



**Independent Environmental Audit Report 9 (IA9)
Sydney Metro**

**Sydney Metro Western Sydney Airport (SSI 10051)
Finishing Auxiliary Works (FAW)
Footbridge St Mary's (FSM)**

Audit Date: 18 February 2026

Morasey Ref: MESYM: 2026106-02

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Western Sydney Airport (SSI 10051)

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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 (SM-WSA) Finishing and Auxiliary Works (FAW). This audit is the 9th IEA conducted for the WSA project, and the 6th IEA conducted for Footbridge St Mary's (FSM).

The temporal period covered by the audit is between the date of the 8th SM-WSA IEA (IA8) on 25th August 2025 to the date of the site inspection for this IEA 9 (IA9) on 18th February 2026. 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:	<p>Development of the Sydney Metro Western Sydney Airport project comprising:</p> <ul style="list-style-type: none">• 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. **Two non-compliances** and **four Observations** with recommendations for improvement were identified during the audit. Positive observations have been reported in **Section 4.7** of this audit report and in commentary documented throughout the audit table.

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 9

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 9th IEA conducted for the SM-WSA project, and the 6th IEA conducted for Footbridge St Mary's (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 21st October to 2nd 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 Mary's (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 Mary's Station
- Installation of vertical transportation comprising stairs, four escalators and five 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.

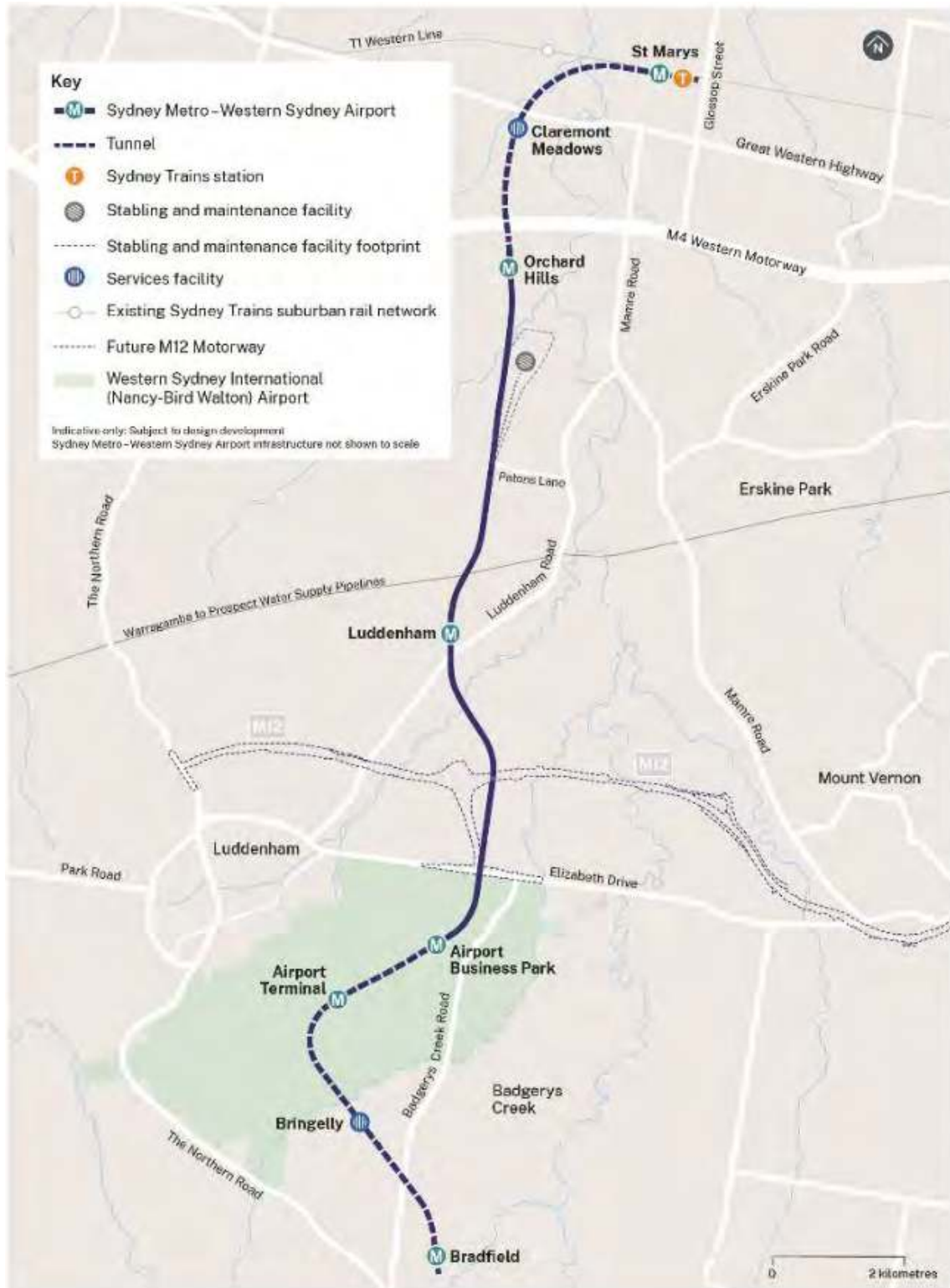


Figure 1: Key Features SM-WSA, Source: Parklife Metro CEMP, Rev02, 19/12/2024

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 Planning Secretary on request.

b. Consistency Assessments

There were no Consistency Assessments (CA) prepared for FAW_FSM during the audit period.

c. Environmental Reviews

There were no Environmental Reviews (ERs) prepared for FAW_FSM during the audit period.

1.1.4 Project Staging

The SM-WSA Staging Report, Revision 12.0, December 2025 was prepared and structured to address the requirements of Conditions of Approval (CoA) A10 to A16 of the CSSI 10051 planning approval. The construction 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)
- Finalisation Auxiliary Works (FAW).

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 12.0) 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 SM-WSA Independent Audit 8 (IA8) on 25th August 2025 to the date of the site inspection for this Independent Audit 9 (IA9) on 18th February 2026. 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 18th February 2026. The following activities were undertaken during the audit period:

Footbridge St Mary's (FSM):

- Installation of canopy modules across the overpass and platforms via crane setup in the future Northern Plaza
- Service installation to the footbridge
- Elevator and escalator installation works
- Electrical works on platforms
- Footpath and services work along Harris Street
- Deflection wall backfill works and deck pours over the rail line
- Waterproofing and patching of structures on the platforms
- Ongoing use of Laydown Area 1, and
- Service installation in the future Northern Plaza.

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. IA9 covers the period from 25th August 2025 to 18th February 2026 (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 FAW, 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 18th February 2026 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 IA9.

Table 1: Audit Team

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

The Audit Team was approved by the Department of Planning, Housing and Infrastructure (the Department | DPHI) in correspondence dated 26th November 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 13th January 2026 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.

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 13 th January 2026. DPHI responded on 14 th January 2026 but did not raise any issues specific to FAW_FSM.	N/A
NSW EPA	Scope consultation correspondence issued to NSW EPA on 13 th January 2026. EPA responded on 16 th January 2026 but did not raise any issues specific to FAW_FSM.	N/A
Liverpool City Council	Scope consultation correspondence was issued to Liverpool City Council (LCC) on 13 th January 2026. No response was received from LCC.	N/A
Penrith City Council	Scope consultation correspondence issued to Penrith City Council on 13 th January 2026. PCC responded on 21 st January 2026 but did not raise any issues specific to FAW_FSM.	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	Jett Blake	Opening & Closing meetings, Site inspection & provision of evidence
Sydney Metro	Manager Environment Western Sydney Airport Project Delivery	Tim Solomon	Opening & Closing meetings, Interviews & provision of evidence
Sydney Metro	Environment Manager Western Sydney Airport Project Delivery	Ella Somerset	Closing meeting & provision of evidence
Laing O’Rourke	Environmental Advisor	Kyi-Ella Murray	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
Laing O’Rourke	Environment Manager	Chris McCallum	Closing meeting
Laing O’Rourke	Project Leader	Marijan Harris	Site inspection
TfNSW	Environment & Sustainability Manager	Glenn Sparks	Opening & Closing meetings, Site inspection, & Interviews
TfNSW	Snr Environment & Sustainability Officer	Vivian Tse	Closing meeting
HBI	Environmental Representative	Alex Gale	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 18th February 2026 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 18th February 2026. 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 11th March 2026. 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:

- LOR, TfNSW & Sydney Metro: 18th February 2026.
- Environmental Representative: 23rd February 2026

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 were any non-compliances resulting from the implementation of the document; or
- whether there were 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 FSM Environmental Control Map (ECM) Rev16, dated 18/9/2025
- 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 12, 11 December 2025
- 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 – August 2025-February 2026
- 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 9th Independent Audit (IA9). A summary of the number of conditions assessed and compliance status from IA9 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	30	0	17	1
Part B	11	5	1	5	0
Part C	22	10	0	12	2
Part D	8	0	0	8	0
Part E	134	61	1	72	1
TOTAL	222	106	2	114	4

In summary, a total of **222 conditions** were assessed. **Two non-compliances** and **four Observations** with recommendations for improvement were identified during the audit.

A summary of findings from IA9 has been presented in **Table 6**. Positive observations are discussed in **Section 4.7**.

Findings from the previous Independent Audit (IA8) were also reviewed. The Auditor was satisfied that all findings from IA8 were closed with adequate evidence presented in support of the findings. No further recommendations or actions are considered necessary.

The findings from the previous audit (IA8) are presented in **Table 7**.

Table 6: Summary of Compliance Status – IA9 (18 February 2026)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
NON-COMPLIANCES					
NCR01	C10	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 no tree protection zone (TPZ) established around one of the trees in Laydown 1. The SM-WSA FSM Biodiversity ERAP requires <i>"Construction of fencing or any physical barrier between installation areas and the vegetation to be installed where required"</i> .	Establish a TPZ around the affected tree in Laydown 1 in accordance with the Biodiversity ERAP.	Responsibility: LOR Environment Manager Due Date: Immediately Status: OPEN
NCR02	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.	The CTPMP, Section 3.4 Worker parking states <i>"All workers will be instructed to use public/active transport and not utilise the TfNSW commuter carpark and on-street parking along Harris Street and other surrounding streets. Laing O'Rourke would take appropriate action if informed of this activity occurring"</i> . During the audit site inspection, worker vehicles were observed to be parked in a flagged off area on Harris Street outside of the 32 Harris Street compound. The CTPMP, Section 3.5 On-Street Works Zone states <i>"All construction activities will be contained within the TAP 3 compound. An on-street works zone would not be required for the construction-related works. Should a works zone be required, a</i>	Obtain Council approval (e.g. works zone approval) for worker parking during normal working hours on Harris Street outside the 32 Harris Street site compound. Alternatively, remove the flagged off worker parking area and instruct workers no project parking is allowed in this area. Review and update the CTPMP and Construction Worker Parking Strategy to reflect the actual worker parking available and approved.	Responsibility: LOR Environment Manager Due Date: Immediately Status: OPEN

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
			<p><i>separate application will be made to the Council to organise appropriate approvals for the proposed works zone prior to the start of works, as well as the parking and traffic changes".</i></p> <p>Approval for worker parking outside the Harris Street compound observed during the audit site inspection on 18/2/2026 was requested but not provided as evidence.</p>		
OBSERVATIONS					
OBS1	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.	A spoil truck parked outside Laydown 1 off Forrester Road waiting did not have the SM-WSA project marked on its side or rear. Signage for three other projects was marked on the vehicle.	Ensure all heavy vehicles used for spoil haulage are clearly marked on the sides and rear with the project name and application number.	<p>Responsibility: LOR Environment Manager</p> <p>Due Date: Immediately</p> <p>Status: OPEN</p>
OBS2	C10	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.	Litter was observed overflowing from skip bins and around the site compound.	Clean up litter from the compound and ensure bins are emptied regularly, i.e. before they begin to overflow.	<p>Responsibility: LOR Environment Manager</p> <p>Due Date: Within 5 Days</p> <p>Status: OPEN</p>
OBS3	C13	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies (as	Reference to Table 4-1 in Appendix B of the SM-WSA Staging Report Rev 12, 11/12/2025 should be updated to Table 4-3 to reference the new	Update the Staging Report accordingly.	<p>Responsibility: Sydney Metro Environment Manager</p> <p>Due Date: During the next review</p>

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
		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 prepared to set out the applicability of requirements relating to CEMP environmental management categories - FAW, rather than the superseded AEW).		of the Staging Report Status: OPEN
OBS4	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).	Excavation for CSR works was occurring in the northern plaza. ERSED controls were missing from one end of the diversion pipe under the access and were deteriorated around the stormwater inlet. Wheelie bins and bollards were stored on top of the stormwater grate. Given the amount of disturbed material located in the works area, the controls would not be deemed effective in reducing the risk of sediment entry to stormwater during a rain event. It is noted there was no rain at the time of the inspection.	Remove bins and bollards from the stormwater grate. Refresh ERSED controls in the vicinity and replace missing controls to reduce the risk of sediment entry to stormwater during the next rain event.	Responsibility: LOR Environment Manager Due Date: Within 24 Hours or prior to the next rain event, whichever is sooner. Status: OPEN

Table 7: Review of previous audit findings – IA8 (25 August 2025)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA8 ASSESSMENT & STATUS
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. <i>DPHI responded that the NC should be raised against Condition E38. Evotix was updated to change the condition allocation.</i>	N/A CLOSED during IA8 <i>No further actions or recommendations are considered necessary.</i>
OBSERVATIONS					
IA8 – OBS 1	C10	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	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</i>	Update the Staging Report to include detail on the FAW stage when this information is available.	The Staging Report was updated to Rev12, dated 11/12/2025 and included provision for the FAW stage of works. CLOSED <i>No further actions or</i>

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA8 ASSESSMENT & STATUS
		<p>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.</p>	<p><i>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".</i> The Staging Report remained under review at the time of IA8 and detail on the FAW stage had not been documented.</p>		<p><i>recommendations are considered necessary.</i></p>

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

As part 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 August 2025 to February 2026 that could be attributed to the FAW_FSM project.

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, 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 were no Consistency Assessments prepared for FAW_FSM during the audit period.
- 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 13th January 2026 to obtain input on the scope of the Independent Audit in accordance with Section 3.2 of the IAPAR. DPHI responded on 14th January 2026 but did not raise any issues specific to FAW_FSM. 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**:

- 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 9th Independent Audit conducted for the SM-WSA project, and the 6th IEA conducted for FSM, covering the period from 25th August 2025 to 9th February 2026.

In summary, a total of **222 conditions** were assessed. **Two non-compliances** and **four Observations** with recommendations for improvement were identified during the audit. 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: LOR site compound; some litter from skip bins was observed

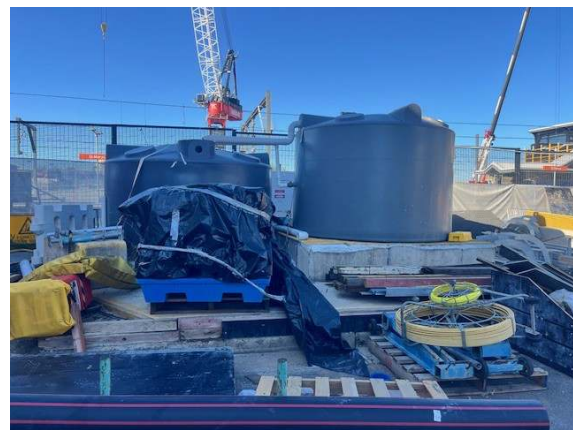


Photo 3: Site compound on hardstand and materials storage.

Photo 4: Water treatment tanks discharged to cess via permit or reused. Fuel cell.

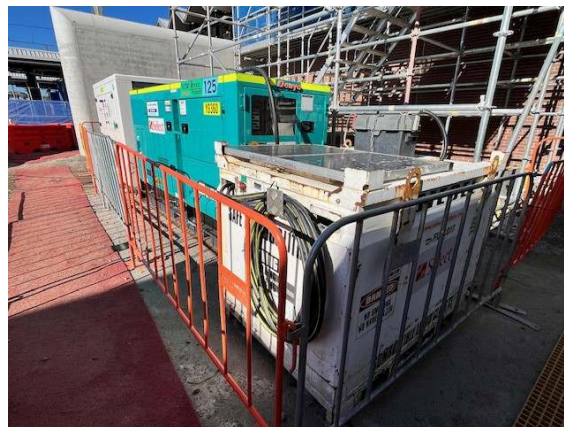


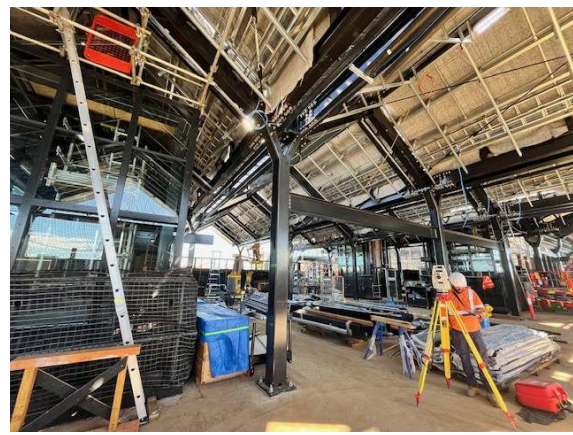
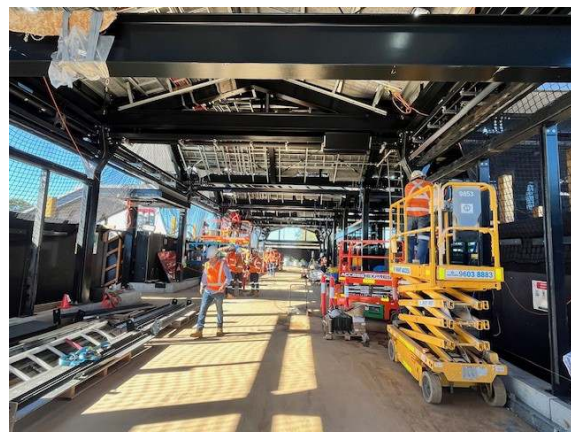
Photo 5: Generators with secondary containment for diesel (used for backup power for lifts during possession).



Photos 6-8: Northern plaza – CSR installation.



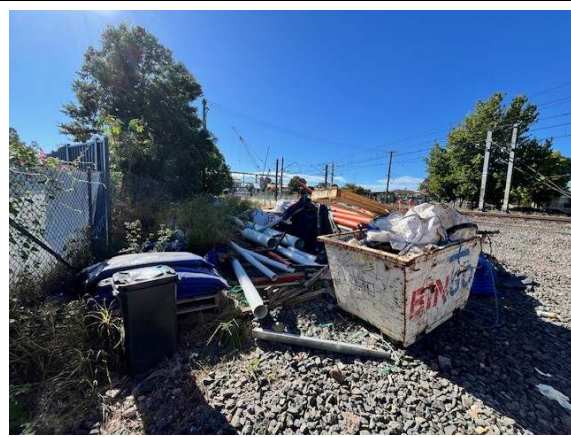
Photos 9 & 10: Missing and deteriorated ERSED controls around the stormwater drain adjacent to the Northern Plaza CSR works.



Photos 11&12: Works to the platform concourse.



Photos 13&14: St Mary's platform





Photos 15-20: Material storage and stockpiling in Laydown 1. Location of concrete washout overflow incident.



Photo 21: No tree protection established around the tree in Laydown 1.



Photo 22&23: Heavy vehicle for spoil haulage not marked on the rear or sides with project details as required by Condition A46.



Photo 24&25: Signage about temporary parking changes on Harris Street



Photo 26: Worker parking in flagged off area on Harris Street. No s138 approval obtained from Council.

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 Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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.	<ul style="list-style-type: none"> 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 	C	<p>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.</p> <p>SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement.</p> <p>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.</p> <p>There were no Consistency Assessments (CAs) or Environmental Reviews (ERs) relevant to FAW_FSM prepared during the audit period.</p>
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	<p>As per the findings from this audit, including any Non-Compliances and Observations raised throughout. During the previous audit (IA8) a non-compliance with Condition A2 was raised in relation to operation of the St Marys station vibration monitor. 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. DPHI responded to the NC raised with Condition A2, which was later reallocated to Condition E38 based on DPHI's assessment. Refer to Condition E38 for more information.</p>
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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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 	C	<p>SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement.</p> <p>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.</p> <p>There were no Consistency Assessments (CAs) or Environmental Reviews (ERs) relevant to FAW_FSM prepared during the audit period. There were no other inconsistencies identified during the audit period.</p>
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, 18/2/2026	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, 18/2/2026	NT	Auditees advised no written requirements or directions have been issued by the Planning Secretary during the audit period.
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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Interview with ER, 23/2/2026 	C	<p>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 and were approved by DPHI prior to construction commencement.</p>
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.	<ul style="list-style-type: none"> 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	<p>Approval for SSI-10051 was granted on 23/7/2021.</p> <p>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.</p>

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 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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, 18/2/2026	NT	There were no requests for extensions of time issued under Condition A9 during the audit period.
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 12, 11 Dec 2025 • 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).
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 11, 11 Oct 2024 • ER Endorsement Staging Report V11, dated 11/10/2024 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 12, 11 Dec 2025 • ER Endorsement Staging Report V12, dated 17/12/2025	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 FAW - Footbridge St Marys in the Staging Report Rev12 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 12 on 11/12/2025.
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 12, 11 Dec 2025 • ER Endorsement Staging Report Rev 12, dated 17/12/2025 • Post Approval Form (SSI-10051-PA-679), WSA CSSI 10051 Staging Report (Rev 12), dated 19/12/2025 • Letter from DPHI RE: WSA Staging Report Rev12, dated 14/1/2026	C	The Staging Report Rev12, dated 11/12/2025 was submitted to DPHI for information on 19/12/2025 The Staging Report Revision 12 was revised to include the following: • FSM transfer from AEW to FAW scope (IEA8 audit recommendation) • CRW scope of works under FAW (PS-105 management under LIW) There were no non-compliances with implementation of the Staging Report identified during the audit.
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 12, 11/12/2025	C	Finishing Auxiliary Works (FAW), Footbridge St Marys (FSM) and allocation of conditions of approval is included in the Staging Report . The allocation of conditions to FAW_FSM in the Staging Report Rev12 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 12, 11 Dec 2025 • ER Endorsement Staging Report Rev 12, dated 17/12/2025 • Post Approval Form (SSI-10051-PA-679), WSA CSSI 10051 Staging Report (Rev 12), dated 19/12/2025 • Letter from DPHI RE: WSA Staging Report Rev12, dated 14/1/2026	C	The Staging Report Rev12, dated 11/12/2025 was submitted to DPHI for information on 19/12/2025 The Staging Report Revision 12 was revised to include the following: • FSM transfer from AEW to FAW scope (IEA8 audit recommendation) • CRW scope of works under FAW (PS-105 management under LIW)
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 12, 11 Dec 2025 • ER Endorsement Staging Report Rev 12, dated 17/12/2025 • Post Approval Form (SSI-10051-PA-679), WSA CSSI 10051 Staging Report (Rev 12), dated 19/12/2025 • Letter from DPHI RE: WSA Staging Report Rev12, dated 14/1/2026	C	Strategies, plans and programs have been submitted as per the FAW_FSM project described in the Staging Report Rev 12 of the Staging Report was updated to include the following: The Staging Report Revision 12 was revised to include the following: • FSM transfer from AEW to FAW scope (IEA8 audit recommendation) • CRW scope of works under FAW (PS-105 management under LIW)
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 12, 11 Dec 2025 • ER Endorsement Staging Report Rev 12, dated 17/12/2025 • Post Approval Form (SSI-10051-PA-679), WSA CSSI 10051 Staging Report (Rev 12), dated 19/12/2025 • Letter from DPHI RE: WSA Staging Report Rev12, dated 14/1/2026	C	Strategies, plans and programs have been submitted as per the FAW_FSM project described in the Staging Report . Rev 12 of the Staging Report was updated to include the following: The Staging Report Revision 12 was revised to include the following: • FSM transfer from AEW to FAW scope (IEA8 audit recommendation) • CRW scope of works under FAW (PS-105 management under LIW) Refer to Audit Table Part C for submission of CEMP and Sub-plans and timing verification.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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ANCILLARY FACILITIES

Ancillary Facilities				
A17	<p>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:</p> <p>(a) they are located within or immediately adjacent to the Construction Boundary of the CSSI; and</p> <p>(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</p> <p>(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</p> <p>(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.</p> <p><i>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.</i></p>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 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 17/11/2023 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	<p>The following Ancillary Facilities are listed for proposed use in Section 1.2.3 of the CEMP:</p> <ul style="list-style-type: none"> The main FSM site compound and laydown, Harris Street Laydowns 1-5 2 Harris Street <p>*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.</p> <p>Page 72-73 of the CEMP references laydowns 1-5 being approved under the Ancillary Facilities Checklist. MAF checklists were provided as evidence.</p> <p>As per Section 12.8 of the CEMP, "Should any further ancillary facilities be required LORAC will submit the necessary assessment to TINSW and the ER. Future ancillary facilities would be approved in accordance with A17 or A22. "</p> <p>There were no FSM A17 Ancillary Facility Assessments approved during the audit period.</p> <p>No A17 AFs are known to have been established during the audit period.</p> <p>The CEMP was updated to Rev5 to change terminology from Minor Ancillary Facilities (MAFs) to Ancillary Facilities (AFs) at the request of DPHI.</p> <p>No ancillary facilities outside of the documents in Condition A1 are planned to be required.</p>

SITE ESTABLISHMENT WORK

Site Establishment Management Plan				
A18	<p>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:</p> <p>(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);</p> <p>(b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s);</p> <p>(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;</p> <p>(d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to:</p> <p>(i) meet the performance outcomes stated in the documents listed in Condition A1; and</p> <p>(ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and</p> <p>(e) a program for monitoring the performance outcomes, including a program for construction noise monitoring, where appropriate or required.</p> <p>Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each ancillary facility.</p>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	NT	There were no Site Establishment Management Plans prepared for FAW_FSM under Condition A18 during the audit period.

Use of Ancillary Facilities

A21	<p>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).</p> <p><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></p>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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 .
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Item
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Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW_February 2026

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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Interview with ER, 23/2/2026 Site inspection, 18/2/2026 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.	<ul style="list-style-type: none"> Site inspection, 18/2/2026 Interview with Sydney Metro & LOR, 18/2/2026 	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).	<ul style="list-style-type: none"> Site inspection, 18/2/2026 	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.	<ul style="list-style-type: none"> Interview with ER, 23/2/2026 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 FAW_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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	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.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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.
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.	<ul style="list-style-type: none"> 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).	<ul style="list-style-type: none"> 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).

Item
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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A32	<p>For the duration of the work until the commencement of operation, or as agreed with the Planning Secretary, the approved ER must:</p> <p>(a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI;</p> <p>(b) consider and inform the Planning Secretary on matters specified in the terms of this approval;</p> <p>(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;</p> <p>(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:</p> <p>(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</p> <p>(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);</p> <p>(iii) provide a written statement to the Planning Secretary advising the documents have been endorsed.</p> <p>(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;</p> <p>(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;</p> <p>(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;</p> <p>(h) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints received directly by the Department;</p> <p>(i) consider or assess the impacts of minor ancillary facilities as required by Condition A22; and</p> <p>(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.</p> <p>(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</p> <p>(l) assess the impacts of activities as required by the Low Impact Work definition.</p>	<ul style="list-style-type: none"> • Interview with ER, 23/2/2026 • Sydney Metro WSA ER Monthly Report August 2025, dated 5/9/2025 • DPHI Submission, SM WSA ER, DPHI, August 2025 Final, lodged 5/9/2025 • Sydney Metro WSA ER Monthly Report September 2025, dated 7/10/2025 • DPHI Submission, SM WSA ER, DPHI, September 2025 Final, lodged 7/10/2025 • Sydney Metro WSA ER Monthly Report October 2025, dated 7/11/2025 • DPHI Submission, SM WSA ER, DPHI, October 2025 Final, lodged 7/11/2025 • Sydney Metro WSA ER Monthly Report November 2025, dated 5/12/2025 • DPHI Submission, SM WSA ER, DPHI, November 2025 Final, lodged 5/12/2025 • Sydney Metro WSA ER Monthly Report December 2025, dated 15/1/2026 • DPHI Submission, SM WSA ER, DPHI, December 2025 Final, lodged 15/1/2026 • Sydney Metro WSA ER Monthly Report January 2026, dated 6/2/2026 • DPHI Submission, SM WSA ER, DPHI January 2026 Final, lodged 6/2/2026 • Sydney Metro WSA FSM ER Inspection Report #50, dated 22/10/2025 • Sydney Metro WSA FSM ER Inspection Report #51, dated 5/11/2025 • Sydney Metro WSA FSM ER Inspection Report #52, dated 19/11/2025 • Sydney Metro WSA FSM ER Inspection Report #53, dated 3/12/2025 • Sydney Metro WSA FSM ER Inspection Report #54, dated 17/12/2025 • Sydney Metro WSA FSM ER Inspection Report #55, dated 16/1/2026 • Sydney Metro WSA FSM ER Inspection Report #56, dated 28/1/2026 • Sydney Metro WSA FSM ER Inspection Report #57, dated 11/2/2026 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 12, 11/12/2025 • ER Endorsement Staging Report Rev 12, dated 11/12/2025 • 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	<p>(a) No formal communication has been received from DPHI requiring ER response within the audit period.</p> <p>(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.</p> <p>(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 TNSW. Minutes are distributed by TNSW.</p> <p>(d) Documents reviewed by the ER during the audit period are documented in the ER Monthly Reports.</p> <p>(e) Submission of documents to DPHI after ER endorsement was verified throughout the audit.</p> <p>(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.</p> <p>(g) There has been no request made by the Planning Secretary to the ER to assist with audits during the audit period.</p> <p>(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.</p> <p>(i) Ancillary facilities in use were approved by the ER using a checklist.</p> <p>(j) Minor amendments to the documents listed in Condition A32(j) have been approved by the ER as required.</p> <p>(k) ER Monthly reports are prepared and submitted to DPHI as required.</p> <p>(l) Low impact works are assessed by the ER during review of out of hours permits, as described throughout this audit.</p> <p>ER inspections are conducted fortnightly. Issues identified by the ER have included: Minor soil tracking from the laydown and site compound; Improvement to ERSED controls; and Litter management.</p> <p>Noise monitoring records are submitted to the ER after each possession, and the ER has not identified any issue with the monitoring undertaken or mitigation measures in place during out of hours work.</p> <p>An incident was raised after the ER observed a concrete washout to have overflowed in Laydown Area 1. The actions from the incident were closed out to the satisfaction of the ER. The site was noted by the ER to be generally tidy and well managed with relatively low environmental risk.</p> <p>Three representatives from the DPHI compliance team attended the site for an inspection on 5/11/2025. No issues were raised by the Department.</p> <p>Evidence of close-out of each issue raised by the ER was sighted by the auditor and closed-out in Evotix.</p> <p>Issues identified in ER inspection reports had been rectified at the time of the audit site inspection.</p> <p>No ER endorsements or approvals were required during the IA9 audit period.</p> <p>NB: The CEMP requires update for annual review, and to incorporate changes to the Staging Report Rev12.</p>
A33	<p>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:</p> <p>(a) the Complaints Register (to be provided on a weekly basis or as requested); and</p> <p>(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).</p>	<ul style="list-style-type: none"> • Interview with ER, 23/2/2026 	C	<p>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.</p>
NOTIFICATION OF COMMENCEMENT				
A34	<p>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.</p>	<ul style="list-style-type: none"> • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 12, 12/12/2025 • 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	<p>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.</p>
A35	<p>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.</p>	<ul style="list-style-type: none"> • 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	<p>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.</p>

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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 – Independent Auditor Nomination for February 2026 SSTOM and FSM Audit, Ref. SSI-10051-PA-670, dated 26/11/2025	C	This audit (FAW_FSM IA9 SSI-10051, dated 18/2/2026) is being conducted in accordance with the Independent Audit Post Approval Requirements (2020).
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 IA9 SSI-10051, dated 18/2/2026) • 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 – Independent Auditor Nomination for February 2026 SSTOM and FSM Audit, Ref. SSI-10051-PA-670, dated 26/11/2025	C	DPHI Letter approves the appointment of Ms Josephine Heltborg as Lead Auditor to conduct the 9th Construction phase Independent Audit (IA9) 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 (FAW_FSM IA9 SSI-10051, dated 18/2/2026) • DPHI Letter, Sydney Metro Western Sydney Airport – Independent Auditor Nomination for February 2026 SSTOM and FSM Audit, Ref. SSI-10051-PA-670, dated 26/11/2025	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 IA9 will be verified during the 10th SM-WSA Audit (IA10).
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 IA9 SSI-10051, dated 18/2/2026) • SM - WSA Independent Audit No.8 – Combined Response to Findings • Evidence of submission of SM-WSA Submission of Independent Audit Report #4 & #8 to DPHI, 3/10/2025 (SSI-10051-PA-653)	C	This audit (FAW_FSM IA9 SSI-10051, dated 18/2/2026) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with Condition A40 for IA9 will be verified during the 10th SM-WSA Audit (IA10). The IA8 FSM Audit Report (SM-WSA Audit Report), including the Proponent's response to audit findings, was submitted to the Planning Secretary on 3/10/2025, within two months of the IA8 site inspection on 11/8/2025.
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, 18/2/2026 • Site inspection, 18/2/2026 • Sydney Metro Environmental Incident and Non-compliance Notification Report, Fuel leak (minor), dated 19/11/2025 • Sydney Metro Environmental Incident and Non-compliance Notification Report, Concrete washout overflow, dated 28/1/2026	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. There were two Class 3 (minor) environmental incidents raised during the audit period. One incident related to a concrete washout overflow (no impact to stormwater or beyond the project boundary). The other incident related to a minor oil leak. Actions taken were recorded in the incident reports and verified as closed in Evotix (formerly 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 12, 11/12/2025	NT	Condition A42 is not applicable to FAW_FSM as per the Staging Report Rev12, 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, 18/2/2026	NT	No incidents triggering notification to DPHI occurred during the audit period.
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, 18/2/2026 • Site inspection, 18/2/2026	NT	There were no Non-Compliances (NCs) raised for FAW_FSM during the audit period.
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, 18/2/2026 • Site inspection, 18/2/2026	NT	There were no Non-Compliances (NCs) raised for FAW_FSM during the audit period.
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, 18/2/2026 • Site inspection, 18/2/2026	C	Observation 1: A spoil truck parked outside Laydown 1 off Forrester Road did not have the SM-WSA project marked on its side or rear. Signage for three other projects was marked on the vehicle. Recommendation: Ensure all heavy vehicles used for spoil haulage are clearly marked on the sides and rear with the project name and application number.
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, 18/2/2026 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/	C	During the site inspection for IA9 signage observed was deemed to be compliant.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
PART B				
COMMUNITY INFORMATION AND REPORTING				
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT				
Community Communication				
B1	<p>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.</p> <p>Should the Overarching Community Communication Strategy be updated, a copy must be provided to the Planning Secretary for information.</p>	<ul style="list-style-type: none"> 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, 18/2/2026 FSM Complaints Register August 2025-February 2026 	C	<p>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.</p> <p>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.</p> <p>Submission to and receipt from DPHI sighted for updated OCCS Rev5, dated 31/7/2024.</p>
COMPLAINTS MANAGEMENT SYSTEM				
B2	<p>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.</p>	<ul style="list-style-type: none"> FSM Complaints Register August 2025-February 2026 Interview with Sydney Metro & LOR, 18/2/2026 SM-WSA Cumulative Impact Meeting Minutes #018 20/8/2025 SM-WSA Cumulative Impact Meeting Minutes #019 17/9/2025 SM-WSA Cumulative Impact Meeting Minutes #020 15/10/2025 SM-WSA Cumulative Impact Meeting Minutes #021 19/11/2025 SM-WSA Cumulative Impact Meeting Minutes #022 17/12/2025 SM-WSA Cumulative Impact Meeting Minutes #023 21/1/2026 	C	<p>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.</p> <p>A Weekly Complaints Report is distributed to DPHI and the ER if required, though there have been no complaints for FSM.</p> <p>The ER Project Monthly Report summarises complaints attributed to the project for the month.</p> <p>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.</p> <p>Recent meeting minutes were provided as evidence and included attendees from Sydney Metro, SSTOM and FAW_FSM Environment and Project management teams.</p> <p>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.</p> <p>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.</p>
B3	<p>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:</p> <p>(a) a 24-hour telephone number for the registration of complaints and enquiries about the CSSI;</p> <p>(b) a postal address to which written complaints and enquiries may be sent;</p> <p>(c) an email address to which electronic complaints and enquiries may be transmitted; and</p> <p>(d) a mediation system for complaints unable to be resolved.</p> <p>This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.</p>	<ul style="list-style-type: none"> FSM Complaints Register August 2025-February 2026 Interview with Sydney Metro & LOR, 18/2/2026 	C	<p>(a) A project 1800 number (1800 717 703) has been established</p> <p>(b) Project postal address: Sydney Metro, PO Box K659, Haymarket NSW 1240</p> <p>(c) FSM uses SMWSA contacts for community enquiries and complaints. Information is included in monthly notifications and all other correspondence.</p> <p>(d) A mediation system has been established (refer B8-B10)</p> <p>The above information is available on the project website, on shadecloth around construction sites, and is included in community notifications.</p>
B4	<p>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:</p> <p>(a) number of complaints received;</p> <p>(b) date and time of the complaint;</p> <p>(c) number of people (in the household) affected in relation to a complaint, if relevant;</p> <p>(d) method by which the complaint was made;</p> <p>(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;</p> <p>(f) issue of the complaint;</p> <p>(g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and</p> <p>(h) if no action was taken, the reason(s) why no action was taken.</p>	<ul style="list-style-type: none"> FSM Complaints Register August 2025-February 2026 Interview with Sydney Metro & LOR, 18/2/2026 	C	<p>The FSM Complaints Register for the audit period was sighted.</p> <p>The Complaints Register is updated as complaints are received.</p> <p>The Contractor provides a copy of the Complaints Register to TINSW daily.</p> <p>Sydney Metro provides a copy of the Complaints Register to DPHI weekly. A copy is also provided to the ER weekly.</p> <p>There were no complaints received in relation to the project during the audit period.</p>
B5	<p>Complainants must be advised of the following information before, or as soon as practicable after, providing personal information:</p> <p>(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;</p> <p>(b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies;</p> <p>(c) the supply of personal information by the complainant is voluntary; and</p> <p>(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).</p> <p>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.</p>	<ul style="list-style-type: none"> FSM Complaints Register August 2025-February 2026 Interview with Sydney Metro & LOR, 18/2/2026 	NT	<p>There were no complaints received in relation to the project during the audit period.</p>

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9 WSA FAW February 2026

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>	<ul style="list-style-type: none"> FSM Complaints Register August 2025-February 2026 Interview with Sydney Metro & LOR, 18/2/2026 	C	Sydney Metro provides a copy of the SM-WSA 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 .	<ul style="list-style-type: none"> FSM Complaints Register August 2025-February 2026 Interview with Sydney Metro & LOR, 18/2/2026 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 FAW_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.	<ul style="list-style-type: none"> FSM Complaints Register August 2025-February 2026 Interview with Sydney Metro & LOR, 18/2/2026 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 FAW_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.	<ul style="list-style-type: none"> FSM Complaints Register August 2025-February 2026 Interview with Sydney Metro & LOR, 18/2/2026 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 FAW_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.	<ul style="list-style-type: none"> FSM Complaints Register August 2025-February 2026 Interview with Sydney Metro & LOR, 18/2/2026 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 FAW_FSM during the audit period.

PROVISION OF ELECTRONIC INFORMATION				
B11	<p>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:</p> <p>(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.</p> <p>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.</p> <p>All information required in this condition is to be provided on the website or webpage, and easy to navigate.</p>	<ul style="list-style-type: none"> LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ Sydney Metro Document Library: https://www.sydnymetro.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, 18/2/2026 Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	C	<p>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.sydnymetro.info/documents</p> <p>(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.sydnymetro.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 12, 11/12/2025 (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 IA5/ WSA IA8) was on the project website.</p> <p>The website was generally easy to navigate and documents searched for by the Auditor were located in a timely manner.</p>

Item
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Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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	<p>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.</p>	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 Letter from HBI to Sydney Metro RE: ER endorsement of Rev 12 of Staging Report, dated 17/12/2025 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	<p>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).</p> <p>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".</p> <p>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".</p> <p>The CEMP annual review is due by 27/2/2026 and will include an updates to address changes to the Staging Report Rev12.</p>															
C2	<p>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.</p> <p><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></p>	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 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	<p>The WSA FSM CEMP & Sub-plans were endorsed by the ER in a letter dated 25/5/2023.</p> <p>Construction for FSM commenced on 27/5/2023, after ER approval.</p>															
C3	<p>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.</p>	<ul style="list-style-type: none"> AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 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 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	<p>The WSA FSM CEMP & Sub-plans were:</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>The submission of CEMP & Sub-plans to the ER and compliance with Condition C3 was assessed during a previous audit.</p>															
C4	<p>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.</p>	<ul style="list-style-type: none"> AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 Post Approval Form_20230526032825 (SSI-10051-PA-229), SSI10051-SM-WSA AEW FSM CEMP Rev01 	C	<p>The WSA FSM CEMP Rev 01 was:</p> <ul style="list-style-type: none"> Endorsed by the ER on 25/5/2023 Submitted to DPHI on 26/5/2023 Construction for FSM commenced on 27/5/2023 <p>The submission of CEMP & Sub-plans to the ER and compliance with Condition C4 was assessed during a previous audit.</p>															
C5	<p>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.</p> <p>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.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <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> <p>activities or activity based staging.</p>		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	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 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	<p>Partially Applicable as per the table in Appendix B of the Staging Report Rev 12, 11/12/2025. Appendix B of the Staging Report Rev 12 states "risks will be managed in accordance with Table 4-1".</p> <p>Table 4-1 of the Staging Report lists the following Sub-plans as applicable to AEW - Footbridge St Marys:</p> <ol style="list-style-type: none"> Noise and Vibration Management - CEMP Procedure Non-Aboriginal Heritage Sub-plan - CEMP Aboriginal Cultural Heritage Management Plan Flora and Fauna / Biodiversity - CEMP Visual Amenity - CEMP Soil and Water (including monitoring program) - CEMP Air Quality (including monitoring program) - CEMP Waste (and Recycling) - CEMP Workforce Development Plan <p>The details of agency consultation are included in the CEMP.</p> <p>Consultation with agencies, and the approval of the original FSM CEMP & Procedures was not conducted within the current reporting period. There is no requirement for the Planning Secretary to approve the FSM CEMP and Sub-plans in the SM-WSA Staging Report Rev11.</p> <p>The submission of CEMP & Sub-plans to the ER and compliance with Condition C5 was assessed during a previous audit.</p>
	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																	

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasay Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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.	<ul style="list-style-type: none"> - Sydney Metro WSA Staging Report Rev 11, 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 - 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 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.	<ul style="list-style-type: none"> - 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 FSM CEMP was approved by the ER in a letter dated 25/5/2023. Construction for WSA 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.	<ul style="list-style-type: none"> - 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 FSM CEMP was approved by the ER in a letter dated 25/5/2023. Construction for WSA 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.	<ul style="list-style-type: none"> - 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 FSM CEMP was approved by the ER in a letter dated 25/5/2023. Construction for WSA 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.	<ul style="list-style-type: none"> - 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 - SM-WSA AEW FSM Biodiversity ERAP (CEMP, Attachment A) 	NC	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 FSM CEMP was approved by the ER in a letter dated 25/5/2023. Construction for WSA FSM commenced on 27/5/2023. The implementation of the CEMP was verified during the audit site inspection and as noted throughout the audit. Non-Compliance 1: There was no TPZ established around one of the trees in Laydown 1. The SM-WSA AEW FSM Biodiversity ERAP requires "Construction of fencing or any physical barrier between installation areas and the vegetation to be installed where required". Recommendation: Establish a TPZ around the affected tree in Laydown 1 in accordance with the Biodiversity ERAP. Observation 2: Litter was observed overflowing from skip bins and around the site compound. Recommendation: Clean up litter from the compound and ensure bins are emptied regularly, i.e. before they begin to overflow.
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.	<ul style="list-style-type: none"> - Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition C11 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).
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 .	<ul style="list-style-type: none"> - Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition C12 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 Hellborg, Morasay Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW_February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations															
CONSTRUCTION MONITORING PROGRAMS																			
C13	<p>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.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 30%;">Required Construction Monitoring Programs</th> <th style="width: 65%;">Relevant government agencies to be consulted for each Construction Monitoring Program</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>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> </tbody> </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	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 • 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 • Water Discharge or Reuse Approval Form, dated 19/1/2026 • Water Discharge or Reuse Approval Form, dated 17/11/2025 • Water Discharge or Reuse Approval Form, dated 18/9/2025 • Water Discharge or Reuse Approval Form, dated 10/2/2026 	NT	<p>Partially Applicable as per the table in Appendix B of the Staging Report Rev 12, 11/12/2025. Appendix B of the Staging Report Rev 12 states "risks will be managed in accordance with Table 4-1".</p> <p>Observation 3: Reference to Table 4-1 in Appendix B of the Sydney Metro WSA Staging Report Rev 12, 11/12/2025 should be updated to Table 4-3 to reference the new table prepared to set out the applicability of requirements relating to CEMP environmental management categories - FAW, rather than the superseded AEW).</p> <p>Table 4-3 of the Staging Report lists the following Sub-plans as applicable to FAW_FSM:</p> <ul style="list-style-type: none"> 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 <p>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".</p> <p>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 IA9 audit period.</p> <p>The WSA FSM CEMP was endorsed by the ER in a letter dated 25/5/2023.</p> <p>Environmental monitoring requirements are set out in Section 17.1.2 of the CEMP. Table 12 summarises the monitoring approach as follows:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
	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	<p>Each Construction Monitoring Program must provide:</p> <ul style="list-style-type: none"> (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. 	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 • 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	<p>Auditees advised CoA C21 is managed in accordance with Table-4-3 of the Staging Report as stated in Appendix B of the Staging Report. As per Table 4-3 of the Staging Report, the "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.</p> <p>The WSA FSM CEMP was endorsed by the ER in a letter dated 25/5/2023.</p>															
C15	<p>The Noise and Vibration Construction Monitoring Program must include:</p> <ul style="list-style-type: none"> (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. <p>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.</p>	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 • 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	<p>Auditees advised CoA C21 is managed in accordance with Table-4-3 of the Staging Report as stated in Appendix B of the Staging Report. As per Table 4-3 of the Staging Report, the "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.</p> <p>The WSA FSM CEMP was endorsed by the ER in a letter dated 25/5/2023.</p> <p>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.</p>															

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW_February 2026

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 12, 11/12/2025	NT	Table 4-3 of the Staging Report lists the management plans applicable to FAW_FSM. 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 12, 11/12/2025 • 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 4-3 of the Staging Report as stated in Appendix B of the Staging Report. As per Table 4-3 of the Staging Report, the "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 OOH 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 FSM, 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 12, 11/12/2025 • 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 4-3 of the Staging Report as stated in Appendix B of the Staging Report. As per Table 4-3 of the Staging Report, the "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 OOH 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 12, 11/12/2025	NT	Condition C19 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 12, 11/12/2025 • 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 4-3 of the Staging Report as stated in Appendix B of the Staging Report. As per Table 4-3 of the Staging Report, the "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 OOH 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 2026106-02 Sydney Metro IEA9_WSA_FAW_February 2026

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.	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 • 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 WE15 works on platforms Noise Verification Record Sheet F1.643723, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643679, dated 10/12/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643642, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643640, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643635, dated 10/11/2025 • FSM Water Discharge Register • Water Discharge or Reuse Approval Form, dated 19/1/2026 • Water Discharge or Reuse Approval Form, dated 17/11/2025 • Water Discharge or Reuse Approval Form, dated 18/9/2025 • Water Discharge or Reuse Approval Form, dated 10/2/2026 • LOR Environmental Inspection Reports, dated 16.9.2025, 2.10.2025, 20.11.2025, 11.12.2025, 15.1.2026, 10/2/2026. 	NT	<p>Environmental monitoring requirements are set out in Section 17.1.2 of the CEMP. Table 12 summarises the monitoring approach as follows:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>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 August 2025-February 2026.</p> <p>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 August 2025-February 2026 and includes the approximate volume and destination of pumped water. Water was discharged to IBCs from excavations and lift pits during the IA9 audit period. Water discharge permits were sighted. Water is discharged from IBCs after pH treatment to the cess/ballast or reused for flushing toilets and for dust suppression, though there was no water discharged to land (the cess) during the IA9 audit period.</p> <p>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.</p> <p>Auditees advised CoA C21 is managed in accordance with Table 4-3 of the Staging Report as stated in Appendix B of the Staging Report. As per Table 4-3 of the Staging Report, the "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.</p>
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 . <i>Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.</i>	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 • 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	<p>Environmental monitoring requirements are set out in Section 17.1.2 of the CEMP. Table 12 summarises the monitoring approach as follows:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>Auditees advised CoA C21 is managed in accordance with Table 4-3 of the Staging Report as stated in Appendix B of the Staging Report. As per Table 4-3 of the Staging Report, the "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.</p>

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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

Result	Comment
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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.	<ul style="list-style-type: none"> Site inspection, 18/2/2026 Interview with Auditees, 18/2/2026 	C	Dust suppression measures were observed during the site inspection including hoses, stockpiles covered at the end of shift, and street sweepers during spot load out as required. Site accesses were stabilised to ancillary facilities and compound areas. Hoses used for dust suppression in the Northern Plaza area during CSR works. There were no odours noted during the audit inspection. Dust risk has not been raised as a significant issue for the project.																																																	
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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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E2 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E3 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E4 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E5 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).																																																	
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).	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E6 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E7 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).																																																	

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NC	Non-Compliant (NC)
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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 12, 11/12/2025	NT	Condition E8 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 12, 11/12/2025	NT	Condition E9 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 12, 11/12/2025	NT	Condition E10 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 12, 11/12/2025	NT	Condition E11 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 12, 11/12/2025	NT	Condition E12 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 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. 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, 18/2/2026 • 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.

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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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Watercourse Crossings

E14	<p>The Proponent must design the watercourse crossings and the east-west regional corridor (Patons Lane) crossing to achieve the following objectives:</p> <p>(a) design of viaducts to retain and minimise clearing/disturbance of native vegetation and maximise native plant growth under the structures;</p> <p>(f) maintain and/or improve riparian/terrestrial connectivity under the viaduct and bridge structures to maximise the corridor function;</p> <p>(ii) maximise the viaduct and bridge structures span over the riparian corridor and/or remnant native vegetation whichever is the widest;</p> <p>(iii) minimise the clearing/disturbance of native vegetation and native riparian vegetation; and</p> <p>(iv) maximise light and moisture penetration under the viaduct and bridge structures to support native plant growth;</p> <p>(b) design of culverts and other crossings incorporate the following into the design to provide for movement of aquatic and terrestrial fauna.</p> <p>(j) elevated "dry" cells to encourage terrestrial movement, and recessed "wet" cells to facilitate the movement of aquatic fauna;</p> <p>(i) maximise light penetration into the culvert structures;</p> <p>(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;</p> <p>(c) design of scour protection using natural solutions such as the revegetation of banks with local native species; and</p> <p>(d) details of remnant native vegetation including riparian vegetation.</p> <p>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.</p> <p><i>Note: These design objectives must form part of the Place, Urban Design and Corridor Landscape Plan required under Condition E79.</i></p>	<p>• Sydney Metro WSA Staging Report Rev 12, 11/12/2025</p>	NT	<p>Condition E14 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).</p>
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FLOODING

E15	<p>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.</p> <table border="1"> <thead> <tr><th colspan="3">Table 5: Flood Impact Criteria</th></tr> <tr><th>Parameter</th><th>Location</th><th>Criteria</th></tr> </thead> <tbody> <tr><td rowspan="3">Afflux</td><td rowspan="3">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>Maximum 50 mm where flooding is below floor level</td></tr> <tr><td>Roads</td><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>All areas</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 rowspan="2">Flood hazard</td><td>Residential and commercial land</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 rowspan="3">Flood duration</td><td>Residential and commercial buildings</td><td>No increase to duration of above floor flooding</td></tr> <tr><td>Roads</td><td>No more than one hour increase</td></tr> <tr><td>Crown land, open space, farming, grazing and cropping land</td><td>No more than one hour increase</td></tr> </tbody> </table> <p>the same outcome must be incorporated into the detailed design of the CSSI.</p>	Table 5: Flood Impact Criteria			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	Maximum 50 mm where flooding is below floor level	Roads	Maximum 50 mm	Velocity	Land zoned as rural, primary production, environment or public recreation	Maximum 100 mm	All areas	Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent	Flood hazard	Residential and commercial land	No increase in the flood hazard or risk to life	Roads	No increase in the flood hazard or risk to life	Flood duration	Residential and commercial buildings	No increase to duration of above floor flooding	Roads	No more than one hour increase	Crown land, open space, farming, grazing and cropping land	No more than one hour increase	<p>• Interview with Sydney Metro & LOR, 18/2/2026</p> <p>• AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025</p> <p>• SM-WSA AEW FSM CEMP Rev05 ER Endorsement, dated 20/8/2025</p> <p>• PUDDL Stage 2</p>	NT	<p>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.</p> <p>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.</p>
Table 5: Flood Impact Criteria																																		
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E16	<p>Updated modelling that incorporates these measures and is calibrated and validated with consideration of the results of the Warramatta-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.</p>	<p>• Sydney Metro WSA Staging Report Rev 12, 11/12/2025</p>	NT	<p>Condition E16 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).</p>
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Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasay Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW_February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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 12, 11/12/2025	NT	Condition E17 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 12, 11/12/2025	NT	Condition E18 is not applicable to FAW_FSM as per the Staging Report Rev12, 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, 18/2/2026 • 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. The Platform 3/4 canopy was removed in late 2025, with some rectification works for the paintwork required and being planned in consultation with the GML built heritage consultant. 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, 18/2/2026	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.
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, 18/2/2026 • 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 Goods 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, 18/2/2026 • 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, 18/2/2026 • 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. Archaeological monitoring has historically been undertaken during excavations on the platform. The next round of archaeological monitoring was planned during the Weekend 34 (WE34) Possession (21st & 22nd February 2026). An Excavation Director was nominated/approved for the project in a letter from DPHI dated 5/9/2023.

Item
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Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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).	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 SMWSA 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.
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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 SMWSA 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E30 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).
E31	The updated Aboriginal Cultural Heritage Management Plan must be implemented for the duration of salvage activities and construction.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	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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Auditor: Jo Hellborg, Morasay Environment Pty Ltd
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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW_February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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 12, 11/12/2025	NT	Condition E32 is not applicable to FAW_FSM as per the Staging Report Rev11, Appendix B (Applicability of SMWSA CoA to each project stage).
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, 18/2/2026	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, 18/2/2026 • 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, 18/2/2026 • 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. 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.	• Interview with Sydney Metro & LOR, 18/2/2026 • 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 • Archaeologist monitoring record, note dated 6/9/2025	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. On 6/9/2025, UHF22 was re-exposed in a drainage trench on Platform 3. An archaeologist monitoring record documenting permission to remove/impact was recorded. As the occurrence was not considered unexpected an update to the UEHF memo was not required.

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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & 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 .	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Interview with ER 23/2/2026 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	<p>The FAW_FSM 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 Detailed Noise and Vibration Impact Assessment (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 DNVIS.</p> <p>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).</p> <p>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 OOHW and the DNVIS process.</p>
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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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	<p>Construction hours are documented in the FSM CEMP and the DNVIS.</p> <p>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.</p> <p>There were no known unapproved OOHW known to have been conducted during the audit period.</p>
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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 	NT	Auditees advised there have been no highly noise intensive works conducted for FAW_FSM to date.
E40	This approval does not permit blasting.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 	NT	No blasting is known to have been undertaken for the project.

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasay Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Variation to Work Hours				
E41	<p>Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances:</p> <p>(a) Safety and Emergencies, including:</p> <ul style="list-style-type: none"> (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 <p>(b) Low impact, including:</p> <ul style="list-style-type: none"> (i) construction that causes LAeq(15 minute) noise levels: <ul style="list-style-type: none"> - 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: <ul style="list-style-type: none"> - 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 <p>(c) By Approval, including:</p> <ul style="list-style-type: none"> (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 <p>(d) By Prescribed Activity, including:</p> <ul style="list-style-type: none"> (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. <p>On becoming aware of the need for emergency work in accordance with (a)(i) 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.</p> <p>Notes: 1. Tunnelling does not include station box excavation. 2. Tunnelling ancillary support activities includes logistics support and material handling and delivery</p>	<ul style="list-style-type: none"> • Interview with ER, 23/2/2026 • Interview with Sydney Metro & LOR, 18/2/2026 • Sydney Metro WSA ER Monthly Report August 2025, dated 5/9/2025 • Sydney Metro WSA ER Monthly Report September 2025, dated 7/10/2025 • Sydney Metro WSA ER Monthly Report November 2025, dated 5/12/2025 • Sydney Metro WSA ER Monthly Report December 2025, dated 15/1/2026 • Sydney Metro WSA ER Monthly Report January 2026, dated 6/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025 • E57 Consultation Report, 1-6, 8-13 & 15-20 December 2025 • MW22-MW24_2025_FSM_SM_WSA_OOHW_053 Rev02, dated 27/11/2025 • E57 Consultation Report, 11-14 & 18-21 February 2026 • MW32 & MW33_SM_WSA_OOHW form 057 Rev00, dated 10/2/2026 • E57 Consultation Report, 11-13 October 2025 • WE15_2025_FSM_SMWSA_OOHW_048 Rev02, dated 9/10/2025 • E57 Consultation Report, 1-3, 8-10, 15-17 November 2025 • WE18 19_20_2025_FSM_SMWSA_OOHW_050 Rev01, dated 21.10.2025 • FSM Noise Monitoring Register • Out-of-hours work application form- SM-WSA (WE15 FSM 048_REV02) • FSM WE15 works on platforms Noise Verification Record Sheet F1.643635, 5:10pm, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643679, 5:40pm, dated 10/12/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643723, 8:12pm, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643724, 8:33pm, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643640, 8:36pm, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643642, 11:27pm, dated 10/11/2025 	C	<p>(a) Condition E68(a) was not triggered during the audit period:</p> <p>(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.</p> <p>(ii) - Not triggered.</p> <p>(c)</p> <p>(i) Not triggered (no EPL).</p> <p>(ii) As per works conducted under the OOHW Protocol via OOHW Permits.</p> <p>Examples of OOHW Permits were sighted for FSM OOHW categorised under Condition E41(c):</p> <ul style="list-style-type: none"> • MW22-MW24_2025_FSM_SM_WSA_Out of Hours Works Application, 053 Rev02, approved 27/11/2025. The application was submitted for works undertaken Midweek 22 (MW22) to Midweek 24 (MW24), including MW23 and Weekends WE23, 24 & 25, from 1/12/2025-20/12/2025. The works scope included OSOM deliveries that are required overnight; and concrete pour works. • WE15_22025_FSM_SMWSA_OOHW_048 Rev02, approved 9/10/2025. The application was submitted for works undertaken during Weekend 15 (WE15) to Midweek 15 (MW15), dated 11/10/2025-13/10/2025. The works scope included Footbridge construction, Lift installation, Construction of stairs and canopies, Installation of Sydney Trains services, and works on the Northern Plaza and Harris Street. <p>The FSM Noise Monitoring Tracker and examples of attended noise monitoring results for WE15 were provided as evidence during the audit. The Noise Monitoring Register included data from August 2025-February 2026.</p> <p>Noise monitoring results were compliant with WE15 OOHW predictions</p> <p>(ii) Not triggered</p> <p>(d) Not triggered.</p>

Item
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Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasay Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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	<p>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:</p> <p>(a) justification for why out-of-hours work need to occur;</p> <p>(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:</p> <p>(i) the ER reviews all proposed out-of-hours activities and confirms their risk levels;</p> <p>(ii) low risk activities that can be approved by the ER; and</p> <p>(iii) high risk activities that are approved by the Planning Secretary;</p> <p>(c) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria;</p> <p>(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;</p> <p>(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</p> <p>(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.</p> <p>This condition does not apply if the requirements of Condition E41 are met.</p> <p>Note: <i>Out-of-hours work is any work that occurs outside the construction hours identified in Condition E38 and E39.</i></p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • 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	<p>Reference to the OOHW Protocol is included in the 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.</p>
Construction Noise Management Levels and Vibration Criteria				
E43	<p>Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria:</p> <p>(a) construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009);</p> <p>(b) preferred vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure);</p> <p>(c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives" (for human exposure);</p> <p>(d) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and</p> <p>(e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage).</p> <p>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.</p> <p>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></p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643724, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643723, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643679, dated 10/12/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643642, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643640, dated 10/11/2025 • FSM WE15 works on platforms Noise Verification Record Sheet F1.643635, dated 10/11/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025 • MW22-MW24_2025_FSM_SM_WSA_OOHV_053 Rev02, dated 27/11/2025 • MW32 & MW33_SM_WSA_OOHV form 057 Rev00, dated 10/2/2026 • WE15_2025_FSM_SMWSA_OOHV_048 Rev02, dated 9/10/2025 • WE18 19 20_2025_FSM SMWSA_OOHV_050 Rev01, dated 21.10.2025 	C	<p>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.</p> <p>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.</p> <p>A sample of OOH Permits was reviewed during the audit:</p> <ul style="list-style-type: none"> • MW22-MW24_2025_FSM_SM_WSA_OOHV_053 Rev02, dated 27/11/2025 • MW32 & MW33_SM_WSA_OOHV form 057 Rev00, dated 10/2/2026 • WE15_2025_FSM_SMWSA_OOHV_048 Rev02, dated 9/10/2025 • WE18 19 20_2025_FSM SMWSA_OOHV_050 Rev01, dated 21.10.2025 <p>The permits cover a range of works including a Saturday OOHV shift and midweek OOHV. Mitigation measures are included in each OOHV Permit.</p> <p>Auditees advised there were no potentially vibration impacted receivers identified during the audit period.</p>
E44	<p>All reasonable and feasible mitigation measures must be applied when the following residential ground-borne noise levels are exceeded:</p> <p>(a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and</p> <p>(b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A).</p> <p>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.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • 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 	NT	<p>Ground-borne noise has not been identified as an issue relevant to FAW_FSM during the audit period.</p> <p>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.</p>
E45	<p>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.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • 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	<p>Auditees advised Condition E45 has not been relevant during the audit period.</p>

Item
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Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW_February 2026

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

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.	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • 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: F63190.576, 2.5t Diesel All Terrain Telehandler, dated 18/9/2025 • Road Rail Vehicle Earthmoving Equipment Pre-Mobilisation Checklist Ref: F63190.680, Hi Rail Hydrema 10T Dumper, dated 18/2/2026 • Elevated Work Platform Pre-Mobilisation Checklist Ref: F63190.634, Kenworth Pime Mover & Hiab Trailer, dated 1/12/2025 • Elevated Work Platform Pre-Mobilisation Checklist Ref: F63190.607, Dingli 19ft Electric Scissor Lift, dated 24/10/2025 	C	<p>Noise mitigation measures as per Condition E46 are set out in the Section 8.2 of the FAW_FSM DNVIS and Out of Hours Work (OOHW) Permits.</p> <p>(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. Noise blankets are utilised when generators are 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.</p>
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 .	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • 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 August 2025, dated 5/9/2025 • Sydney Metro WSA ER Monthly Report September 2025, dated 7/10/2025 • Sydney Metro WSA ER Monthly Report November 2025, dated 5/12/2025 • Sydney Metro WSA ER Monthly Report December 2025, dated 15/1/2026 • Sydney Metro WSA ER Monthly Report January 2026, dated 6/2/2026 	C	<p>A DNVIS to assess out of hours work (OOHW) has been prepared for the project site and was available on the project website.</p> <p>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 (AMMIs). 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.</p> <p>The following receivers nearby the FAW_FSM project site have been identified to potentially contain Sensitive Scientific or Medical Equipment: <ul style="list-style-type: none"> • Emerald Medical Centre - 65A Queen Street, Belar St, St Marys NSW 2760 • Autopak-Vetlab Group - 39 Harris St, St Marys NSW 2760 </p> <p>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.</p> <p>LORAC is conducting ongoing coordination with other contractors to ensure that respite periods are maintained throughout the works.</p>
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.	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 	NT	<p>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 vibration monitor in the platform building has been required to be in use during the audit period.</p> <p>The requirement to identify properties at risk of cosmetic damage is addressed in Sections 5 and 7 of the FAW_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: <ul style="list-style-type: none"> • St Marys Commuter Car Park • Platforms 1/2 and 3/4 (Heritage listed - 1888 & 1942-3) • Platforms 3/4 building (Heritage Listed - 1888). </p> <p>Potential vibratory impacts are also assessed in the OOHW Permit process.</p> <p>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.</p>
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>	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 11, 11 Oct 2024 • Interview with Sydney Metro & LOR, 18/2/2026 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 	NT	<p>There have been no sensitive land use(s) identified for FAW_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.</p>

Item
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Auditee/ Client: Laing O'Rourke / Sydney Metro
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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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 12, 11/12/2025	NT	Condition E50 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 12, 11/12/2025 • Interview with Sydney Metro & LOR, 18/2/2026 • 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 12, 11/12/2025 • Interview with Sydney Metro & LOR, 18/2/2026 • 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 12, 11/12/2025 • Interview with Sydney Metro & LOR, 18/2/2026 • 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, 18/2/2026 • 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 reviewed during the audit as does not form a project requirement, and there was no monitoring undertaken during the audit period. 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, 18/2/2026 • 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 .
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, 18/2/2026 • 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 #018 20/8/2025 • SM-WSA Cumulative Impact Meeting Minutes #019 17/9/2025 • SM-WSA Cumulative Impact Meeting Minutes #020 15/10/2025 • SM-WSA Cumulative Impact Meeting Minutes #021 19/11/2025 • SM-WSA Cumulative Impact Meeting Minutes #022 17/12/2025 • SM-WSA Cumulative Impact Meeting Minutes #023 21/1/2026	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 FAW_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.

Item	
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Project No.:	MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Out-of-Hours Works – Community Consultation on Respite				
E57	<p>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:</p> <p>(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).</p> <p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> • Interview with ER, 23/2/2026 • Interview with Sydney Metro & LOR, 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • E57 Consultation Report, 1-6, 8-13 & 15-20 December 2025 • MW22-MW24_2025_FSM_SM_WSA_OOHV_053 Rev02, dated 27/11/2025 • E57 Consultation Report, 11-14 & 18-21 February 2026 • MW32 & MW33_SM_WSA_OOHV form 057 Rev00, dated 10/2/2026 • E57 Consultation Report, 11-13 October 2025 • WE15_2025_FSM_SMWSA_OOHV_048 Rev02, dated 9/10/2025 • E57 Consultation Report, 1-3, 8-10, 15-17 November 2025 • WE18 19 20_2025_FSM_SMWSA_OOHV_050 Rev01, dated 21.10.2025 	C	<p>The application of Condition E57 for FAW_FSM is usually via a case by case assessment for RO and AA offers for sensitive receivers.</p> <p>A representative selection of E57 Consultation Reports (and corresponding OOHV Permits) were sighted during the audit, including evidence of submission to the ER.</p> <p>E57 Consultation Reports were reviewed for rail possessions during MW22-MW24, MW32 & MW33_2025, WE15, WE18, WE19 & WE20. Out of hours work during possession at St Marys Station during the audit period typically included: OSOM deliveries, Concrete pour works, Footbridge construction, Lift installation, Construction of stairs and canopies, Installation of Sydney Trains services, and works on the Northern Plaza and Harris Street.</p> <p>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.</p> <p>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.</p> <p>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.</p>
Noise Mitigation – Operational Noise and Vibration Mitigation Measures				
E58	<p>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:</p> <p>(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).</p> <p>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.</p> <p>The Proponent must implement the identified noise and vibration control measures and make the ONVR publicly available.</p> <p>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.</p>	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	<p>Condition E58 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).</p>
E59	<p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	<p>Condition E59 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).</p>

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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E60	<p>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:</p> <p>(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;</p> <p>(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;</p> <p>(c) a review of the performance of the CSSI against the:</p> <p>(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>;</p> <p>(ii) vibration goals for human exposure for existing sensitive land use(s), as presented in <i>Assessing Vibration: a Technical Guideline (DECC, 2006)</i>;</p> <p>(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);</p> <p>(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;</p> <p>(f) identification of:</p> <p>(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>;</p> <p>(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>;</p> <p>(iii) when these measures are to be implemented; and</p> <p>(iv) how their effectiveness is to be measured and reported to the Planning Secretary and the EPA.</p> <p>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.</p> <p>Note: Refer to Condition B5 about how personal information will be handled.</p>	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E60 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • Site inspection, 18/2/2026 • FSM Complaints Register August 2025-February 2026 	C	Wayfinding signage was installed on the hoarding around the St Marys station site, as observed during the IA9 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.	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • Site inspection, 18/2/2026 • FSM Complaints Register August 2025-February 2026 	C	<p>Visual mitigation measures observed to be installed during the site inspection at St Marys included:</p> <ul style="list-style-type: none"> • Hoarding or ATF with shadecloth installed around the project site. • No graffiti was observed and is understood to be removed promptly when identified. <p>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.</p>

Design Requirements and Strategic Context

E63	<p>The CSSI must be designed with consideration of:</p> <p>(a) the design objectives, principles and guidelines identified in documents listed in Condition A1;</p> <p>(b) the principles and objectives of the draft Connecting with Country Framework;</p> <p>(c) relevant land use changes, masterplans and initiatives, where this information is known and/or available;</p> <p>(d) existing and proposed future local context and character; and</p> <p>(e) transport and land use integration and system functionality in the context of precincts, to the extent it is known and/or defined.</p> <p>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).</p> <p>Note: In accordance with Condition A10 and Condition A16, the requirements of this condition can be staged.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • 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	<p>The St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP) has been prepared to address the requirements of Condition E63.</p> <p>The FSM PUDCLP – E63 Compliance Statement, 19/12/2024 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.</p>
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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	<p>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:</p> <p>(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></p> <p>(b) NASF Guideline E: <i>Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports;</i> and</p> <p>(c) NASF Guideline C: <i>Managing the risk of wildlife strikes in the vicinity of airports.</i></p> <p>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.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • 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	<p>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.</p> <p>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.</p> <p>Lighting is provided on the hoarding for safe pedestrian access at night-time.</p>
Design Guidance and Standards - Active Transport				
E65	<p>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).</p>	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	<p>Condition 65 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).</p>
E66	<p>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.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • FSM Complaints Register February-August 2025 • SM-WSA Complaints Report 1 Feb to 23 July 2025.xlsm • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), Rev G 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	<p>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.</p> <p>The FAW_FSM PUDCLP states <i>"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"</i>.</p> <p>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.</p> <p>Bike shelter construction required in the Western Plaza. The slab has been poured and shed construction is due to commence at the end of March 2026.</p>
Design Review Panel and Design Review				
Panel Membership				
E67	<p>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.</p> <p><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></p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 	C	<p>The Sydney Metro Design Review Panel (DRP) Terms of Reference, Western Sydney Airport Line were sighted and available on the project website.</p> <p>The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month.</p> <p>Participants are set out in Section 3 and include the DRP Chair and panel, including Panel Advisor, Coordinator and SM Project Advisor.</p> <p>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.</p>
E68	<p>The responsibilities of the Design Review Panel include:</p> <p>(a) providing advice and recommendations to the Proponent for consideration in the design development of the CSSI</p> <p>(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</p> <p>(c) reviewing and endorsing any updates to the Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines.</p> <p>The Panel's advice must be consistent with the CSSI as approved.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 	C	<p>The roles and responsibilities of the DRP are set out in Section 3 of the Terms of Reference and align with Condition E68.</p>
E69	<p>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:</p> <p>(a) urban design and place making;</p> <p>(b) landscape architecture; and</p> <p>(c) architecture.</p> <p>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.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 	C	<p>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.</p>
E70	<p>Panel members must be sourced from the NSW State Design Review Panel Pool or otherwise be approved by the NSW Government Architect.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 	C	<p>The responsibilities of Panel Members are set out in Section 3.2 of the DRP Terms of Reference.</p>

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Operation of the Design Review Process				
E71	<p>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:</p> <p>(a) must be generally consistent with the NSW State Design Review Panel Terms of Reference (version 5);</p> <p>(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</p> <p>(c) identify cessation arrangements.</p>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024 	C	<p>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:</p> <p>a) Section 3.2 of the DRP Terms of Reference commits to consistency with the NSW State Design Review Panel Terms of Reference</p> <p>b) The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month</p> <p>c) Cessation arrangements are set out in Section 5.</p>
E72	The DRP must be operated and managed in accordance with the Design Review Panel Terms of Reference .	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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 .	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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) was 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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.

Item
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Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Place, Urban Design and Corridor Landscape Plan				
E77	<p>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:</p> <p>(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);</p> <p>(b) reviewed by an independent and suitably qualified and experienced person nominated by the DRP;</p> <p>(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</p> <p>(d) implemented during construction and operation of the CSSI.</p> <p><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></p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • 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	<p>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.</p> <p>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.</p>
Place, Urban Design and Corridor Landscape Plan - Documentation				
E78	<p>The PUDCLP must document how the following matters have been considered in the design and landscaping of the project:</p> <p>(a) the requirements of Conditions E63 to E65, and</p> <p>(b) advice and recommendations from the DRP.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • 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	<p>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).</p> <p>Appendix C of the PUDCLP sets out how advice and recommendations from the DRP has been addressed.</p>
E79	<p>The PUDCLP must include descriptions and visualisations (as appropriate) of:</p> <p>(a) design of the permanent built elements of the CSSI, including stabling and maintenance and ancillary facilities, service facilities and tunnel portals;</p> <p>(b) plans for station precincts including but not limited to</p> <p>(i) justification of the spatial scope of each station precinct plan;</p> <p>(ii) provision for public art and heritage interpretation installations;</p> <p>(iii) placemaking opportunities, having regard to placemaking initiatives in Western Sydney Aerotropolis planning documents;</p> <p>(iv) interchange access plans developed in consultation with the Traffic and Transport Liaison Group;</p> <p>(v) active transport connections and end of trip facilities, design of pedestrian and cycle access, facilities and fixtures;</p> <p>(vi) design of commuter car parking elements, where relevant;</p> <p>(c) landscaping and building design opportunities to mitigate visual impacts and minimise light spill on the nearby residences;</p> <p>(d) the design of watercourse crossings and east-west corridor movements to give to effect of Condition E14;</p> <p>(e) landscaping:</p> <p>(i) landscape plan, hard and soft elements, for the corridor and the station precincts;</p> <p>(ii) use of native species from the relevant native vegetation community (or communities), where identified as appropriate;</p> <p>(iii) water sensitive urban design initiatives</p> <p>(iv) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design;</p> <p>(viii) measures to prevent wildlife strike risk in proximity to Western Sydney International Airport;</p> <p>(f) details of strategies to rehabilitate, regenerate or revegetate disturbed areas, where relevant;</p> <p>(g) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design;</p> <p>(h) operational maintenance standards; and</p> <p>(i) the timing and responsibilities for implementation of elements included within the PUDCLP.</p>	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024 	C	<p>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 previous audit and no changes reported during the current audit period.</p>

Item
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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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, 18/2/2026	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 12, 11/12/2025	NT	Condition E81 is not applicable to FAW_FSM as per the Staging Report Rev12, 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, 18/2/2026 • Consultation Manager Event - Doorknock Businesses 250804.docx • Consultation Manager Event - Vetlab 10-11 September 2025, dated 4/8/2025 • FSM WE12 Communications Plan 250725.xlsx • st-marys-station-footbridge-community-notification-september-2025_FINAL.pdf	C	Auditees advised there has been no excavation to date for FAW_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 FAW_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 FAW_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. Works to a power pole on Harris Street were conducted on 21/9/2025 and were undertaken in consultation with VetLab AutoPack while the power was isolated. Evidence of consultation with VetLab AutoPack re power pole works on Harris Street was sighted. Consultation with these businesses was ongoing at the time of the audit. No disruption to services is known to have occurred to date.
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, 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • FSM Utilities Management Plan, Stage 2, Rev0, dated 15/7/2025 • Coordination email with Endeavour energy, email chain dated 7/4/2025-3/6/2025 • RE ENL6701 - Endeavour Energy Power Outage Extents, email chain dated 19/8/2025-1/9/2025 • FSM WE12 Communications Plan 250725.xlsx • st-marys-station-footbridge-community-notification-september-2025_FINAL.pdf	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. Works to a power pole on Harris Street were conducted on 21/9/2025 and were undertaken in consultation with VetLab AutoPack while the power was isolated. Evidence of consultation with VetLab AutoPack re power pole works on Harris Street was sighted. Consultation with these businesses was ongoing at the time of the audit. No disruption to services is known to have occurred to date. Evidence of coordination and consultation with the Service provider, Endeavour Energy was sighted.
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, 18/2/2026 • 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 FAW_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, 18/2/2026 • 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.

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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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) .	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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 Photos P3 Rail gouge down Main-Down Rail & post-rail grinding, undated Action Plan_Intelex6_5_182_0, dated 27/2/2026 Infrastructure Handover and Certification Form St Marys LPA_TOA, dated 6/1/2025 Master Event No 17054_Intelex6_5_182_0, dated 27/2/2026 	C	<p>Damage to rail infrastructure occurred on 21/12/2025 when gouges were left on the Platform 3 down main rail near the Glossop Street hi-rail pad. Track certifiers found and reported the damage and action raised to repair within 28 days. Track grinding occurred on 6/1/2025 with track certifier present & infrastructure handover certification provided. Defect was rectified on the following possession and the Down Rail as ground and Track was certified fit for use.</p> <p>Evidence of report of damage to rail infrastructure on 21/12/25 & evidence of damage rectification complete sighted.</p>
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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	NT	<p>Not triggered within the audit period.</p> <p>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.</p> <p>Auditees advised no vibratory activities requiring vibration or settlement monitoring have been conducted during the audit period.</p>
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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E88 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E89 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 to 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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E90 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 AEW FSM Community Liaison Plan, including Small Business Owners Engagement Plan RevD, dated 2/12/2024 LOR Project website: https://www.laingourke.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). <i>Note: Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports (for contamination) for separate sites.</i>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 LOR Project website: https://www.laingourke.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 28/9/2024 Letter DPHI to Sydney Metro RE: SM-WSA AEW FSM Detailed Site Investigation Report, dated 09/9/2024 	NT	<p>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 21/8/2024.</p> <p>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".</p> <p>No moderate-high-risk contaminated sites are known to have been identified for the FSM package of works.</p> <p>The DSI was submitted to DPHI as required, dated 28/8/2024.</p>
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 <i>Contaminated Land Management Act 1997</i> (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. <i>Note: Nothing in this condition prevents the Proponent from preparing individual Remedial Action Plans for separate sites.</i>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 LOR Project website: https://www.laingourke.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 FAW_FSM project.

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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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. <i>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.</i>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 LOR Project website: https://www.laingourke.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 FAW_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). <i>Note: Nothing in this condition prevents the Proponent from preparing individual Validation Reports for separate sites.</i>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 LOR Project website: https://www.laingourke.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 FAW_FSM project.
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>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 LOR Project website: https://www.laingourke.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 FAW_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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 LOR Project website: https://www.laingourke.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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 AEW Footbridge St Marys CEMP, Rev 04, dated 28/3/2025 Contamination and Asbestos Unexpected Finds Procedure, CEMP 	C	The FAW_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 or asbestos encountered during the audit period. Asbestos conduit was previously identified on Platform 3/4 and was uncovered during the audit period. Refer to Condition E99 for details.
E99	The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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 ADE Consulting Asbestos Materials Clearance and Make Safe Report V1F, dated 22/12/2025 Environmental Protection Licence - 4068 - Cleanaway Pty Ltd.pdf Environmental Protection Licence - 12889 - Cleanaway Pty Ltd (Kemps Creek).pdf Cleanaway Kemps Creek Docket, 0.06Tonnes, dated 23/12/2025 Waste Disposal tracker including the waste generated from the examined asbestos UEF (Waste Tracking Register) 	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: <ul style="list-style-type: none"> 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". A further section of asbestos conduit was uncovered during the WE05 possession on 20/12/2025 and removed. ADE supervised the removal and provided a Clearance Certificate and Make Safe Report. The asbestos contaminated material was removed by Grasshopper and disposed at Cleanaway Kemps Creek. The EPL of the disposal facility and docket for 0.06 Tonnes was sighted.

Item
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Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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).	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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>	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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>	<ul style="list-style-type: none"> 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 .	<ul style="list-style-type: none"> Site inspection, 18/2/2026 Interview with Sydney Metro & LOR, 18/2/2026 Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev E, dated 25/7/2024 	C	A Construction Traffic Pedestrian Management Plan (CTPMP) has been prepared for the project. Evidence of submission of the CTPMP 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.	<ul style="list-style-type: none"> Site inspection, 18/2/2026 Interview with Sydney Metro & LOR, 18/2/2026 Live Tracking Report, Hire Activity Report 182113, dated 28/1/2026 	C	An example of a Live Tracking Report 182113 for a 10 Wheeler from Kilmac Civil Pty Ltd, dated 28/1/2026 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 .	<ul style="list-style-type: none"> Site inspection, 18/2/2026 Interview with Sydney Metro & LOR, 18/2/2026 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 : <ul style="list-style-type: none"> 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
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Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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.	<ul style="list-style-type: none"> Site inspection, 18/2/2026 Interview with Sydney Metro & LOR, 18/2/2026 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	<p>Spoil haulage routes have been approved as documented in the CTMP.</p> <p>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.</p> <p>The use of the following roads was subsequently approved by the Department under Condition E105:</p> <ul style="list-style-type: none"> 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 <p>The approval is limited to the period ending 30/6/2027.</p> <p>There were no heavy vehicles observed on local roads during the audit site inspection.</p>
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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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	<p>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.</p> <p>Submission of the Road Dilapidation Report to Council was verified during a previous audit period.</p>
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 .	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 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.

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Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

Result	Comment
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 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 CTPMP, Footbridge St Marys Rev E, dated 25/7/2024 Construction Workers Parking Strategy, Footbridge St Marys RevA, dated 8/11/2023 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2595, dated 28/8/2025-13/10/2025 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2786, dated 17/11/2025-21/11/2025 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2657, dated 16/9/2025-19/9/2025 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2727, dated 16/10/2025-18/10/2025 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2734, dated 24/10/2025-16/11/2025 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2740, dated 22/10/2025-17/11/2025 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2863, dated 16/12/2025-18/12/2025 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2862, dated 19/12/2025-21/12/2025 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2908, dated 5/1/2026-6/1/2026 Penrith Council Temporary Road Reserve Occupancy Permit No. TRO-P2909, dated 7/1/2026-14/1/2026 Photos of worker parking in flagged off zone on Harris Street, dated 18/2/2026 	NC	<p>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; examples were sighted during the audit and includes permits for the delivery of precast panels and canopy modules during possession.</p> <p>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 FAW_FSM project to date.</p> <p>(a) The CTPMP 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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>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.</p> <p>Check photos of worker parking & signage on Harris Street - assess for compliance.</p> <p>Non-Compliance 2: The CTPMP, Section 3.4 Worker parking states "All workers will be instructed to use public/active transport and not utilise the TNSW commuter carpark and on-street parking along Harris Street and other surrounding streets. Laing O'Rourke would take appropriate action if informed of this activity occurring". During the audit site inspection, worker vehicles were observed to be parked in a flagged off area on Harris Street outside of the 32 Harris Street compound.</p> <p>The CTPMP, Section 3.5 On-Street Works Zone states "All construction activities will be contained within the TAP 3 compound. An on-street works zone would not be required for the construction-related works. Should a works zone be required, a separate application will be made to the Council to organise appropriate approvals for the proposed works zone prior to the start of works, as well as the parking and traffic changes". Approval for worker parking outside the Harris Street compound observed during the audit site inspection on 18/2/2026 was requested but not provided as evidence.</p> <p>Recommendation: Obtain Council approval (e.g. works zone approval) for worker parking during normal working hours on Harris Street outside the 32 Harris Street site compound. Alternatively, remove the flagged off worker parking area and instruct workers no project parking is allowed in this area. Review and update the CTPMP and Construction Worker Parking Strategy to reflect the actual worker parking available and approved.</p>
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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 	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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 	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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 	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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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.	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • Site inspection, 18/2/2026 	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.	<ul style="list-style-type: none"> • Site inspection, 18/2/2026 • Interview with Sydney Metro & LOR, 18/2/2026 • 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	<p>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.</p> <p>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.</p>
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.	<ul style="list-style-type: none"> • Site inspection, 18/2/2026 • Interview with Sydney Metro & LOR, 18/2/2026 • Community Consultation Strategy (CCS) • CTPMP, Footbridge St Marys Rev E, dated 25/7/2024 	C	<p>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.</p> <p>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.</p> <p>There have been no known instances of restricted pedestrian or cyclist access to date around the St Marys site.</p> <p>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.</p>
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.	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • Metro WSA TTLG Meeting 51 - Minutes - 4/9/2025 • Metro WSA TTLG Meeting 54 - Minutes - 4/12/2025 • Metro WSA TTLG Meeting 55 - Minutes - 5/2/2026 	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 September 2025-February 2026.
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.	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E117 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E118 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 Heltborg, Morasay Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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, signalled 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.	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E119 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • FSM Utilities Management Plan, Stage 2, Rev0, dated 15/7/2025 • Coordination email with Endeavor energy, email chain dated 7/4/2025-3/6/2025 • RE ENL6701 - Endeavour Energy Power Outage Extents, email chain dated 19/8/2025-1/9/2025 • Consultation Manager Event - Doorknock Businesses 250804.docx • Consultation Manager Event - VetLab 10-11 September 2025, dated 4/8/2025 • FSM WE12 Communications Plan 250725.xlsx • st-marys-station-footbridge-community-notification-september-2025_FINAL.pdf 	C	<p>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.</p> <p>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).</p> <p>Specifically, the plan:</p> <ul style="list-style-type: none"> • 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. <p>Works to a power pole on Harris Street were conducted on 21/9/2025 and were undertaken in consultation with VetLab AutoPack while the power was isolated. Evidence of consultation with VetLab AutoPack re power pole works on Harris Street was sighted. Consultation with these businesses was ongoing at the time of the audit. No disruption to services is known to have occurred to date.</p> <p>Evidence of coordination and consultation with the Service provider, Endeavour Energy was sighted.</p>
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.	<ul style="list-style-type: none"> • Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E121 is not applicable to FAW_FSM as per the Staging Report Rev12, 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.	<ul style="list-style-type: none"> • Interview with Sydney Metro & LOR, 18/2/2026 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • FSM ERAP – Waste and Resource Management • Interview with ER, 23/2/2026 • Appendix F - Sydney Metro Monthly Reporting - Sustainability, January 2026 • FSM - CR4 - 7 - CS3 - C&D Waste tracker • FSM - CR5 - 1 - CS3 - Spoil Tracker 	C	<p>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.</p> <p>Sustainability reporting is prepared monthly by Sydney Metro and the Sustainability Report for January 2026 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.</p> <p>At a project level for FAW_FSM, waste management is tracked by the LOR Sustainability Advisor.</p> <p>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.</p> <p>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.</p> <p>Refer to Conditions E124 & E125 for verification of the movement of spoil to offsite disposal facilities.</p>

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: Laing O'Rourke / Sydney Metro
Auditor: Jo Hellborg, Morasey Environment Pty Ltd
Audit Details: Finishing and Auxiliary Works (FAW)
Project No.: MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 FSM - CR4 - 7 - CS3 - C&D Waste tracker FSM - CR5 - 1 - CS3 - 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 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.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 	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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E127 is not applicable to FAW_FSM as per the Staging Report Rev12, 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).	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 SM-WSA FSM Environmental Control Map (ECM) Rev16, dated 18/9/2025 SM-WSA FSM Environmental Control Map (ECM) Margaret Porter Reserve Rev01, dated 13/11/2025 	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. Observation 4: Excavation for CSR works was occurring in the northern plaza. ERSED controls were missing from one end of the diversion pipe under the access, and were deteriorated around the stormwater inlet. Wheelie bins and bollards were stored on top of the stormwater grate. Given the amount of disturbed material located in the works area, the controls would not be deemed effective in reducing the risk of sediment entry to stormwater during a rain event. It is noted there was no rain at the time of the inspection. Recommendation: Remove bins and bollards from the stormwater grate. Refresh ERSED controls in the vicinity and replace missing controls to reduce the risk of sediment entry to stormwater during the next rain event.
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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E129 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 Water Pollution Impact Assessment will be required to inform licensing consistent with section 45 of the POEO Act.	<ul style="list-style-type: none"> Interview with Sydney Metro & LOR, 18/2/2026 Site inspection, 18/2/2026 	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.	<ul style="list-style-type: none"> Sydney Metro WSA Staging Report Rev 12, 11/12/2025 	NT	Condition E131 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 Heilborg, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.:	MESYM 2026106-02 Sydney Metro IEA9_WSA_FAW February 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Operational Requirements				
E132	<p>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:</p> <p>(a) the ANZG 2018 default guideline values for toxicants at the 95 per cent species protection level;</p> <p>(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</p> <p>(c) for bio accumulative and persistent toxicants, the ANZG 2018 guideline values at a minimum of 99 per cent species protection level.</p> <p>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.</p>	Sydney Metro WSA Staging Report Rev 12, 11/12/2025	NT	Condition E132 is not applicable to FAW_FSM as per the Staging Report Rev12, 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 12, 11/12/2025	NT	Condition E133 is not applicable to FAW_FSM as per the Staging Report Rev12, Appendix B (Applicability of SMWSA CoA to each project stage).
E134	<p>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:</p> <p>(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;</p> <p>(b) predicted incidental groundwater take (dewatering) including cumulative project effects;</p> <p>(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;</p> <p>(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;</p> <p>(e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and</p> <p>(f) a schematic of the conceptual hydrogeological model.</p>	Sydney Metro WSA Staging Report Rev 12, 11/12/2025	NT	Condition E134 is not applicable to FAW_FSM as per the Staging Report Rev12, 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

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-10051-PA-670

Ms Sarah Lepre
Environment Coordinator
Sydney Metro – Western Sydney Airport
Level 43, 680 George St
Sydney NSW 2000

26/11/2025

Sent via the Major Projects Portal only

Sydney Metro - Western Sydney Airport - Independent Auditor Nomination for February 2026 SSTOM and FSM Audit

Dear Ms Lepre

I refer to your request for the Planning Secretary's approval of a suitably qualified, experienced, and independent person to conduct an Independent Audit (**IA**) of the Stations, Systems, Trains, Operations and Maintenance (**SSTOM**) and Footbridge St Marys (**FSM**) stages of the Sydney Metro - Western Sydney Airport project. This has been submitted as required by Schedule 2, Condition A38 of SSI-10051 as modified (the **Approval**) to NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) on 21 November 2025.

NSW Planning has reviewed the independent auditor nomination and, based on the information you have provided, is satisfied that the proposed person is suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I approve the appointment of Ms Josephine Heltborg of Morasey Environment, for the upcoming construction phase IA.

Please note that this correspondence must be appended to the Independent Audit Report.

NSW Planning reserves the right to request an alternate auditor or audit team at any time.

Consolidation of Independent Audit Reports

NSW Planning notes your request to consolidate future SSTOM and FSM construction phase IAs into one audit report, given the appointment of one auditor. Previous construction IAs involved the submission of two separate reports, one for SSTOM and one for FSM, to facilitate separate auditor appointments.

NSW Planning has considered and agrees to your proposal to submit a single IA report covering the SSTOM and FSM stages.

In the interests of clarity, NSW Planning requests that where non-compliances are identified in future IAs, it is clearly specified which project stage each non-compliance relates to.

Department of Planning, Housing and Infrastructure

In accordance with Condition A36 of the Approval, IA's must be prepared, undertaken, and finalised in accordance with the NSW Planning *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

Should you wish to discuss the matter further, please contact Katherine Purdy, Senior Compliance Officer on 02 9585 6093 or email compliance@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "G. Abi-Saab".

Gabriel Abi-Saab
A/Team Leader Compliance - Metro Rail
Compliance

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	<p>Development of the Sydney Metro Western Sydney Airport project comprising:</p> <ul style="list-style-type: none"> • 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	18th February 2026

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	Josephine Heltborg
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

Jo Heltborg

From: @planning.nsw.gov.au>
Sent: Wednesday, 14 January 2026 4:19 PM
To: Jo Heltborg
Cc:
Subject: Re: Independent Audit 9 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

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

Dear Jo,

Thank you for your email.

In addition the scope proposed below, NSW Planning Compliance would like the following to be considered in more detail as part of the upcoming Independent Audit:

- Parking and transport management, namely in relation to St Mary's station.
- Community complaints handling & management namely in relation to St Mary's station.

Accordingly, to aid in the above, we also request that an inspection of the St Mary's Station site be included as part of the 9th IEA to assess community complaints related to parking.

If you have any questions, please let me know.

Regards,

A/Team Leader Compliance - Metro Rail
Development Assessment & Sustainability
Department of Planning, Housing and Infrastructure
T 02 E @planning.nsw.gov.au

dphi.nsw.gov.au

Locked Bay 5022
Parramatta NSW 2124

Working days Monday to Friday, 09:00am - 05:00pm



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

From: @dpie.nsw.gov.au> on behalf of DPE PSVC Compliance Mailbox
<compliance@planning.nsw.gov.au>
Sent: Wednesday, January 14, 2026 10:15 AM
To: @planning.nsw.gov.au>
Subject: FW: Independent Audit 9 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

From: Jo Heltborg <jo@morasey.com.au>
Sent: Tuesday, 13 January 2026 2:43 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Subject: Independent Audit 9 - 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 9th 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 (IAPAR).

The audit is scheduled to commence with a site inspection for SSTOM on **9th February 2026** 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 and FAW, 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.

The sites proposed to be included in the 9th SSTOM audit include: SMF Orchard Hills, Luddenham Station, Portion 3 Linewide, Bringelly Services Facility, Bradfield Station; which includes a selection of Station, Linewide and service facility sites in the southern portion of the project. As agreed with DPHI previously, IEAs would focus on the southern sites and northern sites alternatively (the northern sites were covered in the last audit in August 2025). If preferred by the Department, St Mary's Station site can also be included the 9th IEA to assess community complaints related to parking. Please advise.

We look forward to hearing from you before **27th January 2026**.

Kind regards,

Josephine Heltborg
Principal Environmental Auditor
Morasey Environment Pty Ltd
M:
E: jo@morasey.com.au
W: www.morasey.com.au

Jo Heltborg

From: @epa.nsw.gov.au >
Sent: Friday, 16 January 2026 2:56 PM
To: Jo Heltborg
Subject: EPA Response - Sydney Metro - WSA - Audit 9 - STOM and FAW
Attachments: DOC26 10420-1 OPS - OUT -EPA response to request for input - Independent Audit 9 - Josephine Heltborg - 16 January 2026.pdf

Good afternoon Josephine

Thank you for your email inviting EPA input to the scope of the 9th Construction Independent Audit for the Stations, Systems, Trains, Operations and Maintenance (SSTOM), and Finalisation Auxiliary Works (FAW) for the Sydney Metro Western Sydney Airport project (SSI-10051).

The EPA provides comment in the attached letter.

Kind regards
Jo

A/ Senior Operations Officer - Operations
NSW Environment Protection Authority

.....



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the Traditional Custodians of the land, waters and sky where we work. As part of the world's oldest surviving cultures we pay our respect to Aboriginal Elders past and present.



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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



Our ref: DOC26/10420-1

Josephine Heltborg
Principal Environmental Auditor
Morasey Environment Pty Ltd

16 January 2026

By email: jo@morasey.com.au

Dear Ms Heltborg

Re: Consultation on the 9th 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 13 January 2026 regarding your engagement by Sydney Metro as the independent auditor for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified) 9th 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:

- 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) 9274 6285 or at info@epa.nsw.gov.au, copying joanne.bell1@epa.nsw.gov.au.

Kind regards

Cristin Sheehan
A/Unit Head Regulatory Operations
NSW Environment Protection Authority

NSW Environment Protection Authority
As the environmental steward and regulator of our State we are committed to a sustainable future.
Join us on our mission to protect tomorrow together.

Phone:
131 555
Website:
epa.nsw.gov.au

Email:
info@epa.nsw.gov.au
Mail:
Locked Bag 5022
Parramatta NSW 2124



Jo Heltborg

From: Jo Heltborg
Sent: Tuesday, 13 January 2026 2:47 PM
To: 'lcc@liverpool.nsw.gov.au'
Subject: Independent Audit 9 - 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 9th 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 **9th February 2026** 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 and FAW, 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 **27th January 2026**.

Kind regards,

Jo Heltborg

From: < > @penrith.city>
Sent: Wednesday, 21 January 2026 4:25 PM
To: Jo Heltborg
Subject: RE: Independent Audit 9 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation

Dear Josephine

Thank you for your email below.

Your request has been reviewed by PCC and there is no further comments to add to the audit.

Regards,

Executive Support Officer Environmental Health and Compliance
Environmental Health and Compliance

E @penrith.city
T | M
PO Box 60, PENRITH NSW 2751
www.visitpenrith.com.au
www.penrithcity.nsw.gov.au



From: Jo Heltborg <jo@morasey.com.au>
Sent: Tuesday, 13 January 2026 2:47 PM
To: Penrith City Council - RECORDS <council@penrith.city>
Subject: Independent Audit 9 - 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 9th 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).

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The IAPAR is available at the following link:

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- 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 and FAW, 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;
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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 **27th January 2026**.

Kind regards,

Josephine Heltborg
Principal Environmental Auditor
Morasey Environment Pty Ltd

M:

E: jo@morasey.com.au

W: www.morasey.com.au