Towards Pedestrian Comfort and Safety</i> (TINSW, 2020) and the <i>Cycleway Design Toolbox: Designing for Cycling and Micromobility</i> (TINSW, 2020).	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • SSTOM Complaints Register February - August 2025 • Sydney Metro WSA SSTOM CEMP, Rev 02 19/12/2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 • SMWSA SSTOM – Stage 1 PUDCLP – E63 Compliance Statement, 23/11/24 • SMWSA SSTOM – Stage 2 PUDCLP – E63 Compliance Statement, 26/11/24 • GANSW DRP Response Condition E63 - SMWSA SSTOM - Stage 3 PUDCLP - E63 Compliance Statement, dated 26/11/2024 • DPHI Submission (PA-526) - E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 29/11/2024 • DPHI Receipt of E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 19/12/2024	C	Design of the ATC was finalised with issue of the PUDCLP Stage 2. The PUDCLP Stage 2, Section 2 refers to design objectives and standards and section 6 provides an explanation of how the requirements of Condition E65 have been met.
E66	Active transport facilities must be designed, constructed and/or rectified in accordance with the Guide to Road Design Part 6A: Paths for Walking and Cycling (Austroads, 2017) and relevant Australian Standards (AS) such as 1428.1-2009 Design for access and mobility. The active transport links must also incorporate relevant Crime Prevention Through Environmental Design principles.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • SSTOM Complaints Register February - August 2025 • Sydney Metro WSA SSTOM CEMP, Rev 02 19/12/2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 • SMWSA SSTOM – Stage 1 PUDCLP – E63 Compliance Statement, 23/11/24 • SMWSA SSTOM – Stage 2 PUDCLP – E63 Compliance Statement, 26/11/24 • GANSW DRP Response Condition E63 - SMWSA SSTOM - Stage 3 PUDCLP - E63 Compliance Statement, dated 26/11/2024 • DPHI Submission (PA-526) - E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 29/11/2024 • DPHI Receipt of E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 19/12/2024	NT	The PUDCLP Stage 2, Section 2 refers to Active transport design guidance and standards; Sections 5-7 refer to the design guides and standards required by Condition E66 being incorporated into the design. Crime Prevention Through Environmental Design (CPTED) principles are addressed in the PUDCLP Stage 1: Luddenham Station building & Stabling and Maintenance Facility. It is noted that further information for other stations and the Linewide works will be available in the future Stage 2 SSTOM PUDCLP. The PUDCLP Stage 1, Section 2.5.2 - Community safety and privacy, provides details of the CPTED principles which have been applied to each station and includes consideration of: Direct sightlines; Mitigation of concealed spaces; CCTV; Precinct activation; and Lighting design and customer assistance. The PUDCLP Stage 1 notes CPTED compliance will also be further considered in landscape design packages. The PUCPL Stage 2 states "<i>The requirements of the Guide to Road Design Part 6A and the relevant Australian Standards have been integrated into the design of the active transport facilities at Stations. The Interchange Access Plans (IAP) in Appendix E provide further detail on the transport requirements and principles that are applied to the station precincts</i>".
Design Review Panel and Design Review				
Panel Membership				
E67	The Proponent must establish an independent DRP to provide advice and recommendations to the Proponent during the CSSI's design development and construction to facilitate quality design and place outcomes. The DRP must be formed and hold its first meeting within six months of the date of this approval, or as otherwise agreed with the Planning Secretary. Note: <i>Nothing in this approval prevents the use of an existing design panel as the Design Review Panel convened for this project where the function and composition of that panel complies with the terms of this approval.</i>	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/11/2024	C	The Sydney Metro Design Review Panel (DRP) Terms of Reference, Western Sydney Airport Line were sighted and available on the project website. The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month. Participants are set out in Section 3 and include the DRP Chair and panel, including Panel Advisor, Coordinator and SM Project Advisor. Special advisors and external stakeholders may be invited periodically to participate in DRP meetings to advise on local issues and design outcomes as they relate to matters of interest.
E68	The responsibilities of the Design Review Panel include: (a) providing advice and recommendations to the Proponent for consideration in the design development of the CSSI; (b) provide advice on the application of Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines to key design elements in relation to place making, architecture, heritage, urban and landscape design and artistic aspects of the CSSI; and (c) reviewing and endorsing any updates to the Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines. The Panel's advice must be consistent with the CSSI as approved.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/11/2024	C	The roles and responsibilities of the DRP are set out in Section 3 of the Terms of Reference and align with Condition E68.

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Project No.	MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E69	The DRP must be chaired by the NSW Government Architect (or their nominee), and must be comprised of, where relevant, by suitably qualified, experienced and independent professional(s) in each of the fields of: (a) urban design and place making; (b) landscape architecture; and (c) architecture. The Panel may seek advice from suitably qualified, experienced independent professionals in other fields as required, including but not limited to sustainability, active transport and non-Aboriginal heritage. The Panel must also seek appropriate expertise to ensure Aboriginal cultural heritage and cultural values inform its advice.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The role of the DRP Chair is set out in Section 3.1 of the DRP Terms of Reference and states DRP meetings are chaired by the NSW Government Architect or their nominee. In the event of their absence, the Chair may nominate an Alternative Chair from the regular Panel members.
E70	Panel members must be sourced from the NSW State Design Review Panel Pool or otherwise be approved by the NSW Government Architect.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The responsibilities of Panel Members are set out in Section 3.2 of the DRP Terms of Reference.
Operation of the Design Review Process				
E71	Prior to forming the DRP, a Design Review Panel Terms of Reference is to be developed and endorsed by the NSW Government Architect. The Terms of Reference must be submitted to the Planning Secretary once it is endorsed by the NSW Government Architect and: (a) must be generally consistent with the NSW State Design Review Panel Terms of Reference (version 5); (b) outline the frequency of DRP meetings, coordinated with the Proponent's program requirements, as outlined in Condition E76, to ensure timely advice and design adjustment; and (c) identify cessation arrangements.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The SM-WSA DRP Terms of Reference has been prepared and is available on the project website. The DRP Terms of Reference (Western Sydney Airport line and Metro West) was endorsed by the Government Architect NSW on 4/3/2022. The DRP Terms of Reference was submitted to DPHI for information. The Terms of Reference addresses each part of Condition E71 as follows: a) Section 3.2 of the DRP Terms of Reference commits to consistency with the NSW State Design Review Panel Terms of Reference b) The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month c) Cessation arrangements are set out in Section 5.
E72	The DRP must be operated and managed in accordance with the Design Review Panel Terms of Reference .	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	Noted. As per evidence presented for Conditions E67-E76 .
E73	The NSW Government Architect must, after consultation with the Proponent, appoint an appropriately qualified and experienced design advisor to the DRP and may appoint an alternate design advisor. The advisor must attend meetings of the Panel. The advisor may also be invited by the Panel to assist with decisions regarding the Panel's recommendations and record the Panel's advice and recommendations.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024	C	Appointment of the Panel Advisor is addressed in Section 3.3 of the DRP Terms of Reference, including a list of responsibilities. As per the SDRP Terms of Reference, an alternate Panel advisor may also be appointed to attend where the Panel advisor is absent or unavailable. GANSW Principal Design Advisor Melizza Morales was appointed.
E74	The relevant council may be invited to the meetings of the Panel as observers or to provide feedback on key design elements of the CSSI.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024	C	Section 3 of the DRP Terms of reference sets out the procedure for special advisors and external stakeholders to be invited periodically to participate in DRP meetings to advise on local issues and design outcomes as they relate to matters of interest.
E75	DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation must be included when submitting the final PUDCLP to the Planning Secretary for information.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024 - Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 - Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in May 2024 and submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 was provided during IA3. The design has been regularly reviewed by the DRP. The DRP advice and recommendations and responses will be included in Appendix C of the Final Stage 2 PUDCLP submitted to DPHI for information. In accordance with Condition E75, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. A record of advice and recommendations register was available for review in Appendix C of the Stage 1 PUDCLP to satisfy Condition E75.
E76	The Proponent must provide the design development schedule to the DRP prior to its first meeting, including details of when relevant elements of the detailed design will be available for review by the Panel. The schedule must be updated every three months until the detailed design process is complete.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 DRP 36 DRP Meeting Agenda - 01 February, 2024-Rev 3 - Evidence RE: Design Development Schedule, as provided by the Sydney Metro Manager Precinct and Place Making and Precinct Activation, Property and Place, dated 20/8/2024	C	A package of slides was presented to the DRP on 1/2/2024 (DRP #36) providing the DRP with a future Design Development Schedule as required under Condition E76. A copy of the agenda was also provided for review. NB: The requirement for the Design Development Schedule to be provided to the DRP prior to its first meeting was not verified during this audit (outside the audit period and scope), but should be verified by the Proponent to ensure compliance with Condition E76.

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Place, Urban Design and Corridor Landscape Plan				
E77	A PUDCLP must be prepared to document and illustrate the permanent built works and landscape design of the CSSI and how these works are to be maintained. The PUDCLP must be: (a) prepared by a suitably qualified and experienced person(s) in consultation with the community (including the affected landowners and businesses or a representative of the businesses), Western Parklands City Authority, Western Sydney Planning Partnership and relevant council(s); (b) reviewed by an independent and suitably qualified and experienced person nominated by the DRP; (c) submitted to the Planning Secretary prior to the construction of permanent built surface works and/or landscaping, excluding those elements which for ecological requirements, or technical requirements, or requirements as agreed by the Planning Secretary do not allow for alternate design outcomes; and (d) implemented during construction and operation of the CSSI. <i>Note: The PUDCLP may be developed and considered in stages to facilitate design progression and construction. Any such staging and associated approval would need to facilitate a cohesive final design and not limit final design outcomes.</i>	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 • GANSW Letter of Advice, Sydney Metro WSA, DRP 24, 21/8/2023 • GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024 • GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in May 2024 and submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 was provided during IA3. The design has been regularly reviewed by the DRP. The DRP advice and recommendations and responses will be included in Appendix C of the Final Stage 2 PUDCLP submitted to DPHI for information. In accordance with Condition E75, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. Section 01.6 of the Stage 1 PUDCLP addressed compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit. b) GANSW Principal Design Advisor Melizza Morales was appointed and reviewed the PUDCLP, as documented in GANSW Letter of Advice, Sydney Metro WSA, DRP 24, 21/8/2023.
Place, Urban Design and Corridor Landscape Plan - Documentation				
E78	The PUDCLP must document how the following matters have been considered in the design and landscaping of the project: (a) the requirements of Conditions E63 to E65, and (b) advice and recommendations from the DRP.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in May 2024 and submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 was provided during IA3. The design has been regularly reviewed by the DRP. The DRP advice and recommendations and responses will be included in Appendix C of the Final Stage 2 PUDCLP submitted to DPHI for information. In accordance with Condition E75, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. Section 01.6 of the Stage 1 PUDCLP addressed compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit. A summary of the dates of the DRP meetings and the issues raised by the DRP at these meetings is contained in Section 01 and Appendix C of the PUDCLP Stage 1.
E79	The PUDCLP must include descriptions and visualisations (as appropriate) of: (a) design of the permanent built elements of the CSSI, including stabling and maintenance and ancillary facilities, service facilities and tunnel portals; (b) plans for station precincts including but not limited to (i) justification of the spatial scope of each station precinct plan; (ii) provision for public art and heritage interpretation installations; (iii) placemaking opportunities, having regard to placemaking initiatives in Western Sydney Aerotropolis planning documents; (iv) interchange access plans developed in consultation with the Traffic and Transport Liaison Group; (v) active transport connections and end of trip facilities, design of pedestrian and cycle access, facilities and fixtures; (vi) design of commuter car parking elements, where relevant; (c) landscaping and building design opportunities to mitigate visual impacts and minimise light spill on the nearby residences; (d) the design of watercourse crossings and east-west corridor movements to give to effect of Condition E14; (e) landscaping: (i) landscape plan, hard and soft elements, for the corridor and the station precincts; (ii) use of native species from the relevant native vegetation community (or communities), where identified as appropriate; (iii) water sensitive urban design initiatives (vii) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design; (viii) measures to prevent wildlife strike risk in proximity to Western Sydney International Airport; (f) details of strategies to rehabilitate, regenerate or revegetate disturbed areas, where relevant; (g) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design; (h) operational maintenance standards; and (i) the timing and responsibilities for implementation of elements included within the PUDCLP.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in May 2024 and submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 was provided during IA3. The design has been regularly reviewed by the DRP. The DRP advice and recommendations and responses will be included in Appendix C of the Final Stage 2 PUDCLP submitted to DPHI for information. In accordance with Condition E78, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. Section 01.6 of the Stage 1 PUDCLP addressed compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit. A summary of the dates of the DRP meetings and the issues raised by the DRP at these meetings is contained in Section 01 and Appendix C of the PUDCLP Stage 1.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heilborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Operational Maintenance				
E80	The ongoing maintenance and operation costs of urban design, open space, landscaping and recreational items and work implemented as part of this approval remain the Proponent's responsibility until satisfactory arrangements have been put in place for the transfer of the asset to the relevant authority. Before the transfer of assets, the Proponent must maintain items and work to at least the design standards established in the PUDCLP, required by Condition E79 . The Planning Secretary must be advised prior to the transfer of the asset(s) to the relevant authority.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Not triggered during the audit period.
E81	Should any plant loss occur during the maintenance period the plants must be replaced by the same plant species unless it is determined by a suitably qualified person that a different species is more suitable for that location.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Not triggered during the audit period.
SOCIO-ECONOMIC, LAND USE AND PROPERTY				
E82	The CSSI must be designed and constructed with the objective of minimising impacts to, and interference with third party property, and that such infrastructure and property is protected during construction.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Auditees advised there has been no excavation to date for SSTOM that may pose a settlement risk or interference with third party property. Future SSTOM works in the vicinity of the St Marys Goods Shed will involve preparation of an Environmental Control Map (ECM) to identify relevant environmental aspects, including potential vibration and settlement impacts to the heritage-listed building. It is understood Condition E102 relates predominantly to the SBT portion of the project for the tunnelling works. Groundwater has been encountered in the station boxes and SSTOM's responsibility for groundwater monitoring and settlement monitoring was triggered during the IA3 audit period. The Groundwater Monitoring Program is understood to have commenced. Refer to Condition C22 for more information. Settlement and vibration monitors have been set up at the Goods Shed and settlement monitoring is ongoing.
E83	The utilities and services (hereafter "services") potentially affected by construction must be identified to determine requirements for diversion, protection and / or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. Disruption to services resulting from construction must be avoided, wherever possible, and advised to customers where it is not possible.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Environmental Review ER 002 - Kent Road Watermain, approved 27/3/2024 • Environmental Review ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 29/4/2024 • WSA SSTOM, Stabling and Maintenance Facility, Site Works and Power Installation DNVIS, Rev01, 30/5/2024 • SSTOM Precinct Utility Package Design Report, Stage 2, RevA, dated 3/10/2023	NT	Works with the potential to impact services had not been undertaken during the audit period. Utilities works are planned in streets surrounding the Orchard Hills site in the future, with associated planning approval pathways captured in Environmental Reviews. The design report for services was made available for review during the audit and documents the framework for the identification and management of utility authority assets. Section 3.3 of the design report confirms the design is required to comply with obligations of Third-Party Agreements as stipulated in the Deed so that Sydney Metro is not in breach of complying with these agreements.
Condition Survey				
E84	A suitably qualified and experienced person must undertake condition surveys of all buildings, structures, utilities and the like identified in the documents listed in Condition A1 and the further assessment carried out under mitigation measure GW1 of the Submissions Report as being at risk of damage before commencement of any work that could impact on the subject surface / subsurface structure. The results of the surveys must be documented in a Pre-construction Condition Survey Report for each item surveyed. Copies of Pre-construction Condition Survey Reports must be provided to the relevant owners of the items surveyed in the vicinity of the proposed work, and no later than one (1) month before the commencement of the work that could impact on the subject surface / subsurface structure.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Land Surveys Existing Condition Survey Report, Tram Sheds, St Marys 2760, Rev0, inspection date 30/5/2023	C	Auditees advised a number of pre-condition surveys were conducted under previous packages (SBT and SCAW). The Goods Shed at St Marys has been identified as being at risk of damage by future SSTOM works. It is understood that a pre-condition survey for the Goods Shed was conducted by SBT prior to works within the vicinity of the building. SSTOM provided a copy of a pre-condition survey for the Goods Shed (also understood to be known as the Tram Sheds), the inspection for which was conducted by Land Surveys on 30/5/2023, prior to SSTOM utilising the area of land near the Goods Shed previously. Auditees confirmed that no other buildings, structures, or utilities listed in Condition A1 are at risk of being damaged by SSTOM works. All other high risk sites have been assessed by previous contractors as part of their scope of works, with SSTOM's works primarily consisting around building stations in pre-disturbed areas / scopes (or in greenfield areas with no structures present) or fit out on existing infrastructure that has installed by other (tunnels, viaducts etc).
E85	Condition surveys of all items for which condition surveys were undertaken in accordance with Condition E84 must be undertaken by a suitably qualified and experienced person after completion of the work identified in Condition E84 . The results of the surveys must be documented in a Post-construction Condition Survey Report for each item surveyed. Copies of Post-construction Condition Survey Reports must be provided to the landowners of the items surveyed, and no later than three (3) months following the completion of the work that could impact on the subject surface / subsurface structure.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Letter from Sydney Metro to DPHI RE: SMWSA SSI 10051 Condition E8 – Notification of appointment of Independent Property Assessment Panel, dated 28/6/2023 • Post Approval Form_20230628074714 DPE IPIAP, Compliance Report, Annual Review, Audit Report, SSI-10051-PA-258, dated 28/6/2023 • SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023	NT	Not triggered within the audit period.
E86	The Proponent, where liable, must rectify any property damage caused directly or indirectly (for example from vibration or from groundwater change) by the work at no cost to the owner. Alternatively, the Proponent may pay compensation for the property damage as agreed with the property owner. Rectification or compensation must be undertaken within 12 months of completion of the work identified in Condition E84 unless another timeframe is agreed with the owner of the affected surface or sub-surface structure or recommended by the Independent Property Impact Assessment Panel (IPIAP) .	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Land Surveys Existing Condition Survey Report, Tram Sheds, St Marys 2760, Rev0, inspection date 30/5/2023	NT	There is no property damage known to have occurred as part of SSTOM.

Item
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Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E87	Appropriate equipment to monitor areas in proximity of ancillary facilities and the tunnel route must be installed during construction with particular reference to at risk buildings, structures and utilities identified in the condition surveys required by Condition E84 and / or geotechnical analysis as required. If monitoring during construction indicates exceedance of the vibration criteria identified in the DNVIS prepared under Condition E47 , or levels otherwise determined as appropriate by a suitably qualified structural engineer, then all construction affecting settlement must cease immediately and must not resume until fully rectified or a revised method of construction is established that will ensure protection of affected buildings.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	Not triggered within the audit period. There has been no damage determined to occur as a result of the project. Auditees advised no vibratory activities requiring vibration monitoring have been conducted during the audit period. It is understood that the existing vibration monitor attached to the St Marys Goods Shed and settlement monitoring requirements have been handed over to SSTOM by SBT and vibration and settlement monitoring is ongoing, though SSTOM has not commenced any work within safe working distances of the Goods Shed during the audit period.
E88	An IPIAP must be established prior to tunnelling activities commencing. The Planning Secretary must be informed of the members of the IPIAP and must comprise geotechnical and engineering experts independent of the design and construction team. The IPIAP will be responsible for independently verifying condition surveys undertaken under Conditions E84 and E85 , the resolution of property damage disputes and the establishment of ongoing settlement monitoring requirements.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Letter from Sydney Metro to DPHI RE: SMWSA SSI 10051 Condition E8 – Notification of appointment of Independent Property Assessment Panel, dated 28/6/2023 • Post Approval Form_20230628074714 DPE IPIAP, Compliance Report, Annual Review, Audit Report, SSI-10051-PA-258, dated 28/6/2023 • SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023	C	An Independent Property Impact Assessment Panel (IPIAP) has been established as set out in a letter from Sydney Metro to DPHI RE: SMWSA SSI 10051 Condition E8 – Notification of appointment of Independent Property Assessment Panel, dated 28/6/2023. The IPIAP relates to the entire Sydney Metro – Western Sydney Airport project. The below people will together, act in the capacity of the IPIAP that will be responsible for independently verifying property condition surveys undertaken under Conditions E84 and E85 , the resolution of property damage disputes and the establishment of ongoing settlement monitoring requirements. The letter cited states the members are geotechnical and engineering experts that have a proven track record acting in the capacity of IPIAP members for other State Significant Infrastructure projects, they are: • Dr James Barbato, Associate Director of Mine Subsistence Engineering Consultants • Mr Daryl Kay, Director of Mine Subsistence Engineering Consultants • Mr Paul Roberts, Principal Associate of JK Geotechnics DPHI responded to the IPIAP nominations in an Appointment of Experts Letter, dated 30/6/2023. There have been no investigations or claims of property damage from the project under the IPIAP to date for SSTOM.
E89	Either the affected property owner or the Proponent may refer unresolved disputes arising from potential and/or actual property impacts to the IPIAP for resolution. All costs incurred in the establishing and implementing of the panel must be borne by the Proponent regardless of which party makes a referral to the IPIAP . The findings and recommendations of the IPIAP are final and binding on the Proponent.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023	NT	There have been no SSTOM-related unresolved disputes within the audit period.
E90	Settlement must be monitored for any period beyond the minimum timeframe requirements of Condition E87 if directed so by the IPIAP following its review of the monitoring data from the period not less than six (6) months after settlement has stabilised, consistent with Condition E87 . The results of the monitoring must be made available to the Planning Secretary upon request.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023	NT	SSTOM has not been directed to conduct settlement monitoring by the IPIAP during the audit period.
Small Business Owners Engagement Plan(s)				
E91	Small Business Owners Engagement Plan(s) must be prepared for St Marys and implemented in accordance with the Overarching Community Communication Strategy to minimise impact on small businesses directly affected by construction activities at St Marys during construction. The plan must be prepared and submitted to the Planning Secretary for information before the commencement of construction at St Marys.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Site inspection 11/8/2025 • PLM Small Business Owners Engagement Plan, St Marys, Rev0, dated 10/11/2023 • ParkLife Project website: https://parklifemetro.com.au/project/	C	The Small Business Owners Engagement Plan, St Marys was provided for review and was available on the PLM project website in the community section. Sydney Metro advised that the Small Business Owners Engagement Plan was originally prepared by CPBG prior to Project Construction commencement to satisfy this Condition, thus the requirement to submit to the Planning Secretary applies to the SBT contract, not SSTOM.
SOILS AND CONTAMINATION				
Contaminated sites				
E92	Before commencement of any construction that would result in the disturbance of moderate to high risk contaminated sites as identified in the documents identified in Condition A1, Detailed Site Investigations (for contamination) must be conducted to determine the full nature and extent of the contamination. The Detailed Site Investigation Report(s) and the subsequent report(s), must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The Detailed Site Investigations must be undertaken in accordance with guidelines made or approved under section 105 of <i>Contaminated Land Management Act 1997</i> (NSW). Note: Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports (for contamination) for separate sites.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FIW Contamination Register to PLM_201223 • Email from Tetra Tech to PLM RE: STM PRB Monitoring - 20 December 2024 and 17 January 2025, dated 28/1/2025	C	Detailed Site Investigation (DSI) reports for the WSA project were undertaken prior to commencement of the SSTOM package of works and prior to tunnelling and bulk excavation under previous contractors, SBT and SCAW. A list of DSIs conducted by previous contractors is recorded in a Contamination Register. The review of DSIs has not been verified as part of the SSTOM works package. No moderate-high-risk contaminated sites are known to have been identified for the SSTOM package of works. A contaminated groundwater plume is known to exist at the St Marys site from a former Dry Cleaners property. A Permeable Reactive Barrier (PRB) is in place to prevent migration toward the station box. Groundwater monitoring of the plume was initiated by the previous principal contractor and was recommenced by SSTOM on 20/12/24. Coffey Geosciences have been engaged to conduct the groundwater monitoring. An email from Tetra Tech to PLM, dated 28/1/2025 was sighted and presents a the results from the 1st and 2nd PRB mitigation monitoring events completed on 20/12/2024 & 17/1/2025. Monitoring was conducted in four locations for Tetrachloroethene, Trichloroethene, Cis 1,2 DCE, & Vinyl Chloride. Results indicate chlorinated hydrocarbon concentrations were below the level of reporting, including in SBT-GW-0001 and SBT-GW-0001B which are located between the source area and the PRB.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E93	Should remediation be required to make land suitable for the final intended land use, a Remedial Action Plan must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEiNP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The Remedial Action Plan must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (NSW) and must include measures to remediate the contamination at the site to ensure the site will be suitable for the proposed use when the Remedial Action Plan is implemented. Note: Nothing in this condition prevents the Proponent from preparing individual Remedial Action Plans for separate sites.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023 • Email from Tetra Tech Coffey to PLM RE: STM PRB Monitoring - 11 July 2025, dated 31/7/2025 • SM-WSA-SSTOM-STM Station - St Marys Station Monthly Mitigation Report 3 - March 2025 Rev00, dated 27/5/2025 • SM-WSA-SSTOM-STM Station - St Marys Station Monthly Mitigation Report 4 - April 2025 Rev00, dated 2/6/2025	C	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. With handover of the St Marys Station site (STM) to SSTOM, implementation of the RAP is ongoing until completion of the station box. The STM site is subject to a Statutory Site Audit (Audit (TO-095)) by a NSW EPA Accredited Site Auditor, Tom Onus of Ramboll Australia Pty Ltd, under the NSW Contaminated Land Management Act 1997 (CLM Act). Following a review of a Detailed Site Investigation (DSI) prepared by TTMP in August 2022, it was concluded by the Site Auditor in Interim Audit Advice that: "Preparatory construction works are not considered to constitute remediation works because significant contamination was not identified in soils. However, the following actions are required to ensure any contamination identified during the works is dealt with appropriately to minimise risks to human health and the environment: • Spoil is to be assessed in accordance with Waste and Recycling Management Procedure • Spoil is to be inspected for ACM (asbestos-containing material) by a competent person and the AMP (Asbestos Management Plan) implemented if required. • Groundwater investigation data is to be obtained to inform requirements for any future remediation/management of groundwater and the dewatering procedures • Preparation of a site-specific risk assessment and RAP for groundwater remediation if required based on investigation results. • Bulk excavation below groundwater should not commence until groundwater has been adequately characterised and the site-specific risk assessment and RAP process are complete and approved by the Auditor." For the purpose of the RAP, groundwater level is considered to be approximately 34m AHD consistent with the level reported in the Project Groundwater Monitoring Plan (GMP) for the Bringelly Shale Aquifer, which was adopted for the assessment of drawdown impacts associated with construction with an allowance for potential sustained groundwater inflow due to periods of sustained high rainfall. Monthly groundwater monitoring is being undertaken to determine the effectiveness of the Permeable Reactive Barrier (PRB) installed to manage groundwater contaminated with chlorinated hydrocarbons from the former dry cleaner at 1-7 Queen Street, St Marys. The PRB was installed to the west of St Marys Station in May 2023 to intercept the potential migration of chlorinated hydrocarbons in groundwater due to drawdown associated with the construction of the Station Box. The first ten rounds of monitoring indicate that chlorinated hydrocarbon concentrations are below the level of reporting, including in SBT-GW-0001 and SBT-GW-0001B which are located between the source area and the PRB.
E94	Before commencing remediation, a Section B Site Audit Statement(s) must be prepared by an NSW EPA-accredited Site Auditor that certifies that the Remedial Action Plan(s) is/are appropriate and that the site can be made suitable for the proposed use. The Remedial Action Plan(s) must be implemented and any changes to the Remedial Action Plan(s) must be approved in writing by the NSW EPA-accredited Site Auditor. Note: Nothing in this condition prevents the Proponent from engaging an NSW EPA-accredited Site Auditor to prepare individual Site Audit Statements for Remedial Action Plans for separate sites.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023	NT	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. Refer to Condition E93 for details.
E95	Validation Report(s) must be prepared in accordance with <i>Consultants Reporting on Contaminated Land: Contaminated Land Guidelines</i> (EPA, 2020) and relevant guidelines made or approved under section 105 of the <i>Contaminated Land Management Act 1997</i> (NSW). Note: Nothing in this condition prevents the Proponent from preparing individual Validation Reports for separate sites.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023	NT	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. Refer to Condition E93 for details. Remediation was ongoing at the time of IA4 and a Validation Report is not known to have been triggered.
E96	A Section A1 or Section A2 Site Audit Statement (accompanied by an Environmental Management Plan) and its accompanying Site Audit Report , which state that the contaminated land disturbed by the work has been made suitable for the intended land use, must be submitted to the Planning Secretary and the Relevant Council(s) after remediation and before the commencement of operation of the CSSL. Note: Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023	NT	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. Refer to Condition E93 for details. There is no known requirement for the preparation of a Site Audit Report (SAR) or Site Audit Statement (SAS) for the SSTOM project to date. This condition will be triggered for PLM after the St Marys station box is tanked.
E97	A copy of Detailed Site Investigation Report(s) , Remedial Action Plan(s) , Validation Report(s) , Site Audit Report(s) and Site Audit Statement(s) must be submitted to the Planning Secretary and the Relevant Council(s) for information.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FIW Contamination Register to PLM, 201223 • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023	NT	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. Refer to Condition E93 for details. DSI reports for the WSA project were undertaken prior to commencement of the SSTOM package of works and prior to tunnelling and bulk excavation under previous contractors, SBT and SCAW. A list of DSIs conducted by previous contractors is recorded in a Contamination Register. The review of DSIs has not been verified as part of the SSTOM works package. No moderate-high-risk contaminated sites are known to have been identified for the SSTOM package of works. A contaminated groundwater plume is known to exist at the St Marys site from a former Dry Cleaners property. Potential impacts of the plume on the project are being managed by implementation of the Groundwater Monitoring Program.
E98	An Unexpected Contaminated Land and Asbestos Finds Procedure must be prepared before the commencement of construction and must be followed should unexpected contaminated land or asbestos (or suspected contaminated land or asbestos) be excavated or otherwise discovered during construction.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • SSTOM SWMP, Rev 03, 12/12/2024 • Contamination and Asbestos Unexpected Finds Procedure, Rev D, dated 9/6/2023	C	Appendix C of the SSTOM Soil and Water Management Plan (SWMP) sets out the Unexpected Finds Procedures (UFP) for contamination. The SWMP was submitted to DPHI on 29/11/2021, prior to the commencement of work. Refer to Condition E99 for implementation of the Unexpected Contaminated Land and Asbestos Finds Procedure.

Item
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Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E99	The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - SSTOM SWMP, Rev03, 12/12/2024 - Contamination and Asbestos Unexpected Finds Procedure, Rev D, dated 9/6/2023 - UF-005 PLM Unexpected Find Record Stockpile Asbestos BRD, 19/3/2025 - Environment Protection Licence No. 4614, LA Kennett Enterprises Pty Ltd, Glenfield NSW - Environment Protection Licence No. 11497, Blacktown Waste Services, Marsden Park Landfill, Marsden Park NSW - Property Risk Australia (PRA) Asbestos Materials Clearance Inspection Report, dated 15/7/2025 - Material Management Tracker, Bradfield Station, dated 14 & 15/7/2025 - NSW EPA Intrastate Asbestos tracking receipts, various dated 14 & 15/7/2025 - Alliance Waste Classification Report 17614.6.1-ER-1-9, SSTOM – AEC – Bradfield, dated 21/5/2025 - PLM Email to Auditor RE: SSTOM - RFI 3, dated 25/8/2025 - Glenfield Waste Services dockets x16 (34.90T, 36.20T, 34.64T, 42.24T, 34.84T, 38.28T, 32.08T, 36.32T, 36.58T, 37.22T, 37.00T, 35.38T, 36.98T, 36.94T, 35.92T, 36.62T), dated 14/7/2025 - Glenfield Waste Services dockets x2 (16.44T & 15.22T), dated 15/7/2025	C	There were two unexpected asbestos finds identified during IA4: Bradfield Station: Asbestos was identified during waste classification of a stockpile. Portion 4 Linewide: Asbestos was identified during CSR works. At the time of IA4 the contaminated material remained on site due to access constraints, with a high rail pad requiring construction across the rail line to conduct removal/remedial works. The UEF at Bradfield Station was examined further and involved the removal of an asbestos impacted soil stockpile, and removal of approximately 450 Tonnes of asbestos contaminated spoil from the internal and external surfaces of a plant item. Friable asbestos fragment has been detected in one of the test pits. Records were provided as evidence and included the Asbestos Materials Clearance Inspection Report, dated 14/7/2025-15/7/2025, Bradfield waste disposal tracker, Bingo Industries Asbestos disposal docket (1.96 Tonnes asbestos waste), dated 17/12/2024, and the EPL of the receiving facility (LA Kennett Enterprises, Glenfield, EPL 4614), which permits the disposal of asbestos waste under Condition L3.1. NB: <i>The waste tracker indicates approximately 600 Tonnes of asbestos impacted soil was removed from site, which differs from the 400 Tonnes estimated in the clearance inspection report. This audit does not constitute a full waste audit. If there are any concerns about hazardous waste removal practices these should be examined via a detailed waste audit.</i> PLM provided the following advice in relation to the above discrepancy in an email dated 25/8/2025 "Waste clearance prepared by the Licenced asbestos assessor (LAA) provides an estimated quantity, the tracking provides the actual volume removed with the works undertaken under the supervision and direction of the LAA/LAR to the extent required. Material compaction, moisture content and bulking during excavation and loading can also all impact final tonnage of material removed".
SUSTAINABILITY				
E100	A Sustainability Plan must be prepared to achieve an Infrastructure Sustainability Council of Australia (ISCA) Infrastructure Sustainability rating of +75 (Version 1.2) (or equivalent level of performance using a demonstrated equivalent rating tool) or a 5-Star Green Star rating (or equivalent level of performance using a demonstrated equivalent rating tool).	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro WSA Sustainability Plan, January 2022 - Sydney Metro Letter of submission to DPHI Ref SM-2200002922, dated 21/1/2022 - RE: CSSI 10051 – Condition of Approval E100 & 101 - Submission of Sydney Metro - Western Sydney Airport (SM-WSA) Sustainability Management Plan	C	The Sydney Metro WSA Sustainability Plan (SMP), January 2022 was sighted and was available on the project website. Auditees confirmed the ISCA Rating tool is being followed during Construction, as required by the SMP, and the letter of submission of the Sustainability Plan states the plan has been prepared to achieve IS rating of 75+ as required by Condition E100.
E101	The Sustainability Plan must be submitted to the Planning Secretary for information within six (6) months of the date of this approval and must be implemented throughout construction and operation. <i>Note: Nothing in this condition prevents the Proponent from preparing separate Sustainability Strategies for the construction and operational stages of the CSSI.</i>	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro WSA Sustainability Plan, January 2022 - Sydney Metro Letter of submission to DPHI Ref SM-2200002922, dated 21/1/2022 - RE: CSSI 10051 – Condition of Approval E100 & 101 - Submission of Sydney Metro - Western Sydney Airport (SM-WSA) Sustainability Management Plan	C	The Sydney Metro WSA Sustainability Plan, January 2022 (SMP) was submitted to DPHI on 21/1/2022, within six months of the date of SSI-10051 approval on 23/7/2021.
E102	A Water Reuse Strategy must be prepared, which sets out options for the reuse of collected stormwater and groundwater during construction and operation. The Water Reuse Strategy must include, but not be limited to: (a) evaluation of reuse options; (b) details of the preferred reuse option(s), including volumes of water to be reused, proposed reuse locations and/or activities, proposed treatment (if required), and any additional licences or approvals that may be required; (c) measures to avoid misuse of recycled water as potable water; (d) consideration of the public health risks from water recycling; and (e) time frame for the implementation of the preferred reuse option(s). The Water Reuse Strategy must be prepared based on best practice and advice sought from relevant agencies, as required. The Strategy must be applied during construction. Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail. A copy of the Water Reuse Strategy must be made publicly available. <i>Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational stages of the CSSI.</i>	- PLM Sydney Metro WSA SSTOM Water Reuse Strategy Rev01, dated 15/5/2024 - https://parklifemetro.com.au/wp-content/uploads/2024/05/SMWSASSM-PLD-INL-SB-PLN-000001-Sydney-Metro-WSA-SSTOM-Water-Reuse-Strategy-Rev-01 - Photos: Bradfield rain tanks, LDN rain tanks, OHE rain tanks, P3 Rain tanks, SMF rain tanks, provided 11/2/2025	C	The E102 SSTOM Water Reuse Strategy has been prepared and was available on the PLM project website. The Water Reuse Strategy includes the following: - Water Balance Study - Train wash water Reuse - Rainwater tanks at stations and SMF - Use of recycled water mains water when available to site - Water efficiency strategies - Engagement with Sydney Water was undertaken as part of site establishment process to determine availability of non-potable water mains. Further engagement as part of development of the Water Reuse Strategy was not deemed necessary as available information was sufficient. No other relevant agencies were identified. The contents of the Water Reuse Strategy (a)-(e) have not been re-evaluated here as the strategy was prepared prior to the IA2 audit period. Condition E102 was verified as compliant during IA1. Standpipes were observed to be setup at sediment basins for the efficient reuse of construction water for dust suppression. Auditees advised rainwater harvesting is used at site compounds for flushing toilets. Photos and the location of rain tanks in place were sighted at St Marys Station, Bradfield Station, Luddenham, Orchard Hills Station, Linewide Portion 3, and the SMF.

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Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
TRAFFIC AND TRANSPORT				
E103	Construction Traffic Management Plans (CTMPs) must be prepared in accordance with the Construction Traffic Management Framework. A copy of the CTMPs must be submitted to the Planning Secretary for information before the commencement of any construction in the area identified and managed within the relevant CTMP.	- Site inspection 11/8/2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - PLM Overarching CTMP, Rev0, dated 28/6/2023 - CTMP St Marys Station, Rev01, dated 3/4/2024 - CTMP St Marys Station, DPHI Submission, dated 19/4/2024 - CTMP Orchard Hills Station, Rev02, dated 11/6/2024 - CTMP Orchard Hills Station, DPHI Submission, dated 6/8/2024 - CTMP Linewide RevB - CTMP Linewide, DPHI Submission, dated 5/8/2024 - CTMP St Marys Station, Rev03, dated 8/8/2025 - IA4 audit consultation, Penrith City Council, dated 8/8/2025 & PCC response, dated 22/8/2025 - Email correspondence from PLM's Traffic Manager, dated 26/8/2025 - Consultation with TTLG for STM CTMP including PCC, Emails RE: SM WSA - STTOM –STM - Construction Traffic Management Plan - St Mary's Station - Issued for Review, dated 29/8/2025-12/9/2025	C	Construction Traffic Management Plans (CTMPs) were prepared for the following locations during the previous audit period: - St Marys - Orchard Hills - Linewide CTMPs for the above sites were originally submitted to DPHI prior to construction commencing in each area (refer evidence column for dates). The CTMP for St Marys Station was updated to Rev3, dated 8/8/2025 during the IA4 audit period. Section 6.2 of the CTMP was added and describes issues identified with the Phillip Street / Access Road A Intersection Sightline, which was also raised during consultation for IA4 with Penrith City Council: "In January 2025 in response to a potential road safety risk identified by a member of the community Parklife Metro JV installed regulatory signage on Phillip Street, St Marys prohibiting on street parking. The regulatory signage was installed without notification to Council or approval. The signage remains in place to this day without the necessary consultation being undertaken or approvals being received". In response to community-raised concerns about the sightline at the intersection of Access Road A and Phillip Street, a sightline assessment was undertaken. The assessment found that the installation of No Stopping parking restriction signage along the north side of Phillip Street will resolve the sightline concerns raised. Correspondence from PLM's Traffic Manager, dated 26/8/2025 states "The updated CTMP has now been shared with Council informally, incorporating the technical assessment undertaken by our appointed traffic engineering consultant, which was previously shared with Council on 28 January 2025. Upon receipt of this formal commentary, we will make improvements to our internal processes to ensure any future traffic safety issues are resolved in a timely manner in consultation with Council." Observation 1: PCC provided feedback to audit consultation indicating inadequate consultation had been undertaken by PLM in relation to traffic safety measures on the corner of Phillip Street and Access Road A. Upon examination of all evidence the auditor agrees that communication channels in relation to traffic management and consultation with PCC should be improved. Recommendation: Devise and implement improvements to PLM internal processes to ensure any future traffic safety issues are resolved in a timely manner in consultation with Council, including obtaining approval for the erection of No Stopping signage on Council roads.
Management of Heavy Vehicle Movements				
E104	The locations of all Heavy Vehicles used for spoil haulage must be monitored in real time and the records of monitoring be made available electronically to the Planning Secretary and the EPA upon request for a period of no less than one (1) year following the completion of construction.	- Site inspection 11/8/2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Export Vehicle Activity Report XN98OQ Mack, dated 3/4/2025	C	Import of structural fill (tunnel spoil) to SMF and Linewide was undertaken during the audit period. An example of an Export Vehicle Activity Report XN98OQ Mack, dated 3/4/2025 was provided as evidence.
E105	Local roads proposed to be used by Heavy Vehicles to directly access ancillary facilities / construction sites that are not identified in the documents listed in Condition A1 must be approved by the Planning Secretary and be included in the CTMP.	- Site inspection 11/8/2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Heavy Vehicle Local Roads Report for Use of Local Roads - Orchard Hills Revision C, dated 19/11/2024 - DPHI Submission OHE HVLR Rev A (PA-427), dated 19/8/2024 - DPHI Submission OHE HVLR Rev C (PA-527), dated 29/11/2024 - DPHI Letter to Sydney Metro RE: Orchard Hills Request for Approval of Heavy Vehicle Local Roads - Sewerage Connection, dated 9/1/2025 - Trafficworks Letter RE: Response to Condition E106 of SSI 10051, Paul Mihailidis Level 3 Road Safety Auditor, dated 3/10/2024 - NCR 011 EIR22_Concrete spill and unapproved HV route, dated 31/3/2025 - DPHI Submission - SSTOM NCR 011 - E105 Non-Compliance (SSI-10051-PA-572), dated 4/4/2025 - NCR 012 NCR-012_Concrete Truck on Unapproved HV Route, dated 15/7/2025 - DPHI Submission - SSI-10051 SSTOM NCR-012 (SSI-10051-PA-620), dated 18/7/2025	NC	Spoil haulage routes have been approved as documented in CTMPs. A Heavy Vehicle Local Roads Assessment for the Use of Local Roads (HVLR) to facilitate sewerage connection works was conducted for Orchard Hills and submitted to DPHI for approval on 29/11/2024. The HVLR was prepared in consultation with Penrith City Council and endorsed by Paul Mihailidis, Level 3 Road Safety Auditor. Auditees advised no issues were raised by DPHI upon review of the HVLR. The use of the following roads was subsequently approved by the Department under Condition E105 (in a letter dated 9/1/2025): - Lansdowne Road between Kent Road and Samuel Marsden Road - Samuel Marsden Road north of Lansdowne Road - The first 70m of Samuel Marsden Road south of Lansdowne Road - The first 40m of Flinders Avenue east of Samuel Marsden Road The approval is limited to the period commencing 9/1/2025 and ending 1/2/2026. Self-Reported Non-Compliances 03 & 04: Two NCs were raised against Condition E105 during the audit period: NCR 011 (31/3/2025): Condition E105. A Cono (PLM sub-contractor) dump truck was observed delivering materials to an Orchard Hills SSTOM site (Linewide North – Lansdowne to Patons Lane) via local roads that are not covered under an approved HVLR / CTMP. Notification of the NC to DPHI was on 4/4/2025, within the required 7-day timeframe. Refer also to Condition A44. NCR 012 (15/7/2025): Condition E105. On 11/7/2025 at approximately 8:45am, a Boral agitator truck was observed on Lethbridge Street, St Marys delivering concrete to the St Marys Station site. Following an investigation, it was confirmed the concrete agitator utilised Chapel, Lethbridge and Station Streets which are not approved within the St Marys CTMP for HV haulage. Refer also to Condition A44.

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Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E106	All requests to the Planning Secretary for approval to use local roads under Condition E105 above must include the following: (a) a swept path analysis; (b) demonstration that the use of local roads by Heavy Vehicles for the CSSI will not compromise the safety of pedestrians and cyclists of the safety of two-way traffic flow on two-way roadways; (c) details as to the date of completion of the road dilapidation surveys for the subject local roads; and (d) measures that will be implemented to avoid where practicable the use of local roads past schools, aged care facilities and child care facilities during their peak operation times; and (e) written advice from an appropriately qualified professional on the suitability of the proposed Heavy Vehicle route which takes into consideration items (a) to (d) of this condition.	- Site inspection 11/8/2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Heavy Vehicle Local Roads Report for Use of Local Roads - Orchard Hills Revision C, dated 19/11/2024 - DPHI Submission OHE HVLR Rev A (PA-427), dated 19/8/2024 - DPHI Submission OHE HVLR Rev C (PA-527), dated 29/11/2024 - DPHI Letter to Sydney Metro RE: Orchard Hills Request for Approval of Heavy Vehicle Local Roads - Sewerage Connection, dated 9/1/2025	C	All spoil haulage routes have been approved as documented in CTMPs. Auditees advised there has been no requirement to undertake a Heavy Vehicle Local Road (HVLR) Assessment to date. Future HVLR Assessments are expected to be required for the Orchard Hills site. There were no heavy vehicles observed on local roads during the site inspection. A Heavy Vehicle Local Roads Report for Use of Local Roads (HVLR) - Orchard Hills was submitted to DPHI for approval on 29/11/2024 to facilitate sewerage connection works. The HVLR was prepared in consultation with Penrith City Council and endorsed by Paul Mihalidis, Level 3 Road Safety Auditor. No issues were raised by DPHI. The use of the following roads was subsequently approved by the Department under Condition E105: - Lansdowne Road between Kent Road and Samuel Marsden Road - Samuel Marsden Road north of Lansdowne Road - The first 70m of Samuel Marsden Road south of Lansdowne Road - The first 40m of Flinders Avenue east of Samuel Marsden Road The approval is limited to the period commencing 9/1/2025 and ending 1/2/2026.
Road Dilapidation				
E107	Before any local road is used by a Heavy Vehicle for the purposes of construction of the CSSI, a Road Dilapidation Report must be prepared for the road. A copy of the Road Dilapidation Report must be provided to the Relevant Road Authority(s) within three (3) weeks of completion of the survey and at no later than one (1) month before the road being used by Heavy Vehicles associated with the construction of the CSSI.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Land Surveys Existing Condition Survey Report, Road Corridor - Patons Lane, Rev0, dated 1/6/2023 - Land Surveys Existing Condition Survey Report, Road Corridor - Reserve Road, Rev0, dated 1/6/2023 - Email from PLM Survey Manager to Penrith City Council RE: Road Dilapidation Surveys, dated 13/7/2023 - SM-WSA SSTOM STMLDN/SMF/OHE Local Road Condition Report (PCC) RevA, dated 6/5/2024 - Land Surveys Orchard Hills Road Condition Report Version 1, dated 21/3/2025 - Email from PLM Traffic Manager to Penrith City Council RE: SSTOM - Road Condition Report (Samuel Marsden Rd - Informal issue) & Condition report - PCC roads, dated 26/5/2025	C	Two Road Pre-Condition Dilapidation Surveys were sighted - Reserve Road (1/6/2023) and Patons Lane (1/6/2023). Verification of submission of these road dilapidation reports to the Relevant Road Authority, and date of first use of the road by heavy vehicles was outside the audit period so was not verified. An email from PLM, dated 13/7/2023 lists road dilapidation reports were also prepared for: Gipps Street, Luddenham Road North, Luddenham Road South, Patons Lane, Reserve Road, Putland Street (though timing for these was outside the scope of this audit, and should have been satisfied under the PC of a previous contractor - not verified). A Road Dilapidation Report for Orchard Hills Road was sighted during IA4, dated 21/3/2025. The report was submitted to Penrith City Council on 26/5/2025. PLM advised Samuel Marsden Road had not yet been utilised for heavy vehicles at the time of IA4. Observation 2: The Land Surveys Orchard Hills Road Condition Report , dated 21/3/2025 was submitted to PCC on 26/5/25, more than 3 weeks after the survey was completed.
E108	If damage to roads occurs as a result of the construction of the CSSI, the Proponent must either (at the Relevant Road Authority's discretion): (a) compensate the Relevant Road Authority for the damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-work as identified in the Road Dilapidation Report .	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Interview with ER, 22/08/2025 - Site inspection, 11/08/2025 - ROL Licence No. 2308744, Construction of driveway to access Sydney Metro Western Sydney Airport Line Orchard Hills Station site light vehicle car park, Lansdowne Road Orchard Hills, 24/7/24-31/7/24 - ROL Licence No. 2314812, Luddenham Road is used as a main transport corridor for Linewide site access gate LWD 6 construction - occasional stop / slow is required to allow construction HV access, Luddenham Road Luddenham, 3/8/24-4/9/24 - Email RE: LCC response RE: Independent Audit 7 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM - Consultation, dated 10/3/2025 - Penrith City Council Permit Number RRO-P2010, Road Reserve Opening, 27 Lansdowne Road, Orchard Hills for dates 3/2/25-8/2/25, approved 31/1/2025	NT	Auditees advised any road damage attributed to SSTOM had been fixed and there were no significant potholes identified during the audit period, or during the audit site inspection. Road Occupancy Licences (ROLs) obtained for the rectification of damage were reviewed during the audit. It is understood that SSTOM has come to an agreement with Penrith City Council whereby future rectification of road damage will be able to be conducted without an ROL, and thereby expediting the process by improved efficiencies. It is understood that the rectification of road damage has improved since SSTOM commenced works in the Kent Road / Orchard Hills area, as confirmed by Sydney Metro and the ER. Auditees advised road damage and rectification requirements are discussed in construction meetings, e.g. Lansdowne Road being repaired on 3/4/2025. A road opening approval from PCC and photos of road rectification works at Lansdowne Road was provided dated, 3/2/25. The ER indicated road damage rectification had not been raised as an issue during ER inspections.

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NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Construction Parking and Access Management				
E109	Vehicles associated with the project workforce (including light vehicles and Heavy Vehicles) must be managed to: (a) minimise parking on public roads; (b) minimise idling and queueing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive land use(s); (d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Interview with ER, 22/08/2025 - Site inspection, 11/08/2025 - PLM Overarching CTMP, Rev0, dated 28/6/2023 - CTMP Orchard Hills Station, Rev02, dated 1/6/2024 - Construction Worker Car Parking Strategy, St Marys Station Rev0, dated 1/12/2023 - CTMP St Marys Station, Rev01, dated 3/4/2024 - CTMP, Appendix E Drivers Code of Conduct - Construction meeting minutes 23/1/25	C	Section 5.2 of the Overarching CTMP states: <i>"There will be a shortfall in the amount of on-site parking provision at St Marys. The site-specific Parking Management Plan for St Marys will seek to minimise the impact of the overall demand for construction worker parking through initiatives such as:</i> <i>Investigation of remote parking facility options in conjunction with the provision of shuttle buses</i> <i>Promotion of carpooling</i> <i>Encouraging the use of public transport</i> <i>ParkLife Metro will endeavour to ensure the impact of the contractor parking demand within the St Marys area will not adversely affect the St Marys CBD and residential amenities (existing car parking spaces)".</i> The worker car parking strategy includes stakeholder consultation and responsibilities (ParkLife Metro, Penrith City Council and TNSW). Section 5 of the Strategy includes travel arrangements for workers and plans for communication, satellite parking arrangements and a travel mode needs survey. Section 4.5.2 of the CTMP details the truck routes and has truck swept paths in Appendix A to manage disruption of public access. Section 5 of the CTMP sets out requirements for traffic impact management. St Marys Station was inspected during the audit. Initiatives to reduce worker parking on public streets were observed. (a) Signage including a map indicating restricted parking zones for worker vehicles was displayed on the St Marys construction site hoarding. (b) CTMP Appendix E Drivers Code of Conduct includes commitment <i>"Do not queue on public roads unless a prior approval has been sought"</i>, reference to idling is included in Section 4.2 of the Overarching CTMP. (c) There is a limit on the number of trucks allowed to queue on Patons Lane, and for the SMF, and allowance for truck marshalling inside these sites has been implemented to reduce queuing on public roads. (d) No restriction of access is known to have occurred. There were no project vehicles observed idling or parked in the vicinity of St Marys Station during the audit site inspection. (e) Condition E109 is addressed in the Overarching CTMP, including a commitment to ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP. No complaints about project vehicles parking on public roads are known to have been received during the audit period. The workforce is expected to increase at St Marys in the future. Options for additional project parking are being explored.
Property Access				
E110	Access to all utilities and properties must be maintained during works, unless otherwise agreed with the relevant utility owner, landowner or occupier.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/08/2025	C	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E111	The Proponent must maintain access to properties during the entirety of works unless an alternative access is agreed in writing with the landowner(s) whose access is impacted by the CSSI works.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/08/2025	C	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E112	Where construction of the CSSI restricts a property's access to a public road, the Proponent must, until their primary access is reinstated, provide the property with temporary alternate access to an agreed road decided through consultation with the landowner, at no cost to the property landowner, unless otherwise agreed with the landowner.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/08/2025	NT	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E113	Any property access physically affected by the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier. Property access must be reinstated within one (1) month of the work that physically affected the access is completed or in any other timeframe agreed with the landowner or occupier.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection, 11/08/2025	NT	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E114	During construction, all reasonably practicable measures must be implemented to maintain pedestrian, cyclist and vehicular access to, and parking in the vicinity of, businesses and affected properties. Disruptions are to be avoided, and where avoidance is not possible, minimised. Where disruption cannot be avoided, alternative pedestrian, cyclist and vehicular access, and parking arrangements must be developed in consultation with affected businesses and landowners and implemented before the disruption. Adequate signage and directions to businesses must be provided before, and for the duration of, any disruption.	- Site inspection, 11/08/2025 - Interview with Communications Manager, 16/8/2024 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - PLM Small Business Owners Engagement Plan, St Marys, Rev0, dated 10/11/2023 - Community Consultation Strategy (CCS) - Construction Worker Car Parking Strategy - St Marys Station - Rev 0, dated 1/12/2023 - PLM Overarching CTMP, Rev0, dated 28/6/2023	C	Pedestrian, cyclist and vehicular access management are detailed in the sighted documents. Adequate signage has been implemented as per site observations and audit discussions. There have not been any complaints recorded on this matter. St Marys station was included in the scope of the site inspection for IA4; signage was observed to be installed within the area for 'Resident parking only', and temporary closure of pedestrian access to St Marys station and alternative route map.
Pedestrian and Cyclist Access				
E115	Safe pedestrian and cyclist access must be maintained around the St Marys construction site during construction. In circumstances where pedestrian and cyclist access is restricted or removed due to construction activities, a proximate alternate route which complies with the relevant standards, must be provided and signposted before the restriction or removal of the impacted access.	- Site inspection, 11/08/2025 - Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Community Consultation Strategy (CCS) - CTMP St Marys Station, Rev02, dated 3/5/2024	C	As per the PLM Overarching CTMP Section 4.2, PLM has committed to providing alternate cyclist and pedestrian routes, where these may conflict with construction access/ egress. Any alternate route is to comply with the relevant standards. The CTMP commits to the installation of site safety from site establishment which includes the provision of site specific inductions/mandatory training for personnel around expectation for site operations and interactions with the community. Safe pedestrian and cyclist access was observed around the St Marys Station site during the audit site inspection. Accessible footpaths were observed and clear around the site perimeter hoarding and into and out of St Marys Station. There have been no known instances of restricted pedestrian or cyclist access to date around the St Marys site.
Road Traffic and Safety				
E116	A Traffic and Transport Liaison Group(s) must be established in accordance with the Construction Traffic Management Framework to inform the development of CTMP.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Metro WSA TTLG Meeting 43 - SSTOM Presentation - 3/7/2025 - Metro WSA TTLG Meeting 49 - Minutes - 3/7/2025 - Metro WSA TTLG Meeting 47 - SSTOM Presentation - 1/5/2025 - Metro WSA TTLG Meeting 50 - Minutes - 7/8/2025 - Metro WSA TTLG Meeting 47 - SSTOM Presentation - 7/8/2025	C	A Traffic and Transport Liaison Group (TTLG) has been established for WSA. Meeting minutes were sighted from May, July and August 2025. As per the PLM Overarching CTMP Section 1.6, Sydney Metro is responsible for establishment of the TTLG. PLM participate when necessary for SSTOM and provide the TTLG with required documentation. Three examples of presentations by PLM at the TTLG were provided as evidence, dated 1/5/2025, 3/7/2025 and 7/8/2025.
E117	Supplementary analysis and modelling as required by TNSW and / or the Traffic and Transport Liaison Group(s) must be undertaken to demonstrate that construction and operational traffic can be managed to minimise disruption to traffic network operations, including changes to and the management of pedestrian, bicycle and public transport networks, public transport services, and pedestrian and cyclist movements. Revised traffic management measures must be incorporated into the CTMP. Permanent road works included in the CSSI must be designed, constructed and operated with the objective of integrating with existing and proposed road and related transport networks and minimising adverse changes to the safety, efficiency and, accessibility of the network. Design and assessment of related traffic, parking, pedestrian and cycle accessibility impacts and changes shall be undertaken: (a) in consultation with, and to the reasonable requirements of the relevant Traffic and Transport Liaison Group; (b) in consideration of existing and future demand, connectivity (in relation to permanent changes), performance and safety requirements; (c) to minimise and manage local area traffic impacts; (d) to, where possible and appropriate, retain or reinstate parking in St Marys; (e) to ensure access is maintained to property and infrastructure (f) to address relevant design, engineering and safety guidelines, including Austroads, Australian Standards and TNSW requirements. Copies of civil, structural and traffic signal design plans shall be submitted to the Relevant Road Authority for consultation during design development and before completion of construction of the CSSI.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Metro WSA TTLG Meeting 43 - SSTOM Presentation - 3/7/2025 - Metro WSA TTLG Meeting 49 - Minutes - 3/7/2025 - Metro WSA TTLG Meeting 47 - SSTOM Presentation - 1/5/2025 - Metro WSA TTLG Meeting 50 - Minutes - 7/8/2025 - Metro WSA TTLG Meeting 47 - SSTOM Presentation - 7/8/2025 - PLM Overarching CTMP, Rev0, dated 28/6/2023 - CTMP St Marys Station, Rev02, dated 3/5/2024	NT	As per the PLM Overarching CTMP Section 4.6, measures have been proposed for the scheduling of heavy vehicles to minimise the impact on road users during the SSTOM works including: - Initial induction, mandatory training and regular briefings for all transport contractors - Logistics monitoring to identify and regulate truck operations - Providing personnel at the site gates, if necessary to meter the despatch of trucks onto the road network - Management of truck movements along discrete routes to minimise cumulative impacts from heavy vehicles (see haulage routes in Annexure A) - Regular checks of special and other events, not associated with SSTOM work activities, that could impact on heavy vehicle operations - Scheduling, where feasible, to avoid operating school zones, high pedestrian activity times and peak road periods. - Heavy vehicles will access the arterial roads via the most direct route For spoil haulage vehicles ParkLife Metro D&C will use a software platform to manage and monitor truck movements. These records can be supplied to the relevant authorities and will be retained for one year post the completion of works. Permanent road works have not commenced for the SSTOM project. NB: Refer to Condition E103 for observation and recommendations around improvements to consultation in relation to traffic management and traffic safety.
E118	As part of Condition E117 the Traffic and Transport Liaison Group(s) is to identify opportunities to improve the intersection performance during operation at: (a) Queen Street/Great Western Highway/Mannre Road in St Marys; (b) Glossop Street/ Forrester Road in St Marys; and (c) Glossop Street / Great Western highway in St Marys. Identified improvements must be implemented prior to the commencement of operation.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Metro WSA TTLG Meeting 43 - SSTOM Presentation - 3/7/2025 - Metro WSA TTLG Meeting 49 - Minutes - 3/7/2025 - Metro WSA TTLG Meeting 47 - SSTOM Presentation - 1/5/2025 - Metro WSA TTLG Meeting 50 - Minutes - 7/8/2025 - Metro WSA TTLG Meeting 47 - SSTOM Presentation - 7/8/2025 - PLM Overarching CTMP, Rev0, dated 28/6/2023 - CTMP St Marys Station, Rev02, dated 3/5/2024	C	As per the PLM Overarching CTMP this requirement is held by Sydney Metro and improvements are required to be implemented prior to the commencement of operation. A potential differing interpretation of the terms of the approval was identified during the IA3 audit period and was ongoing during IA4. Sydney Metro remain in the process of seeking clarification with DPHI on Condition E118 requirements in relation to the delivery of traffic performance at intersections. One intersection upgrade was originally identified as required to increase project performance, though consultation with Penrith City Council has identified some additional intersection upgrades they would like included. Consultation with Penrith CC is ongoing to resolve the number of intersection upgrades required. Associated works have not yet commenced.

Item
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Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E119	Permanent road works, including vehicular access, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users must be subject to safety audits demonstrating consistency with relevant design, engineering and safety standards and guidelines. Safety audits must be prepared in consultation with the relevant Traffic and Transport Liaison Group before the completion and use of the subject infrastructure and must be made available to the Planning Secretary upon request.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Metro WSA TTLG Meeting 43 - SSTOM Presentation - 3/7/2025 • Metro WSA TTLG Meeting 49 - Minutes - 3/7/2025 • Metro WSA TTLG Meeting 47 - SSTOM Presentation - 1/5/2025 • Metro WSA TTLG Meeting 50 - Minutes - 7/8/2025 • Metro WSA TTLG Meeting 47 - SSTOM Presentation - 7/8/2025 • PLM Overarching CTMP, Rev0, dated 28/6/2023 • CTMP St Marys Station, Rev02, dated 3/5/2024 • SM-WSA Traffic Management Road Safety Audit Report Draft, Traffic Works, dated 11/8/2023	NT	No permanent road works, including vehicular access, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users had commenced for SSTOM.
UTILITIES MANAGEMENT				
E120	The CSSI must be designed and constructed with the objective of minimising impacts to, and interference with utilities infrastructure, and that such infrastructure and property is protected during construction. Utilities, services and other infrastructure potentially affected by construction must be identified before works affecting the item, to determine requirements for access to, diversion protection, and / or support. The relevant owner(s) and / or provider(s) of services must be consulted to make suitable arrangements for access to diversion, protection, and / or support of the affected infrastructure as required. The Proponent must ensure that disruption to any service is minimised and be responsible for advising local residents and businesses affected before any planned disruption of service.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • STM Precinct Utility Package Design Report, Stage 2, RevA, dated 3/10/2023	C	PLM has prepared a design report for the utilities package of works (STMUT0400), which had not commenced at the time of the audit. The design report was prepared to document the framework for the identification and management of utility authority assets including: • Relocation of existing utilities impacted by the proposed bus interchange along the southern verge of Station Street including • Decommissioning of the temporary construction power installed as part of SBT works • Proposed new electrical ducts on the northern verge of Station Street to cater for future precinct developments • Provision of new DN200 water main along Station Street from Queen Street to Glossop Street as per Sydney Water NOR to cater for firefighting requirements and future precinct water demand • Establish connection to goods shed for all utilities • Establish point of connection for any lead in works, and • Space proof and coordinate the civil and urban design around existing utilities to be retained. Section 6.1 of the Utility Design Report commits to implementation of the Utility Strategy. The overarching strategy to manage utility impacts is to: • Identify public utility assets within the project areas. • Undertake a utility impact assessment of the proposed works. The assessment aims to identify: ◦ Physical impacts from the proposed works, including road, drainage, TCS, structures, etc. ◦ Impact from a constructability, accessibility, and maintainability perspective. • Where impact to an asset is unavoidable, one of the three treatments have been adopted: ◦ Protect during construction – temporary mechanical protection during construction or a change in construction methodology. ◦ Protect – permanent protection of the utility in its current position, e.g., protection slab, concrete encasement, etc. ◦ Relocate the utility There has been no excavation that has disrupted utilities undertaken during the audit period.
Warragamba to Prospect Water Supply Pipeline				
E121	The proponent must consult with WaterNSW regarding design, construction and operational management where the proposal interacts with the Warragamba to Prospect Water Supply Pipeline, and ensure that proposed construction and operational agreements are consistent with the "Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines" and implement all practical measures to protect the Warragamba to Prospect Water Supply Pipelines infrastructure, or as otherwise agreed to by WaterNSW.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • NVMP, SSTOM, Rev 03, 12/12/2024 • NCR 013 - Warragamba Pipeline no slew zone breach, dated 24/7/2025 • DPHI Submission - SSI-10051 SSTOM NCR-013 (SSI-10051-PA-625), dated 30/7/2025	NC	Section 6.4.3 of the SSTOM NVMP sets out the requirements for work near vibration sensitive structures, including heritage-listed structures. In accordance with REMM NAH8, a dilapidation survey of the Warragamba to Prospect Water Supply Pipelines has been completed by Sydney Metro. Prior to commencement of SSTOM Works, ParkLife Metro D&C would consult with WaterNSW regarding design, construction and operational management where the proposal interacts with the Warragamba to Prospect Water Supply Pipeline, in accordance with Condition E121. Construction and operational agreements with WaterNSW would be consistent with the "Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines (WaterNSW, Sep 2021)". Self-Reported Non-Compliance 05: One NC was raised against Condition E121 during the audit period: The construction methodology for viaduct concrete works over the Warragamba Pipeline that was agreed with WaterNSW was not followed when a concrete boom delivering concrete to the viaduct entered the 'no slew zone'. Refer also to Condition A44.
WASTE				
E122	Waste generated during construction and operation must be dealt with in accordance with the following priorities: (a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; (b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and (c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Interview with ER, 22/08/2025 • SSTOM Waste Tracking Register • We Build June 2025 Monthly Waste Report • Djurwa Pty Ltd-We-build SPA Waste Report • PLM Waste Management Sub-plan, Rev 02, 12/12/2024	C	The project waste register for the period was sighted, and documented waste tracking requirements in the Waste Management Sub-plan (WMP) were reviewed. The waste hierarchy as per the WARR Act is described in Section 5.1 of the WMP. Bingo provides a Monthly Waste Report for Construction and office waste collected from each SSTOM site. Total recycled waste to date was reported as 95.31% for the SMF site. A Waste Tracking Register was sighted and includes: Site Name, Address, Product, Waste Type, Net Weight etc. Refer to Conditions E124 & E125 for verification of the movement of spoil between SSTOM sites and to offsite disposal facilities.

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Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E123	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the conditions of the current EPL for the CSSI, or be done in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , as the case may be.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • PLM Waste Management Sub-plan, Rev 02, 12/12/2024 • The Sydney Metro West (Stage 2) Tunnel Spoil Order, November 2022 (Resource Recovery Order under Part 9, Clause 93 of the POEO (Waste) Regulation 2014) • The Sydney Metro West (Stage 2) Tunnel Spoil Exemption, November 2022 (Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the POEO (Waste) Regulation 2014) • BRD Material Tracking Register, dated 3/2/2025 • NSW EPA Section 143 Certificate, VENM, Bradfield Station, dated 6/1/2025 • Linewide Portion 3 Material Tracking Register, dated 20/9/24-6/11/24 • NSW EPA Section 143 Certificate SMW ETP Tunnel Spoil Material Linewide Portion 3, dated 18/9/2024 • SMF Earthworx VENM Material Tracking Register, dated 7/8/24-17/12/24 • NSW EPA Section 143 Certificate SMF Earthworx VENM, dated 17/10/2024 • NSW EPA Section 143 Certificate Metro West (Stage 1) Tunnel Spoil Order 2023, (50000 Tonnes), dated 11/4/2024 • Spoil Management Tracker, Orchard Hills, dated 21/1/2025 • SMF Imported Material Tracker, dated 4/3/25-4/8/25 • Linewide Imported Material Tracker, dated 3/4/25-16/4/25 • NSW EPA Section 143 Certificate, VENM, 800,000m³, SMF, dated 13/3/2025	C	Reusable tunnelling spoil (VENM & ENM) has been imported for SSTOM for reuse at the Stabling and Maintenance Facility (SMF) and Linewide Portion 1, with records included on Import Material Tracking Registers. The import material tracker includes: Date, General Description, Quantity (Tonnes), Material Classification, Onsite Placement, & Truck registration. Sandstone from the Sydney Metro Eastern Tunnelling Package (ETP) has been imported to WSA SSTOM Linewide Portion 3. The Material Tracking Register was provided as evidence and included records of material import from 20/9/2024 to 6/11/2024. A corresponding Section 143 Certificate, dated 18/9/2024 was sighted for the material. The s143 Certificate covers 8,000Tonnes of material and confirms the material is Exempt Material in accordance with the <i>Sydney Metro West (Eastern Tunnelling Package) tunnel spoil order June 2023</i>. Carlingford Shale from Earthworx has been imported to WSA SSTOM Bradfield Station. The Material Tracking Register was provided as evidence and included records of material import from 9/1/2025. A corresponding Section 143 Certificate, dated 6/1/2025 was sighted for the material. The s143 Certificate covers 10,000Tonnes of Virgin Excavated Natural Material (VENM). Material from the Sydney Metro Western Tunnelling Package (WTP) has been imported to the WSA SMF at Orchard Hills. The Material Tracking Register was provided as evidence and included records of material import from 7/8/24-2/10/24. A corresponding Section 143 Certificate, dated 11/4/2024 was sighted for the material. The s143 Certificate covers 50,000 Tonnes of material and confirms the material is Exempt Material in accordance with the Sydney Metro West (Stage 1) tunnel spoil order December 2023. Evidence of spoil tracking between sites was also sighted. The Spoil Management Tracker, Orchard Hills provides records of gravely clay/shale moved from the SBP site to OHE for beneficial reuse on 21/1/2025. Allowance for this movement has been included in the PLM Waste Management Sub-plan, Rev 02, 12/12/2024. Material from Luddenham Operations Shale (VENM) has been imported to the WSA SMF and Linewide Portion 1 under a s143 Certificate during the IA4 audit period. Material Tracking Registers for SMF and Linewide Portion 1 were provided as evidence and included records of material import from 4/3/25-4/8/25 for SMF and 3/4/25-16/4/25 for Linewide. A corresponding Section 143 Certificate, dated 13/3/2025 was sighted for the material imported to SMF. The s143 Certificate covers 800,000m³ of material and confirms the material is Virgin Excavated Natural Material (Waste as per 20240520KLF_VENM_1.0 Virgin Excavated Natural Material Report). Auditees explained the following due diligence process undertaken to ensure all legislative and other requirements have been satisfied in relation to material import: • Routine Spoil Assessments undertaken to ensure compliance with Resource Recovery Order/Exemption throughout the importation period (refer cited examples of Routine Spoil Compliance Assessment within the audit period) • Monthly on-site inspections are undertaken by a suitably qualified environmental consultant to ensure imported material is visually consistent with the classification. As all material being imported during IA4 was VENM or PLM ENM from other SSTOM sites, no spoil inspections were conducted during this period • Waste tracking register is maintained to document the spoil type, quantity and destination where it is lawfully accepted (as discussed above). The above process is documented in the Waste Management Sub-Plan Section 5, Appendix B – 1.3 and Figure B1. Routine spoil assessments/classification conducted at the generating site and monthly inspections at the receiving site represents PLMs internal auditing system to ensure compliance. NB: This audit does not constitute a full waste compliance audit and conclusions are based on representative documents and records provided for review.
E124	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , or to any other place that can lawfully accept such waste.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Interview with ER, 22/08/2025 • PLM Waste Management Sub-plan, Rev 02, 12/12/2024 • STM Material Tracking Register (St Marys) (Exporting Offsite), dated February-March 2024 • Douglas Partners In Situ Waste Classification Assessment - Tower Crane 1 Excavation, SSTOM St Marys Station Ref. 222771.0, dated 6/2/2024 • Djurwa Pty Ltd-Webuild SPA St Marys Disposal Dockets 01 Mar 2024 • Djurwa Pty Ltd-Webuild SPA St Marys Disposal Dockets 28 Feb 2024 • Djurwa Pty Ltd-Webuild SPA St Marys Disposal Dockets 29 Feb 2024 • Spoil Management Tracker (Between Sites), dated January 2024 • Douglas Partners VENM Assessment, SSTOM St Marys Metro Station Ref: 222771.01, dated 25/10/2023 • St Marys Material Tracking Register, dated 26/2/25-27/2/25 • Environment Protection Licence No. 4865, Erskine Park Landfill, Erskine Park NSW • Environment Protection Licence No. 11497, Blacktown Waste Services, Marsden Park Landfill, Marsden Park NSW • Alliance Waste Classification Report 17614.6.1-ER-1-9, SSTOM – AEC – Bradfield, dated 21/5/2025 • SM-WSA St Marys Station Stockpile Waste Classification, Stockpiles STM-TOP1 and STM-SP05 Rev00, dated 21/5/2025	C	Section 5.5 of the SSTOM WMP outlines the process for waste transport and disposal. A hold point has been set for the project and includes the following steps: • Review and approval of the completed Section 143 documentation if the material is going to a receiving site not licensed by the EPA • Review of receiving sites development application, planning approval or EPL to ensure the site holds the correct licence and/or approval to receive such material. A list of licenced waste disposal facilities in proximity to SSTOM Works has been developed and will be updated to include any other disposal or beneficial reuse sites identified during SSTOM Works (Appendix D). Disposal of the material will not occur until the Environment Manager has released the hold point. Requirements for waste tracking and reporting are documented in Section 5.5.1 of the SSTOM WMP and exemptions are outlined in Section 5.5.2. A Register of indicative waste disposal locations is included in Appendix D of the SSTOM WMP and includes the EPL Number for each location. Auditees advised spoil, ENM & VENM is allowed to be moved between PLM EPL premise sites under the Waste Management Sub-plan. An internal tracking register is maintained for each site. REMM WR3 requires a material tracking system would be implemented for material transferred between construction sites. A Spoil Management Tracker is maintained for material moved between SSTOM project sites under the same EPL Premise Maps. The Spoil Management Tracker for St Marys was provided for review during the audit and included waste tracking records from 26/2/2025 to 27/2/2025 during which time asbestos impacted spoil was removed from site. Information in the register included: Date, Quantity (Tonnes), Material Classification, Location of Removal (STM), Destination and Truck Rego. Material was exported to Blacktown Waste Services (EPL 11497) and Cleanaway Erskine Park (EPL 4865) and classified as GSW Special Waste Asbestos. EPLs for both receiving facilities were sighted and confirmed to be licensed to receive asbestos. The corresponding Waste Classification Report was sighted and classified the waste as "Special Waste (Asbestos – friable asbestos / asbestos fines) – General Solid Waste (non-putrescible)". This classification did not align with the material description in the Spoil Management Tracker (GSW-Special Waste Asbestos), or the waste types on the landfill delivery dockets (Blacktown Waste - Waste Type SWA 1) and (Cleanaway Erskine Park -NSW_Asbestos Contaminated Soil ABAC3). PLM advised that <i>"While not identical, the descriptions within the tracker do align with those within the waste classification report, and those listed on the waste dockets. The waste tracker also references the waste classification report directly. PLM has no control of waste type references used by waste facilities, but all align with the classification of asbestos contaminated waste"</i>.

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Project No. MESYM 2024105-02 Sydney Metro IEA4_WSA_SSTOM_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E125	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Interview with ER, 22/08/2025 • PLM Waste Management Sub-plan, Rev 02, 12/12/2024 • St Marys Material Tracking Register, dated 26/2/25-27/2/25 • Alliance Waste Classification Report 17614.6.1-ER-1-9, SSTOM – AEC – Bradfield, dated 21/5/2025 • SM-WSA St Marys Station Stockpile Waste Classification, Stockpiles STM-TOP1 and STM-SP05 Rev00, dated 21/5/2025	C	Waste classification reports were sighted for the examples of waste tracking between sites and to offsite disposal facilities as described for Condition E124 . Disposal dockets and Waste Classifications were provided on request and aligned with data recorded in the Material Tracking Registers.
WATER				
E126	The CSSI must be designed and constructed so as to maintain the NSW Water Quality Objectives (NSW WQO) where they are being achieved as at the date of this approval, and contribute towards achievement of the NSW WQO over time where they are not being achieved as at the date of this approval, unless an EPL in force in respect of the CSSI contains different requirements in relation to the NSW WQO, in which case those requirements must be complied with.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024 • Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 03, 12/12/2024 (SWMP, Appendix B) • SMWSA NSW (Off-airport) Wastewater Discharge Impact Assessment (WDIA), Station Boxes and Tunnelling Works (SBT), RevA.02, dated 17/11/2022 • SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/2022 • SSTOM Discharge Point Schedule, EPL 211807 • Email from PLM Senior Environmental Consultant to NSW EPA RE: EPL No. 21807 - Request for licence variation - Additional discharge points and premise map update, dated 8/8/2024 • PLM SMWSA SSTOM Dewatering Register, up to 19/8/2024 (Register of discharge from Orchard Hills M7 sediment basin & St Marys sediment basin as per EPL) • SM-WSA SSTOM Off Airport Dewatering register 11/2/2022 to 26/6/2025 • SM-WSA SSTOM Dewatering and Reuse Permits: • PMJV-ENV-DWP-87 Orchard Hills L1 Basin, dated 27/3/2025 • PMJV-ENV-DWP-103 Linewide, dated 16/6/2025 • EPL 21807 Monitoring Report March 2025 • EPL 21807 Monitoring Report April 2025 • EPL 21807 Monitoring Report May 2025 • EPL 21807 Monitoring Report June 2025 • EPL 21807 Monitoring Report July 2025	C	PLM maintains water quality objectives in accordance with Condition E126 by conducting water quality monitoring, and analysing results, in accordance with the parameters and discharge criteria set out in a Water Discharge Impact Assessment (WDIA). Two WDIA's were reviewed, the first prepared by SEEC in July 2022 for the Sydney Metro Surface Civil & Alignment Works, and the 2nd prepared in November 2022 for the Off-airport Station Boxes and Tunnelling Works (SBT). The SSTOM surface water quality monitoring program (SWQMP) is set out in Section 6.12.1 and Appendix B of the Soil and Water Management Plan (SWMP). The Surface Water Quality Monitoring Program (SWQMP) commits to monitoring water quality to ensure discharge from the construction impact area is "in accordance with regulatory guidelines, ANZECC/NSW Water Quality Objectives (required by CoA E126), or EPL discharge criteria, and to confirm conclusions from the Water Pollution Discharge Impact Assessment (prepared to CoA E130) and to identify potential non-compliances and corrective actions". Surface water monitoring is conducted at the 14 locations set out in Section 5.1 of the SWQMP at the frequency stated in Section 5.2. Sampling parameters are outlined in Section 5.4. Water quality trigger values are set out in Section 5.5 and Table 10. The project environmental values, based on ANZG 2018 and ANZECC guideline trigger values for the selected toxicants, would be applied for the protection of 95 percent of species in slightly disturbed to moderately disturbed freshwater systems, and 99 percent species protection level for toxicants that bioaccumulate. For physical and chemical stressors, the ANZG 2018 guidelines are the same as the ANZECC 2000 and provide guideline trigger values for slightly disturbed ecosystems in lowland rivers in south-east Australia as shown in Table 10. It is noted that Surface water quality monitoring requirements from the EPL will be undertaken in addition to the monitoring described in the SWQMP. The SSTOM Discharge Point Schedule under EPL 211807 includes discharge and monitoring points located at Aerotropolis (Sediment Basin & WTP), St Marys (WTP), Orchard Hills, Linewide South, and the SMF (Sediment Basins). In an email to NSW EPA on 8/8/2024 PLM confirmed "The Discharge Impact Assessment (DIA), prepared by Strategic Environmental and Engineering Consulting (SEEC), on behalf of the SCAW contractor has been reviewed to ensure it remains appropriate and applicable to the Parklife Metro SSTOM package of works. The DIA assessed discharge to both Cosgroves Creek (proposed EPL Point 5) and Blaxland Creek (Proposed EPL Point 6) and the detention volume proposed in the variation request remains consistent with the DIA. The sediment basins will be managed, maintained and operated by Parklife Metro in a manner consistent with the DIA". An Annual Construction Monitoring Report is required to be prepared under the SWMP. The first Surface Water Quality Construction Monitoring Report for SSTOM covered the period from commencement of Construction on 8/8/2023 to 8/8/2024. The 2nd surface water monitoring report remained under review at the time of IA4. EPL 21807 Monitoring Reports from March-July 2025 were reviewed. Surface water monitoring requirements are set out in Section 3.3 and Appendix D and described compliance with the EPL Condition E2.1 monitoring frequency. The discharge of water from sediment basins occurred at SSTOM-01, 03, 12, 13, 14, and 16 during March-July 2025 and compliance with discharge criteria from the EPL Condition L2.4 is discussed. Discharge permits and water quality criteria during discharge are recorded in Appendix C of the EPL Monitoring Reports and appeared to be compliant. The Off Airport Dewatering register, and examples of dewatering permits were also sighted and provide further evidence of compliance with water discharge requirements.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Construction Requirements				
E127	The Proponent must consider the Guidelines for controlled activities on waterfront land Riparian corridors (Department of Industry 2018) when carrying out work within 40 metres of a watercourse, including its bed.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Site inspection 11/8/2025 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024	C	Section 6.5 of the SWMP sets out requirements for works in waterways and temporary waterway crossings. The SSTOM SWMP commits to undertaking work in and around waterways (within 40m), including in the main creek channels (at Blaxland Creek, unnamed watercourse south of Patons Lane and Cosgrove Creek) in accordance with the Guidelines for controlled activities on waterfront land riparian corridors (Department of Industry 2018). "Works will be scheduled in waterways during periods of predicted low flow to minimise impacts and will be avoided during rainfall events. Where possible, existing creek bed material will be reclaimed and re-used in the reconstruction or stabilisation of creeks. Disturbed creeks will be progressively stabilised to avoid potential scouring and sedimentation with permanent stabilisation measures implemented as soon as practicable". "Temporary waterway crossings, if required, will be designed, constructed, and maintained, consistent with the Blue Book, the Fish Passage Requirements for Waterway Crossings and Policy (2003) and Guidelines for Fish Friendly Waterway Crossings (2003). This design process will be completed in consultation with DPI Fisheries to minimise impacts on natural flow regimes and to not present any barriers. Temporary waterway crossings will be designed by a suitably qualified and experienced person and will incorporate suitable hard, durable material that will avoid erosion of fine particles into waterways or siltation of waterways". "Erosion and sediment controls will be implemented at the entry and exits points of temporary waterway crossings and will be included in the progressive ESCPs. The progressive ESCPs will document that works within the main creek channels will be avoided during and immediately following rainfall events, unless necessary in an emergency to avoid property damage or prevent the loss of life". It is understood that works within 40m of a watercourse have been limited to geotechnical investigation (drilling of boreholes) works for the future ATC bridge. In addition to the future Cosgrove Creek crossing it is understood there are two more planned waterway crossings for SSTOM at a later stage of the project.
E128	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Site inspection 16/2/2025 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills, Rev12, dated 20/6/2025 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Claremont Meadows, Rev01, 2/4/2025 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), St Marys, Rev07, dated 2/4/2024 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Linewide Portion 4, Rev01, dated 26/2/2025 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Linewide Portion 1, Rev04, dated 5/8/2025	C	Progressive Erosion and Sediment Control Plans (PESCPs) were provided for review for Orchard Hills, Claremont Meadows, St Marys, Linewide Portion 4 and Linewide Portion 1, which are updated on a progressive basis to reflect the current stage of construction. The PESCPs were adequately detailed and appeared to reflect conditions observed on site at the time of the audit.
E129	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from construction wastewater treatment plants to surface waters must not exceed: (a) the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG (2018)) default guideline values for toxicants at the 95 per cent species protection level, (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 (ANZECC/ARMCANZ); and (c) for bio accumulative and persistent toxicants, the ANZG (2018) guidelines values at a minimum of 99 per cent species protection level. Where the ANZG (2018) does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG (2018) for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, Conditions P1, O4.7, M2.1, M2.3, M3.1, R3.3, E2, E3 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024 • Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 03, 12/12/2024 (SWMP, Appendix B) • SMWSA NSW (Off-airport) Wastewater Discharge Impact Assessment (WDIA), Station Boxes and Tunnelling Works (SBT), RevA.02, dated 17/11/2022 • SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/2022 • SSTOM Discharge Point Schedule, EPL 211807 • Email from PLM Senior Environmental Consultant to NSW EPA RE: EPL No. 21807 - Request for licence variation - Additional discharge points and premise map update, dated 8/8/2024 • PLM SMWSA SSTOM Dewatering Register, up to 19/8/2024 (Register of discharge from Orchard Hills M7 sediment basin & St Marys sediment basin as per EPL) • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206 (St Marys), dated 5/12/2023 • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53823 (Claremont Meadows), dated 8/1/2025	NT	The SSTOM Discharge Point Schedule under EPL 21807 (Condition P1.1) includes discharge and monitoring points located at Water Treatment Plants (WTPs) at St Marys (discharging to South Creek), and Bradfield Station (discharging to Thompson Creek). Requirements to monitor the concentration of pollutants discharged is set out in the EPL, Condition M2. WTP at Bradfield Station was decommissioned in January 2025. A new WTP has been set up at the Claremont Meadows Service Facility. It is understood there are no current discharges from WTPs to surface waters for SSTOM. Water Treatment Plants (WTP) were operational at the St Marys Station and Claremont Meadows Service Facility at the time of IA4 and treat surface water runoff that accumulates across the hardstand, and groundwater from station boxes and tunnels, discharging to sewer in accordance with Trade Waste Agreements with Sydney Water.
E130	If construction stage stormwater discharges are proposed, a Water Pollution Impact Assessment will be required. Any such assessment must be prepared in consultation with the EPA and be consistent with the National Water Quality Guidelines, with a level of detail commensurate with the potential water pollution risk. Note: If an EPL is required the Water Pollution Impact Assessment will be required to inform licensing consistent with section 45 of the POEO Act.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2025 • Site inspection 11/8/2025 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024 • Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 03, 12/12/2024 (SWMP, Appendix B) • ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807 • SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/2022	C	Construction stage stormwater discharges occur for SSTOM sites at Bradfield Station, SMF, Orchard Hills, Linewide and Bringley. A Water Discharge Impact Assessment (WDIA) was prepared by Strategic Environmental and Engineering Consulting (SEEC), on behalf of the SCAW contractor has been reviewed to ensure it remains appropriate and applicable to the ParkLife Metro SSTOM package of works. The DIA assessed discharge to both Cosgrove Creek (proposed EPL Point 5) and Blaxland Creek (Proposed EPL Point 6) and the detention volume proposed in the variation request remains consistent with the DIA. The sediment basins will be managed, maintained and operated by ParkLife Metro in a manner consistent with the DIA. The WDIA set turbidity discharge limits for discharges to various waterways but concluded that despite this discharge impact assessment indicating that the local waterways can cater for construction basin discharges between 59 NTU and 73 NTU, a conservative discharge limit of 50 NTU was recommended for discharge to all waterways. Based on modelling in the assessment, turbidity in all waterways already naturally exceeds 50 NTU during and after heavy rainfall events, and this is expected to continue to occur during construction. The SSTOM Surface Water Quality Monitoring Program continues to be implemented to provide assurance that discharges comply with discharge criteria.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-02 Sydney Metro IEA4 WSA SSTOM August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E131	Drainage feature crossings (permanent and temporary watercourse crossings and stream diversions) and drainage swales and depressions must be carried out in accordance with relevant guidelines and designed by a suitably qualified and experienced person.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Site inspection 11/8/2025 - Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024 - Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 03, 12/12/2024 (SWMP, Appendix B) - ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3 - SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/2022 - SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills, Rev12, dated 20/6/2025 - SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Claremont Meadows, Rev01, 2/4/2025 - SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), St Marys, Rev07, dated 2/4/2024 - SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Linewide Portion 4, Rev01, dated 26/2/2025 - SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Linewide Portion 1, Rev04, dated 5/8/2025	NT	Section 6.5 of the SWMP sets out requirements for works in waterways and temporary waterway crossings. The SSTOM SWMP commits to undertaking work in and around waterways (within 40m), including in the main creek channels (at Blaxland Creek, unnamed watercourse south of Patons Lane and Cosgroves Creek) in accordance with the Guidelines for controlled activities on waterfront land riparian corridors (Department of Industry 2018). "Works will be scheduled in waterways during periods of predicted low flow to minimise impacts and will be avoided during rainfall events. Where possible, existing creek bed material will be reclaimed and re-used in the reconstruction or stabilisation of creeks. Disturbed creeks will be progressively stabilised to avoid potential scouring and sedimentation with permanent stabilisation measures implemented as soon as practicable. Temporary waterway crossings, if required, will be designed, constructed, and maintained, consistent with the Blue Book, the Fish Passage Requirements for Waterway Crossings and Policy (2003) and Guidelines for Fish Friendly Waterway Crossings (2003). This design process will be completed in consultation with DPI Fisheries to minimise impacts on natural flow regimes and to not present any barriers. Temporary waterway crossings will be designed by a suitably qualified and experienced person and will incorporate suitable hard, durable material that will avoid erosion of fine particles into waterways or siltation of waterways. Erosion and sediment controls will be implemented at the entry and exits points of temporary waterway crossings and will be included in the progressive ESCPs. The progressive ESCPs will document that works within the main creek channels will be avoided during and immediately following rainfall events, unless necessary in an emergency to avoid property damage or prevent the loss of life". It is understood that works within 40m of a watercourse have been limited to geotechnical investigation (drilling of boreholes) works for the future ATC bridge. In addition to the future Cosgrove Creek crossing it is understood there are two more planned waterway crossings for SSTOM at a later stage of the project. PESCPs have been prepared for each site and identify the location of drainage swales at each SSTOM project site. PESCPs have been prepared by Certified Professionals in Erosion and Sediment Control (CPESCs), as identified on each PESCP.
Operational Requirements				
A132	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from operational water treatment plants to surface waters must not exceed: (a) the ANZG 2018 default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ, 2000); and (c) for bio accumulative and persistent toxicants, the ANZG 2018 guideline values at a minimum of 99 per cent species protection level. Where the ANZG 2018 does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG 2018 for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	Interview with Sydney Metro & ParkLife Metro, 15/08/2025	NT	There are no operational WTPs in place for SSTOM.
Groundwater				
E133	Make good provisions for groundwater users must be provided in the event of a material decline in water supply levels, quality or quantity from registered existing bores associated with groundwater changes from either construction and/or ongoing operational dewatering caused by the CSSI.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Sydney Metro WSA - SSTOM - Groundwater Construction Monitoring Report Dec 2023 - Aug 2024 Rev02, dated 13/3/2025 - Post Approval Form_20250328042251, SI-10051-PA-571, Submission of SSTOM Groundwater Monitoring Report Dec23-Aug24, dated 28/3/2025 - Sydney Metro WSA - SSTOM - Groundwater Construction Monitoring Report Sept-Nov 2024 Rev01, dated 15/4/2025 - Post Approval Form_20250502025809, SSI-10051-PA-585, Submission of SSTOM GW Monitoring Report #2 Aug24 - Nov 24, dated 2/5/2025	NT	Groundwater dependent ecosystems (GDE) have been identified in the vicinity of some SSTOM sites e.g. Orchard Hills and Bradfield. Groundwater monitoring had commenced for SSTOM. Auditees advised the Groundwater CMRs include information on compliance with Condition E133 in relation to the potential effects on water supply levels, quality or quantity from registered existing bores. Observation 3: A reference to compliance with Condition E133 could not be found in Groundwater the CMRs. Recommendation: Consider including reference to Condition E133 in the next Groundwater CMR.
E134	The Proponent must submit a revised Groundwater Modelling Report to the Planning Secretary for information before bulk excavation at the relevant construction location. The Groundwater Modelling Report must include: (a) for each construction site where excavation will be undertaken, cumulative (additive) impacts from nearby developments, parallel transport projects and nearby excavation associated with the CSSI; (b) predicted incidental groundwater take (dewatering) including cumulative project effects; (c) potential impacts of the CSSI or detail and demonstrate why the CSSI will not have lasting impacts to the groundwater system, ongoing groundwater incidental take and groundwater level drawdown effects; (d) actions required to minimise the risk of inflows (including in the event the CSSI are delayed or do not progress) and a strategy for accounting for any water taken beyond the life of the operation of the CSSI; (e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and (f) a schematic of the conceptual hydrogeological model.	- Interview with Sydney Metro & ParkLife Metro, 15/08/2025 - Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024 - SSTOM Flora and Fauna Management Plan, Rev 03, 12/12/2024 - CPB Ghella Biannual Groundwater Monitoring Report, December 2023 to June 2024 Rev00, dated 26/9/2024 - Sydney Metro WSA - SSTOM - Groundwater Construction Monitoring Report Dec 2023 - Aug 2024 Rev02, dated 13/3/2025 - Post Approval Form_20250328042251, SI-10051-PA-571, Submission of SSTOM Groundwater Monitoring Report Dec23-Aug24, dated 28/3/2025 - Sydney Metro WSA - SSTOM - Groundwater Construction Monitoring Report Sept-Nov 2024 Rev01, dated 15/4/2025 - Post Approval Form_20250502025809, SSI-10051-PA-585, Submission of SSTOM GW Monitoring Report #2 Aug24 - Nov 24, dated 2/5/2025	NT	PLM advised, "previous contractor CPBG (SBT Package) managed the issue under their Flora and fauna Management Plan (FFMP) requiring six monthly monitoring schedule to identify potential impacts of water drawdown associated with construction. A suitably qualified consultant (ecologist) was engaged to conduct transect establishment, baseline survey and six-monthly monitoring survey (an example report is attached). PLM, like the above CPBG (SBT package), has engaged a suitably qualified ecologist (same consultant that was engaged by CPBG for a seamless continuation of GDE monitoring) to undertake the six-monthly monitoring survey as required under Section 3 of PLM Soil and Water Management Plan : Appendix G - Groundwater Management Procedure". The aspects, impacts and controls related to GDE are included in Sections 2.5 and 3 of the PLM Soil and Water Management Plan: Appendix G - Groundwater Management Procedure' and Section 4.6, 5 and 6.8 of 'PLM Flora and Fauna Management Sub-plan'. PLM has discussed groundwater modelling requirements with Sydney Metro and determined an additional Groundwater Modelling Report is not required as PLM excavation scope is of a much lower impact than that of SBT during tunnelling and station box excavations. Observation 4: A reference to compliance with Condition E134 could not be found in Groundwater the CMRs. Recommendation: Consider including reference to Condition E134 in the next Groundwater CMR.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heitborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-02 Sydney Metro_IA4_WSA_SSTOM_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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Independent Environmental Audit Report

Sydney Metro

Western Sydney Airport (SSI 10051)

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

Attachment 2: Planning Secretary Appointment of Experts

NSW Planning ref: SSI-10051-PA-622

via Major Projects Portal

7 August 2025

Attention: [REDACTED] Sydney Metro Director Environment, Sustainability and Planning

Subject: Sydney Metro - Western Sydney Airport - Auditor nomination - Construction #8

Dear [REDACTED]

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Audit of the Sydney Metro - Western Sydney Airport, submitted to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 28 July 2025, as required by Condition A38 of SSI-10051 as modified (the approval).

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced and independent. NSW Planning acknowledges that [REDACTED] performed work for Healthy Buildings International, which provides environmental representative services to various Sydney Metro projects, until August 2024 but does not consider that this would preclude her provision of independent audit services of this project at this time.

Therefore, in accordance with Condition A38 of the approval and the NSW Planning *Independent Audit Post Approval Requirements* (Independent Audit PARs), as nominee of the Planning Secretary, I endorse the following independent audit team for the eighth construction phase audit:

- [REDACTED] Morasey Environment, as lead auditor
- [REDACTED] Frigalana Environmental, as alternate auditor.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of approval and the Independent Audit PARs. Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Should you wish to discuss the matter further, please email compliance@planning.nsw.gov.au.

Yours sincerely,



A/Team Leader Compliance – Government Projects

NSW Planning

As nominee of the Planning Secretary

Independent Environmental Audit Report

Sydney Metro

Western Sydney Airport (SSI 10051)

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

Attachment 3: Independent Audit Declaration Form

Independent Audit Report Declaration Form

Project Name	Sydney Metro Western Sydney Airport
Consent Number	SSI 10051
Description of Project	Development of the Sydney Metro Western Sydney Airport project comprising: • construction and operation of approximately 23 kilometres of railway track between the T1 Western Line rail line and the proposed Western Sydney Aerotropolis in Bringelly, • construction and operation of new stations and associated ancillary infrastructure at St Marys, Orchard Hills, Luddenham and the Aerotropolis Core precinct, • interchange links with the existing T1 Western Line rail line, • construction and operation of a train stabling and maintenance facility, including an operational control centre, • construction and operation of associated rail infrastructure facilities, construction of tunnels, bridges, viaducts and associated works, • site preparation and enabling earthworks, including land remediation, • associated ancillary infrastructure and works.
Project Address	Land in the suburbs of Oxley Park, North St Marys, St Marys, Werrington, Werrington County, Kingswood, Claremont Meadows, Caddens, St Clair, Erskine Park, Orchard Hills, Luddenham, Greendale, Badgerys Creek, Kemps Creek and Bringelly, in the City of Penrith and City of Liverpool local government areas.
Proponent	Sydney Metro
Title of Audit	Independent Environmental Audit No. 2 – Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Audit Date	11th August 2025

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;

- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

Name of Auditor	
Signature	
Qualification	Master of Environmental Management Exemplar Global Auditor Number 111000
Company	Morasey Environment Pty Ltd

Independent Environmental Audit Report

Sydney Metro

Western Sydney Airport (SSI 10051)

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

Attachment 4: Consultation Records

From: [REDACTED] @planning.nsw.gov.au>
Sent: Wednesday, 27 August 2025 5:01 PM
To: [REDACTED]
Cc:
Subject: RE: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Good afternoon [REDACTED],

Thanks for your email and my apologies for the delay in responding.

NSW Planning does not require any additional issues or consultation to be included within the scope of the Independent Audit that is not already captured by SSI 10051, as modified, and the proposed scope you have listed below.

Please don't hesitate to contact me if you have any questions.

Kind regards,

A/Team Leader Compliance – Government Projects

NSW Planning | Department of Planning, Housing and Infrastructure

T | M | E @planning.nsw.gov.au

Locked Bag 5022 | PARRAMATTA NSW 2124

www.dpie.nsw.gov.au



The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au.

The Department has upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).

From: [REDACTED]
Sent: Wednesday, 27 August 2025 10:08 AM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc:
Subject: RE: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Dear DPHI,

I am following up on consultation issued below for Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW. The audit is progressing well with site inspections now complete. We are currently in the process of finalising the verification of evidence for the project.

Kind regards, ■

From: ■

Sent: Friday, 8 August 2025 8:42 AM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Cc:

Subject: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with DPHI on the scope of the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW) stages in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The audit is scheduled to commence with a site inspection for SSTOM on **11th August 2025** and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that DPHI confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We will also consult with the NSW EPA, Liverpool and Penrith City Councils.

We look forward to hearing from you before **22nd August 2025**.

Kind regards,

From: [REDACTED]
Sent: Friday, 8 August 2025 8:49 AM
To: info@epa.nsw.gov.au
Subject: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with NSW EPA on the scope of the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW) in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link: [getContent \(nsw.gov.au\)](#)

The IAPAR is available at the following link:
[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit will commence with a site inspection on 11th August 2025 and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **22nd August 2025**.

Kind regards,

14 August 2025

Principal Environmental Auditor
Morasey Environment Pty Ltd

By email:

Dear

Re: Consultation on the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW)

The Environment Protection Authority (EPA) refers to your email of 8 August 2025 regarding your engagement by Sydney Metro as the independent auditor for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified) 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW).

An environment protection licence, No. 21807 (licence), is in force for activities being undertaken for the SSTOM project. A copy of the licence, associated notices and a list of non-compliances reported in the annual return is publicly available on the EPA's POEO Public Register at [Environment & Heritage | PRPOEO](#)

The EPA has considered the scope of works you have provided and has identified the following key issues for consideration during the audit:

- Conditions E92 - E99 – Soils and contamination – whether management of contamination identified at multiple locations has been consistent with requirements of the applicable Conditions of Approval.
- Condition E128 – Construction requirements - Erosion and sediment controls – whether the erosion and sediment controls have been/are being implemented and maintained before undertaking any work and during maintenance or construction activities consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).
- Actual impacts compared to predicted impacts documented in the environmental impact assessment – impacts to surface waters.

If you have any further questions about this matter, please contact Joanne Bell, Senior Operations Officer, on (02) or at info@epa.nsw.gov.au, copying @epa.nsw.gov.au

[REDACTED]

From: @penrith.city>
Sent: Friday, 22 August 2025 9:11 AM
To: [REDACTED]
Subject: RE: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Hi [REDACTED]

I have been forwarded your below email of Friday 8 August 2025 regarding Independent Audit 8 for SSI-10051 Sydney Metro Western Sydney Airport – SSTOM & FAW.

Generally, Council has been satisfied with the delivery of the Project and the collaborative approach Sydney Metro and the engaged contractors have taken in working with Council as a primary stakeholder. Unfortunately, I have a matter which has been considered worthy of raising with you in relation to Construction Traffic Management in St Marys.

In January 2025 in response to a potential road safety risk identified by a member of the community Parklife Metro JV installed regulatory signage on Phillip Street, St Marys prohibiting on street parking. The regulatory signage was installed without notification to Council or approval. The signage remains in place to this day without the necessary consultation being undertaken or approvals being received.

Below is a chronological summary of events leading to today which I hope establishes the matter for consideration.

31 July 2024

Council received a customer complaint identifying a potential road safety risk at the intersection of Phillip Street and Local Access Road A, St Marys. Local Access Road A was built by the Project as a temporary means to manage traffic during project construction where Station Street become closed to public access. Management of Local Access Road A and Construction Traffic Management at this location is the responsibility of Sydney Metro and its engaged contractors.

1 August 2024

Council notified Sydney Metro of the received complaint and potential road safety risk and requested action to be taken in response.

22 August 2024

The customer who raised the original complaint contacted Council with continued concern that appropriate signage, or other measure, had not been installed and that another traffic near miss had occurred at the same intersection.

Council made a request to Sydney Metro for an update on what action was being taken in response to the complaint and potential road safety risk.

29 August 2024

Parklife Metro JV provided a mark-up of proposed signage locations and asked for Council to confirm that this was what Council was requesting, and noted signage could take a while (10 weeks) to procure.

30 August 2024

Council advised Parklife Metro JV that it is not for Council to say whether signage is required or where signage needs to be installed. Rather, it is a Sydney Metro Western Sydney Airport (SSTOM) traffic management matter and safety risk to be assessed and suitably addressed by Parklife Metro JV and Sydney Metro in consultation with Council. Council asked to see an assessment of the intersection and the proposed action to respond to the findings of investigation and assessment.

2 September 2024

Council raised the matter in the fortnightly Delivery meeting coordinated by Sydney Metro, requesting an update.

17 December 2024

Council informed the customer who raised the original complaint that Council had been advised changes would be made on site early in the new calendar year to address the safety concern.

16 January 2025

Construction Traffic Management Plan amendment to address the matter was tabled at Traffic Control Group identifying a target submission date of 27 January 2025 for stakeholder review and comment. Council was not in attendance at this meeting.

21 January 2025

Sydney Metro informed Council that Parklife Metro JV installed three 'No Stopping' signs on Phillip Street to address the matter. This had occurred without consultation, notification, or submission and approval of the amended Construction Traffic Management Plan.

Council asked Sydney Metro and Parklife Metro JV if an assessment was completed to determine if the signs were necessary, and if so, could Council please receive this assessment, noting installation of signage had removed on street parking. Council advised that whilst the signs may have been installed the signs need to be included in the anticipated Construction Traffic Management Plan amendments which are required to be submitted to stakeholders for review and comment, receive approval, and be reported to Traffic Control Group. At a later date, it was made known to Council that public vehicles legally parked on Phillip Street at the time the 'No Stopping' signs were installed as a result received parking infringement notices before returning to their vehicle.

28 January 2025

Council received from Parklife Metro JV a completed site assessment.

11 February 2025

During the fortnightly Delivery meeting coordinated by Sydney Metro Council advised that the 'No Stopping' signs were installed without consultation, without assessment being provided to demonstrate the signs were necessary or that they adequately addressed the identified potential road safety risk and asked what approval mechanism was applied to have the signs installed. Minutes of the meeting identify that Parklife Metro JV advised that a revised Construction Traffic Management Plan was being prepared, originally targeted for submission by 27 January 2025.

Current Day - 2025

An updated Construction Traffic Management Plan that addresses the potential road safety risk and the signage installed is yet to be received for review and comment and is yet to receive approval. The matter remains open and is continually raised with Sydney Metro and Parklife Metro JV in fortnightly Delivery meetings and in Traffic Control Group meetings where St Marys is discussed. The matter has also been escalated to the Penrith City Council / Sydney Metro Project Control Group where the matter has been discussed on more than one occasion. The 'No Stopping' signs are still in place on Phillip Street, St Marys without approval.

I have advised both Sydney Metro and Parklife Metro JV that I am raising this matter with you for consideration within Audit #8.

Please feel welcome to reach out to me directly if anything further is required in relation to this matter for consideration.

Kind Regards

**Sydney Metro Interface Lead
City Strategy**

E jo@morasey.com.au
T [02 9570 9600](tel:0295709600) | M [02 9570 9600](tel:0295709600)
PO Box 60, PENRITH NSW 2751
www.visitpenrith.com.au
www.penrithcity.nsw.gov.au



Plant a tree for Father's Day
Sunday 7 September

8.30am-12.30pm
Moolana Parade, South Penrith



From: [REDACTED]

Sent: Friday, 8 August 2025 8:55 AM

To: Penrith City Council - RECORDS <council@penrith.city>

Subject: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

You don't often get email from jo@morasey.com.au. [Learn why this is important](#)

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with NSW EPA on the scope of the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW) in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link: [getContent \(nsw.gov.au\)](https://www.getcontent.nsw.gov.au)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](https://www.independentauditpostapprovalrequirements.nsw.gov.au)

The audit will commence with a site inspection on 11th August 2025 and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
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 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that PCC confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **22nd August 2025**.

Kind regards,

████████████████████
Principal Environmental Auditor
Morasey Environment Pty Ltd
M:

████████████████████
W: www.morasey.com.au

From: [REDACTED]
Sent: Friday, 8 August 2025 8:53 AM
To: lcc@liverpool.nsw.gov.au
Subject: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with NSW EPA on the scope of the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW) in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link: [getContent \(nsw.gov.au\)](#)

The IAPAR is available at the following link:
[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit will commence with a site inspection on 11th August 2025 and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
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 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that LCC confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **22nd August 2025**.

Kind regards,



Independent Environmental Audit Report 8 (IA8)
Sydney Metro

Sydney Metro Western Sydney Airport (SSI 10051)
Finishing Auxiliary Works (FAW)

Audit Date: 25 August 2025

Morasey Ref: MESYM: 2025106-01

Morasey Environment Pty Ltd

ABN: 17 637 707 647

MESYM 2025106-01_IA8_WSA_FAW_SSI 10051_Aug25_RevA

Independent Environmental Audit Report 8 (IA8)

Sydney Metro

Western Sydney Airport (SSI 10051)

Finishing Auxiliary Works (FAW)

Document Quality Management Details.	
Report Name:	Independent Environmental Audit Report 8 (IA8)
Site Details:	Sydney Metro Western Sydney Airport (SSI 10051) Finishing Auxiliary Works (FAW)
Project Number:	2025106-01
Client Name:	Sydney Metro
Client Number:	MESYM

Revision	Date Prepared	Prepared By	Summary of Revision
DRAFT	24.9.2025	████████	Draft submission to client for review
Final	26.9.2025	████████	Final submission to client

Auditor Details	
Name:	████████████████
Company:	Morasey Environment Pty Ltd
Position:	Principal Environmental Auditor (Exemplar Global Certificate No. 111000)
Email:	████████████████
Website:	www.morasey.com.au

EXECUTIVE SUMMARY

This report presents the findings of the Independent Environmental Audit (IEA) conducted by Morasey Environment Pty Ltd for Sydney Metro Western Sydney Airport (WSA) - Stations, Systems, Trains, Operations and Maintenance (SSTOM). This audit is the 8th IEA conducted for the WSA project, and the 5th IEA conducted for Footbridge St Marys (FSM).

The temporal period covered by the audit is between the date of the 7th WSA IEA on 3rd February 2025 to the date of the site inspection for this IEA 8 (IA8) on 25th August 2025. The environmental performance of the project was assessed at the time of the site inspection.

The details of the Development are as follows:

Application Number:	SSI 10051
Applicant:	Sydney Metro
Consent Authority:	Minister for Planning and Public Spaces
Land:	Land in the suburbs of Oxley Park, North St Marys, St Marys, Werrington, Werrington County, Kingswood, Claremont Meadows, Caddens, St Clair, Erskine Park, Orchard Hills, Luddenham, Greendale, Badgerys Creek, Kemps Creek and Bringelly, in the City of Penrith and City of Liverpool local government areas.
Date of Consent:	23 July 2021
Description:	Development of the Sydney Metro Western Sydney Airport project comprising: • construction and operation of approximately 23 kilometres of railway track between the T1 Western Line rail line and the proposed Western Sydney Aerotropolis in Bringelly, • construction and operation of new stations and associated ancillary infrastructure at St Marys, Orchard Hills, Luddenham and the Aerotropolis Core precinct, • interchange links with the existing T1 Western Line rail line, • construction and operation of a train stabling and maintenance facility, including an operational control centre, • construction and operation of associated rail infrastructure facilities, • construction of tunnels, bridges, viaducts and associated works, • site preparation and enabling earthworks, including land remediation, • associated ancillary infrastructure and works.

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSI 10051 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan (CEMP) and Sub-plans. Specifically, this audit was required to satisfy Condition A36 of SSI 10051 which requires Independent Audits of the development to be carried out in accordance with the Independent Audit Post Approval Requirements (IAPARs) prepared by the NSW Department of Planning, Housing and Infrastructure (DPHI), dated May 2020.

This Audit has been conducted in accordance with the IAPARs, and AS/NZS ISO 19011:2014 – Guidelines for Auditing Management Systems. The IAPARs require Independent Audits to be conducted every 26 weeks during Construction, until which time the project becomes operational.

In summary, a total of **222 conditions** were assessed. **One non-compliance** was identified, which had been self-reported by the Project during the audit period. **One Observations** with recommendation for improvement was identified. Positive observations have been reported in **Section 4.7** of this audit report and in commentary documented throughout the audit.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of the Audit Scope. The level of implementation of these requirements on site was also observed as high.

The Auditor would like to thank the Auditees from Sydney Metro and the contractor, Laing O’Rourke for their organisation, cooperation and support during the audit.

Independent Environmental Audit Report 8

Sydney Metro

Western Sydney Airport

Finishing Auxiliary Works (FAW)

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1. INTRODUCTION

This report presents the findings of the Independent Environmental Audit (IEA) conducted by Morasey Environment Pty Ltd for Sydney Metro Western Sydney Airport (SM-WSA), Finishing Auxiliary Works (FAW). This audit is the 8th IEA conducted for the SM-WSA project, and the 5th IEA conducted for Footbridge St Marys (FSM) and has been conducted in accordance with the NSW Department of Planning, Housing and Infrastructure (DPHI) Independent Audit Post Approval Requirements, May 2020 (IAPARs).

The project was approved as State Significant Infrastructure (SSI 10051) on 23rd July 2021. Modification 1 (MOD 1) was approved on 14th April 2022, and MOD 2 was approved on 20th December 2024.

1.1 The Project

1.1.1 Overview

The SM-WSA project involves the construction and operation of a new 23 kilometre metro rail line between St Marys and the Western Sydney Aerotropolis, within the Penrith and Liverpool local government areas. The Metro will provide an interchange with the Sydney Trains network at St Marys. Refer to **Figure 1** for an overview of the SM-WSA Project.

The project includes tunnels between St Marys and Orchard Hills, and between Western Sydney International Airport and Aerotropolis Core, and surface and viaduct rail between Orchard Hills and Western Sydney Airport.

The project is a committed initiative identified in the Greater Sydney Region Plan: A Metropolis of Three Cities – connecting people (Greater Sydney Commission, 2018), Building Momentum: NSW State Infrastructure Strategy 2018-2038 (Infrastructure NSW, 2018) and Future Transport Strategy 2056 (TfNSW, 2018).

The SM-WSA Environmental Impact Statement (EIS) was prepared in October 2020, which assessed the impacts of the construction and operation of the Project. The Project EIS was placed on public exhibition for a period of six weeks from 21 October to 2 December 2020. The Project was declared Critical State Significant Infrastructure (CSSI) and is listed in Schedule 5 of *State Environmental Planning Policy (State and Regional Development)*.

The Stage of the SM-WSA Project that is the subject of this audit is Finishing Auxiliary Works (FAW), which includes the following scope of work for Footbridge St Marys (FSM):

- Demolition and removal of all existing structures and services affected by the FSM Works such as canopy removal, removal/modification of fence line and light pole removals
- Construction of a footbridge spanning the Sydney Trains T1 line at St Marys Station
- Installation of vertical transportation comprising stairs, four (4) escalators and five (5) lifts
- Modifications to existing Sydney Trains assets to enable the construction of the footbridge including relocation of Guards Indicators, CCTV, PA, Over Head Wire System (OHWS), drainage and utility infrastructure, lighting, and platform furniture

- Construction of stairs and canopies which form part of the footbridge structure
- Installation and construction of Sydney Trains services, facilities and rooms Installation of new lighting, passenger information display system (PIDS), PA, CCTV, ticketing, communications network equipment, ventilation, plumbing and all related systems in accordance with Sydney Trains and Australian Standards
- Electrical earthing, bonding protection and stray current mitigation, and
- Northern/Harris Street landscaping, plaza, bike storage, and kerb side transport.

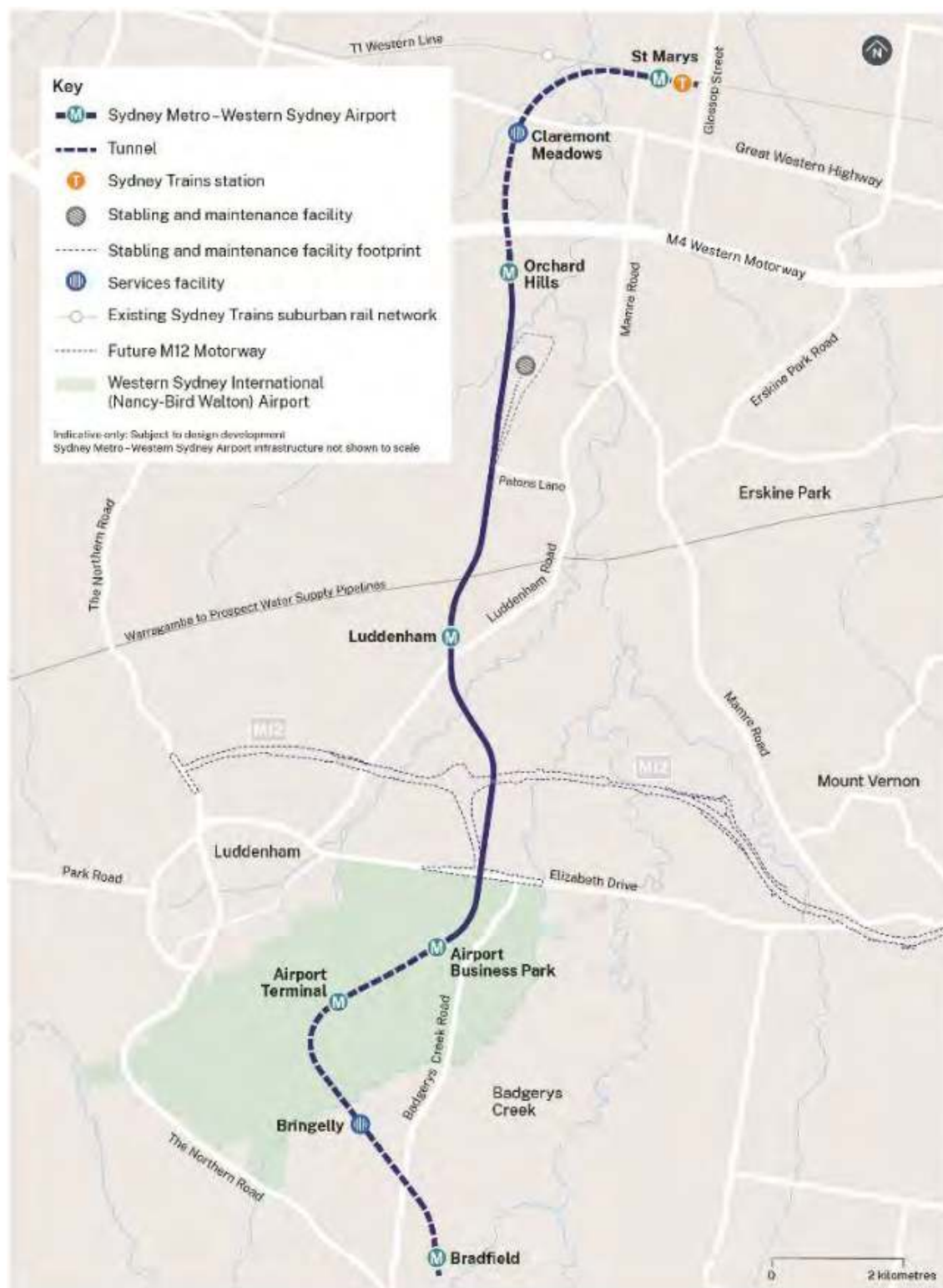


Figure 1: Key Features SM-WSA, Source: Parklife Metro CEMP, Rev02, 19/12/2024

1.1.2 Planning Approval

Details of the project are as follows:

Application Number:	SSI 10051
Applicant:	Sydney Metro
Consent Authority:	Minister for Planning and Public Spaces
Land:	Land in the suburbs of Oxley Park, North St Marys, St Marys, Werrington, Werrington County, Kingswood, Claremont Meadows, Caddens, St Clair, Erskine Park, Orchard Hills, Luddenham, Greendale, Badgerys Creek, Kemps Creek and Bringelly, in the City of Penrith and City of Liverpool local government areas.
Date of Consent:	23 July 2021

The SM-WSA Project was approved by the Minister for Planning and Public Spaces on 23 July 2021 (SSI 10051) under section 5.19 of the *Environmental Planning and Assessment Act 1997* (EP&A Act). Construction commenced in 2021 and is expected to be completed in 2026.

1.1.3 Changes to the Project

The following section describes any approved changes to the project since the time of the planning approval (SSI 10051), within the audit period.

a. Modifications

SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement.

SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends and amends **Condition E13** to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and **Condition E57** so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request.

b. Consistency Assessments

There was one Consistency Assessment (CA) prepared and approved during the audit period:

- **Consistency Assessment-LOR 001:** St Marys Station Platform 3/4 Canopy Removal, dated 9/7/2025 was prepared to assess consistency with the EIS for additional awning changes at Platform 3/4 St Marys Railway Station and the removal of a further 5.5m of the 1990s canopy adjacent to the platform Heritage Building for structural integrity and to allow greater appreciation of the original awning on the station building. The proposed works are located to the eastern end of the platform building and would involve: Isolation and removal of services; Removal of sheeting and any insulation; Removal of structural steel and bolted connections; and Trimming any welded elements.

The proposed changes were deemed to be consistent with the EIS and Submissions Report and the CA was approved by Sydney Metro on 9th July 2025.

c. Environmental Reviews

There were no Environmental Reviews (ERs) prepared or determined during the audit period.

1.1.4 Project Staging

The SM-WSA Staging Report, Revision 11.0, October 2024 was prepared and structured to address the requirements of Conditions of Approval (CoA) A10 to A16 of the CSSI 10051 planning approval. The stages of the project comprise of:

- Advanced and Enabling Works (AEW)
- Station Boxes and Tunnelling (SBT)
- Surface and Civil Alignment Works (SCAW)
- Stations, Systems, Trains, Operations and Maintenance (SSTOM)

Appendix A of the Staging Report sets out the applicability of Conditions of Approval to each stage. The current version of the Staging Report (Revision 11.0) was utilised during this audit to inform applicable conditions to the audit stage.

Section 3.2.5 of the Sydney Metro WSA Staging Report Rev11 states "*The FAW (Finishing Auxiliary Works) stage is still being developed at the time of this report. In accordance with CoA A14, the Staging Report will be revised to include detail on the FAW stage when this information is available. The revised Staging Report will be submitted to the Planning Secretary for information prior to commencement of the FAW stage*". The Staging Report remained under review at the time of IA8 and detail on the FAW stage had not been documented, though was confirmed by Sydney Metro to be limited to the Footbridge St Marys (at the time of IA8). Additional works packages would be added and the Staging Report updated as required.

1.1.5 Audit Period

The audit period is between the date of WSA Independent Audit 7 (IA7) on 3rd February 2025 to the date of the site inspection for this Independent Audit 8 (IA8) on 25th August 2025. The status of site documentation was confined in time to between these dates. The environmental performance of the project was assessed at the time of the site inspection on 25th August 2025. The following activities were undertaken during the audit period:

Footbridge St Mary's (FSM):

- Deflection wall construction
- Beam lifts and deck, column and headstock concrete pours
- Waterproofing of structures on the platforms
- Load-out of excavated material from MAF1 and MAF5
- Pile breakback and excavation on platforms 1/2 and ¾, and
- Excavation and kerb and gutter on the road behind the Harris Street carpark.

1.2 Audit Objectives

The objective of this Independent Audit is to satisfy SSI 10051 Condition A36, which states:

Independent Audits of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020)

The Independent Audit has been undertaken to meet the requirements of the Independent Audit Post Approval Requirements (IAPARs), which sets out the audit methodology and reporting requirements for the Independent Audit.

1.3 Audit Scope

The Independent Audit comprises of four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance, and Reporting. IA8 covers the period from 3rd February 2025 to 25th August 2025 (the 'audit period').

The scope of the Independent Audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- An assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
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 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

The audit commenced with a site inspection on 25th August 2025 and pertains to post-approval requirements and compliance during Construction of the following stages:

- FSM (commencement of Construction, dated 27th May 2023).

1.4 Audit Team and Auditor Approval

In accordance with Condition of Approval (CoA) A36-A40 of SSI 10051, and Section 3.1 of the Independent Audit Post Approval Requirements (IAPAR), independent audits must only be undertaken by a suitably qualified, experienced and independent auditor; the appointment of the auditor agreed in writing by the Planning Secretary before each audit is commissioned.

Table 1 presents the audit team for SM-WSA FAW IA8.

Table 1: Audit Team

Name & Position	Company	Audit Role	Certification
██████ ██████	Morasey Environment Pty Ltd	Lead Auditor	Exemplar Global Certified, Principal Auditor, Environmental Management Systems Auditor, (Certificate No. 111000)
██████ ██████	Trigalana Environmental Pty Ltd	Alternate Auditor	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor, (Certificate No. 120416)

The Audit Team was approved by the Department of Planning, Housing and Infrastructure (the Department | DPHI) in correspondence dated 7th August 2025. The Department's Letter of Agreement to the Audit Team is included as **Attachment 2** and the Auditor's Declaration of independence is included as **Attachment 3**.

2. AUDIT METHODOLOGY

The Independent Audit was conducted in a manner consistent with below reference documents and evidence submitted for review during the audit:

- Independent Audit Post Approval Requirements (NSW DPIE, May 2020)
- ISO 14001: 2015 Environmental Management Systems
- AS/NZS ISO 19011:2019 – Guidelines for Auditing Management Systems

2.1 Audit Planning and Scope Development

The auditee organisations (together referred to as the Auditee/s or Project team) were identified as follows:

- **The Proponent:** Sydney Metro
- **The FSM Contractor:** Laing O’ Rourke (LOR).

Personnel representing the Auditees is identified in **Table 2** below. Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditees
- Confirm the DPHI approved audit team
- Confirm the audit objectives, scope, audit period and indicative audit program
- Consult with DPHI on the audit scope.

2.1.1 Agency Consultation

Section 3.2 of the IAPARs requires the auditor to “*consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit*”.

The NSW Department of Planning, Housing and Infrastructure (DPHI), NSW Environment Protection Authority (EPA), Penrith and Liverpool City Councils were consulted via email on 8th August 2025 to obtain input on the scope of the Independent Audit and confirm any key issues they would like examined, relating to post-approval requirements and compliance. DPHI responded on 27th August 2025 and did not require any additional issues or consultation to be included within the scope of the Independent Audit that is not already captured by SSI 10051.

A summary of the key issues and areas of focus raised by stakeholders during consultation is presented in **Table 2**.

Consultation is also discussed in **Section 4.6** and consultation records are presented in **Attachment 4**.

Table 2: Key issues and areas of focus raised during stakeholder consultation

Stakeholder	Key Issues	How Addressed including Section Reference
DPHI	Scope consultation correspondence was issued to DPHI on 8 th August 2025. DPHI responded on 27 th August 2025: <i>"NSW Planning does not require any additional issues or consultation to be included within the scope of the Independent Audit that is not already captured by SSI 10051, as modified, and the proposed scope you have listed below".</i>	N/A
NSW EPA	Scope consultation correspondence issued to NSW EPA on 8 th August 2025. EPA responded on 15 th August 2025 but did not raise any issues specific to FAW.	N/A
Liverpool City Council	Scope consultation correspondence was issued to Liverpool City Council (LCC) on 8 th August 2025. No response was received from LCC.	N/A
Penrith City Council	Scope consultation correspondence issued to Penrith City Council on 8 th August 2025. PCC responded on 22 nd August 2025 but did not raise any issues specific to FAW.	N/A

The Auditor performed a document review, prepared an Audit Plan and prepared an Initial Request for Information (RFI), which were distributed to the Auditees in preparation for the Independent Audit.

2.2 Auditees

Table 3 identifies the Auditees and other personnel involved in the audit process.

Table 3: Auditees and key personnel

Organisation	Position	Name	Involvement
Sydney Metro	A/Senior Manager – Environment Western Sydney Airport	██████████	Opening & Closing meetings, Interviews & provision of evidence
Sydney Metro	Environmental Coordinator Environment, Sustainability & Planning, Technical Services	██████████e	Interviews & provision of evidence
Sydney Metro	Environment Coordinator Western Sydney Airport Project Delivery	██████████	Closing meeting & provision of evidence
Sydney Metro	Director Environment	██████████	Closing meeting
Laing O'Rourke	Environment Lead	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
Laing O'Rourke	Environmental Advisor	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
Laing O'Rourke	Project Leader	██████████	Opening meeting, Site inspection
TfNSW	Environment & Sustainability Manager	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
HBI	Environmental Representative	██████████	Interview

2.3 Site Inspection and Meetings

The site inspection, opening and closing meetings were held with Project personnel as identified in **Table 3**. The site inspection was conducted on 25th August 2025 and covered the following areas:

- FSM Main works site, and
- Laydown 1.

Site inspection photos, observations and notes are presented **Section 6**.

The opening meeting was held on site on 25th August 2025. During the opening meeting, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed.

A closing meeting was held remotely (via Teams) with Sydney Metro and LOR on 24th September 2025. At the closing meeting, preliminary audit findings were presented, including a summary of preliminary Non-compliances, Observations and Recommendations.

2.4 Interviews and verification of evidence

The Independent Audit included the review of publicly available and requested documents, records and registers to evaluate compliance. Interviews with key project personnel were conducted and further documentary evidence was also sought to verify responses provided by Auditees.

Refer to **Section 2.2** for details on the personnel interviewed. Audit interviews and verification of evidence sessions were conducted with the Auditees as follows:

- Environmental Representative: 12th September 2025
- LOR, TfNSW & Sydney Metro: 25th August 2025.

In addition to the above, the Auditor requested further information, to obtain evidence that was not accessible on project websites or available during the audit interviews and document reviews/in past RFIs. These requests were provided promptly by the Auditees within required timeframes.

2.5 Generating audit findings

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

- Correspondence from DPHI and other stakeholders
- Records, documents and specialist reports
- Interviews with relevant personnel
- Figures, plans and photographs
- Site inspection
- Monitoring data and analysis.

Other applicable approvals, permits or Project-specific environmental requirements (as documented within the Audit Table in **Attachment 1**).

2.6 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR, as listed in **Table 4**, below:

Table 4: Compliance descriptors from Table 2 of the IAPAR

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

Observations and notes have also been made to provide context, and/or identify any opportunities for improvement. This includes positive observations where the project has applied initiatives beyond compliance requirements.

2.6.1 Evaluation of post audit approval documentation

The Auditor assessed whether post approval documents:

- were developed in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate
- have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

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

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

2.6.2 Review

The Draft Independent Audit Report was distributed to the Auditees for review to ensure content is factual and representative. Audit findings have been determined independent of the Auditees, DPHI and any other parties, and based on the evidence assessed during the audit.

3. LIMITATIONS

The audit has been prepared in accordance with the associated proposal and Morasey's Terms and Conditions. This report is for the sole purposes of the Client. Except as required by law, no third party may use or rely on this Report unless otherwise agreed by Morasey in writing.

The site inspection component of the audit was limited to observable aspects that could be noted during a 'walk through' inspection of the construction site. Sampling or monitoring was not included in the scope of this audit. Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The matters raised in this report are only those which came to our attention during the course of performing our assessment and are not necessarily a comprehensive statement of all the weaknesses that may exist or improvements that might be made. Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of construction/operation and their responsibility to prevent and detect irregularities.

Recommendations and suggestions for improvement should be assessed by management for their full commercial impact before they are implemented. We have generally used and relied upon information supplied as being regarded as authoritative and reliable, but no warranty of completeness, accuracy, or reliability is given. The document review conducted during this assessment was limited to those documents and information supplied as part of the audit. The audit scope did not include the independent verification of these sources unless otherwise noted within the report. The scope of this audit does not extend to the verification of items assessed by the Certifier prior to issuing of a certificate for any stage. Morasey will not accept any liability for inaccurate conclusions if the information provided was incomplete, inaccurate, withheld, misrepresented or otherwise not fully disclosed.

To the best of Morasey's knowledge, the facts and matters described in this report reasonably represent the Client's intentions at the time of which Morasey issued the report to the Client. However, the passage of time, the manifestation of latent conditions or the impact of future events (including a change in applicable law) may have resulted in a variation of the report and its possible impact. Morasey will not be liable to update or revise the report to take into account any events or emergent circumstances or facts occurring or becoming apparent after the date of issue of the report.

This Report does not purport to give legal advice; legal advice can only be given by qualified legal practitioners. To the extent permitted by law, Morasey expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report (including without limitation matters arising from any negligent act or omission of Morasey). Morasey does not admit that any action, liability or claim may exist or be available to any third party.

4. AUDIT FINDINGS

The following sections provide a summary of the findings of the audit. The Audit Table is provided in **Attachment 1** and includes details of the evidence collected, observed and provided in support of compliance with the audit criteria. Evidence collected during the site inspection and interviews with personnel has also been included.

4.1 Approvals and documents audited, and evidence sighted

Key documentation reviewed during the audit is listed below. A more comprehensive list of documents and evidence sighted in relation to each Condition of Approval is detailed within the Audit Table (**Attachment 1**):

- LOR Project website: <https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/>
- Sydney Metro Western Sydney Airport (SM-WSA) Advanced Enabling Works (AEW) Footbridge St Marys (FSM) Construction Environmental Management Plan (CEMP) Rev05, Laing O'Rourke, dated 18/6/2025
- SM-WSA AEW FSM Community Liaison Plan, including Small Business Owners Engagement Plan RevD, dated 2/12/2024
- SM-WSA FAW Consistency Assessment LOR 001 - St Marys Station Platform 3/4 Canopy Removal, dated 9/7/2025
- SM-WSA FSM Environmental Control Map (ECM) Rev 15, dated 17/7/2025
- SM-WSA Harris Street Drainage Works ECM Rev 02, dated 23/5/2025
- St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024
- Sydney Metro Western Sydney Airport Environmental Impact Statement (WSA EIS), dated October 2020) (the EIS)
- Sydney Metro Western Sydney Airport Submissions Report, submitted April 2021
- Sydney Metro Western Sydney Airport Response to Submissions Report (RtS), dated December 2020
- Sydney Metro Western Sydney Airport Modification 1 – Biodiversity Credits (SSI-10051-MOD-1) Modification Assessment Report, DPHI 2022
- Sydney Metro Western Sydney Airport Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022
- Sydney Metro – Western Sydney Airport, SSI-10051, Request for Modification to Conditions E13 and E57, correspondence dated 12 August 2024
- Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024
- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 October 2024
- Sydney Metro Project website / Document Library: <https://www.sydneymetro.info/documents>
- SM-WSA Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024
- SM-WSA FAW Complaints Report – Feb-August 2025
- SM-WSA Non-Aboriginal Archaeological Research Design, Artefact, April 2021
- SM-WSA Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024

- SM-WSA Out of Hours Work Protocol v2.0, dated 8/11/2021
- SM-WSA Sustainability Plan, January 2022
- SM-WSA Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024.

4.2 Non-Compliances, Observations and Actions

This Section presents findings from the 8th Independent Audit (IA8). A summary of the number of conditions assessed and compliance status from IA8 is presented in **Table 5**. An overview of each finding and recommendation is presented in **Table 6**.

The Audit Table is provided in **Attachment 1** and includes details of the evidence collected, observed and provided support of compliance with the audit criteria.

Table 5: Summary of conditions assessed and compliance status

SSI 10051 Part	No. Conditions Assessed	Compliance Status			
		Compliant	Non-Compliant	Not Triggered	Observation
Part A	47	31	1	15	1
Part B	11	6	0	5	0
Part C	22	10	0	12	0
Part D	8	0	0	8	0
Part E	134	61	0	73	0
TOTAL	222	108	1	113	1

In summary, a total of **222 conditions** were assessed. **One non-compliance** was identified, which had been self-reported by the Project during the audit period. **One Observations** with recommendation for improvement was identified.

A summary of findings from IA8 has been presented in **Table 6**. Positive observations are discussed in **Section 4.7**.

Findings from the previous Independent Audit (IA7) were also reviewed. The Auditor was satisfied that all findings from IA7 were closed with adequate evidence presented in support of the findings.

The findings from the previous audit (IA7) are presented in **Table 7**.

Table 6: Summary of Compliance Status – IA8 (25 August 2025)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
SELF-REPORTED NON-COMPLIANCES					
IA8 – NC01	A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	There was one notification of Non-Compliance (NC) submitted to DPHI for FSM during the audit period. The Non-Compliance was with project Out of Hours Work Application commitments. While gathering evidence for the upcoming Environmental Independent Audit, it was discovered that the vibration monitor at St Marys station had been powered off since 06/04/2025. During the period 6/4/25–1/8/25, Out of Hours Work (OOHW) applications indicated that vibration monitoring would be undertaken as a precaution, despite no sensitive receptors being within the minimum working distances. Notification of the NC to DPHI was submitted on 1/8/2025, within the required 7-day timeframe.	The NC was discussed during the audit and the auditor was satisfied that appropriate actions had been closed-out internally.	N/A CLOSED

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
OBSERVATIONS					
IA8 – OBS 1	A10	The CSSI may be constructed and operated in stages. Where staged construction and/or operation is proposed, a Staging Report must be prepared. The Staging Report must be submitted to the Planning Secretary for information no later than one (1) month before the lodgement of any CEMP or CEMP sub plan for the first of the proposed stages of construction (or if only staged operation is proposed, one (1) month before the commencement of operation of the first of the proposed stages of operation), unless otherwise agreed with the Planning Secretary.	Section 3.2.5 of the Sydney Metro WSA Staging Report Rev11 states "The FAW (Finishing Auxiliary Works) stage is still being developed at the time of this report. In accordance with CoA A14, the Staging Report will be revised to include detail on the FAW stage when this information is available. The revised Staging Report will be submitted to the Planning Secretary for information prior to commencement of the FAW stage". The Staging Report remained under review at the time of IA8 and detail on the FAW stage had not been documented.	Update the Staging Report to include detail on the FAW stage when this information is available.	Responsibility: Sydney Metro Environment Manager Due Date: Evidence for submission during IA9, February 2026 Status: OPEN

Table 7: Review of previous audit findings – IA7 (3 February 2025)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA8 ASSESSMENT & STATUS
NON-COMPLIANCES					
10051_IA7_1	A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	On 11 and 31/10/24 oversized overmass vehicles used Harris Street and Forrester Road, St Marys, without Penrith Council approval (Council had requested additional swept path information on 14/10/24).	Nil	N/A CLOSED during IA7
10051_IA7_5	C22	Local roads proposed to be used by Heavy Vehicles to directly access ancillary facilities / construction sites that are not identified in the documents listed in Condition A1 must be approved by the Planning Secretary and be included in the CTMP.	On 18-19/09/24 heavy vehicles used Forrester Road, St Marys, (to access a private road rather than to access Harris Street) prior to Planning Secretary approval which was issued late on 19/09/24.	Nil	N/A CLOSED during IA7

4.3 Adequacy of Environmental Management Plan, Sub-plans and Post-Approval documents

As part of the Independent Audit, the Auditor reviewed the CEMP, Sub-plans and environmental post-approval documents for each stage (refer Section 4.1 for references) and conducted a high level assessment whether the above documents:

- have been developed in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate
- have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

The Auditor also assessed the adequacy of post approval documents (on the basis of whether):

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

The Project's post-approval documents have been reviewed, endorsed and approved by required parties – Sydney Metro, the ER, and DPHI. The endorsements and approvals confirm that the relevant requirements from the Project Approval, the EIS and RtS have been incorporated. This is further reviewed and evidenced in the Audit Table (refer **Attachment 1**).

The CEMP, Sub Plans, Strategies and Construction Monitoring Programs prepared for the Project were of excellent quality. The evidence reviewed and/or sighted during this Independent Audit indicates that these documents are being implemented; with no non-compliances raised against the mitigations measures within.

4.4 Complaints

Complaints are recorded in Consultation Manager, a TfNSW database. A Weekly Complaints Report is distributed to DPHI and the Environmental Representative (ER) when triggered. The ER Project Monthly Report summarises complaints for the month.

The complaints register was reviewed during the audit and showed no complaints were received during February 2025-August 2025 that could be attributed to the FSM project.

The complaints register indicates that Sydney Metro and its contractors for each stage have adequately responded to the complaints.

4.4.1 Cumulative Impacts

A review of the Complaints Management System process in relation to the management of potential cumulative impacts from nearby projects, including interface works and other Sydney Metro WSA Packages was conducted during the audit.

Potential exists for cumulative impacts with the SSTOM project at St Marys station. Cumulative impacts from interfaces and other nearby construction sites have been managed through monthly Cumulative Impact Meetings. Recent meeting minutes were provided as evidence and included attendees from Sydney Metro, SCAW, SBT, SSTOM and FSM Environment and Project management

teams. Issues discussed in meetings included a lookahead for out of hours work at each location, and potential for cumulative impacts related to environmental aspects including Surface water management, Air quality and Heavy Vehicle (HV) movements during peak hours.

Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site.

4.5 Incidents and Non-Compliances

Non-compliances identified during the audit period have been discussed in **Section 4.2**.

Environmental incidents and non-compliances raised during the audit period were recorded on the Project's Incident and Non-Compliance Register.

No environmental incidents were raised that would require notification under the planning approval within the audit period. Review of the Monthly ER Reports to DPHI aligned with the above reporting of environmental incidents and non-compliances.

4.6 Actual vs Predicted Impacts

A qualitative assessment has been undertaken as part of this Independent Audit to assess actual versus predicted impacts for works conducted during the audit period, considering below:

- The extent to which the Project has been altered to that assessed and approved in the EIS and RtS during the audit period
- Incidents and non-compliance during the audit period
- Complaints during the audit period
- Compliance with the Project Approval during the audit period
- Review of key scope consultation issues and area of concerns, and
- High-level assessment of adequacy and implementation of post approval documents.

Qualitative assessment findings are summarised below:

- SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement.
- There was one Consistency Assessment prepared and approved during the audit period and has been considered during the audit (refer **Section 1.1.3** for details). The proposed changes were deemed to be consistent with the EIS and Submissions Report.
- Refer to **Sections 4.2 & 4.5** for incidents and non-compliances recorded within the audit period.
- Refer to **Section 4.4** for complaints recorded within the audit period.
- Compliance with the project approval is tracked on an ongoing basis by the Sydney Metro and Contractor Environment Teams. Compliance tracking at a high level is included in a Compliance Tracking Register. An ER has also been engaged and provides support in the management of compliance with the planning approval and reports monthly to DPHI as required.
- The Auditor consulted with DPHI, NSW EPA, Liverpool and Penrith City Councils on 8th August 2025 to obtain input on the scope of the Independent Audit in accordance with Section 3.2 of the IAPAR. DPHI responded on 27th August 2025 and indicated "NSW Planning does not require any

*additional issues or consultation to be included within the scope of the Independent Audit that is not already captured by SSI 10051, as modified, and the proposed scope you have listed below". A summary of the key issues and areas of focus raised by stakeholders during consultation is presented in **Table 2**. Refer to **Section 4.6** and consultation records are presented in **Attachment 4**. The Audit Table in **Attachment 1** includes audit evidence and findings in relation to each applicable condition.*

- Refer **Section 4.3** for a high -level assessment of the adequacy and implementation of post approval documents.

4.7 Environmental Performance

The environmental performance of the Project during the audit period was considered by the Auditor to be of a high standard. Refer to the following **positive observations**:

- Process in place for the management of potential cumulative impacts from other SM-WSA projects operating concurrently with SSTOM.
- Implementation of the Out of Hours Works (OOHW) process including preparation of OOHW Approvals for frequent possessions for various activities.

There were no agency notices, Penalty notices or Prosecutions known to have been raised in relation to the project during the audit period.

Further assessment of environmental performance has been documented using photos, observations and notes from the site inspection. Refer **Section 6**.

5. AUDIT CONCLUSIONS

This Audit Report presents the findings from the 8th Independent Audit conducted for the SM-WSA project, and the 5th IEA conducted for FSM, covering the period from 3rd February 2025 to 25th August 2025.

In summary, a total of **222 conditions** were assessed. **One non-compliance** was identified, which had been self-reported by the Project during the audit period. **One Observations** with recommendation for improvement was identified. Positive observations have been reported in **Section 4.7** of this audit report and in commentary documented throughout the audit.

There were no other matters considered relevant by the auditor.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of the Audit Scope. The level of implementation of these requirements on site was also observed as high.

The Auditor would like to thank the Auditees from Sydney Metro and the contractor, Parklife Metro for their organisation, cooperation and support during the audit.

6. SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS



Photos 1 & 2: FSM construction as viewed from the LOR site compound.



Photo 3: Water treatment tanks discharged to cess via permit or reused. Fuel cell.



Photo 4: Site compound on hardstand and materials storage.



Photo 5: Compliant hazardous chemical storage.



Photo 6: Skip bins with lids; good housekeeping observed



Photo 7: Controls in place around stormwater grates in the site compound.



Photo 8: Base slab poured for Sydney Trains building.



Photo 9: Material storage within the site compound on hardstand; good housekeeping and no tracking



Photo 10: Signage in place at site entrance from Harris Street.



Photo 11: Coir logs in place along site boundary and isolated excavations.



Photo 12: Works on the pedestrian bridge were ongoing with lighting pointed away from receivers.



Photo 13: Works on the pedestrian bridge were ongoing – low environmental risk.



Photo 14: Access to platforms and view of adjacent SSTOM St Marys station site.



Photo 15: FSM as viewed from the platform. Hoardings were free from graffiti.



Photo 16: Tree protection was in place at Laydown 1.



Photo 17: Inert materials storage and stabilised internal access at Laydown 1.



Photo 18: Stockpiling away from concrete barriers at Laydown 1. Stockpiles to be covered at end of shift.

Independent Environmental Audit Report

Sydney Metro

Western Sydney Airport (SSI 10051)

Finishing Auxiliary Works (FAW)

Attachment 1: Independent Audit Table

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
PART A ADMINISTRATIVE CONDITIONS				
GENERAL				
A1	The Proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the: (a) Sydney Metro – Western Sydney Airport Environmental Impact Statement dated 21 October 2020; and (b) Sydney Metro – Western Sydney Airport Submissions Report submitted April 2021 (c) Sydney Metro – Western Sydney Airport, NSW Infrastructure Approval (SSI_10051) – Request for modification of Condition E4, dated March 2022; and (d) Sydney Metro – Western Sydney Airport, SSI-10051, Request for Modification to Conditions E13 and E57. Correspondence dated 12 August 2024.	• Sydney Metro - Western Sydney Airport Environmental Impact Statement (WSA EIS), dated October 2020 (the EIS) • Sydney Metro WSA Submissions Report, submitted April 2021 • Sydney Metro WSA Response to Submissions Report (RIS), dated December 2020 • Sydney Metro WSA Modification 1 – Biodiversity Credits (SSI-10051-MOD-1) Modification Assessment Report, DPHI 2022 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022 • Sydney Metro – Western Sydney Airport, SSI-10051, Request for Modification to Conditions E13 and E57, correspondence dated 12 August 2024 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • Consistency Assessment LOR 001 - St Marys Station Platform 3/4 Canopy Removal, dated 9/7/2025	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout. Refer also to the review of the Sydney Metro WSA Modification 1 – Biodiversity Credits (SSI-10051-MOD-1), SSI-10051-MOD-2, corresponding Modification Assessment Reports, as well as Consistency Assessments prepared during the audit period in the body of the audit report. SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement. SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends Condition E13 to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and Condition E57 so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request. There was one Consistency Assessment prepared and approved during the audit period: • Consistency Assessment - LOR 001 - St Marys Station Platform 3/4 Canopy Removal, dated 9/7/2025 was prepared to assess consistency with the EIS for additional awning changes at Platform 3/4 St Marys Railway Station and the removal of a further 5.5m of the 1990s canopy adjacent to the platform Heritage Building for structural integrity and to allow greater appreciation of the original awning on the station building. The proposed works are located to the eastern end of the platform building, and would involve: Isolation and removal of services; Removal of sheeting and any insulation; Removal of structural steel and bolted connections; and Trimming any welded elements. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 9th July 2025.
A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	• Refer evidence throughout this audit table	NC	As per the findings from this audit, including any Non-Compliances and Observations raised throughout. During the previous audit (IA7) a non-compliance with Condition A2 was raised when on 11 and 31/10/24 oversize overmass vehicles used Harris Street and Forrester Road, St Marys, without Penrith Council approval (Council had requested additional swept path information on 14/10/24). This was subsequently reported to the Department and the Department issued a warning letter on 19/12/24. No repeat occurrences or actions required to be closed out since the warning letter was issued. Self-Reported Non-Compliance 1: • NCR 051 (1/8/2025): Condition A2. Non-Compliance with project Out of Hours Work Application commitments. While gathering evidence for the upcoming Environmental Independent Audit, it was discovered that the vibration monitor at St Marys station had been powered off since 06/04/2025. During the period 5/4/25–1/8/25, Out of Hours Work (OOHW) applications indicated that vibration monitoring would be undertaken as a precaution, despite no sensitive receptors being within the minimum working distances. Notification of the NC to DPHI was submitted on 1/8/2025, within the required 7-day timeframe. Refer also Conditions A44 & A45.
A3	In the event of an inconsistency between: (a) the terms of this approval and any document listed in Condition A1 inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in Condition A1 inclusive, the most recent document will prevail to the extent of the inconsistency. Note: For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.	• Interview with Sydney Metro & LOR, 25/8/2025 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • Consistency Assessment LOR 001 - St Marys Station Platform 3/4 Canopy Removal, dated 9/7/2025	C	SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement. SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends Condition E13 to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and Condition E57 so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request. Potential inconsistencies were assessed by the Consistency Assessment (CA) and Environmental Review process. There was one Consistency Assessment prepared and approved during the audit period: • Consistency Assessment - LOR 001 - St Marys Station Platform 3/4 Canopy Removal, dated 9/7/2025 was prepared to assess consistency with the EIS for additional awning changes at Platform 3/4 St Marys Railway Station and the removal of a further 5.5m of the 1990s canopy adjacent to the platform Heritage Building for structural integrity and to allow greater appreciation of the original awning on the station building. The proposed works are located to the eastern end of the platform building, and would involve: Isolation and removal of services; Removal of sheeting and any insulation; Removal of structural steel and bolted connections; and Trimming any welded elements. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 9th July 2025.
A4	In the event that there are differing interpretations of the conditions of this approval, including in relation to a condition of this approval, the Planning Secretary's interpretation is final.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	No differing interpretations are known to have occurred during the audit period.
A5	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to: (a) the environmental performance of the CSSI; (b) any document or correspondence in relation to the CSSI; (c) any notification given to the Planning Secretary under the terms of this approval; (d) any audit of the construction or operation of the CSSI; (e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); (f) the carrying out of any additional monitoring or mitigation measures; and (g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	Auditees advised no written requirements or directions have been issued by the Planning Secretary during the audit period.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8 WSA FAW August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A6	Where the terms of this approval require a document or monitoring program to be prepared or a review to be undertaken in consultation with identified parties, evidence of the consultation undertaken must be submitted to the Planning Secretary with the document. The evidence must include: (a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval; (b) a log of the dates of engagement or attempted engagement with the identified party and a summary of the issues raised by them; (c) documentation of the follow-up with the identified party(s) where feedback has not been provided to confirm that the party(s) has none or has failed to provide feedback after repeated requests; (d) outline of the issues raised by the identified party(s) and how they have been addressed; and (e) description of the outstanding issues raised by the identified party(s) and the reasons why they have not been addressed.	• Interview with Sydney Metro & LOR, 25/8/2025 • Interview with ER, 7/02/2025	C	As per conditions requiring consultation throughout this audit table, including in relation to monitoring programs and document review. Monitoring programs have been incorporated into CEMP Sub-plans are approved by DPHI prior to construction commencement.
A7	This approval lapses five (5) years after the date on which it is granted, unless work has physically commenced on or before that date.	• Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 • Sydney Metro MCoA A35 Notification of commencement of Construction- AEW Footbridge St Marys, dated 19/5/2023 • Post Approval Form, 20230519044011 (SSI-10051-PA-223), A35 Notification of commencement AEW FSM, 19/5/2023	C	Approval for SSI-10051 was granted on 23/7/2021. Notifications of commencement of Construction were submitted to DPHI (as per Conditions A34 & A35) for each stage. The Notification of Commencement of Construction for FSM was dated 19/5/2023 for commencement on 27/5/2023 and was within the five year commencement period.
A8	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of this approval.	• SSI-10051 Approval, dated 23/7/2021	C	Noted.
A9	Any document that must be submitted or action taken within a timeframe specified in or under the conditions of this approval may be submitted or undertaken within a later timeframe agreed with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident under Condition A41 .	• Interview with Sydney Metro & LOR, 25/8/2025 • DPHI Letter to Sydney Metro RE: Sydney Metro - Western Sydney Airport - Request to extend IE Audit - Metro WSA, dated 28/7/2025	C	A request for an extension of time to undertake the projects Independent Environmental Audits as per Conditions A36-40 of SSI No. 10051 and the IAPARs (2020) was submitted to NSW Planning on 22/7/2025. NSW Planning notes the request seeks to commence the audit site inspection on 18/8/2025 (rather than 4/8/2025) as a result of procurement. The Planning Secretary agreed to the extension request in accordance with Schedule 2, Condition A9 of the Approval. SM-WSA IEA8 site inspections commenced on 11/8/2025.
STAGING				
A10	The CSSI may be constructed and operated in stages. Where staged construction and/or operation is proposed, a Staging Report must be prepared. The Staging Report must be submitted to the Planning Secretary for information no later than one (1) month before the lodgement of any CEMP or CEMP sub plan for the first of the proposed stages of construction (or if only staged operation is proposed, one (1) month before the commencement of operation of the first of the proposed stages of operation), unless otherwise agreed with the Planning Secretary.	• Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 • ER Endorsement Staging Report V11, dated 11/10/2024	NT	Condition A10 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage). Observation 1: Section 3.2.5 of the Sydney Metro WSA Staging Report Rev11 states <i>"The FAW (Finishing Auxiliary Works) stage is still being developed at the time of this report. In accordance with CoA A14, the Staging Report will be revised to include detail on the FAW stage when this information is available. The revised Staging Report will be submitted to the Planning Secretary for information prior to commencement of the FAW stage". The Staging Report remained under review at the time of IA8 and detail on the FAW stage had not been documented.</i> Recommendation: Update the Staging Report to include detail on the FAW stage when this information is available.
A11	The Staging Report must: (a) set out how construction of the whole of the CSSI will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; (b) if staged operation is proposed, set out how the operation of the whole of the CSSI will be staged, including details of each stage and the general timing of when operation of each stage will commence; (c) specify conditions that apply to each stage of construction and operation including how compliance with conditions will be achieved across and between each of the stages of the CSSI; (d) set out mechanisms for managing any cumulative impacts arising from the proposed staging; and (e) for the purposes of informing Conditions C2, C7 and C17 , include an assessment of the predicted level of environmental risk and potential level of community concern posed by the construction activities required to construct each stage of the CSSI. With respect to (e) above, the risk assessment must use an appropriate process consistent with AS/NZS ISO 31000: 2018; Risk Management - Guidelines and must be endorsed by the ER . Note: 1. A Staging Report may reflect the staged construction and operation of the project through geographical activities, temporal activities or activity-based staging. 2. The risk matrix must reflect the stages of construction identified in the Staging Report	• Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 • ER Endorsement of the SMWSA Staging Report Rev6, dated 28/2/2023 • ER Endorsement Staging Report V11, dated 11/10/2024	NT	The Staging Report addresses each part (a) - (e) of Condition A11, as set out in the Staging Report compliance table, as verified during the audit, and the allocation of conditions of approval is included in the Staging Report. The allocation of conditions to AEW - Footbridge St Marys in the Staging Report Rev11 has been used to determine the scope for this audit. ER Endorsement of the Staging Report Rev08 was provided as evidence and included reference to endorsement of the risk assessment associated with the Staging Report as per Condition A11(e). The Staging Report was updated to Revision 11 on 11/10/2024. Condition A11 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
A12	The CSSI must be staged in accordance with the Staging Report , and submitted for information to the Planning Secretary.	• Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 • ER Endorsement Staging Report Rev 11, dated 11/10/2024 • Post Approval Form, 20241011054404 (SSI-10051-PA-506), WSA CSSI 10051 Staging Report (Rev 11), dated 11/10/2024 • Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024	C	The Staging Report Rev11, dated 11/10/2024 was submitted to DPHI for information on 11/10/2024. The Staging Report Revision 11 was revised to include the following: • Minor update to definitions and abbreviations • Updated timing of stages • Administrative updates related to the renaming of Aerotropolis to Bradfield Station • Review of the applicability of Conditions E8 to E12 to reflect their applicability to the SSTOM stage. • Review the applicability of REMM NA13 to reflect applicability to the SSTOM stage. There were no non-compliances with implementation of the Staging Report identified during the audit.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A13	Where staging is proposed, the terms of this approval that apply or are relevant to the work or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024 - Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement Staging Report Rev11, dated 11/10/2024	C	As per observation for Condition A10, the FAW stage has not been detailed in the staging report. For the purpose of this audit, the Footbridge St Marys (FSM) project has been assumed to fall under the Advanced Enabling Works (AEW) stage. The allocation of conditions to AEW in the Staging Report Rev11 has been used to determine the scope of this audit.
A14	Where changes are proposed to the staging of construction or operation, a revised Staging Report must be prepared and submitted to the Planning Secretary for information before the commencement of changes to the stage of construction or the stage of operation.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement Staging Report Rev 11, dated 11/10/2024 - Post Approval Form_20241011054404 (SSI-10051-PA-506), WSA CSSI 10051 Staging Report (Rev 11), dated 11/10/2024 - Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024	C	The Staging Report Rev11, dated 11/10/2024 was submitted to DPHI for information on 11/10/2024. The Staging Report Revision 11 was revised to include the following: - Minor update to definitions and abbreviations - Updated timing of stages - Administrative updates related to the renaming of Aerotropolis to Bradfield Station - Review of the applicability of Conditions E8 to E12 to reflect their applicability to the SSTOM stage. - Review the applicability of REMM NA13 to reflect applicability to the SSTOM stage.
A15	Where changes are proposed to the risk assessment related to the staging of construction or operation, a revised Staging Report must be submitted to the Planning Secretary for information one (1) month before the lodgement of any CEMP or CEMP sub plan associated with the stage where change in risk assessment is proposed.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement Staging Report Rev 11, dated 11/10/2024 - Post Approval Form_20241011054404 (SSI-10051-PA-506), WSA CSSI 10051 Staging Report (Rev 11), dated 11/10/2024 - Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024	C	Strategies, plans and programs have been submitted as per the AEW project described in the Staging Report. Rev 11 of the Staging Report was updated to include the following: - Minor update to definitions and abbreviations - Updated timing of stages - Administrative updates related to the renaming of Aerotropolis to Bradfield Station - Review of the applicability of Conditions E8 to E12 to reflect their applicability to the SSTOM stage. - Review the applicability of REMM NA13 to reflect applicability to the SSTOM stage.
A16	The Proponent may submit any strategies, plans or programs required by this approval on a progressive basis, within each stage of the CSSI. Notes: - While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to ensure that the existing activities on site are covered by suitable strategies, plans or programs at all times; and - If the submission of any strategy, plan or program is to be submitted on a progressive basis, then the relevant strategy, plan or program must clearly describe the activities to which the strategy, plan or program applies, the relationship of this activity to any future activities within the stage, and the trigger for updating the strategy, plan or program. - The staged submission of strategies, plans or programs may reflect the construction and operation of the project through geographical activities, temporal activities or activity-based staging.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - ER Endorsement Staging Report Rev 11, dated 11/10/2024 - Post Approval Form_20241011054404 (SSI-10051-PA-506), WSA CSSI 10051 Staging Report (Rev 11), dated 11/10/2024 - Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024	C	Strategies, plans and programs have been submitted as per the AEW project described in the Staging Report. Rev 11 of the Staging Report was updated to include the following: - Minor update to definitions and abbreviations - Updated timing of stages - Administrative updates related to the renaming of Aerotropolis to Bradfield Station - Review of the applicability of Conditions E8 to E12 to reflect their applicability to the SSTOM stage. - Review the applicability of REMM NA13 to reflect applicability to the SSTOM stage. Refer to Audit Table Part C for submission of CEMP and Sub-plans and timing verification.
ANCILLARY FACILITIES				
Ancillary Facilities				
A17	Ancillary facilities that are not identified by description and location in the documents listed in Condition A1 can only be established and used in each case if: - they are located within or immediately adjacent to the Construction Boundary of the CSSI; and - they are not located next to sensitive land use(s) (including where an access road is between the facility and the receiver), unless the landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location; and - they have no impacts on Heritage Items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and - the establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts. Note: This condition does not apply to any ancillary facilities or work that are exempt or complying development, established before the commencement of construction under this approval or minor ancillary facilities established under Condition A22.	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025 - Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP) Rev05, Laing O'Rourke, dated 18/6/2025 - ER Endorsement of the SM-WSA, AEW, Footbridge St Marys CEMP, Rev 05, dated 20/8/2025 - FSM MAF checklist (Laydowns), approved by ER 17/11/23 - SM-WSA FSM - Minor Ancillary Facilities Checklist Rev5, approved by ER, 10/7/2024 - DPHI Submission Post Approval Form_20250825003131 (PA-635), LORAC SM-WSA • AEW-FSM - CEMP Rev 5, dated 25/8/2025	NT	The following Ancillary Facilities are listed for proposed use in Section 1.2.3 of the CEMP: - The main FSM site compound and laydown, Harris Street - Laydowns 1-5 2 Harris Street *It is understood that the Glossop Street Laydown is Laydown 2; Hobart Street Gate 4 is Laydown 3 & Hobart Street Gate 5 is Laydown 4. Page 72-73 of the CEMP references laydowns 1-5 being approved under the Ancillary Facilities Checklist. MAF checklists were provided as evidence. As per Section 12.8 of the CEMP, "Should any further ancillary facilities be required LORAC will submit the necessary assessment to TNSW and the ER. Future ancillary facilities would be approved in accordance with A17 or A22. " There were no FSM A17 Ancillary Facility Assessments approved during the audit period. No A17 AFs are known to have been established during the audit period. The CEMP was updated to Rev5 to change terminology from Minor Ancillary Facilities (MAFs) to Ancillary Facilities (AFs) at the request of DPHI. No ancillary facilities outside of the documents in Condition A1 are planned to be required.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
SITE ESTABLISHMENT WORK				
Site Establishment Management Plan				
A18	Before establishment of any ancillary facility (excluding exempt or complying development, minor ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A22 and those considered in an approved CEMP), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facilities. The Site Establishment Management Plan must be prepared in consultation with the Relevant Council(s) and relevant government agencies. The Site Establishment Management Plan must include: (a) a description of activities to be undertaken during establishment of the ancillary facility (including scheduling and duration of work to be undertaken at the site); (b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s); (c) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of site establishment work; (d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to: (i) meet the performance outcomes stated in the documents listed in Condition A1; and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and (e) a program for monitoring the performance outcomes, including a program for construction noise monitoring, where appropriate or required. Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each ancillary facility.	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025 - Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP), Laing O'Rourke, dated 13/06/23 - FSM MAF checklist (Laydowns), approved by ER 17/11/23	NT	There were no Site Establishment Management Plans prepared for FAW_FSM under Condition A18 during the audit period.
A19	With the exception of a Site Establishment Management Plan expressly nominated by the Planning Secretary to be endorsed by the ER , all Site Establishment Management Plans must be submitted to the Planning Secretary for approval one (1) month before the establishment of any ancillary facilities.	Interview with Sydney Metro & LOR, 25/8/2025	NT	There were no Site Establishment Management Plans prepared for FAW_FSM under Condition A18 during the audit period.
A20	A Site Establishment Management Plan expressly nominated by the Planning Secretary to be endorsed by the ER must be submitted to the ER for endorsement one (1) month before the establishment of that ancillary facility or as otherwise agreed with the ER .	Interview with Sydney Metro & LOR, 25/8/2025	NT	There were no Site Establishment Management Plans prepared for FAW_FSM under Condition A18 during the audit period.
Use of Ancillary Facilities				
A21	The use of ancillary facility for construction must not commence until the CEMP required by Condition C1 relevant CEMP Sub-plans required by Condition C5 and relevant Construction Monitoring Programs required by Condition C13 have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable). <i>Note: This condition does not apply to Condition A22 or where the use of an ancillary facility is Low Impact Work or for Low Impact Work.</i>	- Interview with Sydney Metro & LOR, 25/8/2025 - Letter from Sydney Metro to DPHI and post approval portal lodgement record RE: notification of AEW FSM to DPHI, dated 19/05/23 - Emails x 2 from Sydney Metro to Liverpool and Penrith Councils RE: notification of AEW FSM to Council, dated 19/05/23	NT	There were no new construction ancillary facilities approved for use during the audit period, or Minor Ancillary Facilities (MAFs) established under Condition A22 .

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heilborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Minor Ancillary Facilities				
A22	Lunch sheds, office sheds, portable toilet facilities and the like, can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria: (a) are located within or adjacent to the Construction Boundary; and (b) have been assessed by the ER to have - (i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the ICNG, traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and (ii) minimal environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and Heritage items beyond those already approved under other terms of this approval.	• Interview with Sydney Metro & LOR, 25/8/2025 • Interview with ER, 12/9/2025 • Site inspection, 25/8/2025 • Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) CEMP Rev05, dated 18/6/2025 • FSM MAF checklist (Laydowns), approved by ER, dated 17/11/23	NT	The project has determined that MAFs established to date are located in areas already assessed by the documents listed in Condition A1 (i.e. within the project boundary and identified as indicative office and amenities locations in the EIS). Maps in the EIS, Chapter 8 Project Description (e.g. Figure 8-11) and Table 8-3 set out indicative office & amenities locations. There were no Minor Ancillary Facility Assessments conducted or approved during the audit period.
Boundary screening				
A23	Boundary screening must be erected around ancillary facilities that are adjacent to sensitive land use(s) for the duration that the ancillary facility is in use unless otherwise agreed with relevant affected residents, business operators or landowners.	• Site inspection, 25/8/2025	C	The site was predominantly surrounded by hoarding and Sydney Metro branding. Boundary screening was confirmed to be in place at Laydown 1 during the site inspection. The other ancillary facilities for FSM were not in use at the time of the audit.
A24	Boundary screening required under Condition A23 must minimise visual impacts on adjacent sensitive land use(s).	• Site inspection, 25/8/2025	C	As per Condition A23 , Auditees advised ancillary facilities Hobart Gate 4 and Hobart Gate 5 are located adjacent to residential areas. Boundary screening is maintained and noise blankets are in place as required to reduce visual and other community impact.
INDEPENDENT APPOINTMENTS				
A25	All Independent Appointments required by the terms of this approval must have regard to the Department's guideline <i>Seeking approval from the Department for the appointment of independent experts</i> (DPIE, 2020) and hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	• Interview with ER, 7/02/2025 • DPHI Independent ER Appointment Letter RE: Appointment of Alex Gale as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	DPHI has approved the independent appointment of the ER for the project. Supporting letter from HBI includes details of ER experience and suitability. The Complaints Mediator (not activated for FSM) was appointed previously.
A26	The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must: (a) facilitate and assist the Planning Secretary in any such audit; and (b) make it a term of their engagement of an Independent Appointment that the Independent Appointment facilitate and assist the Planning Secretary in any such audit.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	A DPHI audit of an Independent Appointment is not known to have occurred during the audit period.
A27	Upon completion of an audit under Conditions A26 above, the Planning Secretary may withdraw its approval of an Independent Appointment should they consider the Independent Appointment has not exercised their functions in accordance with this approval. Note: Conditions A26 and A27 apply to all Independent Appointments including the ER and Independent Auditor.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	The auditor is not aware of any formal withdrawals of independent appointments by DPHI during the audit period.
ENVIRONMENT REPRESENTATIVE				
A28	Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	• DPHI Independent ER Appointment Letter RE: Appointment of Alex Gale as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023 • Post Approval Form, _20230321040318 (SSI-10051-PA-197), Approval of Additional ER, submitted 21/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.
A29	The proposed ER must be a suitably qualified and experienced person(s) who was not involved in the preparation of the documents listed in Condition A1 , and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it.	• DPHI Independent ER Appointment Letter RE: Appointment of Alex Gale as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A30	The Proponent may engage more than one ER for the CSSI, in which case the functions to be exercised by an ER under the terms of this approval may be carried out by any ER that is approved by the Planning Secretary for the purposes of the CSSI.	• DPHI Independent ER Appointment Letter RE: Appointment of Alex Gale as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan".
A31	The ER must meet the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).	• DPHI Independent ER Appointment Letter RE: Appointment of Alex Gale as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023 • Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_WSA, dated 9/3/2022	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan". Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_WSA, dated 9/3/2022 includes statements and CV of ER Brett McLennan and supporting evidence of meeting the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).
A32	For the duration of the work until the commencement of operation, or as agreed with the Planning Secretary, the approved ER must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval; (c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community; (d) review documents identified in Conditions A10, A18, A20, C1, C5 and C13 and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) endorse the documents before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or (ii) endorse the documents before the implementation of such documents (if those documents are only required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary / Department); (iii) provide a written statement to the Planning Secretary advising the documents have been endorsed. (e) for documents that are required to be submitted to the Planning Secretary / Department for information under (d)(i) above, the documents must be submitted as soon as practicable to the Planning Secretary / Department after endorsement by the ER, unless otherwise agreed by the Planning Secretary; (f) regularly monitor the implementation of the documents listed in Conditions A10, A18, A20, C1, C5 and C13 to ensure implementation is being carried out in accordance with the document and the terms of this approval; (g) as may be requested by the Planning Secretary, help plan or attend audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A36; (h) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints received directly by the Department; (i) consider or assess the impacts of minor ancillary facilities as required by Condition A22; and (j) consider any minor amendments to be made to the Site Establishment Management Plan, CEMP, CEMP Sub-plans and construction monitoring programs without increasing impacts to nearby sensitive land use(s), and are consistent with the terms of this approval and the Site Establishment Management Plan, CEMP, CEMP Sub-plans and construction monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval; (k) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports". The Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the CSSI or as otherwise agreed by the Planning Secretary; and (l) assess the impacts of activities as required by the Low Impact Work definition.	• Interview with ER, 12/9/2025 • Sydney Metro WSA ER Monthly Report February 2025, dated 7/3/2025 • Sydney Metro WSA ER Monthly Report March 2025, dated 7/4/2025 • Sydney Metro WSA ER Monthly Report April 2025, dated 6/5/2025 • Sydney Metro WSA ER Monthly Report May 2025, dated 6/6/2025 • Sydney Metro WSA ER Monthly Report June 2025, dated 7/7/2025 • Sydney Metro WSA FSM ER Inspection Report #34, dated 12/2/2025 • Sydney Metro WSA FSM ER Inspection Report #35, dated 22/2/2025 • Sydney Metro WSA FSM ER Inspection Report #36, dated 12/3/2025 • Sydney Metro WSA FSM ER Inspection Report #37, dated 22/3/2025 • Sydney Metro WSA FSM ER Inspection Report #38, dated 14/4/2025 • Sydney Metro WSA FSM ER Inspection Report #39, dated 30/4/2025 • Sydney Metro WSA FSM ER Inspection Report #40, dated 14/5/2025 • Sydney Metro WSA FSM ER Inspection Report #41, dated 28/5/2025 • Sydney Metro WSA FSM ER Inspection Report #42, dated 11/6/2025 • Sydney Metro WSA FSM ER Inspection Report #43, dated 25/6/2025 • Sydney Metro WSA FSM ER Inspection Report #44, dated 16/7/2025 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 • ER Endorsement Staging Report Rev 11, dated 11/10/2024 • ER Endorsement of MW52, MW02, MW03 & MW04, 2025_FSM_SM_WSA_OOHV_037 Rev02 - PG ER, dated 2/7/2025 • ER Endorsement of WE01_2025_FSM_SM_WSA_OOHV_036 Rev01 PG ER, dated 2/7/2025 • Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP) Rev05, Laing O'Rourke, dated 18/6/2025 • ER Endorsement of the Sydney Metro Western Sydney Airport, Advanced and Enabling Works, Footbridge St Marys Construction Environmental Management Plan, Rev 05, dated 20/8/2025	C	(a) No formal communication has been received from DPHI requiring ER response within the audit period. (b) The ER provides information to the Planning Secretary predominantly via reports and meetings. ER Monthly Reports include relevant information on incidents, non-compliances and complaints. An informal monthly meeting with DPHI is held to discuss environmental issues and concerns. Monthly meetings with DPHI and Sydney Metro are also attended by the ER, and includes an agenda and meeting minutes. (c) ER recommendations are included in ER Inspection Reports, which are in the form of Corrective Actions and Improvement Opportunities related to environmental management. Fortnightly project meetings are attended by the ER with Sydney Metro & LORAC. The ER also holds informal meetings with LORAC fortnightly after ER inspections, and chaired by TINSW. Minutes are distributed by TINSW. (d) Documents reviewed by the ER during the audit period are documented in the ER Monthly Reports. (e) Submission of documents to DPHI after ER endorsement was verified throughout the audit. (f) The implementation of the documents listed in Conditions A10, C1 and C13 is predominantly monitored during ER site inspections, which are generally fortnightly (though may be more frequent dependent on the scope of work and associated risk). The implementation of Condition A18 and A20 has not been relevant during the audit period. (g) There has been no request made by the Planning Secretary to the ER to assist with audits during the audit period. (h) There has been no request made by the Planning Secretary to the ER to assist in the resolution of community complaints during the audit period. (i) Ancillary facilities in use were approved by the ER using a checklist. (j) Minor amendments to the documents listed in Condition A32(i) have been approved by the ER as required. (k) ER Monthly reports are prepared and submitted to DPHI as required. (l) Low impact works are assessed by the ER during review of out of hours permits, as described throughout this audit. ER inspections are conducted fortnightly. Issues identified by the ER have included stockpiling at Laydown 1 and the rectification and maintenance of ERSED controls; Stabilisation of surfaces at Laydown 1 to prevent mud tracking. Maintenance of gutters to keep free from sand and ballast; and the segregation of waste and other stored materials. The site was noted by the ER to be generally tidy and well managed. Evidence of close-out of each issue raised by the ER was sighted by the auditor and closed-out in SAI 360. Issues identified in ER inspection reports had been rectified at the time of the audit site inspection.
A33	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition A32 (including preparation of the ER monthly report), as well as: (a) the Complaints Register (to be provided on a weekly basis or as requested); and (b) a copy of any assessment carried out by the Proponent of whether proposed work is consistent with the approval (which must be provided to the ER before the commencement of the subject work).	• Interview with ER, 12/9/2025 • Consistency Assessment LOR 001 - St Marys Station Platform 3/4 Canopy Removal, dated 9/7/2025 • Email from ER to Sydney Metro RE: FSM Consistency Assessment, dated 18/7/2025	C	The ER advised all required information has been provided to them by the Proponent in order for them to undertake their duty, including complaints reports (weekly) and monthly complaints summaries. The Consistency Assessment for St Marys Station Platform 3/4 Canopy Removal was approved by Sydney Metro on 9/7/2025. An email from the ER was received as evidence that he had reviewed the CA, dated 18/7/2025. The St Marys Station Platform 3/4 Canopy Removal works had not commenced at the time of the audit and were planned for the Weekend 10 (WE10) possession.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
NOTIFICATION OF COMMENCEMENT				
A34	The Department, and relevant Councils must be notified in writing of the date of commencement of construction at least seven (7) days before the commencement of construction.	- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 - MCoA A35 Notification of commencement of Construction- AEW Footbridge St Marys, dated 19/5/2023 - Post Approval Form_20230519044011 (SSI-10051-PA-223), A35 Notification of commencement AEW FSM, 19/5/2023	C	Notification of commencement of Construction for FSM was submitted to DPHI on 19/5/2023 for commencement date 27/5/2023, more than 7 days prior to commencement of Construction.
A35	If construction of the CSSI is to be staged, the Department, Liverpool City Council and Penrith City Council must be notified in writing at least seven (7) days before the commencement of each stage, of the date of the commencement of that stage.	- Email to Liverpool City Council RE: Notification of Commencement FSM (CoA A35), dated 19/5/2023 - Email to Penrith City Council RE: Notification of Commencement FSM (CoA A35), dated 19/5/2023	C	Notification of commencement of Construction for FSM was submitted to Liverpool City Council and Penrith City Council on 19/5/2023 for commencement date 27/5/2023, more than 7 days prior to commencement of Construction.
INDEPENDENT ENVIRONMENTAL AUDIT				
A36	Independent Audits of the CSSI must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020).	- DPHI Letter, Sydney Metro Western Sydney Airport – Auditor nomination - Construction #8, Ref: SSI-10051-PA-622, dated 7/8/2025 - DPHI Letter to Sydney Metro RE: Sydney Metro - Western Sydney Airport - Request to extend IE Audit - Metro WSA, dated 28/7/2025	C	This audit (FAW_FSM IA8 SSI-10051, dated 4/08/2025) is being conducted in accordance with the Independent Audit Post Approval Requirements (2020). Refer to Condition A9 for approved request for extension of audit timeframe to 18/8/2025.
A37	Notwithstanding Condition A36 , the Proponent may prepare an audit program to outline the scope and timing of each independent audit that will be undertaken during construction. If prepared, the audit program must be developed in consultation with, and approved by, the Planning Secretary prior to commencement of the first audit and implemented throughout construction.	- DPHI Independent Audit Post Approval Requirements, 2020 - This audit (FAW_FSM IA8 SSI-10051, dated 4/08/2025) - Auditor Declaration of Independence Form, SSI-10051, J. Heltborg	C	Noted.
A38	Proposed independent auditors must be approved by the Planning Secretary before the commencement of an Independent Audit.	DPHI Letter, Sydney Metro Western Sydney Airport – Auditor nomination - Construction #8, Ref: SSI-10051-PA-622, dated 7/8/2025	C	DPHI Letter approves the appointment of Ms Josephine Heltborg as Lead Auditor and Mr Richard Peterson as Alternate Auditor as the audit team to conduct the 8th Construction phase Independent Audit (IA8) pursuant to SSI-10051.
A39	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020), upon giving at least four (4) weeks' notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.	- This audit (FAW_FSM IA8 SSI-10051, dated 4/08/2025) - DPHI Letter, Sydney Metro Western Sydney Airport – Auditor nomination - Construction #8, Ref: SSI-10051-PA-622, dated 7/8/2025	C	This audit (FAW_FSM IA8 SSI-10051, dated 25/8/2025) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with Condition A39 for FSM IA8 will be verified during the 9th SM-WSA Audit (IA9).
A40	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within two (2) months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020) unless otherwise agreed by the Planning Secretary.	- This audit (FAW_FSM IA8 SSI-10051, dated 25/8/2025) - SM - WSA Independent Audit No.7 – Combined Response to Findings, 17/4/2025 - Evidence of submission of SM-WSA Submission of Independent Audit Report #3 & #7 to DPHI, 17/4/2025 (SSI-10051-PA-582) & reference to: - Independent Audit No.7 – Audit Report, Wolfpeak, February 2025 (SBT, SCAW, AEW FSM) - Independent Environmental Audit Report No.3, Morasey, February 2025 (SSTOM) - SM-WSA Independent Audit No.7 and No.3 – Combined response to findings - DPHI Letter to Sydney Metro RE: Sydney Metro Western Sydney Airport (SSI-10051) – extension to submission date for seventh independent audit report, dated 25/3/2025	C	This audit (FAW_FSM IA8 SSI-10051, dated 25/8/2025) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with Condition A40 for IA8 will be verified during the 9th SM-WSA Audit (IA9). The IA7 FSM Audit Report (SM-WSA Audit Report), including the Proponent's response to audit findings, was submitted to the Planning Secretary on 17/4/2025. While the submission was not within 2 months of the IA7 FSM site inspection on 3/2/2025, a letter from DPHI dated 25/3/2025 confirms granting of an extension for submission of the 7th IEA report to 18/4/2025. The 7th IEA report was issued prior to the extended deadline.
INCIDENT AND NON-COMPLIANCE NOTIFICATION AND REPORTING				
Incident Notification, Reporting and Response				
A41	The Planning Secretary must be notified via phone or in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. Any notification via phone must be followed up by a notification in writing via the Major Projects website within 24 hours of the initial phone call. The written notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the location and general nature of the incident.	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025 - Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 08, dated 6/2/2025 - Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 09, dated 6/7/2025 - Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 10, dated 12/4/2025 - Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 11, dated 28/4/2025 - Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 13, dated 7/5/2025 - Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 14, dated 5/6/2025	NT	No incidents triggering notification to DPHI occurred during the audit period. Class 3 (minor) environmental incident reports raised during the audit period were provided for review and discussed with auditees and agreed not to trigger DPHI notification. Class 3 (minor) environmental incidents related mainly to small spills. Actions taken were recorded in the incident reports and verified as closed in SAI360.
A42	Any incident within or potentially affecting the Controlled Areas of the WaterNSW Pipelines corridor must also be reported to WaterNSW on the WaterNSW 24-hour Incident Notification Number 1800 061 069.	Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024	NT	Condition A42 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
A43	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A .	Interview with Sydney Metro & LOR, 25/8/2025	NT	No incidents triggering notification to DPHI occurred during the audit period.

Item
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Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Non-Compliance Notification				
A44	The Planning Secretary must be notified in writing via the Major Projects website within seven (7) days after the Proponent becomes aware of any non-compliance with the terms of this approval.	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025 - DPHI Submission Post Approval Form_20250806064356 (SSI-10051-PA-628), SM-WSA NCR-051 FSM Noise & Vibration Monitoring, dated 6/8/2025 - Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 51, dated 1/8/2025	C	There was one notification of Non-Compliance (NC) submitted to DPHI for FSM_FAW during the audit period. • NCR 051 (1/8/2025): Condition A2 Non-Compliance with project Out of Hours Work Application commitments. While gathering evidence for the upcoming Environmental Independent Audit, it was discovered that the vibration monitor at St Marys station had been powered off since 06/04/2025. During the period 6/4/25–1/8/25, Out of Hours Work (OOHW) applications indicated that vibration monitoring would be undertaken as a precaution, despite no sensitive receptors being within the minimum working distances. Notification of the NC to DPHI was submitted on 1/8/2025, within the required 7-day timeframe. Refer to Condition A2.
A45	A non-compliance notification must identify the CSSI (including the application number for it), set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be undertaken to address the non-compliance. <i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i>	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025	C	There was one notification of Non-Compliance (NC) submitted to DPHI for FSM_FAW during the audit period. Refer to Conditions A2 and A44 for details. Details in the NCR reports submitted to DPHI complied with the requirements of Condition A45.
IDENTIFICATION OF WORKFORCE				
A46	All Heavy Vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and application number to enable immediate identification by a person viewing the Heavy Vehicle standing 20 metres away.	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025	C	There was no active spoil haulage observed at the time of the audit site inspection, and no NC raised in relation to Condition A46 during the audit period.
A47	The CSSI name, application number, telephone number, postal address and email address required under Condition B3 must be available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also be provided on the website required under Condition B11 .	- Site inspection, 25/8/2025 - LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/	C	During the site inspection for IA8 signage observed was deemed to be compliant.
PART B				
COMMUNITY INFORMATION AND REPORTING				
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT				
Community Communication				
B1	The Overarching Community Communication Strategy as provided in the documents listed in Condition A1, or updated Strategy must be implemented for the duration of the work. Should the Overarching Community Communication Strategy be updated, a copy must be provided to the Planning Secretary for information.	- SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 - Post Approval submission form (PA-465) to DPHI, WSA OCCS Rev 5, dated 12/8/2024 - DPIE Letter to Sydney Metro RE: Receipt of SM-WSA OCCS Rev 5, dated 31/7/2024, dated 20/8/2024 - Interview with Sydney Metro & LOR, 25/8/2025 - FSM Complaints Register February-August 2025	C	The Community Communication Strategy (CCS) is a Sydney Metro document that sets out the mechanisms for which communication between the community and key stakeholders will be carried out. The CCS addresses who (the Proponent, Independent Appointments and/or construction contractor) will engage with the community, relevant councils and agencies, how they will engage and the timing of engagements. Submission to and receipt from DPHI sighted for updated OCCS Rev5, dated 31/7/2024.

Item
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Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
COMPLAINTS MANAGEMENT SYSTEM				
B2	A Complaints Management System must be prepared and implemented before the commencement of any work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the CSSI.	- FSM Complaints Register February-August 2025 - Interview with Sydney Metro & LOR, 25/8/2025 - SM-WSA Cumulative Impact Meeting Minutes #012 12/2/2025 - SM-WSA Cumulative Impact Meeting Minutes #013 19/3/2025 - SM-WSA Cumulative Impact Meeting Minutes #014 16/4/2025 - SM-WSA Cumulative Impact Meeting Minutes #015 14/5/2025 - SM-WSA Cumulative Impact Meeting Minutes #016 25/6/2025 - SM-WSA Cumulative Impact Meeting Minutes #017 16/7/2025	C	Complaints are recorded in Consultation Manager (CM), a TINSW database. Liem Ngo is the appointed Community Consultation Manager for the project. There have been no complaints received in relation to the project. One complaint received on 22/7/2025 in relation to worker behaviour and property access at Samuel Marsden Road was investigated and found not to be attributed to the FSM project. A Weekly Complaints Report is distributed to DPHI and the ER if required, though there have been no complaints for FSM. The ER Project Monthly Report summarises complaints attributed to the project for the month. Potential exists for cumulative impacts with SSTOM at St Marys station. Cumulative impacts from interfaces and other nearby construction sites have been managed through monthly Cumulative Impact Meetings. Recent meeting minutes were provided as evidence and included attendees from Sydney Metro, SCAW, SBT, SSTOM and FSM Environment and Project management teams. Issues discussed in meetings included a lookahead for out of hours work at each location, and potential for cumulative impacts related to environmental aspects including Surface water management, Air quality and Heavy Vehicle (HV) movements during peak hours. Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site.
B3	The following information must be available to facilitate community enquiries and manage complaints before the commencement of work and for 12 months following the completion of construction: (a) a 24-hour telephone number for the registration of complaints and enquiries about the CSSI; (b) a postal address to which written complaints and enquiries may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved. This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.	- FSM Complaints Register February-August 2025 - SM-WSA Complaints Report 1 Feb to 23 July 2025.xlsm - Interview with Sydney Metro & LOR, 25/8/2025	C	(a) A project 1800 number (1800 717 703) has been established (b) Project postal address: Sydney Metro, PO Box K659, Haymarket NSW 1240 (c) FSM uses SMWSA contacts for community enquiries and complaints. Information is included in monthly notifications and all other correspondence. Evidence sighted. (d) A mediation system has been established (refer B8-B10) The above information is available on the project website, on shade cloth around construction sites, and is included in community notifications.
B4	A Complaints Register must be maintained recording information on all complaints received about the CSSI during the carrying out of any work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the: (a) number of complaints received; (b) date and time of the complaint; (c) number of people (in the household) affected in relation to a complaint, if relevant; (d) method by which the complaint was made; (e) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (f) issue of the complaint; (g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and (h) if no action was taken, the reason(s) why no action was taken.	- FSM Complaints Register February-August 2025 - SM-WSA Complaints Report 1 Feb to 23 July 2025.xlsm - Interview with Sydney Metro & LOR, 25/8/2025	C	The FSM Complaints Register for the audit period was sighted. The Complaints Register is updated as complaints are received. The Contractor provides a copy of the Complaints Register to TINSW daily. Sydney Metro provides a copy of the Complaints Register to DPHI weekly. A copy is also provided to the ER weekly. There have been no complaints received in relation to the project during the audit period.
B5	Complainants must be advised of the following information before, or as soon as practicable after, providing personal information: (a) the Complaints Register may be forwarded to government agencies, including the Department (Department of Planning Industry and Environment, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150), to allow them to undertake their regulatory duties; (b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies; (c) the supply of personal information by the complainant is voluntary; and (d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement). The Collection Statement must be included on the Proponent or development website to make prospective complainants aware of their rights under the <i>Privacy and Personal Information Protection Act 1998</i> (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.	- FSM Complaints Register February-August 2025 - Interview with Sydney Metro & LOR, 25/8/2025	NT	There have been no complaints received in relation to the project during the audit period.
B6	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request. Note: Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.	- FSM Complaints Register February-August 2025 - Interview with Sydney Metro & LOR, 25/8/2025	C	Sydney Metro provides a copy of the SM-WSA Complaints Register to DPHI weekly.

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Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8 WSA FAW August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B7	A Community Complaints Mediator that is independent of the design and construction personnel must be engaged by the Proponent, upon the referral of the complaint by the ER in accordance with the Overarching Community Communication Strategy .	- FSM Complaints Register February-August 2025 - Interview with Sydney Metro & LOR, 25/8/2025 - SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 - Sydney Metro WSA Construction Complaints Management System	NT	In accordance with the Sydney Metro WSA Construction Complaints Management System, issues and complaint escalation to independent mediation would be at the recommendation of the ER following a thorough review of the complaint information in consideration of the project planning and assessment process. The Director, Project Communication may also refer a complaint to independent mediation at any point in the complaint. There have been no complaints referred to mediation during the course of the FSM project.
B8	The role of the Community Complaints Mediator is to provide independent mediation services for any reasonable and unresolved complaint referred by the ER where a member of the public is not satisfied by the Proponent's response. Where a Community Complaints Mediator is required, a mediator accredited under the National Mediator Accreditation System (NMAS), administered by the Mediator Standards Board must be appointed.	- FSM Complaints Register February-August 2025 - Interview with Sydney Metro & LOR, 25/8/2025 - SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 - Sydney Metro WSA Construction Complaints Management System	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for FSM during the audit period.
B9	The Community Complaints Mediator will: (a) review any unresolved disputes, referred by the ER in accordance with the Overarching Community Communication Strategy; (b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes; and (c) provide a copy of the recommendations, and the Proponent's response to the recommendations, to the Planning Secretary within one month of the recommendations being made.	- FSM Complaints Register February-August 2025 - Interview with Sydney Metro & LOR, 25/8/2025 - SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 - Sydney Metro WSA Construction Complaints Management System	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for FSM during the audit period.
B10	Community Complaints Mediation will not be enacted before the Complaints Management System required by Condition B2 has been executed for a complaint and will not consider issues such as property acquisition, where other dispute processes are provided for in this approval, statute or clear government policy and resolution processes are available, or matters which are not within the scope of this CSSI.	- FSM Complaints Register February-August 2025 - Interview with Sydney Metro & LOR, 25/8/2025 - SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 - Sydney Metro WSA Construction Complaints Management System	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for FSM during the audit period.
PROVISION OF ELECTRONIC INFORMATION				
B11	A website or webpage providing information in relation to the CSSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 24 months following the completion of all stages of construction of the CSSI. Up-to-date information (excluding confidential, private, commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including: (a) information on the current implementation status of the CSSI; (b) a copy of the documents listed in Condition A1, and any documentation relating to any modifications made to the CSSI or the terms of this approval; (c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval, or links to the referenced documents where available; (d) a copy of each statutory approval, licence or permit required and obtained in relation to the CSSI, or where the issuing agency maintains a website of approvals, licences or permits, a link to that website; (e) a current copy of each document required under the terms of this approval, which must be published within one (1) week of its approval or before the commencement of any work to which they relate or before their implementation, as the case may be; and (f) a copy of the audit reports required under this approval. Where the information / document relates to a particular work or is required to be implemented, it must be published before the commencement of the relevant work to which it relates or before its implementation. All information required in this condition is to be provided on the website or webpage, and easy to navigate.	- LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ - Sydney Metro Document Library: https://www.sydneymetro.info/documents - Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP) Rev05, Laing O'Rourke, dated 18/6/2025 - Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	C	A project website had been established for FSM: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ Sydney Metro also maintains a project website: https://www.sydneymetro.info/documents (a) Work Updates including current and past work activity notifications were available on the Sydney Metro project website and addressed the current scope of work at the time of the audit, including out of hours works. The website includes documentation required under Condition A1 including CEMPs, communication strategies and reports, sustainability documents etc. (b) & (c) Documents listed in Condition A1 were available on the website: https://www.sydneymetro.info/documents, and included the EIS Chapters & Appendices, Submissions Report and overarching documents associated with the project approval, e.g. Ministers Conditions of Approval, Unexpected Contamination Finds Protocol, and WSA Staging Report Rev 11, 11 Oct 2024. (d) Project approval was on the website. (e) A current copy of most documents requested as evidence during the audit was available on the project website. (f) The previous SM-WSA Independent Audit Report (FSM IA4/ WSA IA7) was on the project website. The website was generally easy to navigate and documents searched for by the Auditor were located in a timely manner.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
PART C				
CONSTRUCTION ENVIRONMENTAL MANAGEMENT				
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN				
C1	Construction Environmental Management Plans (CEMPs) and CEMP Sub-plans must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during construction.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • Letter from HBI to Sydney Metro RE: ER endorsement of Rev 11 of Staging Report, dated 11/10/2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • DPHI Submission of AEW Footbridge St Marys CEMP, dated 26/5/2023 • Post Approval Form_20230526032825 (SSI-10051-PA-229), SSI10051-SM-WSA AEW FSM CEMP Rev01 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • SM-WSA AEW FSM DNVIS RevD ER Approval, dated 11/2/2025 • SM-WSA Environmental Impact Statement, Appendix F - Construction Environmental Management Framework (CEMF), September 2020	C	Appendix C of the Staging Report documents applicable CEMP requirements for each stage, which have been addressed in the CEMP, endorsed by the ER and approved by DPHI. The CEMP includes reference to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). Section 3.4 (f) of the SM-WSA CEMP addresses the preparation of CEMPs and requires "The Principal Contractor CEMP will cover the requirements of the relevant planning approval documentation, the conditions of all other permits and licences, the Principal Contractor's corporate EMS, the environmental provisions of the contract documentation and this Construction Environmental Management Framework". Section 12.2 (a)(viii) of the CEMP addresses Soil and Water and requires "Principal Contractors will develop and implement a Soil and Water Management Plan for all off-airport works ... will include as a minimum: The requirements of any applicable licence conditions".
C2	With the exception of any CEMPs expressly nominated by the Planning Secretary to be endorsed by the ER , all CEMPs must be submitted to the Planning Secretary for approval. <i>Note: The Planning Secretary will consider the assessment of the predicted level of environmental risk and potential level of community concern required under Condition A11(e) when deciding whether any CEMP's may be endorsed by the ER.</i>	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP, Rev 04, dated 28/3/2025 • SM-WSA AEW FSM CEMP Rev04 ER Endorsement, dated 3/4/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025	C	The WSA FSM CEMP & Sub-plans were endorsed by the ER in a letter dated 25/5/2023. Construction for FSM commenced on 27/5/2023, after ER approval.
C3	The CEMP(s) not requiring the Planning Secretary's approval must be submitted to the ER for endorsement no later than one (1) month before the commencement of construction or where instruction is staged no later than one (1) month before the commencement of that stage. That CEMP must obtain the endorsement of the ER as being consistent with the conditions of this approval and all undertakings made in the documents listed in Condition A1 .	• AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • Sydney Metro MCoA A35 Notification of commencement of Construction- AEW Footbridge St Marys, dated 19/5/2023 • Post Approval Form_20230519044011 (SSI-10051-PA-Z23), A35 Notification of commencement AEW FSM, 19/5/2023 • DPHI Submission of AEW Footbridge St Marys CEMP, dated 26/5/2023 • Post Approval Form_20230526032825 (SSI-10051-PA-229), SSI10051-SM-WSA AEW FSM CEMP Rev01	C	The WSA FSM CEMP & Sub-plans were: • Endorsed by the ER on 25/5/2023 • Submitted to DPHI on 26/5/2023 • Construction for FSM commenced on 27/5/2023, after ER approval. Notification of commencement of construction was submitted to DPHI (as per Conditions A34 & A35) for FSM. Commencement of Construction for FSM was on 19/5/2023 for commencement date 27/5/2023. The submission of CEMP & Sub-plans to the ER and compliance with Condition C3 was assessed during a previous audit.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations															
C4	Any CEMP to be approved by the Planning Secretary must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	• AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • DPHI Submission of AEW Footbridge St Marys CEMP, dated 26/5/2023 • Post Approval Form_20230526032825 (SSI-10051-PA-229), SSI10051-SM-WSA AEW FSM CEMP Rev01	C	The WSA FSM CEMP Rev 01 was: • Endorsed by the ER on 25/5/2023 • Submitted to DPHI on 26/5/2023 • Construction for FSM commenced on 27/5/2023 The submission of CEMP & Sub-plans to the ER and compliance with Condition C4 was assessed during a previous audit.															
C5	Of the CEMP Sub-plans required under Condition C1, the following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan. Details of issues raised by a government agency during consultation (as required by Condition A6) must be provided with the relevant CEMP Sub-plan when submitted to the Planning Secretary / ER (whichever is applicable). Where a government agency(s) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why. <table><tr><th></th><th>Required CEMP Sub-plan</th><th>Relevant government agencies to be consulted for each CEMP Sub-plan</th></tr><tr><td>(a)</td><td>Noise and vibration</td><td>Relevant Councils and WaterNSW (in relation to its assets)</td></tr><tr><td>(b)</td><td>Flora and fauna</td><td>DPIE EES, DPI Fisheries, and Relevant Councils</td></tr><tr><td>(c)</td><td>Soil and Water</td><td>DPI Fisheries, and Relevant Councils</td></tr><tr><td>(d)</td><td>Non-Aboriginal heritage</td><td>Relevant Councils, WaterNSW and Heritage NSW</td></tr></table> temporal activities or activity based staging.		Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan	(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)	(b)	Flora and fauna	DPIE EES, DPI Fisheries, and Relevant Councils	(c)	Soil and Water	DPI Fisheries, and Relevant Councils	(d)	Non-Aboriginal heritage	Relevant Councils, WaterNSW and Heritage NSW	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • DPHI Submission of AEW Footbridge St Marys CEMP, dated 26/5/2023 • Post Approval Form_20230526032825 (SSI-10051-PA-229), SSI10051-SM-WSA AEW FSM CEMP Rev01 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	C	Partially Applicable as per the table in Appendix B of the Staging Report Rev 11, 11 Oct 2024. Appendix B of the Staging Report Rev 11 states "risks will be managed in accordance with Table 4-1". Table 4-1 of the Staging Report lists the following Sub-plans as applicable to AEW - Footbridge St Marys: a) Noise and Vibration Management - CEMP Procedure b) Non-Aboriginal Heritage Sub-plan - CEMP c) Aboriginal Cultural Heritage Management Plan d) Flora and Fauna / Biodiversity - CEMP e) Visual Amenity - CEMP f) Soil and Water (including monitoring program) - CEMP g) Air Quality (including monitoring program) - CEMP h) Waste (and Recycling) - CEMP i) Workforce Development Plan The details of agency consultation are included in the CEMP. Consultation with agencies, and the approval of the original AEW CEMP & Procedures was not conducted within the current reporting period. There is no requirement for the Planning Secretary to approve the EAW/FSM CEMP and Sub-plans in the SM-WSA Staging Report Rev11. The submission of CEMP & Sub-plans to the ER and compliance with Condition C5 was assessed during a previous audit.
	Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan																	
(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)																	
(b)	Flora and fauna	DPIE EES, DPI Fisheries, and Relevant Councils																	
(c)	Soil and Water	DPI Fisheries, and Relevant Councils																	
(d)	Non-Aboriginal heritage	Relevant Councils, WaterNSW and Heritage NSW																	
C6	The CEMP Sub-plans must state how: (a) the environmental performance outcomes identified in the documents listed in Condition A1 will be achieved; (b) the mitigation measures identified in the documents listed in Condition A1 will be implemented; (c) the relevant terms of this approval will be complied with; and (d) issues requiring management during construction (including cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART principles.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • DPHI Submission of AEW Footbridge St Marys CEMP, dated 26/5/2023 • Post Approval Form_20230526032825 (SSI-10051-PA-229), SSI10051-SM-WSA AEW FSM CEMP Rev01 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	C	The WSA FSM CEMP & Sub-plans were approved by the ER in a letter dated 25/5/2023. Construction for WSA AEW_FSM commenced on 27/5/2023. The submission of CEMP & Sub-plans to the ER and compliance with Condition C6 was assessed during a previous audit.															
C7	With the exception of any CEMP Sub-plans expressly nominated by the Planning Secretary to be endorsed by the ER, all CEMP Sub-plans must be submitted to the Planning Secretary for approval.	• AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025	C	ER approval of the WSA FSM CEMP was not within the current audit period. Compliance with Condition C7 was verified during a previous audit. The WSA AEW_FSM CEMP was approved by the ER in a letter dated 25/5/2023. Construction for WSA AEW_FSM commenced on 27/5/2023.															
C8	The CEMP Sub-plans not requiring the Planning Secretary's approval must obtain the endorsement of the ER as being in accordance with the conditions of approval and all relevant undertakings made in the documents listed in Condition A1 . Any of these CEMP Sub-plans must be submitted to the ER with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	• AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025	C	ER approval of the WSA FSM CEMP was not within the current audit period. Compliance with Condition C8 was verified during a previous audit. The WSA AEW_FSM CEMP was approved by the ER in a letter dated 25/5/2023. Construction for WSA AEW_FSM commenced on 27/5/2023.															
C9	Any of the CEMP Sub-plans to be approved by the Planning Secretary must be submitted to the Planning Secretary with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	• AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025	C	ER approval of the WSA FSM CEMP was not within the current audit period. Compliance with Condition C9 was verified during a previous audit. The WSA AEW_FSM CEMP was approved by the ER in a letter dated 25/5/2023. Construction for WSA AEW_FSM commenced on 27/5/2023.															
C10	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans , as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction.	• AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025	C	DPHI approval of the original WSA FSM CEMP & Sub-plans was not within the current audit period. Compliance with Condition C10 was verified during a previous audit. The WSA AEW_FSM CEMP was approved by the ER in a letter dated 25/5/2023. Construction for WSA AEW_FSM commenced on 27/5/2023. The implementation of the CEMP was verified during the audit site inspection and as noted throughout the audit.															
C11	In addition to the relevant requirements of the CEMF, the Flora and Fauna CEMP Sub-plan must include but not be limited to: (a) details of how the requirements of Conditions E11 will be met; (b) details of a dewatering plan of farm dams including: (i) supervision of dewatering by a suitably qualified ecologist; (ii) a methodology for the transfer of native fauna species known to inhabit and/or use the dam; (iii) the location and suitability of the proposed relocation sites; and (iv) any potential impacts of relocating the fauna to the relocation sites; (c) protocols for incidental finds of threatened species and ecological communities within the construction boundary.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition C11 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).															

Item
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Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations															
C12	In addition to the relevant requirements of the CEMP, the Soil and Water CEMP Sub-Plan must include but not be limited to: (a) details how the requirements of Conditions E127, E128 and E129 will be met; and (b) the unexpected contaminated finds protocol required by Condition E98.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition C12 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).															
CONSTRUCTION MONITORING PROGRAMS																			
C13	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies (as required by Condition A6) identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP. Where a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why. <table><tr><th></th><th>Required Construction Monitoring Programs</th><th>Relevant government agencies to be consulted for each Construction Monitoring Program</th></tr><tr><td>(a)</td><td>Noise and vibration</td><td>Relevant Councils and WaterNSW (in relation to its assets)</td></tr><tr><td>(b)</td><td>Surface water quality</td><td>DPIE Water, DPI Fisheries, and Relevant Councils</td></tr><tr><td>(c)</td><td>Groundwater</td><td>DPIE Water</td></tr><tr><td>(d)</td><td>Air Quality</td><td>Relevant Councils</td></tr></table>		Required Construction Monitoring Programs	Relevant government agencies to be consulted for each Construction Monitoring Program	(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)	(b)	Surface water quality	DPIE Water, DPI Fisheries, and Relevant Councils	(c)	Groundwater	DPIE Water	(d)	Air Quality	Relevant Councils	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	NT	Partially Applicable as per the table in Appendix B of the Staging Report Rev 11, 11 Oct 2024. Appendix B of the Staging Report Rev 11 states "risks will be managed in accordance with Table 4-1". Table 4-1 of the Staging Report lists the following Sub-plans as applicable to AEW - Footbridge St Marys: a) Noise and Vibration Management - CEMP Procedure b) Non-Aboriginal Heritage Sub-plan - CEMP c) Aboriginal Cultural Heritage Management Plan d) Flora and Fauna / Biodiversity - CEMP e) Visual Amenity - CEMP f) Soil and Water (including monitoring program) - CEMP g) Air Quality (including monitoring program) - CEMP h) Waste (and Recycling) - CEMP i) Workforce Development Plan Auditees advised "CoA C21 is managed in accordance with Table-4-1 within staging report as stated in Appendix B of the Staging report. As per Table 4-1 of the staging report, 'CEMP/CEMP-P procedure will include monitoring requirements as relevant and proportionate to the potential risk posed by the activities within that sub-stage'. In accordance with the CEMP, information is provided to TNSW and the ER upon request. The OOHW data is provided to TNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the planning secretary as required". Compliance with Condition C13 was verified during IA1. The details of agency consultation are included in the CEMP. Consultation with agencies, and the approval of the original AEW CEMP & Procedures was not conducted within the current reporting period. The WSA FSM CEMP was endorsed by the ER in a letter dated 25/5/2023. Environmental monitoring requirements are set out in Section 17.1.2 of the CEMP. Table 12 summarises the monitoring approach as follows: • Noise: Attended noise monitoring during high-risk activities, Out of Hours Works and in response to complaints, or as required under the SM OOHW Protocol • Vibration: Attended vibration monitoring as required or as required under the SM OOHW Protocol and CSSI for works within heritage curtilage • Water quality: Dewatering • Air quality: Visual inspections to make sure that dust impacts are minimised to the greatest extent practicable. Relevant environmental monitoring information to manage relatively low risk of FSM works is included within the CEMP and attached ERAPs Attachment F). In addition to the LORAC CEMP, noise and vibration monitoring will be undertaken in accordance with the Sydney Metro Out of Hours Works Protocol and Sydney Metro Construction Noise and Vibration Strategy.
	Required Construction Monitoring Programs	Relevant government agencies to be consulted for each Construction Monitoring Program																	
(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)																	
(b)	Surface water quality	DPIE Water, DPI Fisheries, and Relevant Councils																	
(c)	Groundwater	DPIE Water																	
(d)	Air Quality	Relevant Councils																	
C14	Each Construction Monitoring Program must provide: (a) details of baseline data available including the period of baseline monitoring; (b) details of baseline data to be obtained and when; (c) details of all monitoring of the project to be undertaken; (d) the parameters of the project to be monitored; (e) the frequency of monitoring to be undertaken; (f) the location of monitoring; (g) the reporting of monitoring results and analysis results against relevant criteria; (h) details of the methods that will be used to analyse the monitoring data; (i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicated unacceptable project impacts; (j) a consideration of SMART principles; (k) any consultation to be undertaken in relation to the monitoring programs; and (l) any specific requirements as required by Conditions C15 to C16.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	NT	Auditees advised "CoA C21 is managed in accordance with Table-4-1 within staging report as stated in Appendix B of the Staging report. As per Table 4-1 of the staging report, 'CEMP/CEMP-P procedure will include monitoring requirements as relevant and proportionate to the potential risk posed by the activities within that sub-stage'. In accordance with the CEMP, information is provided to TNSW and the ER upon request. The OOHW data is provided to TNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the planning secretary as required". The WSA FSM CEMP was endorsed by the ER in a letter dated 25/5/2023.															
C15	The Noise and Vibration Construction Monitoring Program must include: (a) noise and vibration monitoring at representative residential and other locations (including at the worst-affected residences), subject to property owner approval, to confirm construction noise and vibration levels; (b) monitoring undertaken during the day, evening and night-time periods throughout the construction period and cover the range of activities being undertaken; (c) method and frequency for reporting monitoring results; and (d) a process to undertake real time noise and vibration monitoring. The results of the monitoring must be readily available to the construction team, the Proponent and ER. The Planning Secretary and EPA must be provided with access to the results on request.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	NT	Auditees advised "CoA C21 is managed in accordance with Table-4-1 within staging report as stated in Appendix B of the Staging report. As per Table 4-1 of the staging report, 'CEMP/CEMP-P procedure will include monitoring requirements as relevant and proportionate to the potential risk posed by the activities within that sub-stage'. In accordance with the CEMP, information is provided to TNSW and the ER upon request. The OOHW data is provided to TNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the planning secretary as required". The WSA FSM CEMP was endorsed by the ER in a letter dated 25/5/2023. Auditees reported the results of monitoring were provided to Sydney Metro and the ER as required. The Planning Secretary is not known to have requested a copy of noise or vibration monitoring results.															

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C16	Groundwater Construction Monitoring Program must include: (a) groundwater monitoring networks at each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1; (b) detail of the location of all monitoring bores with nested sites to monitor both shallow and deep groundwater levels and quality; (c) define the location of saltwater interception monitoring where sentinel groundwater monitoring bores will be installed between the saline sources and that of each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1; (d) results from existing monitoring bores; (e) monitoring and gauging of groundwater inflow to the excavations predicted to intercept groundwater in the documents listed in Condition A1, appropriate trigger action response plan for all predicted groundwater impacts upon each noted neighbouring groundwater system component for each excavation construction site; (f) trigger levels for groundwater quality, salinity and groundwater drawdown in monitoring bores and / or other groundwater users; (g) daily measurement of the amount of water discharged from the water treatment plants; (h) water quality testing of the water discharged from treatment plants; (i) management and mitigation measures and criteria, including measures to address impacts on groundwater dependent ecosystems; (j) groundwater inflow to the excavations to enable a full accounting of the groundwater take from the Sydney Basin Central Groundwater Source; (k) reporting of groundwater gauging at excavations, groundwater monitoring, groundwater trigger events and action responses; and (l) methods for providing the data collected to Sydney Water where discharges are directed to their assets.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Table 4-1 of the Staging Report lists the management plans applicable to AEW - Footbridge St Marys. A Groundwater Management Plan is not required.
C17	With the exception of any Construction Monitoring Programs expressly nominated by the Planning Secretary to be endorsed by the ER , all Construction Monitoring Programs must be submitted to the Planning Secretary for approval.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	NT	Auditees advised "CoA C21 is managed in accordance with Table-4-1 within staging report as stated in Appendix B of the Staging report. As per Table 4-1 of the staging report, 'CEMP/CEMP-P procedure will include monitoring requirements as relevant and proportionate to the potential risk posed by the activities within that sub-stage'. In accordance with the CEMP, information is provided to TNSW and the ER upon request. The OOHW data is provided to TNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the planning secretary as required". The Sydney Metro WSA Staging Report sets out the requirement for ER Endorsement and DPHI approval roles for AEW, Sub-plans and monitoring programs, which have been applied for the project.
C18	The Construction Monitoring Programs not requiring the Planning Secretary's approval must obtain the endorsement of the ER as being in accordance with the conditions of approval and all undertakings made in the documents listed in Condition A1 . Any of these Construction Monitoring Programs must be submitted to the ER for endorsement at least one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	NT	Auditees advised "CoA C21 is managed in accordance with Table-4-1 within staging report as stated in Appendix B of the Staging report. As per Table 4-1 of the staging report, 'CEMP/CEMP-P procedure will include monitoring requirements as relevant and proportionate to the potential risk posed by the activities within that sub-stage'. In accordance with the CEMP, information is provided to TNSW and the ER upon request. The OOHW data is provided to TNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the planning secretary as required".
C19	Any of the Construction Monitoring Programs which require Planning Secretary approval must be endorsed by the ER and then submitted to the Planning Secretary for approval at least one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition C19 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
C20	Unless otherwise agreed with the Planning Secretary, construction must not commence until the Planning Secretary has approved, or the ER has endorsed (whichever is applicable), all of the required Construction Monitoring Programs and all relevant baseline data for the specific construction activity has been collected.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	NT	Auditees advised "CoA C21 is managed in accordance with Table-4-1 within staging report as stated in Appendix B of the Staging report. As per Table 4-1 of the staging report, 'CEMP/CEMP-P procedure will include monitoring requirements as relevant and proportionate to the potential risk posed by the activities within that sub-stage'. In accordance with the CEMP, information is provided to TNSW and the ER upon request. The OOHW data is provided to TNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the planning secretary as required".

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heltborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C21	The Construction Monitoring Programs, as approved by the Planning Secretary or the ER has endorsed (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary or the ER (whichever is applicable), whichever is the greater.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025 • FSM Noise Monitoring Register • FSM WE01 works on platforms Noise Verification Record Sheet F1.608845, dated 5/7/2025 • FSM WE01 works on platforms Noise Verification Record Sheet F1.608846, dated 5/7/2025 • FSM Water Discharge Register • FSM Water Discharge or Reuse Approval Form F1.624750, dated 22/8/2025 • FSM Water Discharge or Reuse Approval Form F1.615383, dated 28/7/2025 • LOR Environmental Inspection Reports, dated 14.2.2025, 16.4.2025, 18.7.2025, 19/3/20225, 19/5/2025, 27/6/2025, 30/1/2025.	NT	Environmental monitoring requirements are set out in Section 17.1.2 of the CEMP. Table 12 summarises the monitoring approach as follows: • Noise: Attended noise monitoring during high-risk activities, Out of Hours Works and in response to complaints, or as required under the SM OOHW Protocol • Vibration: Attended vibration monitoring as required or as required under the SM OOHW Protocol and CSSI for works within heritage curtilage • Water quality: Dewatering • Air quality: Visual inspections to make sure that dust impacts are minimised to the greatest extent practicable. Relevant environmental monitoring information to manage relatively low risk of FSM works is included within the CEMP and attached ERAPs Attachment F. In addition to the LORAC CEMP, noise and vibration monitoring will be undertaken in accordance with the Sydney Metro Out of Hours Works Protocol and Sydney Metro Construction Noise and Vibration Strategy. The FSM Noise Monitoring Register and examples of attended noise monitoring results were provided as evidence during the audit. The Noise Monitoring Register included data from February-August 2025. The FSM Water Discharge Register and examples of water discharge monitoring results were provided as evidence during the audit. The Water Discharge Register included data from February-August 2025. Water is discharged from IBCs after pH treatment to the cess/ballast or reused for flushing toilets. There were three events when water was discharged to land during the audit period. Visual monitoring for dust is conducted daily and recorded in LOR Weekly Environmental Inspection Checklists. Examples of these checklists were provided as evidence during the audit. Auditees advised "CoA C21 is managed in accordance with Table-4-1 within staging report as stated in Appendix B of the Staging report. As per Table 4-1 of the staging report, 'CEMP/CEMP-P procedure will include monitoring requirements as relevant and proportionate to the potential risk posed by the activities within that sub-stage'. In accordance with the CEMP, information is provided to TNSW and the ER upon request. The OOHW data is provided to TNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the planning secretary as required".
C22	The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, ER and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program. Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	NT	Environmental monitoring requirements are set out in Section 17.1.2 of the CEMP. Table 12 summarises the monitoring approach as follows: • Noise: Attended noise monitoring during high-risk activities, Out of Hours Works and in response to complaints, or as required under the SM OOHW Protocol • Vibration: Attended vibration monitoring as required or as required under the SM OOHW Protocol and CSSI for works within heritage curtilage • Water quality: Dewatering • Air quality: Visual inspections to make sure that dust impacts are minimised to the greatest extent practicable. Relevant environmental monitoring information to manage relatively low risk of FSM works is included within the CEMP and attached ERAPs Attachment F). In addition to the LORAC CEMP, noise and vibration monitoring will be undertaken in accordance with the Sydney Metro Out of Hours Works Protocol and Sydney Metro Construction Noise and Vibration Strategy. Auditees advised "CoA C21 is managed in accordance with Table-4-1 within staging report as stated in Appendix B of the Staging report. As per Table 4-1 of the staging report, 'CEMP/CEMP-P procedure will include monitoring requirements as relevant and proportionate to the potential risk posed by the activities within that sub-stage'. In accordance with the CEMP, information is provided to TNSW and the ER upon request. The OOHW data is provided to TNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the planning secretary as required".

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations																																																		
PART E																																																						
KEY ISSUE CONDITIONS																																																						
AIR QUALITY																																																						
E1	All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.	- Site inspection, 25/8/2025 - Interview with Auditees, 25/8/2025	C	Dust suppression measures were observed during the site inspection including hoses, stockpiles covered at the end of shift, and street sweepers during spoil load out as required. Site accesses were stabilised to ancillary facilities and compound areas. There were no odours noted during the audit inspection. Dust risk has not been raised as a significant issue for the project.																																																		
BIODIVERSITY AND TREES																																																						
Biodiversity Credits																																																						
E2	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E2 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).																																																		
E3	Impacts to plant community types must not exceed those identified in the documents listed in Condition A1 , unless otherwise approved by the Planning Secretary. In requesting the Planning Secretary's approval, an assessment of the additional impact(s) to plant community types and an updated ecosystem and / or species credit requirement under Condition E4 below, if required, must be provided.	Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E3 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).																																																		
E4	Prior to impacts on the biodiversity values set out in Table 3 and Table 4, the number and classes of ecosystem credits and species credits (like-for-like) must be retired. Note: Credits have been calculated using the Biodiversity Assessment Method. <table><tr><th colspan="2">Table 3: Ecosystem credits</th></tr><tr><th>Plant Community Type (PCT) ID and name</th><th>Number of Credits</th></tr><tr><td>724 Broad-leaved Ironbark – Grey Box – <i>Macaleuca decora</i> grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion</td><td>240</td></tr><tr><td>835 Forest Red Gum – Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion</td><td>217</td></tr><tr><td>848 Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion</td><td>202 205</td></tr><tr><td>1830 Swamp Oak open forest on riverbeds of Cumberland Plain and Hunter Valley</td><td>151</td></tr><tr><td>TOTAL</td><td>840 848</td></tr></table> <table><tr><th colspan="2">Table 4: Species credits required</th></tr><tr><th>Species</th><th>Number of Credits</th></tr><tr><td><i>Allocasuarina (Banksia) Shrub</i></td><td>24</td></tr><tr><td><i>Allocasuarina (Gympie) Shrub</i></td><td>64</td></tr><tr><td><i>Allocasuarina glauca</i></td><td>27</td></tr><tr><td><i>Conostemon elegans (White-flowered Warbler)</i></td><td>44</td></tr><tr><td><i>Calyptra tenuifolia</i></td><td>21 72</td></tr><tr><td><i>Grevillea juniperina subsp. juniperina</i> (Juniper-leaved Grevillea)</td><td>67 362</td></tr><tr><td><i>Grevillea parviflora subsp. parviflora</i> (Small-leaved Grevillea)</td><td>32</td></tr><tr><td><i>Melaleuca undulata subsp. undulata</i> (Endangered-population <i>Melaleuca undulata</i> R. Br. subsp. <i>undulata</i>)</td><td>132</td></tr><tr><td><i>Macropus melanotus</i></td><td>42</td></tr><tr><td><i>Dryas nuchalis subsp. nuchalis</i></td><td>18</td></tr><tr><td><i>Allocasuarina (Banksia) Shrub</i></td><td>24</td></tr><tr><td><i>Huttonia parviflora</i></td><td>19 31</td></tr><tr><td><i>Mentha canaliculata</i></td><td>108</td></tr><tr><td>Cumberland Plain Land Snail</td><td></td></tr><tr><td><i>Myotis Macropus</i> (Southern Myotis)</td><td>250</td></tr><tr><td>TOTAL SPECIES CREDITS</td><td>519 444</td></tr></table>	Table 3: Ecosystem credits		Plant Community Type (PCT) ID and name	Number of Credits	724 Broad-leaved Ironbark – Grey Box – <i>Macaleuca decora</i> grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion	240	835 Forest Red Gum – Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion	217	848 Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	202 205	1830 Swamp Oak open forest on riverbeds of Cumberland Plain and Hunter Valley	151	TOTAL	840 848	Table 4: Species credits required		Species	Number of Credits	<i>Allocasuarina (Banksia) Shrub</i>	24	<i>Allocasuarina (Gympie) Shrub</i>	64	<i>Allocasuarina glauca</i>	27	<i>Conostemon elegans (White-flowered Warbler)</i>	44	<i>Calyptra tenuifolia</i>	21 72	<i>Grevillea juniperina subsp. juniperina</i> (Juniper-leaved Grevillea)	67 362	<i>Grevillea parviflora subsp. parviflora</i> (Small-leaved Grevillea)	32	<i>Melaleuca undulata subsp. undulata</i> (Endangered-population <i>Melaleuca undulata</i> R. Br. subsp. <i>undulata</i>)	132	<i>Macropus melanotus</i>	42	<i>Dryas nuchalis subsp. nuchalis</i>	18	<i>Allocasuarina (Banksia) Shrub</i>	24	<i>Huttonia parviflora</i>	19 31	<i>Mentha canaliculata</i>	108	Cumberland Plain Land Snail		<i>Myotis Macropus</i> (Southern Myotis)	250	TOTAL SPECIES CREDITS	519 444	Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E4 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
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E5	The requirement to retire like-for-like ecosystem credits and species credits in Condition E4 may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem credits and species credits.	Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E5 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).																																																		
E6	Where evidence of compliance with the <i>Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits for the purpose of applying the variation rules</i> has been provided to the Planning Secretary, variation rules may be applied to retire the relevant ecosystem credits and species credits as set out in the BAM Biodiversity Credit Report (Variation).	Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E6 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).																																																		
E7	Evidence of the retirement of credits in satisfaction of Condition E4 or payment to the Biodiversity Conservation Fund in satisfaction of Condition E5 must be provided to the Planning Secretary prior to impacts on the biodiversity values.	Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E7 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).																																																		

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Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Key Fish Habitat				
E8	The Proponent must minimise impacts to Key Fish Habitat (KFH) as defined in <i>Policy and Guidelines for Fish Habitat Conservation and Management</i> (DPI, 2013 update). Residual impacts to KFH, following the implementation of habitat rehabilitation or other environmental compensation measures, must be offset at a ratio of 2:1 habitat offset requirement in accordance with the <i>Policy and Guidelines for Fish Habitat Conservation and Management</i> (DPI, 2013 update) and in consultation with DPI Fisheries.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E8 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E9	Where offsets are required in accordance with Condition E8 , payment of the habitat offset requirement must be made to the DPI Fish Conservation Trust Fund prior to the commencement of Work that impacts KFH.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E9 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E10	Where offsets are required in accordance with Condition E8 , the Proponent must submit to the Planning Secretary a receipt confirming payment to the DPI Fish Conservation Trust Fund within one (1) month of making the payment.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E10 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
Nest Boxes				
E11	Nest Boxes must be installed one (1) month prior to any removal of existing tree hollows and/or the release of any captured hollow dependent fauna.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E11 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
Re-use of Timber				
E12	Prior to vegetation clearing, the Proponent must identify where it is practicable for the CSSI to reuse native trees and vegetation that are to be removed. If it is not possible for the CSSI to reuse removed native trees and vegetation, the Proponent must consult with the relevant council(s), NSW National Parks & Wildlife Service, Western Sydney Parklands Trust, Greater Sydney Local Land Services, Landcare groups, DPI Fisheries and any additional relevant government agencies to determine if: (a) hollows, tree trunks (greater than 25-30 centimetres in diameter and 2-3 metres in length), mulch, bush rock and root balls salvaged from native vegetation impacted by the CSSI; and (b) collected plant material, seeds and/or propagated plants from native vegetation impacted by the CSSI, could be used by others in habitat enhancement and rehabilitation work, before pursuing other disposal options.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E12 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E13	Revegetation and the provision of replacement trees must be informed by a Tree Survey undertaken during detailed design. The Tree Survey must identify the number, type and location of any trees to be removed, except for trees that are offset under Condition E4 . The Tree Survey must be submitted to the Planning Secretary for information with the Place, Urban Design and Corridor Landscape Plan required under Condition E78, one (1) month before the commencement of operation. Where trees are to be removed, the Proponent must provide a net increase in the number of replacement trees at a ratio of 2:1, except trees that are offset under Condition E4 . Replacement trees must have a minimum pot size consistent with the relevant authority's plans / programs / strategies for vegetation management, street planting, or open space landscaping, or as agreed by the relevant authority(ies). Replacement trees must be planted before the commencement of operation. Note: For the purposes of this condition, the relevant authority is that State or local government authority that owns or manages the land on which the replacement trees will be planted.	• Interview with Sydney Metro & LOR, 25/8/2025 • St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • Consolidated Tree Survey (SCAW, SBT, AEW, SSTOM), 19/8/2025	NT	A small number of trees were removed by FSM upon project commencement in 2023, and are recorded in the Tree Removal Register. No trees are known to have been removed by FSM since 2023. As described in the PUDCLP, "the St Marys Station footbridge project will require the removal of existing trees to make way for permanent surface works. The provision of replacement trees has been informed by a Tree Survey undertaken by a suitably qualified Arborist. The provision of replacement trees is a key outcome of the project. New tree planting is to be at a ratio of 2:1, except trees that are offset under Condition E4 (biodiversity credits). SSTOM and CLW contractors will undertake tree planting. St Marys Station footbridge will be responsible for the completion of a tree survey during detailed design that identifies the number, type, and location of any trees to be removed (except for trees that are offset under Condition E4)". MOD 2 was determined on 20/12/2024 and amends Condition E13 to decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and Condition E57 so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request. LORAC presented a Consolidated Tree Survey for FSM as evidence during the audit. The tree survey includes the tree location, species, heights, diameter and GPS coordinates for each tree, and specifies whether the tree has been removed or is approved for removal. 17 trees were removed. Revegetation and tree replacement had not commenced at the time of the audit, and is required prior to the commencement of operation.

Item
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Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations																										
Watercourse Crossings																														
E14	The Proponent must design the watercourse crossings and the east-west regional corridor (Patons Lane) crossing to achieve the following objectives: (a) design of viaducts to retain and minimise clearing/disturbance of native vegetation and maximise native plant growth under the structures, (i) maintain and/or improve riparian/terrestrial connectivity under the viaduct and bridge structures to maximise the corridor function; (ii) maximise the viaduct and bridge structures span over the riparian corridor and/or remnant native vegetation whichever is the widest; (iii) minimise the clearing/disturbance of native vegetation and native riparian vegetation; and (iv) maximise light and moisture penetration under the viaduct and bridge structures to support native plant growth; (b) design of culverts and other crossings incorporate the following into the design to provide for movement of aquatic and terrestrial fauna, (i) elevated "dry" cells to encourage terrestrial movement, and recessed "wet" cells to facilitate the movement of aquatic fauna; (ii) maximise light penetration into the culvert structures; (iii) a naturalised base along the bed of the culvert; and 'fauna furniture' (such as rocks, logs, ropes and ledges) to facilitate fauna movement to maintain connectivity and provide fauna passage; (c) design of scour protection using natural solutions such as the revegetation of banks with local native species; and (d) details of remnant native vegetation including riparian vegetation. The Proponent must consult with DPIE EES, DPI Fisheries and engage suitably qualified experts in fauna crossing design to achieve the outcomes of this condition. Note: These design objectives must form part of the Place, Urban Design and Corridor Landscape Plan required under Condition E79.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E14 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).																										
FLOODING																														
E15	The CSSI must be designed and constructed with the objective of not exceeding the flood impacts presented in the documents listed in Condition A1 or the flood impact criteria in Table 5, whichever is greater, within and in the vicinity of the CSSI for all flood events up to and including the one (1) per cent Annual Exceedance Probability (AEP) flood event. Table 5: Flood Impact Criteria <table><tr><th>Parameter</th><th>Location</th><th>Criteria</th></tr><tr><td rowspan="4">Afflux</td><td rowspan="2">Land zoned as residential, industrial or commercial, and critical infrastructure</td><td>Maximum 10 mm to buildings that are flood prone in existing conditions</td></tr><tr><td>No new above floor flooding</td></tr><tr><td rowspan="2">Roads</td><td>Maximum 50 mm where flooding is below floor level</td></tr><tr><td>Maximum 50 mm</td></tr><tr><td rowspan="2">Velocity</td><td rowspan="2">Land zoned as rural, primary production, environment or public recreation</td><td>Maximum 100 mm</td></tr><tr><td>Maximum 100 mm</td></tr><tr><td rowspan="2">Flood hazard</td><td>Residential and commercial land</td><td>Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent</td></tr><tr><td>Roads</td><td>No increase in the flood hazard or risk to life</td></tr><tr><td rowspan="3">Flood duration</td><td>Residential and commercial buildings</td><td>No increase in the flood hazard or risk to life</td></tr><tr><td>Roads</td><td>No increase to duration of above floor flooding</td></tr><tr><td>Crown land, open space, farming, grazing and cropping land</td><td>No more than one hour increase</td></tr></table> the same outcome must be incorporated into the detailed design of the CSSI.	Parameter	Location	Criteria	Afflux	Land zoned as residential, industrial or commercial, and critical infrastructure	Maximum 10 mm to buildings that are flood prone in existing conditions	No new above floor flooding	Roads	Maximum 50 mm where flooding is below floor level	Maximum 50 mm	Velocity	Land zoned as rural, primary production, environment or public recreation	Maximum 100 mm	Maximum 100 mm	Flood hazard	Residential and commercial land	Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent	Roads	No increase in the flood hazard or risk to life	Flood duration	Residential and commercial buildings	No increase in the flood hazard or risk to life	Roads	No increase to duration of above floor flooding	Crown land, open space, farming, grazing and cropping land	No more than one hour increase	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025 • PUDCLP Stage 2	NT	FSM is not in a flood prone area and therefore the flood impact criteria is not applicable - as per Attachment P Compliance Matrix in the FSM CEMP and as per assessments made in previous audit reports. NB: Morasey have been engaged as Independent Auditors for the project and are not qualified or suitably experienced to comment on the applicability of flood-related conditions. This advice should be sought from appropriately qualified and experienced flood engineers or other specialists in this field.
Parameter	Location	Criteria																												
Afflux	Land zoned as residential, industrial or commercial, and critical infrastructure	Maximum 10 mm to buildings that are flood prone in existing conditions																												
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Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E16	Updated modelling that incorporates these measures and is calibrated and validated with consideration of the results of the Wianamatta-South Creek Catchment Flood Assessment prepared by Infrastructure NSW as part of Stage 2 of the South Creek Sector Review must be prepared by a suitably qualified flood consultant. The modelling must identify changes in post-development flood behaviour including cumulative flood impacts associated with Western Sydney International Airport and the M12, where this information is available, prior to detailed design being finalised.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E16 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E17	Where flooding characteristics exceed the levels identified in Condition E15 above the Proponent must undertake the following: (a) consult with affected landowners for properties adversely flood affected as a result of the CSSI regarding appropriate mitigations; and (b) consult with the NSW State Emergency Service (SES) and Relevant Council(s) regarding the management of any continuous and residual flood risk from rarer flood events larger than the 1 per cent AEP and up to the probable maximum flood. In the event that the Proponent and the affected landowner cannot agree on the measures to mitigate the impact as described in Condition E15 , the Proponent must engage a suitably qualified and experienced independent person to advise and assist in determining the impact and relevant mitigation measures.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E17 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E18	Flood information including flood reports, models and geographic information system outputs must be provided to the DPIE PDPS, Relevant Council(s), DPIE EES and the SES in order to assist in preparing relevant documents and to reflect changes in flood behaviour as a result of the CSSI. The DPIE PDPS, Relevant Council(s), DPIE EES and the SES must be notified in writing that the information is available no later than one (1) month following the completion of construction. Information requested by the DPIE PDPS, Relevant Council(s), DPIE EES or the SES must be provided no later than six (6) months following the completion of construction or within another timeframe agreed with the DPIE PDPS, Relevant Council(s), DPIE EES and the SES. The project flood models and data must be uploaded to the NSW Flood Data Portal and access must be provided to the DPIE PDPS, Relevant Council(s), DPIE EES and SES no later than one (1) month following the completion of construction.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E18 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
HERITAGE				
NON-ABORIGINAL HERITAGE				
E19	The Proponent must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in Condition A1 . Unexpected heritage finds identified by the CSSI must be managed in accordance with the Unexpected Heritage Finds and Human Remains Procedure outlined in Conditions E34 to E36. Consideration of avoidance and redesign to protect unexpected finds of state heritage significance must be addressed where this condition applies.	• Interview with Sydney Metro & LOR, 25/8/2025 • Non-Aboriginal Heritage Management Plan (NAHMP), Rev 02.01, 12/12/2024 • Attachment R of the LOR FSM CEMP, Heritage Management Procedure, Artefact, May 2023 • GML Heritage St Marys Station—Unexpected Heritage Finds (UHF01-32), dated 25/6/2025	C	Section 4 of the Non-Aboriginal Heritage Management Plan (NAHMP) lists Non-Aboriginal heritage items that could potentially be impacted by the FSM works. There has been no known damage to Heritage items during the project. No unexpected finds of state heritage significance have been encountered.
E20	The dismantling and reassembly of the jib crane at St Marys Station, if required, must only be undertaken under the supervision of a consultant experienced in the conservation of heritage machinery.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	Management of the jib crane at St Marys is set out in Section 6.8.1 of the NAHMP, and would require preparation of a detailed methodology should the jib crane require relocation. Exclusion zones are set out in Section 6.11 of the NAHMP and will include the jib crane and Goods Shed within the St Marys Railway Station Group. It is understood that disassembly of the jib crane is unlikely to be required by FSM.

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Result	Comment
NC	Non-Compliant (NC)
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E21	The St Marys Goods Shed must not be destroyed, modified or otherwise adversely affected, except as identified in the documents listed in Condition A1.	- Interview with Sydney Metro & LOR, 25/8/2025 - Non-Aboriginal Heritage Management Plan (NAHMP), Rev 02.01, 12/12/2024	C	No damage has reportedly occurred to the St Marys Goods Shed during the audit period and FSM has not interface with the good shed. Exclusion zones are set out in Section 6.11 of the NAHMP and will include the jib crane and Good Shed within the St Marys Railway Station Group.
E22	The Archaeological Research Design included in the documents listed in Condition A1 must be implemented during construction.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro – Western Sydney Airport Non-Aboriginal Archaeological Research Design, Artefact, April 2021 - Non-Aboriginal Heritage Management Plan (NAHMP), Rev 02.01, 12/12/2024	NT	The Archaeological Research Design (ARD) forms Appendix K to the Submissions Report. The ARD is relevant at St Marys and will form part of the future precinct works for services. The requirement for an Archaeological Method Statement (AMS) on the project are set out in Section 6.6 of the NAHMP. An activity-specific AMS is required for ground disturbing activities in the area of the St Marys Goods Yard and Shed, and the Excavation Director will determine whether monitoring or a test excavation program is necessary. Ground disturbing works had not been undertaken by FSM in this area and are not likely to be attributed to the FSM scope of work. Archaeological excavations under an AMS had not been conducted at the time of the audit, but would be required to be undertaken in accordance with the Archaeological Research Design and Excavation Methodology(s), as set out in Section 6.7 of the NAHMP.
E23	Before commencement of archaeological excavation, the Proponent must, in consultation with Heritage NSW, nominate a suitably qualified Excavation Director , who complies with Heritage Council of NSW's <i>Criteria for Assessment of Excavation Director</i> (September 2019), to oversee and advise on matters associated with historical archaeology for the approval of the Planning Secretary. The Excavation Director must be present to oversee excavation, advise on archaeological issues, advise on the duration and extent of oversight required during archaeological excavations consistent with the Archaeological Research Design and Excavation Methodology(s) identified in the documents listed in Condition A1 . More than one Excavation Director may be engaged for CSSI to exercise the functions required under the conditions of this approval.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro – Western Sydney Airport Non-Aboriginal Archaeological Research Design, Artefact, April 2021 - Letter from SM to DPHI RE SMWSA - CoA E23 - Submission of Nominated Excavation Director, dated 16/8/2023 - Letter from DPHI to SM RE: Excavation Direction Nomination / Approval, dated 5/9/2023	NT	No archaeological excavation has been undertaken to date for FSM. An Excavation Director was nominated/approved for the project in a letter from DPHI dated 5/9/2023.
E24	Archival photographic digital recording must be undertaken for all listed heritage items which will be affected by the CSSI. The recordings must be undertaken prior to the commencement of Work which may impact the items and documented in an Archival Recording Report . The recordings must include buildings, structures and landscape features and detailed maps showing the location of features. The archival recording must be prepared in accordance with <i>How to Prepare Archival Records of Heritage Items</i> (NSW Heritage Office, 1998) and <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> (NSW Heritage Office, 2006).	- Interview with Sydney Metro & LOR, 25/8/2025 - Existing Condition Survey Report, Tram Sheds, St Marys, Rev 0, Land Surveys, 30/5/2023 - SMWSA - St Marys Station: Goods Shed alteration to ground level elevation, Statement of Heritage Impact, June 2022 - St Marys Railway Station, Archival Recording - Final Report, Biosis, Rev1, dated 11/1/2022 - Submission to DPHI, dated 30/10/2023	C	Archival recording reports for the St Marys Goods Shed have been prepared. The heritage-listed jib crane is covered in the 2022 Biosis Archival Recording Report. While outside the scope of this audit, auditees confirmed the Report was prepared after the commencement of Construction, but prior to potential physical impact in the subject areas.
E25	The Archival Recording Report must be submitted to the Planning Secretary, relevant councils and Heritage NSW for information within 12 months of completing all work described in the documents listed in Condition A1 in relation to heritage items. Copies of the Archival Recording Report must also be provided to relevant local historical societies.	Interview with Sydney Metro & LOR, 25/8/2025	NT	Not triggered within the audit period.
E26	Following completion of all work described in the documents listed in Condition A1 in relation to heritage items, a non-Aboriginal Archaeological Excavation Report including the details of further historical research either undertaken or to be carried out and archaeological excavations (with artefact analysis and identification of a final repository for finds) and addressing the research design, must be prepared in accordance with any guidelines and standards required by the Heritage Council of NSW and Heritage NSW.	Interview with Sydney Metro & LOR, 25/8/2025	NT	Not triggered within the audit period.
E27	The non-Aboriginal Archaeological Excavation Report must be submitted to the Planning Secretary, relevant councils and Heritage NSW for information within 12 months of completing all Work described in the documents listed in Condition A1 in relation to heritage items. Copies of the Report must also be provided to relevant local historical societies and local libraries.	Interview with Sydney Metro & LOR, 25/8/2025	NT	Not triggered within the audit period.
ABORIGINAL HERITAGE				
E28	All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects or places of cultural significance except as authorised by this approval.	- Interview with Sydney Metro & LOR, 25/8/2025 - SM-WSA Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 - ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 - Attachment R of the LOR FSM CEMP: Heritage Management Procedure, Artefact, May 2023	NT	No AHIMS or other cultural heritage sites or artefacts are known to occur within the project boundary. No unexpected finds of Aboriginal cultural heritage are known to have occurred.

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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E29	The Registered Aboriginal Parties (RAPs) must be kept regularly informed about the CSSI. The RAPs must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the CSSI throughout construction.	- Interview with Sydney Metro & LOR, 25/8/2025 - SM-WSA Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 - ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 - Attachment R of the LOR FSM CEMP: Heritage Management Procedure, Artefact, May 2023 - Quarterly Registered Aboriginal Party (RAP) update, June 2025	C	Evidence to support ongoing consultation with Registered Aboriginal Parties (RAPs) was provided via the Quarterly Registered Aboriginal Party (RAP) update, June 2025. The Aboriginal Cultural Heritage Excavation Report for Sydney Metro – Western Sydney Airport was finalised in early March 2024, to fulfil Condition E32. The report was prepared by AECOM, in consultation with RAPs. The final report was distributed to all RAPs registered on the Sydney Metro – Western Sydney Airport project on 8 March 2024. Section 2 of the report provides an overview of the Aboriginal community consultation undertaken to inform the preparation of the project's original and revised ACHARs, as well as the off-airport ACHMP. RAP participation in the SM-WSA salvage program is also detailed. No Aboriginal cultural heritage test and salvage excavations have been undertaken for FSM.
E30	The Aboriginal Cultural Heritage Management Plan included in the documents listed in Condition A1 must be updated to include: (a) a methodology for the completion of pedestrian surveys for all areas within the project footprint yet to be surveyed; (b) procedures for undertaking further test excavation and, if necessary, salvage excavations prior to the commencement of works in areas subject to further test excavation; (c) mapping that clearly outlines all areas yet to be subject to survey, test excavations, and salvage excavations; (d) a procedure to update mapping following the completion of survey, test excavations, and salvage excavations that detail the archaeological works conducted across the project footprint; (e) a procedure for updating the predictive model following the identification of new Aboriginal heritage items; and (f) a procedure to report and update the effectiveness of the following the completion of survey, test excavation activities or significant artefact finds. The updated Plan must be submitted to the Planning Secretary for information prior to works in areas identified for further test excavations. Note: Salvage excavations in the areas identified for salvage in documents in Condition A1, may occur prior to additional test excavations occurring.	- Interview with Sydney Metro & LOR, 25/8/2025 - SM-WSA Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 - ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 - DPHI Submission (PA-541) Aboriginal Cultural Heritage Management Plan, dated 19/12/2024 - Quarterly Registered Aboriginal Party (RAP) update, June 2025 - Attachment R of the LOR FSM CEMP: Heritage Management Procedure, Artefact, May 2023	C	A detailed review of the Aboriginal Cultural Heritage Management Plan (ACHMP) was conducted as part of a previous IEA and found to comply with Condition E30. The SM-WSA ACHMP was updated to Rev10 on 24/11/2024 and endorsed by the ER on 17/12/2024. Amendment to the plan included: - Update to consultation - Renaming Aerotropolis Station to Bradfield Station - Minor administrative updates The ACHMP was submitted to DPHI on 19/12/2024.
E31	The updated Aboriginal Cultural Heritage Management Plan must be implemented for the duration of salvage activities and construction.	Interview with Sydney Metro & LOR, 25/8/2025	NT	No AHIMS or other cultural heritage sites or artefacts are known to occur within the project boundary. No unexpected finds of Aboriginal cultural heritage are known to have occurred.
E32	At the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s) must be prepared by a suitably qualified person. The Aboriginal Cultural Heritage Excavation Report(s) must: (a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and (b) document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds). The RAPs must be given a minimum of 28 days to consider the report(s) and provide comments before the report(s) is finalised. The final report(s) must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, Gandangara LALC and Deerubbin LALC, the RAPs and local libraries within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).	Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E32 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).

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Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E33	Where previously unidentified Aboriginal objects or places of cultural significance are discovered, all work must immediately stop in the vicinity of the affected area. Works potentially affecting the previously unidentified objects or places must not recommence until Heritage NSW has been informed. The measures to consider and manage this process must be specified in the Unexpected Heritage Finds and Human Remains Procedure required by Condition E34 and include registration in the Aboriginal Heritage Information Management System (AHIMS), where required.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	No previously unidentified Aboriginal objects or places of cultural significance have been discovered for FSM.
Unexpected Finds and Human Remains				
E34	An Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected heritage finds (heritage items and values) in accordance with any guidelines and standards prepared by the Heritage Council of NSW or Heritage NSW.	• Interview with Sydney Metro & LOR, 25/8/2025 • SM-WSA Non-Aboriginal Heritage Management Plan, Rev 02.01, 12/12/2024 • SM-WSA Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 • Attachment R of the LOR FSM CEMP: Heritage Management Procedure, Artefact, May 2023	C	The Unexpected Heritage Finds and Human Remains Procedure is included in the ACHMP and Attachment R of the LOR FSM CEMP: Heritage Management Procedure, Section 4.3.4.
E35	The Unexpected Heritage Finds and Human Remains Procedure must be prepared by a suitably qualified and experienced heritage specialist in consultation with the Heritage Council of NSW (with respect to non-Aboriginal cultural heritage) and in relation to Aboriginal cultural heritage, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010) and submitted to the Planning Secretary for information no later than one (1) month before the commencement of construction.	• Interview with Sydney Metro & LOR, 25/8/2025 • SM-WSA Aboriginal Cultural Heritage Management Plan Rev 02.01, 12/12/2024 • Attachment R of the LOR FSM CEMP: Heritage Management Procedure, Artefact, May 2023 • GML Heritage Memo, St Marys Station—Unexpected Heritage Finds (UHF01–32), dated 25/6/2025	C	Assessed as compliant during previous IEAs.
E36	The Unexpected Heritage Finds and Human Remains Procedure , as submitted to the Planning Secretary, must be implemented for the duration of construction. Where archaeological investigations have been undertaken as a result of Unexpected Finds notifications then a Final Archaeological Report must be provided in accordance with Heritage Council guidance and standard requirements for final reporting under Excavation Permits. <i>Note: Human remains that are found unexpectedly during the carrying out of work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately. Management of human remains in NSW is subject to requirements set out in the Public Health Act 2010 (NSW) and Public Health Regulation 2012 (NSW). Nothing in these conditions prevents separate procedures for the Unexpected Heritage Finds and Human Remains Procedure.</i>	• Interview with Sydney Metro & LOR, 25/8/2025 • SM-WSA Aboriginal Cultural Heritage Management Plan Rev 02.01, 12/12/2024 • Attachment R of the LOR FSM CEMP: Heritage Management Procedure, Artefact, May 2023 • GML Heritage Memo, St Marys Station—Unexpected Heritage Finds (UHF01–32), dated 25/6/2025	C	Unexpected Aboriginal heritage finds are to be managed in accordance with Section 6.24 of Sydney Metro's Unexpected Heritage Finds Procedure [SM-18-00105232], Appendix A to the ACHMP. Unexpected finds are addressed in Section 4.3 of the SM-WSA ACHMP. An Unexpected Heritage Finds Procedure is also included in the LOR Heritage Management Procedure, Section 4.3.4. A number of unexpected heritage finds have been recorded to date for FSM and are summarised in a memo prepared by GML Heritage, St Marys Station—Unexpected Heritage Finds (UHF01–32), dated 25/6/2025. The memo provides assurance that the UEF Procedure has been followed in each instance and presents the background of the project, the context of UHF01-UHF32 and an assessment of their significance to inform management recommendations.
NOISE AND VIBRATION				
Land Use Survey				
E37	A detailed land use survey must be undertaken to confirm sensitive land use(s) (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration and construction ground-borne noise. The survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of work which generates construction noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Detailed Noise and Vibration Impact Statements required under Condition E47 .	• Interview with Sydney Metro & LOR, 25/8/2025 • Interview with ER 12/9/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 & Attachment F Environmental Control Procedures • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	C	The FAW DNVIS identifies noise catchment areas (NCAs) and sensitive receivers potentially exposed to project noise. NCAs are identified in the Land Use Survey, Section 3.1 of the DNVIS and classifies land uses into: residential buildings, commercial/industrial buildings, or 'other sensitive' land uses which includes educational institutions, childcare centres, medical facilities, places of worship, and outdoor recreation areas. Sensitive receiver information is determined via the Land Use Survey in the Detailed Noise and Vibration Impact Assessment (DNVIS). A DNVIS has been prepared for the project site to predict the impact of project activities on nearby receivers, including noise and vibration sensitive receivers. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels (NMLs) requiring Additional Mitigation Measures (AMMs). The DNVIS is provided to the ER for review and the subject works are not permitted to commence until the DNVIS has been finalised. Refer to Condition E47 for further discussion of the assessment of OOHV and the DNVIS process.
Construction Hours				
E38	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 6:00pm Saturdays; and (c) at no time on Sundays or public holidays.	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	C	Construction hours are documented in the FSM CEMP and the DNVIS. The DNVIS includes the verification of compliance against each applicable SSI 10051 Condition of Approval and recommends whether the proposed works can be managed to comply with SSI 10051. There were no known unapproved OOHV known to have been conducted during the audit period.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Highly Noise Intensive Work				
E39	Except as permitted by an EPL or approved in accordance with the Out-of-Hours Works Protocol required by Condition E42, highly noise intensive work that result in an exceedance of the applicable NML at the same receiver must only be undertaken: (a) between the hours of 8:00 am to 6:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) if continuously, then not exceeding three (3) hours, with a minimum cessation of work of not less than one (1) hour. For the purposes of this condition, 'continuously' includes any period during which there is less than one (1) hour between ceasing and recommencing any of the work.	- Interview with Sydney Metro & LOR, 25/8/2025 - AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 - WE01_2025_FSM_SM_WSA_Out of Hours Work Application_036 Rev01, dated 2/7/2025 - FSM Noise Monitoring Register - FSM WE01 works on platforms Noise Verification Record Sheet F1.608845, dated 5/7/2025 - FSM WE01 works on platforms Noise Verification Record Sheet F1.608846, dated 5/7/2025	NT	Auditees advised there have been no highly noise intensive works conducted for FSM to date.
E40	This approval does not permit blasting.	- Interview with Sydney Metro & LOR, 25/8/2025 - AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025	NT	No blasting is known to have been undertaken for the project.
Variation to Work Hours				
E41	Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances: (a) Safety and Emergencies, including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or (b) Low impact, including: (i) construction that causes LAeq(15 minute) noise levels: - no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and - no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and (ii) construction that causes: - continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006); or - intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006); or (c) By Approval, including: (i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or (ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E42 ; or (iii) negotiated agreements with directly affected residents and sensitive land user(s); or (d) By Prescribed Activity, including: (i) tunnelling and ancillary support activities (excluding cut and cover tunnelling and surface works not directly supporting tunnelling) are permitted 24 hours a day, seven days a week; or (ii) grout batching at the Orchard Hills construction site is permitted 24 hours per day, seven days per week; or (iii) delivery of material that is required to be delivered outside of standard construction hours in Condition E38 to directly support tunnelling activities, except between the hours 10:00 pm and 7:00 am to / from the Orchard Hills ancillary facility; or (iv) haulage of spoil generated through tunnelling is permitted 24 hours per day, seven days per week except between the hours of 10:00 pm and 7:00 am to / from the Orchard Hills construction site; or (v) works within an acoustic enclosure are permitted 24 hours a day, seven days a week where there is no exceedance of noise levels or intermittent vibration levels under Low impact circumstances identified in Condition E41(b), unless otherwise agreed with the Planning Secretary; or (vi) tunnel and underground station box fit out works are permitted 24 hours per day, seven days per week. On becoming aware of the need for emergency work in accordance with (a)(ii) above, the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. The Proponent must use best endeavours to notify as soon as practicable all noise and/or vibration affected sensitive land user(s) of the likely impact and duration of those work. Notes: 1. Tunnelling does not include station box excavation. 2. Tunnelling ancillary support activities includes logistics support and material handling and delivery	- Interview with ER, 12/9/2025 - Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro WSA ER Monthly Report February 2025, dated 7/3/2025 - Sydney Metro WSA ER Monthly Report March 2025, dated 7/4/2025 - Sydney Metro WSA ER Monthly Report April 2025, dated 6/5/2025 - Sydney Metro WSA ER Monthly Report May 2025, dated 6/6/2025 - Sydney Metro WSA ER Monthly Report June 2025, dated 7/7/2025 - AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 - ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025 - WE01_2025_FSM_SM_WSA_Out of Hours Work Application_036 Rev01, dated 2/7/2025 - FSM Noise Monitoring Register - FSM WE01 works on platforms Noise Verification Record Sheet F1.608845, dated 5/7/2025 - FSM WE01 works on platforms Noise Verification Record Sheet F1.608846, dated 5/7/2025	C	(a) Condition E68(a) was not triggered during the audit period: (b) (i) Low Impact Works undertaken during the audit period have been assessed and approved as part of the Out of Hours Works (OOHW) Permit process. No specific stand-alone low impact works were approved OOH during the audit period. (ii) - Not triggered. (c) (i) Not triggered (no EPL). (ii) As per works conducted under the OOHW Protocol via OOHW Permits. An example OOHW Permit was sighted for FSM OOHW categorised under Condition E41(c): SM-WSA FSM Out of Hours Work Application_036 Rev01, approved 2/7/2025. Ther application was submitted for works undertaken on Weekend 01 (WE01), 5th July 2025 – 7th July 2025 and included Construction of footbridge – Scaffold & FRP (superstructure), and the installation of precast/prefab elements. The application also considered potential impacts to sensitive receivers in the vicinity of laydowns including Laydown 1, Glossop Street, Harris Street Compound and the SSTOM compound. The FSM Noise Monitoring Register and examples of attended noise monitoring results were provided as evidence during the audit. The Noise Monitoring Register included data from February-August 2025. (iii) Not triggered (d) Not triggered.

Item
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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Out-Of-Hours Work Protocol – Work not subject to an EPL				
E42	An Out-Of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of work (not subject to an EPL) that is outside the hours defined in Conditions E38 and E39. The Protocol must be approved by the Planning Secretary before commencement of the out-of-hours work. The Protocol must be prepared in consultation with the ER. The Protocol must provide: (a) justification for why out-of-hours work need to occur; (b) identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: (i) the ER reviews all proposed out-of-hours activities and confirms their risk levels; (ii) low risk activities that can be approved by the ER; and (iii) high risk activities that are approved by the Planning Secretary; (c) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria; (d) a process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of Condition E56. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land user(s) would be exposed to, including the number of noise awakening events; (e) procedures to facilitate the coordination of out-of-hours work including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided; and (f) notification arrangements for affected receivers for all approved out-of-hours works and notification to the Planning Secretary of approved low risk out-of-hours works. This condition does not apply if the requirements of Condition E41 are met. Note: <i>Out-of-hours work is any work that occurs outside the construction hours identified in Condition E38 and E39.</i>	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • Sydney Metro WSA Out of Hours Work Protocol v2.0, dated 8/11/2021 • WSA-OOHW-Protocol-Approval-of-Plan-Strategy, dated 11/11/2021	C	Reference to the OOHW Protocol is included in the AEW Footbridge St Marys CEMP. Refer previous audits for details of OOHW Protocol approval and consultation, and verification of Protocol contents in accordance with Condition E42.
Construction Noise Management Levels and Vibration Criteria				
E43	Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria: (a) construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009); (b) preferred vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); (c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives" (for human exposure); (d) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and (e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage). Any work identified as exceeding the noise management levels and / or vibration criteria must be managed in accordance with the Noise and Vibration CEMP Sub-plan. Note: <i>The ICNG identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction Noise Management Level.</i>	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • WE01_2025_FSM_SM_WSA_Out of Hours Work Application_036 Rev01, dated 2/7/2025 • FSM Noise Monitoring Register • FSM WE01 works on platforms Noise Verification Record Sheet F1.608845, dated 5/7/2025 • FSM WE01 works on platforms Noise Verification Record Sheet F1.608846, dated 5/7/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025 • SM-WSA FSM Out of Hours Work Application_034 Rev01, approved 3/6/2025 • SM-WSA FSM Out of Hours Work Application_033 Rev01, approved 5/6/2025	C	In accordance with CSSI 10051, a DNVIS is to be prepared for each construction site before construction noise and vibration impacts commence for any work that may exceed the NMLs, vibration criteria and / or ground borne noise levels specified in Conditions E43 and E44 at any residence outside construction hours identified in Condition E38, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under Condition E87. The DNVIS includes the verification of compliance against each applicable SSI 10051 Condition of Approval and recommends whether the proposed works can be managed to comply with SSI 10051. Condition E43 is addressed under the DNVIS Section 5.1 which sets out General Cosmetic Damage Vibration Goals. Section 8.4 sets out Additional Mitigation Measures and Section 8.6 Community Notification. A sample of OOH Permits was reviewed during the audit: • SM-WSA FSM Out of Hours Work Application_036 Rev01, approved 2/7/2025 • SM-WSA FSM Out of Hours Work Application_034 Rev01, approved 3/6/2025 • SM-WSA FSM Out of Hours Work Application_033 Rev01, approved 5/6/2025 The permits cover a range of works including a Saturday OOHW shift and midweek OOHW. Mitigation measures are included in each OOHW Permit. Auditees advised there were no potentially vibration impacted receivers identified during the audit period.
E44	All reasonable and feasible mitigation measures must be applied when the following residential ground-borne noise levels are exceeded: (a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and (b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A). The mitigation measures must be outlined in the Noise and Vibration CEMP Sub-plan, including in any Out-of-Hours Work Protocol, required by Condition E42.	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • FSM Complaints Register February-August 2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	C	Ground-borne noise has not been identified as an issue relevant to FSM during the audit period. Ground-borne noise criteria and potential impacts associated with ground-borne noise is set out in Sections 4.4 and 6.6 of the FSM DNVIS. LOR has predicted that ground-borne noise impacts for FSM are expected to be negligible and deemed a detailed ground-borne noise assessment is not required. There were no complaints received related to ground-borne noise during the audit period.
E45	Noise generating work in the vicinity of potentially-affected community, religious, educational institutions and noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) resulting in noise levels above the NMLs must not be timetabled within sensitive periods, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution.	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • FSM Complaints Register February-August 2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	Auditees advised Condition E45 has not been relevant during the audit period.

Item
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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Construction Noise and Vibration Mitigation and Management				
E46	Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise and vibration levels are minimised around sensitive land use(s). Practices may include, but are not limited to: (a) use of regularly serviced low sound power equipment; (b) at source control, temporary noise barriers (including the arrangement of plant and equipment) around noisy equipment and activities such as rock hammering and concrete cutting; (c) use of non-tonal reversing alarms; and (d) use of alternative construction and demolition techniques.	• Interview with Sydney Metro & LOR, 25/8/2025 • Site inspection, dated 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • Forklift and Telehandler Pre-Mobilisation Checklist Ref: F67954.83, Unit AL2730 - Magni Telehandler, dated 16/5/2025 • Concrete Pump Pre-Mobilisation Checklist Ref: F67954.79, WCP028 - HINO Boom Pump Reg. X073VF, dated 22/4/2025 • Elevated Work Platform Pre-Mobilisation Checklist Ref: F67954.48, SE191521 - 19FT Dingli Electric Scissor Lift, dated 3/3/2025 • Elevated Work Platform Pre-Mobilisation Checklist Ref: F67954.104, Unit OHN2603 - 32ft Electric Scissor Lift, dated 18/6/2025	C	Noise mitigation measures as per Condition E46 are set out in the Section 8.2 of the FSM DNVIS and Out of Hours Work (OOHW) Permits. (a) Plant and equipment service records are managed via the Fieldview system. (b) At source noise controls are mainly implemented at ancillary facilities in residential areas. Other works are undertaken behind the site hoarding and not within the vicinity of sensitive receivers. There were no generators on site. (c) Pre-start checks include a check for reversing alarms (no beepers allowed). (d) Examples of the use of alternative construction and demolition techniques was discussed and included a the use of rechargeable battery operated lighting towers. There was no demolition undertaken during the audit period. Proposed saw cutting in replacement of hammering for canopy removal.
E47	Detailed Noise and Vibration Impact Statements (DNVIS) must be prepared for any work that may exceed the NMLs, vibration criteria and / or ground-borne noise levels specified in Conditions E43 and E44 at any residence outside construction hours identified in Condition E38, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under Condition E87. The DNVIS must include specific mitigation measures identified through consultation with affected sensitive land user(s) and the mitigation measures must be implemented for the duration of the works. A copy of the DNVIS must be provided to the ER before the commencement of the associated works. The Planning Secretary and the EPA may request a copy (ies) of the DNVIS.	• Interview with Sydney Metro & LOR, 25/8/2025 • Site inspection, dated 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • Sydney Metro WSA ER Monthly Report February 2025, dated 7/3/2025 • Sydney Metro WSA ER Monthly Report March 2025, dated 7/4/2025 • Sydney Metro WSA ER Monthly Report April 2025, dated 6/5/2025 • Sydney Metro WSA ER Monthly Report May 2025, dated 6/8/2025 • Sydney Metro WSA ER Monthly Report June 2025, dated 7/7/2025	C	A DNVIS to assess out of hours work (OOHW) has been prepared for the project site and was available on the project website. A Land Use Survey was prepared for the assessment and forms Section 3.1 to the DNVIS. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels (NMLs) requiring Additional Mitigation Measures (AMMs). Sensitive receiver information in the DNVIS is captured from the Land Use Survey. Receivers potentially sensitive to noise and vibration have been categorised as residential buildings, commercial/industrial buildings, or 'other sensitive' land uses which includes educational institutions, childcare centres, medical facilities, places of worship, outdoor recreation areas, etc. The following receivers nearby the FSM project site have been identified to potentially contain Sensitive Scientific or Medical Equipment: • Emerald Medical Centre - 65A Queen Street, Belar St, St Marys NSW 2760 • Autopak-Vetlab Group - 39 Harris St, St Marys NSW 2760 The DNVIS is provided to the ER for review and the subject works are not permitted to commence until the DNVIS has been finalised. Implementation of the specific mitigation measures is verified by the LORAC Environment Manager, and the ER during construction, as evidenced in ER inspection and monthly reports. LORAC is conducting ongoing coordination with other contractors to ensure that respite periods are maintained throughout the works.
E48	Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before works that generate vibration commences in the vicinity of those properties. If the potential exceedance is to occur more than once or extend over a period of 24 hours, owners and occupiers must be provided a schedule of potential exceedances on a monthly basis for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Noise and Vibration CEMP Sub-plan.	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	Auditees advised there were no vibratory activities with the potential to affect buildings, structures or receivers identified during the audit period. There was therefore no vibration monitoring undertaken and no vibratory exceedances identified. The requirement to identify properties at risk of cosmetic damage is addressed in Sections 5 and 7 of the FSM DNVIS. Vibration screening criteria for cosmetic damage is listed in Table 7.1 of the FSM DNVIS. The identification of potentially affected receivers is included in Section 7.2 of the DNVIS as follows: • St Marys Commuter Car Park • Platforms 1/2 and 3/4 (Heritage listed - 1888 & 1942-3) • Platforms 3/4 building (Heritage Listed - 1888). Potential vibratory impacts are also assessed in the OOHW Permit process. It is understood that notification to properties at risk of exceeding vibration screening criteria would generally be captured in the notification process for noisy works.
E49	Where sensitive land use(s) are identified in Appendix B as exceeding the highly noise affected criteria during typical case construction, mitigation measures must be implemented with the objective of reducing typical case construction noise below the highly noise affected criteria at each relevant sensitive landuse(s). Activities that would exceed highly noise affected criteria during typical case construction must not commence until the measures identified in this condition have been implemented, unless otherwise agreed with the Planning Secretary. Note: Mitigation measures may include path barrier controls such as acoustic sheds and/or noise walls, at-property treatment, or a combination of path and at-property treatment.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	There have been no sensitive land use(s) identified for FSM exceeding the highly noise affected criteria during typical case construction during the audit period. Condition E49 has not been triggered to date for FSM.

Item
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Auditor: Jo Heitborg, Morasey Environment Pty Ltd
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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E50	For all construction sites where acoustic sheds are installed, the sheds must be designed, constructed and operated to minimise noise emissions. This would include the following considerations: (a) all significant noise producing equipment that would be used during the night-time would be inside the sheds, where feasible and reasonable; (b) noise generating ventilation systems such as compressors, scrubbers, etc, would be located inside the sheds and external air intake/discharge ports would be appropriately acoustically treated; and (c) the doors of acoustic sheds would be kept closed during the night-time period. Where night-time vehicle access is required at sites with nearby residences, the shed entrances would be designed and constructed to minimise noise breakout.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E50 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E51	Where Condition E49 determines that at-property treatment (temporary or permanent) is the appropriate measure to reduce noise impacts, this at-property treatment must be offered to landowners of residential properties for habitable living spaces, unless other mitigation or management measures are agreed to by the landowner. Landowners must be advised of the range of options that can be installed at or in their property and given a choice as to which of these they agree to have installed. A copy of all guidelines and procedures that will be used to determine at-property treatment at their residence must be provided to the landowner.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	There have been no sensitive land use(s) identified for FSM exceeding the highly noise affected criteria during typical case construction during the audit period. Condition E49 has not been triggered to date for FSM.
E52	Any offer for at-property treatment or the application of other noise mitigation measures in accordance with Condition E51 , does not expire until the noise impacts specified in Condition E49 , affecting that property are completed, even if the landowner initially refuses the offer. <i>Note : If an offer has been made but is not accepted, this does not preclude the commencement of construction under Condition E49.</i>	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	There has been no application of at-property treatment or other noise mitigation measures applicable to Condition E52 to date for FSM.
E53	The implementation of at-property treatment does not preclude the application of other noise and vibration mitigation and management measures including temporary and long term accommodation.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	There has been no application of at-property treatment or other noise mitigation measures applicable to Condition E53 to date for FSM.
Construction Vibration Mitigation - Heritage Items				
E54	Vibration testing must be conducted during vibration generating activities that have the potential to impact on Heritage items to verify minimum working distances to prevent cosmetic damage. In the event that the vibration testing and attended monitoring shows that the preferred values for vibration are likely to be exceeded, the Proponent must review the construction methodology and, if necessary, implement additional mitigation measures. Such measures must include, but not be limited to, review or modification of excavation techniques.	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Interview, 12/9/2025	NT	There has been no vibration monitoring conducted for FSM to date and no vibration generating activities identified within minimum working distances with the potential to impact on heritage items. The identification of potentially affected receivers is included in Section 7.2 of the DNVIS as follows: • St Marys Commuter Car Park • Platforms 1/2 and 3/4 (Heritage listed - 1888 & 1942-3) • Platforms 3/4 building (Heritage Listed - 1888). It is understood that unattended vibration monitoring is conducted for due diligence purposes in the St Marys platform building but has not been examined during the audit as does not form a project requirement. Refer to Condition A2 for more information.
E55	The Proponent must seek the advice of a heritage specialist on methods and locations for installing equipment used for vibration, movement and noise monitoring at Heritage items.	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	As per Condition E54 .

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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Utility Coordination and Respite				
E56	All work undertaken for the delivery of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided. The Proponent must: (a) reschedule any work to provide respite to impacted noise sensitive land use(s) so that the respite is achieved in accordance with Condition E57; or (b) consider the provision of alternative respite or mitigation to impacted noise sensitive land use(s); and (c) provide documentary evidence to the ER in support of any decision made by the Proponent in relation to respite or mitigation. The consideration of respite must also include all other approved Critical SSI, SSI and SSD projects which may cause cumulative and / or consecutive impacts at receivers affected by the delivery of the CSSI.	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • SM-WSA Cumulative Impact Meeting Minutes #012 12/2/2025 • SM-WSA Cumulative Impact Meeting Minutes #013 19/3/2025 • SM-WSA Cumulative Impact Meeting Minutes #014 16/4/2025 • SM-WSA Cumulative Impact Meeting Minutes #015 14/5/2025 • SM-WSA Cumulative Impact Meeting Minutes #016 25/6/2025 • SM-WSA Cumulative Impact Meeting Minutes #017 16/7/2025	C	Auditees advised there have been no circumstances where Condition E56 has become relevant during FSM to date (no third party utility works are known to have occurred within the vicinity). Third party works relevant to Condition E56 will be managed as per the DNVIS and OOHV procedures discussed elsewhere during the audit. The process for cumulative impacts and respite is defined in the FSM DNVIS. Potential exists for cumulative impacts with SSTOM at St Marys station. Cumulative impacts from interfaces and other nearby construction sites have been managed through monthly Cumulative Impact Meetings. Outcomes of these meetings are referenced and discussed as appropriate within fortnightly formal Environmental Working Group minutes or in informal discussions with PLM (SSTOM). Recent meeting minutes were provided as evidence and included attendees from Sydney Metro, SSTOM and FSM Environment and Project management teams. Issues discussed in meetings included a lookahead for out of hours work at each location, and potential for cumulative impacts related to environmental aspects including Surface water management, Air quality and Heavy Vehicle (HV) movements during peak hours. Informal discussions about the minimisation of cumulative impacts is also understood to occur between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site.
Out-of-Hours Works – Community Consultation on Respite				
E57	In order to undertake out-of-hours work outside the work hours specified under Condition E38, appropriate respite periods for the out-of-hours work must be identified in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with: (a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work; (b) a description of the potential work, location and duration of the out-of-hours work; (c) the noise characteristics and likely noise levels of the work; and (d) likely mitigation and management measures which aim to achieve the relevant NMLs under Condition E43 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers). The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the ER before the out of hours work commences, and to the EPA and the Planning Secretary on request. Note: Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the RBL at any residence.	• Interview with ER, 7/02/2025 • Interview with Sydney Metro & LOR, 25/8/2025 • LOR WE34 - FSM - E57 Consultation Report 22-24 February 2025 • Email from LOR to the ER RE: Sydney Metro WSA Advanced and Enabling Works: St Marys station Footbridge MCoA E57 memo, dated 21/2/2025 • LOR WE44 - FSM - E57 Consultation Report 3-5 May 2025 • Email from LOR to the ER RE: Sydney Metro WSA Advanced and Enabling Works: St Marys station Footbridge MCoA E57 memo, dated 1/5/2025 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	C	The application of Condition E57 for FSM is usually via a case by case assessment for RO and AA offers for sensitive receivers. A representative selection of E57 Consultation Reports (and corresponding OOHV Permits) were sighted during the audit, including evidence of submission to the ER. E57 Consultation Reports were reviewed for rail possessions during Weekend 34 (WE34) and WE44. Out of hours work during possession at St Marys Station typically includes pile breaking, bulk excavation, FRP, spoil removal and asphalt rectification. Proposed works involving laydown areas was also verified to be included in E57 consultation reports. E57 Consultation Reports provide a summary of consultation undertaken in accordance with E57 with respect to out of hours works activities at each site, and include a list of eligible properties and respite offers. Maps of the distribution area are also included in the Consultation Reports. Community Notifications are uploaded to the Sydney Metro website and were current at the time of the audit. Where impacted properties have not been able to be reached by door-knocking, 'SWMY' slips are left at the property that include contact details to get in touch. E57 Consultation Reports were also available on the LOR_FSM project website. LOR is conducting ongoing coordination with other contractors to ensure that respite periods are maintained throughout the works. MOD 2 was determined on 20/12/2024 and amends Condition E57 so that information on consultation, respite and out of hours work information be provided to the EPA and Planning Secretary on request. No such requests are known to have been made.

Item
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Auditor: Jo Heilborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Noise Mitigation - Operational Noise and Vibration Mitigation Measures				
E58	The Proponent must prepare an Operational Noise and Vibration Review (ONVR) to confirm noise and vibration mitigation measures that would be implemented for the Operation of the CSSI for the ultimate service. The ONVR must be prepared as part of the iterative design development and in consultation with the EPA, relevant council(s), other relevant stakeholders and must: (a) identify appropriate Operational noise and vibration objectives and levels for surrounding development, including existing and potential future (as known at the time of ONVR preparation) sensitive land use(s); (b) confirm the operational noise and vibration predictions based on the expected final design. Confirmation must be based on an appropriately calibrated noise model; (c) identify sensitive land uses that are predicted to exceed: (i) noise criteria set out in the Rail Infrastructure Noise Guideline (EPA, 2013), Noise Policy for Industry (EPA, 2017); and (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006); (d) identify all noise and vibration mitigation measures including location, type and timing of mitigation measures, with a focus on: (i) source control and design; (ii) at the receiver (if relevant); and (iii) 'best practice' achievable noise and vibration outcome for each activity; (e) describe how the final suite of mitigation measures will achieve: (i) the noise criteria outlined in the Rail Infrastructure Noise Guideline (EPA, 2013) and Noise Policy for Industry (EPA, 2017); and (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006); (f) include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures being offered; (g) include procedures for operational noise and vibration complaints management, including investigation and monitoring (subject to complainant agreement). The ONVR must be verified by an independent acoustic expert and submitted to the Planning Secretary for approval before the implementation of any operational noise mitigation measures. The Proponent must implement the identified noise and vibration control measures and make the ONVR publicly available. Note: The design of noise barriers and the like must be undertaken in consultation with the relevant stakeholders, including affected landowners and businesses (or a representative of a business), Western Parklands City Authority and relevant council(s) as part of the Place, Urban Design and Corridor Landscape Plan required under Condition E79.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E58 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E59	Operational noise mitigation measures as identified in Condition E58 that will not be physically affected by work, must be implemented within six months of submitting the ONVR, unless otherwise agreed by the Planning Secretary. Where implementation of operational noise mitigation measures are not proposed to be implemented in accordance with this requirement, the Proponent must submit to the Planning Secretary a report providing justification as to why, along with details of temporary measures that would be implemented to reduce construction noise impacts, until such time that the operational noise mitigation measures are implemented.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E59 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).

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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E60	Within 12 months of the commencement of operation of the CSSI, the Proponent must undertake monitoring of operational noise to compare actual noise performance of the CSSI against the noise performance predicted in the review of noise mitigation measures required by Condition E58. An Operational Noise and Vibration Compliance Report (ONVCR) must be prepared to document this monitoring and include, but not necessarily be limited to: (a) noise and vibration monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under Condition E58; (b) methodology, location and frequency of noise and vibration monitoring undertaken, including monitoring sites at which CSSI noise and vibration levels are ascertained, with specific reference to locations indicative of impacts on receivers; (c) a review of the performance of the CSSI against the: (i) operational noise levels in terms of criteria and noise goals established in the <i>NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017)</i>; (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in <i>Assessing Vibration: a Technical Guideline (DECC, 2006)</i>; (d) details of any complaints and enquiries received in relation to Operational noise and vibration generated by the CSSI (between the date of commencement of Operation and the date the report was prepared); (e) an assessment of the performance and effectiveness of applied noise and vibration mitigation measures together with a review and if necessary, reassessment of mitigation measures; (f) identification of: (i) additional measures to meet the criteria outlined in the <i>NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017)</i>; (ii) additional measures to meet the vibration goals for human exposure for existing sensitive land, as presented in <i>Assessing Vibration: a Technical Guideline (DECC, 2006)</i>; (iii) when these measures are to be implemented; and (iv) how their effectiveness is to be measured and reported to the Planning Secretary and the EPA. The ONVCR must be submitted to the Planning Secretary and the EPA within 60 days of completing the Operational noise and vibration monitoring and made publicly available. Note: Refer to Condition B5 about how personal information will be handled.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E60 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
PLACE, URBAN DESIGN AND VISUAL AMENITY				
Construction Sites				
E61	Wayfinding information must be incorporated on temporary hoardings to guide pedestrians around the St Marys construction site and enhance their understanding and experience of the locality and space.	• Interview with Sydney Metro & LOR, 25/8/2025 • Site inspection, 25/8/2025 • FSM Complaints Register February-August 2025	C	Wayfinding signage was installed on the hoarding around the St Marys station site, as observed during the IA8 site inspection.
E62	The CSSI must be constructed in a manner that minimises visual impacts of construction sites including temporary landscaping and vegetative screening, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, wherever practicable.	• Interview with Sydney Metro & LOR, 25/8/2025 • Site inspection, 25/8/2025 • FSM Complaints Register February-August 2025	C	Visual mitigation measures observed to be installed during the site inspection at St Marys included: • Hoarding or ATF with shadecloth installed around the project site. • No graffiti was observed and is understood to be removed promptly when identified. Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There have been no complaints regarding visual impacts during the audit period.
Design Requirements and Strategic Context				
E63	The CSSI must be designed with consideration of: (a) the design objectives, principles and guidelines identified in documents listed in Condition A1; (b) the principles and objectives of the draft Connecting with Country Framework; (c) relevant land use changes, masterplans and initiatives, where this information is known and/or available; (d) existing and proposed future local context and character; and (e) transport and land use integration and system functionality in the context of precincts, to the extent it is known and/or defined. Responses to items (a) – (e) must be reviewed by the Design Review Panel (DRP) to inform the design of permanent built works and landscape design of the CSSI. The outcome of the DRP review must be provided to the Planning Secretary prior to the submission of the Place, Urban Design and Corridor Landscape Plan (PUDCLP). Note: In accordance with Condition A10 and Condition A16, the requirements of this condition can be staged.	• Interview with Sydney Metro & LOR, 25/8/2025 • St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024 • DPHI Submission (PA-542) Post Approval Form_20241219032005, SM-WSA FSM PUDCLP (E63 Compliance Statement), dated 19/12/2024 • DPHI Letter to Sydney Metro RE: SM-WSA, Footbridge St Marys (FSM), Submission of Design Review Panel (DRP) review outcomes of design response – Place, Urban Design and Corridor Landscape Plan (PUDCLP) (E63 Compliance Statement), undated	C	The St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP) has been prepared to address the requirements of Condition E63. The FSM PUDCLP – E63 Compliance Statement, 19/12/24 was provided as evidence and outlines compliance with Condition E63, as verified by LOR. Submission of the PUDCLP and associated compliance was verified during a previous audit period. Compliance with Condition E63 has been set out in Section 1.7 of the FSM PUDCLP.

Item
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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Design Guidance and Standards - Lighting and Security				
E64	The CSSI must be constructed and operated with the objective of minimising light spill to surrounding properties. All lighting associated with the CSSI must be consistent with the requirements of: (a) ASINZS 4282:2019 <i>Control of the obtrusive effects of outdoor lighting, relevant Australian Standards in the series ASINZS 1158 - Lighting for Roads and Public Spaces;</i> (b) NASF Guideline E: <i>Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports;</i> and (c) NASF Guideline C: <i>Managing the risk of wildlife strikes in the vicinity of airports.</i> Mitigation measures must be provided to manage residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.	- Interview with Sydney Metro & LOR, 25/8/2025 - ER Inspection Reports Feb-August 2025 - FSM Complaints Register February-August 2025 - SM-WSA Complaints Report 1 Feb to 23 August 2025 - AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 - OOHW Permits	C	The OOHW approval process includes an assessment of controls to be applied to minimise light spill during construction. Mitigation measures to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners are included in the approval process during night works. Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There were no complaints re light spill during the audit period.
Design Guidance and Standards - Active Transport				
E65	Designs must have regard to the Movement and Place Framework relevant guidance including the <i>Walking Space Guide: Towards Pedestrian Comfort and Safety</i> (TINSW, 2020) and the <i>Cycleway Design Toolbox: Designing for Cycling and Micromobility</i> (TINSW, 2020).	Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition 65 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E66	Active transport facilities must be designed, constructed and/or rectified in accordance with the Guide to Road Design Part 6A: Paths for Walking and Cycling (Austroads, 2017) and relevant Australian Standards (AS) such as 1428.1-2009 Design for access and mobility. The active transport links must also incorporate relevant Crime Prevention Through Environmental Design principles.	- Interview with Sydney Metro & LOR, 25/8/2025 - FSM Complaints Register February-August 2025 - SM-WSA Complaints Report 1 Feb to 23 July 2025.xlsx - AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 - St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024 - DPHI Submission (PA-542) Post Approval Form_20241219032005, SM-WSA FSM PUDCLP (E63 Compliance Statement), dated 19/12/2024 - DPHI Letter to Sydney Metro RE: SM-WSA, Footbridge St Marys (FSM), Submission of Design Review Panel (DRP) review outcomes of design response – Place, Urban Design and Corridor Landscape Plan (PUDCLP) (E63 Compliance Statement), undated	C	The FSM PUDCLP addressed compliance with Condition E66. Refer to Sections 3.8 Pedestrian modelling, 4.5 Access and Circulation, 5.1 Vision and Objectives, & 6.1 Landscape Plan. The FSM PUDCLP states "The requirements of the Guide to Road Design Part 6A and relevant Australian Standards including AS1428.1-2009 have been integrated into the design of St Marys Station footbridge where applicable". The PUDCLP, Appendix D includes the Interchange Access Plan (IAP), which provides further detail on the transport requirements and principles that are applied to the St Marys Station footbridge precinct.

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Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Design Review Panel and Design Review				
Panel Membership				
E67	The Proponent must establish an independent DRP to provide advice and recommendations to the Proponent during the CSSI's design development and construction to facilitate quality design and place outcomes. The DRP must be formed and hold its first meeting within six months of the date of this approval, or as otherwise agreed with the Planning Secretary. <i>Note: Nothing in this approval prevents the use of an existing design panel as the Design Review Panel convened for this project where the function and composition of that panel complies with the terms of this approval.</i>	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The Sydney Metro Design Review Panel (DRP) Terms of Reference, Western Sydney Airport Line were sighted and available on the project website. The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month. Participants are set out in Section 3 and include the DRP Chair and panel, including Panel Advisor, Coordinator and SM Project Advisor. Special advisors and external stakeholders may be invited periodically to participate in DRP meetings to advise on local issues and design outcomes as they relate to matters of interest.
E68	The responsibilities of the Design Review Panel include: (a) providing advice and recommendations to the Proponent for consideration in the design development of the CSSI (b) provide advice on the application of Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines to key design elements in relation to place making, architecture, heritage, urban and landscape design and artistic aspects of the CSSI; and (c) reviewing and endorsing any updates to the Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines. The Panel's advice must be consistent with the CSSI as approved.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The roles and responsibilities of the DRP are set out in Section 3 of the Terms of Reference and align with Condition E68.
E69	The DRP must be chaired by the NSW Government Architect (or their nominee), and must be comprised of, where relevant, by suitably qualified, experienced and independent professional(s) in each of the fields of: (a) urban design and place making; (b) landscape architecture; and (c) architecture. The Panel may seek advice from suitably qualified, experienced independent professionals in other fields as required, including but not limited to sustainability, active transport and non-Aboriginal heritage. The Panel must also seek appropriate expertise to ensure Aboriginal cultural heritage and cultural values inform its advice.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The role of the DRP Chair is set out in Section 3.1 of the DRP Terms of Reference and states DRP meetings are chaired by the NSW Government Architect or their nominee. In the event of their absence, the Chair may nominate an Alternative Chair from the regular Panel members.
E70	Panel members must be sourced from the NSW State Design Review Panel Pool or otherwise be approved by the NSW Government Architect.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The responsibilities of Panel Members are set out in Section 3.2 of the DRP Terms of Reference.
Operation of the Design Review Process				
E71	Prior to forming the DRP, a Design Review Panel Terms of Reference is to be developed and endorsed by the NSW Government Architect. The Terms of Reference must be submitted to the Planning Secretary once it is endorsed by the NSW Government Architect and: (a) must be generally consistent with the NSW State Design Review Panel Terms of Reference (version 5); (b) outline the frequency of DRP meetings, coordinated with the Proponent's program requirements, as outlined in Condition E76, to ensure timely advice and design adjustment; and (c) identify cessation arrangements.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The SM-WSA DRP Terms of Reference has been prepared and is available on the project website. The DRP Terms of Reference (Western Sydney Airport line and Metro West) was endorsed by the Government Architect NSW on 4/3/2022. The DRP Terms of Reference was submitted to DPHI for information. The Terms of Reference addresses each part of Condition E71 as follows: a) Section 3.2 of the DRP Terms of Reference commits to consistency with the NSW State Design Review Panel Terms of Reference b) The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month c) Cessation arrangements are set out in Section 5.
E72	The DRP must be operated and managed in accordance with the Design Review Panel Terms of Reference.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	Noted. As per evidence presented for Conditions E67-E76.
E73	The NSW Government Architect must, after consultation with the Proponent, appoint an appropriately qualified and experienced design advisor to the DRP and may appoint an alternate design advisor. The advisor must attend meetings of the Panel. The advisor may also be invited by the Panel to assist with decisions regarding the Panel's recommendations and record the Panel's advice and recommendations.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024	C	Appointment of the Panel Advisor is addressed in Section 3.3 of the DRP Terms of Reference, including a list of responsibilities. As per the SDRP Terms of Reference, an alternate Panel advisor may also be appointed to attend where the Panel advisor is absent or unavailable. GANSW Principal Design Advisor Melizza Morales was appointed.

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NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E74	The relevant council may be invited to the meetings of the Panel as observers or to provide feedback on key design elements of the CSSI.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024	C	Section 3 of the DRP Terms of reference sets out the procedure for special advisors and external stakeholders to be invited periodically to participate in DRP meetings to advise on local issues and design outcomes as they relate to matters of interest.
E75	DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation must be included when submitting the final PUDCLP to the Planning Secretary for information.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024 - GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024 - St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024 - DPHI Submission (PA-542) Post Approval Form_20241219032005, SM-WSA FSM PUDCLP (E63 Compliance Statement), dated 19/12/2024 - DPHI Letter to Sydney Metro RE: SM-WSA, Footbridge St Marys (FSM), Submission of Design Review Panel (DRP) review outcomes of design response – Place, Urban Design and Corridor Landscape Plan (PUDCLP) (E63 Compliance Statement), undated	C	The St Marys Station Footbridge Place, Place, Urban Design and Corridor Landscape Plan (PUDCLP) finalised in December 2024 and submitted to DPHI on 19/12/2024. Auditees advised the design has been regularly reviewed by the DRP and Section 2.2 of the PUDCLP sets out the involvement of the DRP. Appendix D sets out how DRP advice and recommendations have been addressed. The DRP recommendations and the Proponents responses are included.
E76	The Proponent must provide the design development schedule to the DRP prior to its first meeting, including details of when relevant elements of the detailed design will be available for review by the Panel. The schedule must be updated every three months until the detailed design process is complete.	- Interview with Sydney Metro & LOR, 25/8/2025 - Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 - DRP 36 DRP Meeting Agenda - 01 February, 2024-Rev 3 - Evidence RE: Design Development Schedule, as provided by the Sydney Metro Manager Precinct and Place Making and Precinct Activation, Property and Place, dated 20/8/2024	C	Verified during a previous audit period.

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Place, Urban Design and Corridor Landscape Plan				
E77	A PUDCLP must be prepared to document and illustrate the permanent built works and landscape design of the CSSI and how these works are to be maintained. The PUDCLP must be: (a) prepared by a suitably qualified and experienced person(s) in consultation with the community (including the affected landowners and businesses or a representative of the businesses), Western Parklands City Authority, Western Sydney Planning Partnership and relevant council(s); (b) reviewed by an independent and suitably qualified and experienced person nominated by the DRP; (c) submitted to the Planning Secretary prior to the construction of permanent built surface works and/or landscaping, excluding those elements which for ecological requirements, or technical requirements, or requirements as agreed by the Planning Secretary do not allow for alternate design outcomes; and (d) implemented during construction and operation of the CSSI. <i>Note: The PUDCLP may be developed and considered in stages to facilitate design progression and construction. Any such staging and associated approval would need to facilitate a cohesive final design and not limit final design outcomes.</i>	• Interview with Sydney Metro & LOR, 25/8/2025 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 • GANSW Letter of Advice, Sydney Metro WSA, DRP 24, 21/8/2023 • GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024 • GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024 • St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024 • DPHI Submission (PA-542) Post Approval Form_20241219032005, SM-WSA FSM PUDCLP (E63 Compliance Statement), dated 19/12/2024 • DPHI Letter to Sydney Metro RE: SM-WSA, Footbridge St Marys (FSM), Submission of Design Review Panel (DRP) review outcomes of design response – Place, Urban Design and Corridor Landscape Plan (PUDCLP) (E63 Compliance Statement), undated	C	The St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP) was finalised in December 2024 and submitted to DPHI on 19/12/2024. The requirements of Condition E76 are addressed in the FSM PUDCLP. Refer to Section 1.5 Qualified Persons, Section 2 Collaboration and Consultation, and Appendix A - Evidence of collaboration and consultation.
Place, Urban Design and Corridor Landscape Plan - Documentation				
E78	The PUDCLP must document how the following matters have been considered in the design and landscaping of the project: (a) the requirements of Conditions E63 to E65, and (b) advice and recommendations from the DRP.	• Interview with Sydney Metro & LOR, 25/8/2025 • St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024 • DPHI Submission (PA-542) Post Approval Form_20241219032005, SM-WSA FSM PUDCLP (E63 Compliance Statement), dated 19/12/2024 • DPHI Letter to Sydney Metro RE: SM-WSA, Footbridge St Marys (FSM), Submission of Design Review Panel (DRP) review outcomes of design response – Place, Urban Design and Corridor Landscape Plan (PUDCLP) (E63 Compliance Statement), undated	C	Compliance with Conditions E63 to E65 is addressed in Section 1.7 of the St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP). Appendix C of the PUDCLP sets out how advice and recommendations from the DRP has been addressed.
E79	The PUDCLP must include descriptions and visualisations (as appropriate) of: (a) design of the permanent built elements of the CSSI, including stabling and maintenance and ancillary facilities, service facilities and tunnel portals; (b) plans for station precincts including but not limited to (i) justification of the spatial scope of each station precinct plan; (ii) provision for public art and heritage interpretation installations; (iii) placemaking opportunities, having regard to placemaking initiatives in Western Sydney Aerotropolis planning documents; (iv) interchange access plans developed in consultation with the Traffic and Transport Liaison Group; (v) active transport connections and end of trip facilities, design of pedestrian and cycle access, facilities and fixtures; (vi) design of commuter car parking elements, where relevant; (c) landscaping and building design opportunities to mitigate visual impacts and minimise light spill on the nearby residences; (d) the design of watercourse crossings and east-west corridor movements to give to effect of Condition E14; (e) landscaping: (i) landscape plan, hard and soft elements, for the corridor and the station precincts; (ii) use of native species from the relevant native vegetation community (or communities), where identified as appropriate; (iii) water sensitive urban design initiatives (iv) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design; (v) measures to prevent wildlife strike risk in proximity to Western Sydney International Airport; (f) details of strategies to rehabilitate, regenerate or revegetate disturbed areas, where relevant; (g) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design; (h) operational maintenance standards; and (i) the timing and responsibilities for implementation of elements included within the PUDCLP.	• Interview with Sydney Metro & LOR, 25/8/2025 • St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024	C	In accordance with Condition E75, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP) and issued to the Planning Secretary for information. Section 1.7 of the Stage 1 PUDCLP addresses compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Operational Maintenance				
E80	The ongoing maintenance and operation costs of urban design, open space, landscaping and recreational items and work implemented as part of this approval remain the Proponent's responsibility until satisfactory arrangements have been put in place for the transfer of the asset to the relevant authority. Before the transfer of assets, the Proponent must maintain items and work to at least the design standards established in the PUDCLP, required by Condition E79 . The Planning Secretary must be advised prior to the transfer of the asset(s) to the relevant authority.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	Not triggered during the audit period.
E81	Should any plant loss occur during the maintenance period the plants must be replaced by the same plant species unless it is determined by a suitably qualified person that a different species is more suitable for that location.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E81 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
SOCIO-ECONOMIC, LAND USE AND PROPERTY				
E82	The CSSI must be designed and constructed with the objective of minimising impacts to, and interference with third party property, and that such infrastructure and property is protected during construction.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	Auditees advised there has been no excavation to date for FSM that may pose a settlement risk or interference with third party property. It is understood Condition E102 relates predominantly to tunnelling works, which are not part of the FSM scope. Future works in the vicinity of the St Marys Goods Shed (a heritage-listed building) are understood to be part of the SSTOM scope of works and the FSM project does not have a direct interface with this area. There is no known requirement for FSM to conduct groundwater monitoring or settlement monitoring. Upcoming works to a power pole may have an impact to VetLab AutoPack while the power is isolated. Consultation with these businesses was ongoing at the time of the audit.
E83	The utilities and services (hereafter "services") potentially affected by construction must be identified to determine requirements for diversion, protection and / or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. Disruption to services resulting from construction must be avoided, wherever possible, and advised to customers where it is not possible.	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • FSM Utilities Management Plan, Stage 2, Rev0, dated 15/7/2025	NT	Works with the potential to impact services had not been undertaken during the audit period. A Utilities Management Plan has been prepared and serves as a guide to provide systematic methods for planning, implementing and performing construction work, including for excavation works. The intent of the document is to eliminate or minimise the risks of fatalities, injuries and events arising from conducting work in the vicinity of underground, overhead and concealed services. Future works to a power pole on Harris Street may have an impact to VetLab AutoPack while the power is isolated. Consultation with these businesses was ongoing at the time of the audit. No disruption to services is known to have occurred to date.
Condition Survey				
E84	A suitably qualified and experienced person must undertake condition surveys of all buildings, structures, utilities and the like identified in the documents listed in Condition A1 and the further assessment carried out under mitigation measure GW1 of the Submissions Report as being at risk of damage before commencement of any work that could impact on the subject surface / subsurface structure. The results of the surveys must be documented in a Pre-construction Condition Survey Report for each item surveyed. Copies of Pre-construction Condition Survey Reports must be provided to the relevant owners of the items surveyed in the vicinity of the proposed work, and no later than one (1) month before the commencement of the work that could impact on the subject surface / subsurface structure.	• Interview with Sydney Metro & LOR, 25/8/2025 • Land Surveys Existing Condition Survey Report, St Marys Station TAP3 Roads, dated 4/8/2023 • Land Surveys Existing Condition Survey Report, Harris Street Compound, St Marys 2760, dated 12/7/2023 • Land Surveys Existing Condition Survey Report, Laydown Area, St Marys 2760, dated 12/7/2023 • Land Surveys Existing Condition Survey Report, Heritage Toilet Block, St Marys Station 2760, dated 12/7/2023 • Land Surveys Existing Condition Survey Report, St Marys Station Platforms 2760, dated 12/7/2023 • Land Surveys Existing Condition Survey Report, Work Area, St Marys Station 2760, dated 12/7/2023 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	C	LOR provided a copy of pre-condition surveys conducted in relation to Condition E84 (i.e. as listed in Condition A1) for the following areas: • St Marys Station TAP3 Roads • Harris Street Compound • Laydown Area • Heritage Toilet Block, St Marys Station • St Marys Station Platforms • Work Area, St Marys Station Auditees confirmed that no other buildings, structures, or utilities listed in Condition A1 are known to be at risk of being damaged by FSM works.
E85	Condition surveys of all items for which condition surveys were undertaken in accordance with Condition E84 must be undertaken by a suitably qualified and experienced person after completion of the work identified in Condition E84 . The results of the surveys must be documented in a Post-construction Condition Survey Report for each item surveyed. Copies of Post-construction Condition Survey Reports must be provided to the landowners of the items surveyed, and no later than three (3) months following the completion of the work that could impact on the subject surface / subsurface structure.	• Interview with Sydney Metro & LOR, 25/8/2025 • Letter from Sydney Metro to DPHI RE: SMWSA SSI 10051 Condition E8 – Notification of appointment of Independent Property Assessment Panel, dated 28/6/2023 • Post Approval Form, 20230628074714 DPE IPIAP, Compliance Report, Annual Review, Audit Report, SSI-10051-PA-258, dated 28/6/2023 • SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023	NT	Not triggered within the audit period.
E86	The Proponent, where liable, must rectify any property damage caused directly or indirectly (for example from vibration or from groundwater change) by the work at no cost to the owner. Alternatively, the Proponent may pay compensation for the property damage as agreed with the property owner. Rectification or compensation must be undertaken within 12 months of completion of the work identified in Condition E84 unless another timeframe is agreed with the owner of the affected surface or sub-surface structure or recommended by the Independent Property Impact Assessment Panel (IPIAP) .	• Interview with Sydney Metro & LOR, 25/8/2025 • Land Surveys Existing Condition Survey Report, St Marys Station TAP3 Roads, dated 4/8/2023 • Land Surveys Existing Condition Survey Report, Harris Street Compound, St Marys 2760, dated 12/7/2023 • Land Surveys Existing Condition Survey Report, Laydown Area, St Marys 2760, dated 12/7/2023 • Land Surveys Existing Condition Survey Report, Heritage Toilet Block, St Marys Station 2760, dated 12/7/2023 • Land Surveys Existing Condition Survey Report, St Marys Station Platforms 2760, dated 12/7/2023 • Land Surveys Existing Condition Survey Report, Work Area, St Marys Station 2760, dated 12/7/2023 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	There is no property damage known to have occurred as part of FSM.

Item
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Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8 WSA FAW August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E87	Appropriate equipment to monitor areas in proximity of ancillary facilities and the tunnel route must be installed during construction with particular reference to at risk buildings, structures and utilities identified in the condition surveys required by Condition E84 and / or geotechnical analysis as required. If monitoring during construction indicates exceedance of the vibration criteria identified in the DNVIS prepared under Condition E47 , or levels otherwise determined as appropriate by a suitably qualified structural engineer, then all construction affecting settlement must cease immediately and must not resume until fully rectified or a revised method of construction is established that will ensure protection of affected buildings.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	Not triggered within the audit period. Auditees advised no at risk buildings have been identified under Condition E87 . Section 7 of the DNVIS identifies heritage buildings within the vicinity of the project and includes mitigation measures to reduce vibration risk. There has been no damage determined to have occurred as a result of the project. Auditees advised no vibratory activities requiring vibration or settlement monitoring have been conducted during the audit period. It is understood that the existing vibration monitor attached to the St Marys Goods Shed and settlement monitoring requirements were handed over to SSTOM by SBT and vibration and settlement monitoring is ongoing. Vibration monitoring for due diligence purposes is being undertaken by LOR in the St Marys platform building. Refer to NC self-reported for Condition A2 during the audit period.
E88	An IPIAP must be established prior to tunnelling activities commencing. The Planning Secretary must be informed of the members of the IPIAP and must comprise geotechnical and engineering experts independent of the design and construction team. The IPIAP will be responsible for independently verifying condition surveys undertaken under Conditions E84 and E85 , the resolution of property damage disputes and the establishment of ongoing settlement monitoring requirements.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E88 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E89	Either the affected property owner or the Proponent may refer unresolved disputes arising from potential and/or actual property impacts to the IPIAP for resolution. All costs incurred in the establishing and implementing of the panel must be borne by the Proponent regardless of which party makes a referral to the IPIAP . The findings and recommendations of the IPIAP are final and binding on the Proponent.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E89 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E90	Settlement must be monitored for any period beyond the minimum timeframe requirements of Condition E87 if directed so by the IPIAP following its review of the monitoring data from the period not less than six (6) months after settlement has stabilised, consistent with Condition E87 . The results of the monitoring must be made available to the Planning Secretary upon request.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E90 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
Small Business Owners Engagement Plan(s)				
E91	Small Business Owners Engagement Plan(s) must be prepared for St Marys and implemented in accordance with the Overarching Community Communication Strategy to minimise impact on small businesses directly affected by construction activities at St Marys during construction. The plan must be prepared and submitted to the Planning Secretary for information before the commencement of construction at St Marys.	• Interview with Sydney Metro & LOR, 25/8/2025 • Site inspection, 25/8/2025 • AEW FSM Community Liaison Plan, including Small Business Owners Engagement Plan RevD, dated 2/12/2024 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/	C	The Community Liaison Plan, including Small Business Owners Engagement Plan, Footbridge St Marys was provided for review and was available on the LOR project website in the community section. The requirement to submit to the Planning Secretary was assessed during a previous audit.
SOILS AND CONTAMINATION				
Contaminated sites				
E92	Before commencement of any construction that would result in the disturbance of moderate to high risk contaminated sites as identified in the documents identified in Condition A1, Detailed Site Investigations (for contamination) must be conducted to determine the full nature and extent of the contamination. The Detailed Site Investigation Report(s) and the subsequent report(s), must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The Detailed Site Investigations must be undertaken in accordance with guidelines made or approved under section 105 of <i>Contaminated Land Management Act 1997</i> (NSW). Note: Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports (for contamination) for separate sites.	• Interview with Sydney Metro & LOR, 25/8/2025 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024 • Letter Sydney Metro to DPHI RE: SM-WSA Submission of Detailed Site Investigation Report under Condition of Approval E97 - AEW FSM, dated 28/8/2024 • Letter DPHI to Sydney Metro RE: SM-WSA AEW FSM Detailed Site Investigation Report, dated 09/9/2024	NT	A Detailed Site Investigation (DSI) was conducted for the Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, by ADE, in a report dated 21/08/2024. ADE found that "All soil samples collected during this investigation reported chemical concentrations below the adopted site assessment criteria. Visual inspection of the subject materials did not identify indicators of PASS, hydrocarbon odours / staining and or ACM". No moderate-high-risk contaminated sites are known to have been identified for the FSM package of works. The DSI was submitted to DPHI as required, dated 28/8/2024.
E93	Should remediation be required to make land suitable for the final intended land use, a Remedial Action Plan must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The Remedial Action Plan must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (NSW) and must include measures to remediate the contamination at the site to ensure the site will be suitable for the proposed use when the Remedial Action Plan is implemented. Note: Nothing in this condition prevents the Proponent from preparing individual Remedial Action Plans for separate sites.	• Interview with Sydney Metro & LOR, 25/8/2025 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024	NT	There is no remediation known to be required as part of the FSM project.
E94	Before commencing remediation, a Section B Site Audit Statement(s) must be prepared by an NSW EPA-accredited Site Auditor that certifies that the Remedial Action Plan(s) is/are appropriate and that the site can be made suitable for the proposed use. The Remedial Action Plan(s) must be implemented and any changes to the Remedial Action Plan(s) must be approved in writing by the NSW EPA-accredited Site Auditor. Note: Nothing in this condition prevents the Proponent from engaging an NSW EPA-accredited Site Auditor to prepare individual Site Audit Statements for Remedial Action Plans for separate sites.	• Interview with Sydney Metro & LOR, 25/8/2025 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024	NT	There is no remediation known to be required as part of the FSM project.
E95	Validation Report(s) must be prepared in accordance with <i>Consultants Reporting on Contaminated Land: Contaminated Land Guidelines</i> (EPA, 2020) and relevant guidelines made or approved under section 105 of the <i>Contaminated Land Management Act 1997</i> (NSW). Note: Nothing in this condition prevents the Proponent from preparing individual Validation Reports for separate sites.	• Interview with Sydney Metro & LOR, 25/8/2025 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024	NT	There is no remediation known to be required as part of the FSM project.

Item
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Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E96	A Section A1 or Section A2 Site Audit Statement (accompanied by an Environmental Management Plan) and its accompanying Site Audit Report, which state that the contaminated land disturbed by the work has been made suitable for the intended land use, must be submitted to the Planning Secretary and the Relevant Council(s) after remediation and before the commencement of operation of the CSSI. <i>Note: Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.</i>	- Interview with Sydney Metro & LOR, 25/8/2025 - LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ - Sydney Metro Project website: https://www.sydneymetro.info/documents - FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024	NT	There is no remediation known to be required as part of the FSM project.
E97	A copy of Detailed Site Investigation Report(s), Remedial Action Plan(s), Validation Report(s), Site Audit Report(s) and Site Audit Statement(s) must be submitted to the Planning Secretary and the Relevant Council(s) for information.	- Interview with Sydney Metro & LOR, 25/8/2025 - LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ - Sydney Metro Project website: https://www.sydneymetro.info/documents - FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024 - Letter Sydney Metro to DPHI RE: SM-WSA Submission of Detailed Site Investigation Report under Condition of Approval E97 - AEW FSM, dated 28/8/2024 - Letter DPHI to Sydney Metro RE: SM-WSA AEW FSM Detailed Site Investigation Report, dated 09/9/2024	C	A Detailed Site Investigation (DSI) was conducted for the Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, by ADE, in a report dated 21/08/2024. ADE found that "All soil samples collected during this investigation reported chemical concentrations below the adopted site assessment criteria. Visual inspection of the subject materials did not identify indicators of PASS, hydrocarbon odours / staining and or ACM". No moderate-high-risk contaminated sites are known to have been identified for the FSM package of works. The DSI was submitted to DPHI as required, dated 28/8/2024. Submission of the DSI to councils was verified during previous IEAs.
E98	An Unexpected Contaminated Land and Asbestos Finds Procedure must be prepared before the commencement of construction and must be followed should unexpected contaminated land or asbestos (or suspected contaminated land or asbestos) be excavated or otherwise discovered during construction.	- Interview with Sydney Metro & LOR, 25/8/2025 - AEW Footbridge St Marys CEMP, Rev 04, dated 28/3/2025 - Contamination and Asbestos Unexpected Finds Procedure, CEMP	C	The FSM CEMP documents the Unexpected Finds Procedure (UFP) for contamination, and was submitted to DPHI prior to commencement of construction. There were no unexpected finds of contamination encountered during the audit period.
E99	The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.	- Interview with Sydney Metro & LOR, 25/8/2025 - AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 - Waste Disposal tracker including the waste generated from the examined asbestos UEF (Waste Tracking Register) - ADE Onsite Visual Asbestos Clearance Certificate, dated 8/3/2025 - Cleanaway Kemps Creek Docket, 0.12Tonnes, dated 13/3/2025 - Environmental Protection Licence - 4068 - Cleanaway Pty Ltd	C	On 8/3/2025 an unexpected find of asbestos was identified at St Marys Station, between Platforms 3 and 4 during excavation. This event was reviewed as an example during the audit. Auditees provided the following evidence for review: - Waste Disposal tracker including the waste generated from the above asbestos UEF - Corresponding disposal dockets - EPL of the receiving facility - Waste Classification report/certificate - ADE Asbestos Materials Clearance Inspection Report. Suspected asbestos containing conduits were removed by ADE and the area made safe. No ACM was observed within the removal area. ADE confirmed that "Upon visual inspection of the subject area and surrounds, the asbestos containing materials have been removed/made safe to a satisfactory standard. The subject area may be reoccupied safely, subject to the limitations and/or notes listed above".

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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
SUSTAINABILITY				
E100	A Sustainability Plan must be prepared to achieve an Infrastructure Sustainability Council of Australia (ISCA) Infrastructure Sustainability rating of +75 (Version 1.2) (or equivalent level of performance using a demonstrated equivalent rating tool) or a 5-Star Green Star rating (or equivalent level of performance using a demonstrated equivalent rating tool).	• Interview with Sydney Metro & LOR, 25/8/2025 • Sydney Metro WSA Sustainability Plan, January 2022 • Sydney Metro Letter of submission to DPHI Ref SM-2200002922, dated 21/1/2022 - RE: CSSI 10051 – Condition of Approval E100 & 101 - Submission of Sydney Metro - Western Sydney Airport (SM-WSA) Sustainability Management Plan	C	The Sydney Metro WSA Sustainability Plan (SMP), January 2022 was sighted and was available on the project website. Auditees confirmed the ISCA Rating tool is being followed during Construction, as required by the SMP, and the letter of submission of the Sustainability Plan states the plan has been prepared to achieve IS rating of 75+ as required by Condition E100 .
E101	The Sustainability Plan must be submitted to the Planning Secretary for information within six (6) months of the date of this approval and must be implemented throughout construction and operation. <i>Note: Nothing in this condition prevents the Proponent from preparing separate Sustainability Strategies for the construction and operational stages of the CSSI.</i>	• Interview with Sydney Metro & LOR, 25/8/2025 • Sydney Metro WSA Sustainability Plan, January 2022 • Sydney Metro Letter of submission to DPHI Ref SM-2200002922, dated 21/1/2022 - RE: CSSI 10051 – Condition of Approval E100 & 101 - Submission of Sydney Metro - Western Sydney Airport (SM-WSA) Sustainability Management Plan	C	The Sydney Metro WSA Sustainability Plan, January 2022 (SMP) was submitted to DPHI on 21/1/2022, within six months of the date of SSI-10051 approval on 23/7/2021.
E102	A Water Reuse Strategy must be prepared, which sets out options for the reuse of collected stormwater and groundwater during construction and operation. The Water Reuse Strategy must include, but not be limited to: (a) evaluation of reuse options; (b) details of the preferred reuse option(s), including volumes of water to be reused, proposed reuse locations and/or activities, proposed treatment (if required), and any additional licences or approvals that may be required; (c) measures to avoid misuse of recycled water as potable water; (d) consideration of the public health risks from water recycling; and (e) time frame for the implementation of the preferred reuse option(s). The Water Reuse Strategy must be prepared based on best practice and advice sought from relevant agencies, as required. The Strategy must be applied during construction. Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail. A copy of the Water Reuse Strategy must be made publicly available. <i>Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational stages of the CSSI.</i>	• CEMP, Attachment Q: Water Reuse Strategy	C	The E102 FSM Water Reuse Strategy has been prepared and was available on the FSM project website, attached to the CEMP. The Water Reuse Strategy addresses each part of Condition A102 and includes an evaluation of reuse options (Section 2) and Preferred reuse options (Section 3.0). A Non-potable water feasibility assessment is included in Section 3.0 also. Onsite reuse parameters are documented in Section 4.0 and water efficiency measures are included in Section 5.0. An example water discharge permit is attached. The contents of the Water Reuse Strategy (a)-(e) have not been re-evaluated here as the strategy was prepared prior to the current audit period. Condition E102 was verified as compliant during IA1. Water accumulated in excavations is pumped to the construction water tanks and treated prior to discharge to cess or reused for flushing toilets or dust suppression. Rainwater tanks capture runoff from the roof of the site compound buildings and is reused for flushing toilets or dust suppression.
TRAFFIC AND TRANSPORT				
E103	Construction Traffic Management Plans (CTMPs) must be prepared in accordance with the Construction Traffic Management Framework. A copy of the CTMPs must be submitted to the Planning Secretary for information before the commencement of any construction in the area identified and managed within the relevant CTMP .	• Site inspection, 25/8/2025 • Interview with Sydney Metro & LOR, 25/8/2025 • Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev E, dated 25/7/2024	C	A Construction Traffic Management Plan (CTMP) has been prepared for the project. Evidence of submission of the CTMP to DPHI was verified during a previous audit period.
Management of Heavy Vehicle Movements				
E104	The locations of all Heavy Vehicles used for spoil haulage must be monitored in real time and the records of monitoring be made available electronically to the Planning Secretary and the EPA upon request for a period of no less than one (1) year following the completion of construction.	• Site inspection, 25/8/2025 • Interview with Sydney Metro & LOR, 25/8/2025 • Live Tracking Report, Hire Activity Report 179163, dated 2/6/2025	C	An example of an Live Tracking Report 179163 for a 10 Wheeler from D&J Bulk Haulage Pty Ltd, dated 2/6/2025 was provided as evidence. The report includes maps of the truck route.
E105	Local roads proposed to be used by Heavy Vehicles to directly access ancillary facilities / construction sites that are not identified in the documents listed in Condition A1 must be approved by the Planning Secretary and be included in the CTMP .	• Site inspection, 25/8/2025 • Interview with Sydney Metro & LOR, 25/8/2025 • DPHI Approval of E105-E106 HVLR Rev H, dated 14/8/2025 • Heavy Vehicle Local Roads Report, Footbridge St Marys, Rev H, dated 13/9/2024	C	Spoil haulage routes have been approved as documented in the CTMP. A Heavy Vehicle Local Roads Assessment for the Use of Local Roads (HVLR) to facilitate the project was updated to RevH in August 2024, conditionally approved, and resubmitted to DPHI for approval in August 2025. DPHI approved the HVLR RevH, including a request for extension on 14/8/2025. The HVLR was prepared in consultation with Penrith City Council and endorsed by Alex Gosper, Level 3 Road Safety Auditor. The use of the following roads was subsequently approved by the Department under Condition E105: • Australia Street between Hobart Street and Brisbane Street • Brisbane Street between Glossop Street and Australia Street • Hobart Street between Glossop Street and Sydney Street • Forrester Road between Harris Street and Rail Corridor The approval is limited to the period ending 30/6/2027. There were no heavy vehicles observed on local roads during the audit site inspection.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E106	All requests to the Planning Secretary for approval to use local roads under Condition E105 above must include the following: (a) a swept path analysis; (b) demonstration that the use of local roads by Heavy Vehicles for the CSSI will not compromise the safety of pedestrians and cyclists of the safety of two-way traffic flow on two-way roadways; (c) details as to the date of completion of the road dilapidation surveys for the subject local roads; and (d) measures that will be implemented to avoid where practicable the use of local roads past schools, aged care facilities and child care facilities during their peak operation times; and (e) written advice from an appropriately qualified professional on the suitability of the proposed Heavy Vehicle route which takes into consideration items (a) to (d) of this condition.	- Site inspection, 25/8/2025 - Interview with Sydney Metro & LOR, 25/8/2025 - DPHI Approval of E105-E106 HVLR Rev H, dated 14/8/2025 - Heavy Vehicle Local Roads Report, Footbridge St Marys, Rev H, dated 13/9/2024	C	Spoil haulage routes have been approved as documented in the CTMP. A Heavy Vehicle Local Roads Assessment for the Use of Local Roads (HVLR) to facilitate the project was updated to RevH in August 2024, conditionally approved, and resubmitted to DPHI for approval in August 2025. DPHI approved the HVLR RevH, including a request for extension on 14/8/2025. The HVLR was prepared in consultation with Penrith City Council and endorsed by Alex Gosper, Level 3 Road Safety Auditor. The use of the following roads was subsequently approved by the Department under Condition E105: - Australia Street between Hobart Street and Brisbane Street - Brisbane Street between Glossop Street and Australia Street - Hobart Street between Glossop Street and Sydney Street - Forrester Road between Harris Street and Rail Corridor The approval is limited to the period ending 30/6/2027. There were no heavy vehicles observed on local roads during the audit site inspection.
Road Dilapidation				
E107	Before any local road is used by a Heavy Vehicle for the purposes of construction of the CSSI, a Road Dilapidation Report must be prepared for the road. A copy of the Road Dilapidation Report must be provided to the Relevant Road Authority(s) within three (3) weeks of completion of the survey and at no later than one (1) month before the road being used by Heavy Vehicles associated with the construction of the CSSI.	- Interview with Sydney Metro & LOR, 25/8/2025 - AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 - Land Surveys Existing Condition Survey Report, Forrester Road Rev0, dated 4/8/2023 - Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev E, dated 25/7/2024	C	A Road Pre-Condition Dilapidation Survey was sighted for Forrester Road (4/8/2023), and is included as Appendix 5 of the CTMP. Verification of submission of the road dilapidation report to the Relevant Road Authority, and date of first use of the road by heavy vehicles was outside the audit period so was not verified. Submission of the Road Dilapidation Report to Council was verified during a previous audit period.
E108	If damage to roads occurs as a result of the construction of the CSSI, the Proponent must either (at the Relevant Road Authority's discretion): (a) compensate the Relevant Road Authority for the damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-work as identified in the Road Dilapidation Report .	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025 - Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev E, dated 25/7/2024	NT	No damage is known to have occurred to roads during the audit period.
Construction Parking and Access Management				
E109	Vehicles associated with the project workforce (including light vehicles and Heavy Vehicles) must be managed to: (a) minimise parking on public roads; (b) minimise idling and queuing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive land use(s); (d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP .	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025 - CTPMP, Footbridge St Marys Rev E, dated 25/7/2024 - Construction Workers Parking Strategy, Footbridge St Marys RevA, dated 8/11/2023	C	Sections 3.4, & Sections 4.3-4.6 of the FSM CTPMP address Condition E109. Appendix 2 sets out the Construction Worker Parking Strategy and includes stakeholder consultation and responsibilities (LORAC, Penrith City Council and TNSW). The strategy was prepared to minimise the demand for parking in nearby public and residential streets or public parking facilities. During possessions, permits are obtained from Council for street parking. St Marys Station and surrounding streets were inspected during the audit. Worker parking on public roads is not known to have been presented as an issue for the FSM project to date. (a) The CTMP commits to 16 construction worker parking spaces being provided for LOR workers in the 19 Harris Street parking compound. Construction workers will also be encouraged to use public transport to access the site. (b) The proposed construction vehicle routes to and from the TAP 3 work compounds are primarily based on the approved truck routes under the Sydney Metro West CTMF. In addition, as per the existing road restriction, it is noted that a left turn from Glossop Street to Harris Street is only permitted for up to 7m long vehicles. As such, construction vehicles above 7m would only access the work compounds along Harris Street by turning left from Forrester Road onto Harris Street. (c) Truck drivers will be advised of the designated truck routes to/from the site. No queuing or marshalling of trucks will be permitted on public roads in the vicinity of the site. In addition, construction vehicle movements will be minimised during school zone hours (i.e. 8:00am to 9:30am and 2:30pm to 4:00pm). Auditees advised engineers are in contact with delivery drivers to schedule truck movements to reduce idling and queuing. (d) Pedestrian access to the main work compound along Harris Street will be provided via a security controlled gate on the northeastern corner of the site. All personnel entering the site will be required to undertake an induction program. Trained on-site personnel will be present at the site access to manage pedestrian movements and assist with vehicle ingress and egress. (e) Condition E109 is addressed in the CTMP, including a commitment to ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP. Driver inductions are required to be completed which includes the communication of requirements to stick to nominated haulage routes. Traffic Control Plans are prepared more locally to identify where pedestrians have access etc.
Property Access				
E110	Access to all utilities and properties must be maintained during works, unless otherwise agreed with the relevant utility owner, landowner or occupier.	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025	C	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E111	The Proponent must maintain access to properties during the entirety of works unless an alternative access is agreed in writing with the landowner(s) whose access is impacted by the CSSI works.	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025	C	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E112	Where construction of the CSSI restricts a property's access to a public road, the Proponent must, until their primary access is reinstated, provide the property with temporary alternate access to an agreed road decided through consultation with the landowner, at no cost to the property landowner, unless otherwise agreed with the landowner.	- Interview with Sydney Metro & LOR, 25/8/2025 - Site inspection, 25/8/2025	NT	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E113	Any property access physically affected by the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier. Property access must be reinstated within one (1) month of the work that physically affected the access is completed or in any other timeframe agreed with the landowner or occupier.	• Interview with Sydney Metro & LOR, 25/8/2025 • Site inspection, 25/8/2025	NT	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E114	During construction, all reasonably practicable measures must be implemented to maintain pedestrian, cyclist and vehicular access to, and parking in the vicinity of, businesses and affected properties. Disruptions are to be avoided, and where avoidance is not possible, minimised. Where disruption cannot be avoided, alternative pedestrian, cyclist and vehicular access, and parking arrangements must be developed in consultation with affected businesses and landowners and implemented before the disruption. Adequate signage and directions to businesses must be provided before, and for the duration of, any disruption.	• Site inspection, 25/8/2025 • Interview with Sydney Metro & LOR, 25/8/2025 • AEW FSM Community Liaison Plan, including Small Business Owners Engagement Plan RevD, dated 2/12/2024 • Community Consultation Strategy (CCS) • Construction Workers Parking Strategy, Footbridge St Marys RevA, dated 8/11/2023 • CTPMP, Footbridge St Marys Rev E, dated 25/7/2024	C	Pedestrian, cyclist and vehicular access management are detailed in the sighted documents. Adequate signage has been implemented as per site observations and audit discussions. There have not been any complaints recorded on this matter. As per Section 4.3 of the CTPMP, pedestrian access to the main work compound along Harris Street will be provided via a security controlled gate on the northeastern corner of the site. All personnel entering the site will be required to undertake an induction program. Trained on-site personnel will be present at the site access to manage pedestrian movements and assist with vehicle ingress and egress. These measures were observed to be implemented during the audit.
Pedestrian and Cyclist Access				
E115	Safe pedestrian and cyclist access must be maintained around the St Marys construction site during construction. In circumstances where pedestrian and cyclist access is restricted or removed due to construction activities, a proximate alternate route which complies with the relevant standards, must be provided and signposted before the restriction or removal of the impacted access.	• Site inspection, 25/8/2025 • Interview with Sydney Metro & LOR, 25/8/2025 • Community Consultation Strategy (CCS) • CTPMP, Footbridge St Marys Rev E, dated 25/7/2024	C	As per Section 4.3 of the CTPMP, pedestrian access to the main work compound along Harris Street will be provided via a security controlled gate on the northeastern corner of the site. All personnel entering the site will be required to undertake an induction program. Trained on-site personnel will be present at the site access to manage pedestrian movements and assist with vehicle ingress and egress. Safe pedestrian and cyclist access was observed around the St Marys Station site during the audit site inspection. Accessible footpaths were observed and clear around the site perimeter hoarding and into and out of St Marys Station. There have been no known instances of restricted pedestrian or cyclist access to date around the St Marys site. Traffic control is understood to be in place if pedestrian access is affected, e.g. Harris Street drainage works were observed to be underway at the time of the audit, where part of the footpath was impacted. The footpath was reinstated at the end of each day.
Road Traffic and Safety				
E116	A Traffic and Transport Liaison Group(s) must be established in accordance with the Construction Traffic Management Framework to inform the development of CTMP .	• Interview with Sydney Metro & LOR, 25/8/2025 • TTLG FSM Meeting April 2025 • TTLG FSM Meeting May 2025 • TTLG FSM Meeting June 2025 • TTLG FSM Meeting July 2025 • TTLG FSM Meeting August 2025 • Metro WSA TTLG Meeting 49 - Minutes - 3/7/2025 • Metro WSA TTLG Meeting 50 - Minutes - 7/8/2025	C	A Traffic and Transport Liaison Group (TTLG) has been established for WSA. Meeting minutes were sighted from May 2024 - February 2025 Sydney Metro is responsible for establishment of the TTLG. LORAC participate when necessary for FSM and provide the TTLG with required documentation. Meeting minutes were provided as evidence, dated April-August 2025.
E117	Supplementary analysis and modelling as required by TINSW and / or the Traffic and Transport Liaison Group(s) must be undertaken to demonstrate that construction and operational traffic can be managed to minimise disruption to traffic network operations, including changes to and the management of pedestrian, bicycle and public transport networks, public transport services, and pedestrian and cyclist movements. Revised traffic management measures must be incorporated into the CTMP . Permanent road works included in the CSSI must be designed, constructed and operated with the objective of integrating with existing and proposed road and related transport networks and minimising adverse changes to the safety, efficiency and, accessibility of the network. Design and assessment of related traffic, parking, pedestrian and cycle accessibility impacts and changes shall be undertaken: (a) in consultation with, and to the reasonable requirements of the relevant Traffic and Transport Liaison Group ; (b) in consideration of existing and future demand, connectivity (in relation to permanent changes), performance and safety requirements; (c) to minimise and manage local area traffic impacts; (d) to, where possible and appropriate, retain or reinstate parking in St Marys; (e) to ensure access is maintained to property and infrastructure (f) to address relevant design, engineering and safety guidelines, including Austroads, Australian Standards and TINSW requirements. Copies of civil, structural and traffic signal design plans shall be submitted to the Relevant Road Authority for consultation during design development and before completion of construction of the CSSI.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E117 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E118	As part of Condition E117 the Traffic and Transport Liaison Group(s) is to identify opportunities to improve the intersection performance during operation at: (a) Queen Street/ Great Western Highway/ Mamre Road in St Marys; (b) Glossop Street/ Forrester Road in St Marys; and (c) Glossop Street / Great Western highway in St Marys. Identified improvements must be implemented prior to the commencement of operation.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E118 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E119	Permanent road works, including vehicular access, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users must be subject to safety audits demonstrating consistency with relevant design, engineering and safety standards and guidelines. Safety audits must be prepared in consultation with the relevant Traffic and Transport Liaison Group before the completion and use of the subject infrastructure and must be made available to the Planning Secretary upon request.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E119 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
UTILITIES MANAGEMENT				
E120	The CSSI must be designed and constructed with the objective of minimising impacts to, and interference with utilities infrastructure, and that such infrastructure and property is protected during construction. Utilities, services and other infrastructure potentially affected by construction must be identified before works affecting the item, to determine requirements for access to, diversion protection, and / or support. The relevant owner(s) and / or provider(s) of services must be consulted to make suitable arrangements for access to diversion, protection, and / or support of the affected infrastructure as required. The Proponent must ensure that disruption to any service is minimised and be responsible for advising local residents and businesses affected before any planned disruption of service.	• Interview with Sydney Metro & LOR, 25/8/2025 • FSM Utilities Management Plan, Stage 2, Rev0, dated 15/7/2025	C	A Utilities Management Plan has been prepared and serves as a guide to provide systematic methods for planning, implementing and performing construction work, including for excavation works. The intent of the document is to eliminate or minimise the risks of fatalities, injuries and events arising from conducting work in the vicinity of underground, overhead and concealed services. It applies to all manner of work activities and tasks which involve ground disturbance (potholing for utility location, topsoil or ground strip, driving star pickets or posts, trenching, boreholes, piling, bulk excavation), surface penetration (vertical walls, floor slabs or ceilings) and movement below or adjacent to overhead conductors or cabling (crane operations, plant movement, logistics, material haulage, demolition or any construction activity). Specifically, the plan: • Addresses the location of existing services potentially affected by the construction of TAP3 • Illustrates which services require to be relocated or removed • Discusses the measures to minimise and manage hazards associated with working in proximity to the services and utilities • Identify the measures and controls in place to minimise and manage any unexpected disruptions to services and utilities. There has been no known excavation that has the potential to disrupt utilities undertaken during the audit period.
Warragamba to Prospect Water Supply Pipeline				
E121	The proponent must consult with WaterNSW regarding design, construction and operational management where the proposal interacts with the Warragamba to Prospect Water Supply Pipeline, and ensure that proposed construction and operational agreements are consistent with the "Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines" and implement all practical measures to protect the Warragamba to Prospect Water Supply Pipelines infrastructure, or as otherwise agreed to by WaterNSW.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E121 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
WASTE				
E122	Waste generated during construction and operation must be dealt with in accordance with the following priorities: (a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; (b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and (c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.	• Interview with Sydney Metro & LOR, 25/8/2025 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • FSM ERAP – Waste and Resource Management • Interview with ER, 7/02/2025 • Appendix F - Sydney Metro Monthly Reporting - Sustainability _July_2025 • FSM - CR4 - 7 - CS2 - C&D Waste tracker • FSM - CR5 - 1 - CS2 - Spoil Tracker	C	The project waste register for the period was sighted, and documented waste tracking requirements in the CEMP (ERAP – Waste and Resource Management) were reviewed. The waste hierarchy as per the WARR Act is described in Section 12.8.10, Table 10 of the CEMP. Sustainability reporting is prepared monthly by Sydney Metro and the Sustainability Report for July 2025 was provided as evidence. Reports include various waste data including: Construction & demolition waste; Reusable spoil (VENM & ENM); Office waste, General solid waste, and Contaminated waste, and includes data for reuse, recycling and offsite disposal. At a project level for FSM, waste management is tracked by the LOR Sustainability Advisor. A Waste Tracker is maintained for Construction & Demolition Waste and includes a Waste Description, Subcontractor, reference to the Tipping Docket, and Final destination. The volume of office and construction waste for various waste streams is also recorded. A Spoil Tracker is also maintained for and includes Date, Location, Contractor, Waste contractor, Waste Classification Report Number, Description of the waste, Waste type, End use, % Recycled, EPL & Waste Facility details. Refer to Conditions E124 & E125 for verification of the movement of spoil to offsite disposal facilities.

Item
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Auditee/ Client: Laing O'Rourke / Sydney Metro
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Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E123	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the conditions of the current EPL for the CSSI, or be done in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , as the case may be.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	Auditees advised there has been no material import to site under an RRO or RRE. No VENM has been imported to site.
E124	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , or to any other place that can lawfully accept such waste.	• Interview with Sydney Metro & LOR, 25/8/2025 • FSM - CR4 - 7 - CS2 - C&D Waste tracker • FSM - CR5 - 1 - CS2 - Spoil Tracker	C	At a project level for FSM, waste management is tracked by the LOR Sustainability Advisor. A Spoil Tracker is also maintained for and includes Date, Location, Contractor, Waste contractor, Waste Classification Report Number, Description of the waste, Waste type, End use, % Recycled, EPL & Waste Facility details. The above trackers record EPLs of disposal facilities to ensure they are appropriately licensed to accept the waste. 100% of reusable spoil and VENM removed from the FSM site to date is recorded as being recycled (0% to landfill). Non-reusable spoil is disposed to landfill.
E125	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	• Interview with Sydney Metro & LOR, 25/8/2025 • ADE Waste Classification and Analysis Report, Laing O'Rourke Compound, 32 - 34 Harris Street, Saint Marys NSW 2760, dated 29/4/2024 • Alliance Waste Classification and Virgin Excavated Natural Material Report, dated 13/9/2024	C	Two in-situ Waste Classification Reports were completed in September 2024 to classify all areas within the platform and site compound and were reviewed during the audit. Refer to Condition E99 for an evaluation of waste tracking for asbestos impacted spoil.
WATER				
E126	The CSSI must be designed and constructed so as to maintain the NSW Water Quality Objectives (NSW WQO) where they are being achieved as at the date of this approval, and contribute towards achievement of the NSW WQO over time where they are not being achieved as at the date of this approval, unless an EPL in force in respect of the CSSI contains different requirements in relation to the NSW WQO, in which case those requirements must be complied with.	• Interview with Sydney Metro & LOR, 25/8/2025	NT	Auditees advised there is no water discharged offsite and no Water Treatment Plants in place for the project.
Construction Requirements				
E127	The Proponent must consider the Guidelines for controlled activities on waterfront land Riparian corridors (Department of Industry 2018) when carrying out work within 40 metres of a watercourse, including its bed.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E127 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E128	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).	• Interview with Sydney Metro & LOR, 25/8/2025 • Site inspection, 25/8/2025 • SM-WSA FSM Environmental Control Map (ECM), dated 17/7/2025 • SM-WSA Harris Street Drainage Works ECM Rev 02, dated 23/5/2025	C	There is one main overarching Erosion and Sediment Control Plan (ESCP) that has been prepared for the project, which is updated on a progressive basis to reflect the current stage of construction. The ESCP was adequately detailed and appeared to reflect conditions observed on site at the time of the audit. Separate ESCPs for additional works are prepared as required, for example an ESCP was prepared for the Harris Street stormwater works. ECMs are kept up to date and displayed at the site.
E129	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from construction wastewater treatment plants to surface waters must not exceed: (a) the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG (2018)) default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 (ANZECC/ARMCANZ); and (c) for bio accumulative and persistent toxicants, the ANZG (2018) guidelines values at a minimum of 99 per cent species protection level. Where the ANZG (2018) does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG (2018) for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E129 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E130	If construction stage stormwater discharges are proposed, a Water Pollution Impact Assessment will be required. Any such assessment must be prepared in consultation with the EPA and be consistent with the National Water Quality Guidelines, with a level of detail commensurate with the potential water pollution risk. Note: If an EPL is required the <i>Water Pollution Impact Assessment</i> will be required to inform licensing consistent with section 45 of the POEO Act.	• Interview with Sydney Metro & LOR, 25/8/2025 • Site inspection, 25/8/2025	NT	There are no construction stage stormwater discharges proposed for FSM.
E131	Drainage feature crossings (permanent and temporary watercourse crossings and stream diversions) and drainage swales and depressions must be carried out in accordance with relevant guidelines and designed by a suitably qualified and experienced person.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E131 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Heitborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No. MESYM 2025106-01 Sydney Metro IEA8_WSA_FAW_August 2025

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Operational Requirements				
E132	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from operational water treatment plants to surface waters must not exceed: (a) the ANZG 2018 default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ, 2000); and (c) for bio accumulative and persistent toxicants, the ANZG 2018 guideline values at a minimum of 99 per cent species protection level. Where the ANZG 2018 does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG 2018 for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E132 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
Groundwater				
E133	Make good provisions for groundwater users must be provided in the event of a material decline in water supply levels, quality or quantity from registered existing bores associated with groundwater changes from either construction and/or ongoing operational dewatering caused by the CSSI.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E133 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
E134	The Proponent must submit a revised Groundwater Modelling Report to the Planning Secretary for information before bulk excavation at the relevant construction location. The Groundwater Modelling Report must include: (a) for each construction site where excavation will be undertaken, cumulative (additive) impacts from nearby developments, parallel transport projects and nearby excavation associated with the CSSI; (b) predicted incidental groundwater take (dewatering) including cumulative project effects; (c) potential impacts of the CSSI or detail and demonstrate why the CSSI will not have lasting impacts to the groundwater system, ongoing groundwater incidental take and groundwater level drawdown effects; (d) actions required to minimise the risk of inflows (including in the event the CSSI are delayed or do not progress) and a strategy for accounting for any water taken beyond the life of the operation of the CSSI; (e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and (f) a schematic of the conceptual hydrogeological model.	• Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024	NT	Condition E134 is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).

Independent Environmental Audit Report

Sydney Metro

Western Sydney Airport (SSI 10051)

Finishing Auxiliary Works (FAW)

Attachment 2: Planning Secretary Appointment of Experts

NSW Planning ref: SSI-10051-PA-622

via Major Projects Portal

7 August 2025

Attention: [REDACTED] Sydney Metro Director Environment, Sustainability and Planning

Subject: Sydney Metro - Western Sydney Airport - Auditor nomination - Construction #8

Dear [REDACTED]

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Audit of the Sydney Metro - Western Sydney Airport, submitted to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 28 July 2025, as required by Condition A38 of SSI-10051 as modified (the approval).

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced and independent. NSW Planning acknowledges that [REDACTED] performed work for Healthy Buildings International, which provides environmental representative services to various Sydney Metro projects, until August 2024 but does not consider that this would preclude her provision of independent audit services of this project at this time.

Therefore, in accordance with Condition A38 of the approval and the NSW Planning *Independent Audit Post Approval Requirements* (Independent Audit PARs), as nominee of the Planning Secretary, I endorse the following independent audit team for the eighth construction phase audit:

- [REDACTED] Morasey Environment, as lead auditor
- [REDACTED] Trigalana Environmental, as alternate auditor.

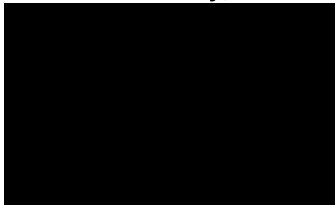
Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of approval and the Independent Audit PARs. Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Should you wish to discuss the matter further, please email compliance@planning.nsw.gov.au.

Yours sincerely,



A/Team Leader Compliance – Government Projects

NSW Planning

As nominee of the Planning Secretary

Independent Environmental Audit Report

Sydney Metro

Western Sydney Airport (SSI 10051)

Finishing Auxiliary Works (FAW)

Attachment 3: Independent Audit Declaration Form

Independent Audit Report Declaration Form

Project Name	Sydney Metro Western Sydney Airport
Consent Number	SSI 10051
Description of Project	Development of the Sydney Metro Western Sydney Airport project comprising: • construction and operation of approximately 23 kilometres of railway track between the T1 Western Line rail line and the proposed Western Sydney Aerotropolis in Bringelly, • construction and operation of new stations and associated ancillary infrastructure at St Marys, Orchard Hills, Luddenham and the Aerotropolis Core precinct, • interchange links with the existing T1 Western Line rail line, • construction and operation of a train stabling and maintenance facility, including an operational control centre, • construction and operation of associated rail infrastructure facilities, construction of tunnels, bridges, viaducts and associated works, • site preparation and enabling earthworks, including land remediation, • associated ancillary infrastructure and works.
Project Address	Land in the suburbs of Oxley Park, North St Marys, St Marys, Werrington, Werrington County, Kingswood, Claremont Meadows, Caddens, St Clair, Erskine Park, Orchard Hills, Luddenham, Greendale, Badgerys Creek, Kemps Creek and Bringelly, in the City of Penrith and City of Liverpool local government areas.
Proponent	Sydney Metro
Title of Audit	Independent Audit 8 - Finishing and Auxiliary Works_Footbridge St Marys
Audit Date	25th August 2025

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;

- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

Name of Auditor	
Signature	
Qualification	Master of Environmental Management Exemplar Global Auditor Number 111000
Company	Morasey Environment Pty Ltd

Independent Environmental Audit Report

Sydney Metro

Western Sydney Airport (SSI 10051)

Finishing Auxiliary Works (FAW)

Attachment 4: Consultation Records

[REDACTED]

From: [REDACTED] <[REDACTED]@planning.nsw.gov.au>
Sent: Wednesday, 27 August 2025 5:01 PM
To: [REDACTED]
Cc:
Subject: RE: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Good afternoon [REDACTED]

Thanks for your email and my apologies for the delay in responding.

NSW Planning does not require any additional issues or consultation to be included within the scope of the Independent Audit that is not already captured by SSI 10051, as modified, and the proposed scope you have listed below.

Please don't hesitate to contact me if you have any questions.

Kind regards,

A/Team Leader Compliance – Government Projects

NSW Planning | Department of Planning, Housing and Infrastructure

T | **M** | **E** [@planning.nsw.gov.au](mailto:[REDACTED]@planning.nsw.gov.au)

Locked Bag 5022 | PARRAMATTA NSW 2124

www.dpie.nsw.gov.au



The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au.

The Department has upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).

From: [REDACTED]
Sent: Wednesday, 27 August 2025 10:08 AM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc:
Subject: RE: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Dear DPHI,

I am following up on consultation issued below for Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW. The audit is progressing well with site inspections now complete. We are currently in the process of finalising the verification of evidence for the project.

Kind regards, ■

From: ■

Sent: Friday, 8 August 2025 8:42 AM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Cc:

Subject: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with DPHI on the scope of the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW) stages in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The audit is scheduled to commence with a site inspection for SSTOM on **11th August 2025** and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that DPHI confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We will also consult with the NSW EPA, Liverpool and Penrith City Councils.

We look forward to hearing from you before **22nd August 2025**.

Kind regards,

From: [REDACTED]
Sent: Friday, 8 August 2025 8:49 AM
To: info@epa.nsw.gov.au
Subject: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with NSW EPA on the scope of the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW) in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link: [getContent \(nsw.gov.au\)](#)

The IAPAR is available at the following link:
[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit will commence with a site inspection on 11th August 2025 and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **22nd August 2025**.

Kind regards,

14 August 2025

Principal Environmental Auditor
Morasey Environment Pty Ltd

By email:

Dear Ms

Re: Consultation on the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW)

The Environment Protection Authority (EPA) refers to your email of 8 August 2025 regarding your engagement by Sydney Metro as the independent auditor for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified) 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW).

An environment protection licence, No. 21807 (licence), is in force for activities being undertaken for the SSTOM project. A copy of the licence, associated notices and a list of non-compliances reported in the annual return is publicly available on the EPA's POEO Public Register at [Environment & Heritage | PRPOEO](#)

The EPA has considered the scope of works you have provided and has identified the following key issues for consideration during the audit:

- Conditions E92 - E99 – Soils and contamination – whether management of contamination identified at multiple locations has been consistent with requirements of the applicable Conditions of Approval.
- Condition E128 – Construction requirements - Erosion and sediment controls – whether the erosion and sediment controls have been/are being implemented and maintained before undertaking any work and during maintenance or construction activities consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).
- Actual impacts compared to predicted impacts documented in the environmental impact assessment – impacts to surface waters.

If you have any further questions about this matter, please contact Joanne Bell, Senior Operations Officer, on (02) or at info@epa.nsw.gov.au, copying @epa.nsw.gov.au

From: [REDACTED]
Sent: Friday, 8 August 2025 8:55 AM
To: council@penrith.city
Subject: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with NSW EPA on the scope of the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW) in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link: [getContent \(nsw.gov.au\)](#)

The IAPAR is available at the following link:
[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit will commence with a site inspection on 11th August 2025 and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that PCC confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **22nd August 2025**.

Kind regards,

From: [REDACTED]
Sent: Friday, 8 August 2025 8:53 AM
To: lcc@liverpool.nsw.gov.au
Subject: Independent Audit 8 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with NSW EPA on the scope of the 8th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW) in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link: [getContent \(nsw.gov.au\)](#)

The IAPAR is available at the following link:
[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit will commence with a site inspection on 11th August 2025 and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that LCC confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **22nd August 2025**.

Kind regards,