



SSI 10038 and SSI 19238057- Sydney Metro response to Independent Audit 07

SM-XX-XXXXXXXXXX

Applicable to:	Sydney Metro West
Status:	Final
Date of issue:	21 Oct 2025

CSSI 10038 – Findings from the Independent Audit (August 2025)

Item	Relevant phase	Condition	Type	Requirement	Finding	Recommended or completed action	By whom	Status
No new non-compliances or observations identified								

CSSI 19238057 - Findings from the Independent Audit (August 2025)

Item	Condition	Type	Requirement	Finding	Recommended or completed action ¹	By Whom	Status ²	Proponent Response
19238057_Aug25_1	D71	Observation	<i>The locations of all heavy vehicles used for spoil haulage for the CSSI 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.</i>	JCG have established and implemented a robust vehicle tracking system (Virtual Superintendent (VS)). This system requires use of an app that is installed on mobile phones in each of the heavy vehicle drivers used for spoil haulage on the Project. The app provides real-time GPS tracking of the heavy vehicle. As part of the loading process, JCG's loader (also fitted with VS) must select the active truck in the system prior to loading. In the event the truck doesn't have VS active, the loader is unable to select the truck and loading will not commence. The GPS is then monitored from loading site to spoil destination in real-time and the system tracks speed, fatigue, time/duration and route analysis. As part of the tipping process, the nominated tip site destination is predetermined in VS by the JCG logistics team. For the haulier to complete the journey, they must enter the tip site geofence (a GPS boundary around the tip site). Should the driver fail to enter the tip site geofence, the system will not record the load as being completed and the haulier will not receive payment for the load. As part of the system, JCG have built in autonomous monitoring to identify when a GPS signal is lost, allowing identification and further investigation as required. According to the evidence provided JCG identified 49 x instances during the audit period whereby GPS inactivity was recorded (out of 32,140 trips recorded in total). JCG interrogated these events and all but 6 x events were a result of legitimate circumstances (e.g.: fatigue breaks, end-of-shift logoff oversight, phone coverage, or that the trucks were on site during the inactivity or were not being used for spoil haulage at the time of the inactivity). The remaining 6 x instances, occurring during 6 – 10 March 2025 and attributed to driver error or similar, were responded to by JCG immediately and resulted in drivers reactivating	JCG identified, interrogated and responded to each instance of GPS inactivity recorded during the audit period.	JCG	Closed	JCG have implemented a robust vehicle tracking system (virtual superintendent) that provides real-time GPS tracking of heavy vehicles. 49 instances of GPS inactivity were identified during the audit period from a total of 32,140 trips and were as a result of valid circumstances such as fatigue breaks, phone coverage or trucks not being in use during the period of GPS inactivity. 6 instances were as a result of driver error and were actioned immediately by JCG ensuring no repeat occurrences. Additionally, JCG has not identified circumstances where spoil has not been tipped at the nominated disposal location. JCG will continue to monitor GPS activity through the virtual superintendent system and respond to any instances of GPS inactivity.

¹ The recommended or completed actions do not preclude the requirement to notify the Department of any actual non-compliance within 7 days of becoming aware of them in accordance with A46/A47.

² Status of finding and action according to the Auditor at the time of finalising the Report.

Item	Condition	Type	Requirement	Finding	Recommended or completed action ¹	By Whom	Status ²	Proponent Response
				the GPS prior to collecting the next spoil load. There do not appear to be repeat occurrences and to date JCG has not identified any material loaded at a JCG site which has not been tipped at the nominated destination. For the reasons set out above, the Auditor considers that JCG have complied with D71.				
19238057_Aug25_2	D77	Non-compliance	<i>All vehicles associated with the CSSI (including light vehicles and Heavy Vehicles) must be managed to:</i> a) <i>minimise parking on public roads;</i> b) <i>minimise idling and queueing on state and regional roads;</i> c) <i>not carry out marshalling of construction vehicles near sensitive land user(s);</i> d) <i>not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and</i> e) <i>ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMPs</i>	Note that this finding is consistent with that identified in the previous audit report, but covers the current audit period. JCG have a system to manage heavy vehicles on the Project, however the system failed to ensure spoil haulage vehicles adhered to the nominated haulage routes identified in the CTMPs on 73 x occasions during the audit period. JCG provided a range of information regarding this requirement and the following is of note: - JCG has an advanced and robust system for managing heavy vehicles, and is of the view that it is implementing all reasonable and feasible control measures to ensure adherence is achieved (including training, real-time monitoring, weekly analysis of route breaches, disciplinary action in accordance with the Driver Code of Conduct, and reporting via the CPAS Monitoring Report). Evidence was provided supporting this and the Auditor does not dispute this position. - The 73 x off-route events represents 0.23% of total movements for the 6 month period (32,140 trips recorded in total). - None of the off-route events resulted in heavy vehicles travelling past sensitive areas such as schools. - There were no complaints regarding off-route heavy vehicle movements recorded in the complaints register, nor were there any associated incidents.	As noted, JCG have implemented a range of controls to seek to prevent off-route events occurring. These should continue. The off-route events are reported in Table 5 of the CPAS Monitoring Report, and this information is provided to the Department. The Auditor is not aware of the Department raising issues with the reported off-route events on previous occasions. As a result of this matter being captured in the previous audit report, Sydney Metro submitted a request under A11 to report on non-compliances with this condition at the time of submission of the CPAS Monitoring Report (essentially lining up the A47 and D77 reporting times), thus avoiding the obligation to report such events continuously throughout the year. At the time of writing the Department had not yet approved (or rejected) the request.	Sydney Metro and JCG	Open	JCG have implemented all reasonable and feasible measures to ensure spoil haulage vehicles comply with the nominated haulage routes identified in the CTMPs. These measures have been effective as 99.7% of spoil haulage vehicles have adhered to the nominated route. As noted by the auditor, JCG have advanced monitoring in place to identify and respond to potential contraventions of Project requirements. Where the contraventions have occurred, they are associated with human behaviour, rather than systemic failure, and JCG have taken appropriate action to address each event. JCG will continue to monitor and report in the CPAS 6 monthly report any instances where the nominated haulage route is not followed. JCG will also implement the non-compliance reporting framework as agreed with DPHI.